

Records Management and Retention Policy

Applicable to:	✓	All individual schools within NEAT Academy Trust
	x	Specified schools only within NEAT Academy Trust
	✓	Central Team within NEAT Academy Trust
	✓	NEAT Active Ltd.
Approval body:	NEAT Finance, Audit and Risk Committee, which may be delegated NEAT Active Ltd. Board of Directors, which may be delegated	

Statutory policy	No
Publish on website	Yes – trust, schools and Benfield Sports Centre

Review Date	
Frequency	Next Review Due
Annually	September 2024 (or earlier if new guidance or legislation issued and/or business need for earlier review identified)

Version Control:

Author	Date	Version	Status	Notes
Head of Business Services (LB)	05/12/23 FAR Committee 15/12/23 NAL Board	1.0	Final	New policy based on IRMS toolkit (May 2019).

1 Purpose

The purpose of this policy is to outline our approach to managing the retention and secure disposal of information in line with our business requirements and legal obligations.

2 Scope

This policy applies to both NEAT Academy Trust and its subsidiary company, NEAT Active Ltd, (the NEAT Group).

We recognise record management as a core corporate function that supports effective management.

A record management programme ensures that authoritative evidence of our work is created, captured, maintained and accessible within the scope of our information governance policy framework. This allows for improved accountability, transparency, continuity, decision making, and better compliance with relevant legislation and regulations, as well as protecting the rights and interests of ourselves and our pupils.

A record is defined as information created, received and maintained as evidence and as an asset by the organisation in pursuit of legal obligations or in the transaction of business. Records are retained as evidence for a set period determined by legal, regulatory and functional requirements.

These records may be created, received or maintained in hard copy or electronic format e.g. paper documents, scanned documents, e-mails which document business activities and decisions, audio and video recordings, text messages, notes of telephone and virtual conversations, spreadsheets, Word documents, presentations etc.

This policy applies to all records created, received or maintained in the course of carrying out our functions, regardless of whether it is in paper or electronic format and regardless of storage location.

This policy applies to our employees, non-executive directors, local governing committee members, contractors, agents and representatives, volunteers and agency workers working for, or on behalf of, the organisation.

Data protection (including subject access requests), information security (including data breaches) and acceptable use of systems are addressed in separate NEAT Group policies and agreements.

3 Legal considerations


This policy is designed to comply with the various pieces of legislation which outline retention requirements. These include, but are not limited to:

- Freedom of Information Act 2000 – including the Code of Practice Section 46 (FOIA)
- The UK General Data Protection Regulations (the UK GDPR)
- Data Protection Act 2018 (DPA 18)
- Public Records Act 1958
- Limitation Act 1980
- Inquiries Act 2005

4 Roles and responsibilities

- **NEAT Academy Trust and NEAT Active Ltd Boards of Directors:** have overall responsibility for ensuring that the organisations meet the statutory requirements related to records management. The Finance, Audit and Risk Committee provides scrutiny and evaluation of the trust's responsibilities for information governance on behalf of the Board. Day-to-day responsibility for compliance and providing the necessary assurance is delegated to the following roles by the Boards.
- **Data Protection Officer (DPO):** assists the organisations in monitoring compliance with the UK GDPR and the Data Protection Act 2018 and advises on records management and retention issues.

We have appointed Veritau as our DPO. Veritau's contact details are follows:

Schools Data Protection Officer Veritau West Offices Station Rise York YO1 6GA schoolsDPO@veritau.co.uk // 01904 554025	
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The DPO operates in an advisory capacity.

- **Senior Information Risk Owner (SIRO):** is responsible for overseeing the implementation of this policy and ensuring that effective records management practices are in place across the organisations. They will ensure that staff are appropriately trained in relation to records management, supported by the SPOC and IAOs. In our organisation this role lies with the Head of Business Services.
- **Single Point of Contact (SPOC):**
The SPOC will support the SIRO in the day-to-day operational management of the school, providing guidance on good records management practices and promoting compliance with this policy so that information can be retrieved easily, appropriately and in a timely way. They will help develop and carry out regular reviews of the records management programme, at least annually, to ensure compliance and to check that records are stored securely and can be accessed appropriately. In schools, this is a member of our Business Support Team: Operations Manager, Business Support Manager or Senior Administrator; in the NEAT Central Team, this is the Data and Information Governance Manager; for NEAT Active Ltd, this is the Sports Centre Manager; for Newcastle PE and School Sport Service (NPSSS), this is PE and School Sport Assistant Manager.
- **Information Asset Owner (IAO)**
The IAO is responsible for the security and maintenance of a particular record during its lifecycle. They need to understand how information is created, amended or added to over time, and know who has access to the records and why. They are responsible for the appropriate disposal of information when it is no longer required. A record of the relevant IAO is included in our Information Asset Registers.

- **Stakeholders:** Everyone working for, or on behalf of, the organisations including employees, non-executive directors, local governing committee members, contractors, agents and representatives, volunteers and agency workers is responsible for managing records consistently in accordance with this policy. They must keep complete and accurate records which adequately document their work.

5 Records Management

We have a robust programme in place for managing our records throughout their lifecycle. This includes using methods such as version control and file plans to ensure that records can be easily searched and accessed in the event of an information request. We also include records and information management as a risk on our risk register.

5.1 Information Asset Register (IAR)

In accordance with Article 30 of UK GDPR, we have in place an Information Asset Register (IAR) which maintains a record of our processing activities. The IAR documents exactly what records we hold, where they are stored, who has access to the information and the retention periods in place. This is reviewed, at least annually, to ensure it remains accurate.

5.2 Email management

We have a process in place to ensure that emails are also managed in line with this policy and our retention schedule. Emails discussing our business or reflecting significant actions or decisions concerning our business will not be stored in personal email inboxes but will be removed and stored securely in the appropriate filing system.

Email inboxes are regularly reviewed by staff to ensure any unnecessary emails are deleted.

6 Pupil records

Schools are under a duty to maintain a record for each pupil which serves as the core record of an individual's progress through the education system and should accompany them throughout their school career. The information within the pupil record must be easy to find, accurately and objectively recorded, and expressed in a professional manner.

Pupil records are held electronically within our management information system (MIS). Some information, not forming part of the core record, will be held outside the MIS in either electronic or paper format. This includes information which has shorter retention periods such as attendance registers, consent forms, medical forms, accident forms, absence notes and pupil work.

6.1 Safeguarding files

Records relating to pupils involved with child protection or safeguarding are held securely in a designated system accessible to the Designated Safeguarding Leads (DSLs). This is stored separately to the core pupil record to ensure confidentiality and restricted accessibility.

7 Workforce records

Records relating to the school workforce will be held securely, either electronically or in paper format, with appropriate measures in place to ensure accessibility is restricted.

8 Governance volunteer records

Records relating to members, non-executive directors and local governing committee members will be held securely, either electronically or in paper format, with appropriate measures in place to ensure accessibility is restricted.

9 Storage and security

All records, especially where containing personal data, will be stored securely to maintain confidentiality, whilst also keeping information accessible to those authorised to see it. Electronic records will have appropriate security and access controls in place, and systems will have robust audit functions in place wherever possible.

Paper records will be stored in secure, lockable storage areas with restricted access.

When sharing or transferring records containing personal information, we will ensure appropriate transmission security controls are in place, in line with our Information Security Policy.

8.1 Retention

Retention is the period a record is kept for after it stops being actively used, but before it is destroyed. Retention is a vital part of records management as it allows organisations to retain records only for as long as needed, and discourages records being kept for long periods 'just in case'.

The retention period for particular types of records is determined by legal, regulatory or functional requirements. We have adopted a Retention Schedule based on the IRMS Schools Toolkit which sets out our specified retention periods (Appendix 1).

8.2 Disposal

We will ensure that any records containing personal or confidential information are disposed of appropriately and securely when they have reached the end of their retention period, in line with our retention schedule.

Records held in databases or electronic management systems with the functionality for automatic destruction of records after a specified period of time will be used wherever possible. A review of the records will be carried out prior to destruction, where practical.

Where automatic disposal is not in place, for example for paper records, we will carry out a manual review, at least annually, to ensure they are deleted in line with retention guidelines.

The disposal of all information is documented to ensure that we maintain a record of when it has been deleted and by whom. This allows us to evidence that a record no longer exists, or has been transferred to another institution, in the event of a subject access or Freedom of Information request being received.

A record should be retained of all files destroyed including, where relevant:

- file reference number;
- description of file;
- date of disposal;
- method of disposal; and
- staff member who destroyed record.

9 Archiving

A small percentage of our records will be selected for permanent preservation as part of the Local Authority Archives Service. This is maintained as a resource to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging and shared heritage; to prompt memories of school-life among many generations; and to serve as a research resource for all interested in the history of the school and the community it serves.

Records containing personal information will only be selected for archive with appropriate safeguards in place to protect the rights and freedoms of individuals. This will include anonymisation or pseudonymisation wherever possible.

10 Training

Since all employees are involved in creating, maintaining and using records, it is vital that everyone understands their record management responsibilities as set out in this policy. We will ensure that staff are appropriately trained or experienced and that they understand the need for effective record keeping.

When we introduce new technology or ICT systems we ensure that users are appropriately trained to use these systems and can manage records within them effectively.

General

This policy is at the discretion of the boards of directors and can be varied at any time. In the event of any conflict with primary legislation or statutory regulations, the legal provisions will have precedence over this policy in all cases.

Appendix 1 - Retention Schedule for NEAT Academy Trust and NEAT Active Ltd.

1. Governance, Funding and Financial Management

Individual schools are governed by NEAT Academy Trust, which is a private limited company by guarantee. It is also a charitable Trust. NEAT Active Ltd. is a private limited company and is a wholly owned subsidiary company of NEAT Academy Trust.

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.1 Governance					
1.1.1	Governance Statement (within annual report and accounts)	No		Life of governance statement + 6 years	SECURE DISPOSAL
1.1.2	Articles of Association	No		Life of the Company	
1.1.3	Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL
1.1.4	Memorandum of Understanding of Shared Governance among Schools	No	<i>Companies Act 2006 section 355</i>	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL
1.1.5	Members' Agreement	Yes		Life of the Academy Trust	SECURE DISPOSAL
1.1.6	Constitution	No		Life of the Company	
1.1.7	Special Resolutions to amend the Constitution	No		Life of the Company	
1.1.8	Written Scheme of Delegation	No	<i>Companies Act 2006 section 355</i>	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
1.1.9	Directors – Appointment	No		Life of appointment + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.1.10	Directors – Disqualification	No	Company Directors Disqualification Act 1986	Date of disqualification + 15 years	SECURE DISPOSAL
1.1.11	Directors – Termination of Office	No		Date of termination + 6 years	SECURE DISPOSAL
1.1.12	Annual Report – Trustees’/Directors’ Report	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.13	Annual Report and Accounts	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.14	Annual Return	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.15	Appointment of Trustees/Directors and Local Governors	Yes		Life of appointment + 6 years	SECURE DISPOSAL
1.1.16	Statement of Trustees’ Responsibilities	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.17	Appointment and removal of Members	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.18	Strategic Review	No		Date of the review + 6 years	SECURE DISPOSAL
1.1.19	Strategic Plan and School Development Plans	No		Life of plan + 6 years	SECURE DISPOSAL
1.1.20	Accessibility Plan	There may be if the plan refers to specific pupils	Limitation Act 1980 (Section 2)	Life of plan + 6 years	SECURE DISPOSAL
1.2 Board of Directors, Members Meetings and Governing Committees					
1.2.1	Board Meeting Minutes	Could be if the minutes	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
		refer to living individuals			
1.2.2	Board Decisions	Could be if the decisions refer to living individuals		Date of the meeting/ written resolution/Chair's action + a minimum of 10 years	OFFER TO ARCHIVES
1.2.3	Board Meeting: Annual Schedule of Business	No		Current year	SECURE DISPOSAL
1.2.4	Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	SECURE DISPOSAL
1.2.5	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.7	Records relating to the management of Annual General Meeting	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.8	Agendas for Local Governing Committee meetings	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.2.9	Minutes of, and papers considered at, meetings of the Local Governing Committees	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		Principal Set (Signed) – Life of Academy Inspection Copies – Date of meeting + 3 years	SECURE DISPOSAL
1.2.10	Reports presented to the Local Governing Committee	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy	SECURE DISPOSAL or retain with the signed set of minutes
1.2.11	Trusts and Endowments managed by the Academy Trust	No		PERMANENT	
1.2.12	Records relating to complaints dealt with	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL
1.2.14	Register of Directors		Companies Act 2006	Life of the Company + 6 years	SECURE DISPOSAL
1.2.15	Register of Directors' interests [this is not a statutory register]			Life of the Company + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.2.16	Register of Directors' residential addresses		Companies Act 2006	Life of the Company + 6 years	SECURE DISPOSAL
1.2.17	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Company + 6 years	SECURE DISPOSAL
1.2.18	Register of Members		Companies Act 2006	Life of the Company + 6 years	SECURE DISPOSAL
1.2.19	Register of Secretaries		Companies Act 2006	Life of the Company + 6 years	SECURE DISPOSAL
1.2.20	Register of Trustees' interests			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.21	Declaration of Interests Statements [Governance Volunteers] [this is not a statutory register]			Life of the Company + 6 years	SECURE DISPOSAL
1.3 Funding and Finance					
1.3.1	Statement of financial activities for the year	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.2	Financial planning	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.3	Value for money statement	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.4	Records relating to the management of VAT	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.5	Whole of government accounts returns	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.6	Borrowing powers	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.7	Budget plan	No		Current financial year + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.3.8	Charging and Remissions Policy	No		Date policy superseded + 3 years	SECURE DISPOSAL
1.3.9	Finance, Audit and Risk Committee and appointment of responsible officers	No		Life of the Academy	SECURE DISPOSAL
1.3.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.13	Funding Agreement – Termination of the funding agreement			Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.15	Funding Records – Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.17	Per pupil funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.18	Exclusion Agreement	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.3.19	Funding Records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.21	Records relating to loans	No		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	SECURE DISPOSAL
1.3.22	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
1.3.23	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL
1.3.24	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.25	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.26	Payroll records	Yes		Date payroll run + 6 years	SECURE DISPOSAL
1.3.27	Insurance policies	No		Date the policy expires + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.3.28	Records relating to the settlement of insurance claims	No		Date claim settled + 6 years	SECURE DISPOSAL
1.3.29	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
1.3.30	Investment policies	No		Life of the investment + 6 years	SECURE DISPOSAL
1.3.31	Management of Endowment Funds	No		Life of the fund + 6 years	
1.3.32	Annual accounts	No		Current year + 6 years	STANDARD DISPOSAL
1.3.33	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
1.3.34	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.35	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL
1.3.36	Invoices, receipts, purchase order and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.37	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.3.38	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.39	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
1.3.40	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
1.3.41	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL
1.3.42	Inventories of furniture, motor vehicles and equipment	No		Current year + 6 years	SECURE DISPOSAL
1.3.43	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL
1.3.44	Records relating to the leasing of shared facilities, such as sports centres	No		Current year + 6 years	SECURE DISPOSAL
1.3.45	Land and building valuations	No		Date valuation superseded + 6 years	SECURE DISPOSAL
1.3.46	Disposal of assets	No		Date asset disposed of + 6 years	SECURE DISPOSAL
1.3.47	Community School leases for land	No		Date lease expires + 6 years	SECURE DISPOSAL
1.3.48	Commercial transfer arrangements	No		Date of transfer + 6 years	SECURE DISPOSAL
1.3.49	Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.3.50	Transfers of freehold land	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
1.3.51	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.52	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.53	School meals summary sheets	No		Current year + 3 years	SECURE DISPOSAL
1.4 Policies, Frameworks and Overarching Requirements					
1.4.1	Data Protection Policy, including data protection notification	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.2	Freedom of Information Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.3	Information Security Policy including Personal Data Breach Procedure	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.4	Special Educational Needs and Disabilities Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.5	Complaints Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.6	Risk Management Policy	No		Life of framework + 6 years	SECURE DISPOSAL
1.4.7	Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	SECURE DISPOSAL
1.4.8	Home School Agreements	No		Date agreement revised + 6 years	SECURE DISPOSAL
1.4.9	Equality Information and Objectives (public sector)	No		Date of statement + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
	equality duty) Statement for publication				

2. Human Resources

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
2.1 Recruitment					
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks	Yes	DBS Employer Guidance 2018	The organisation should ensure DBS number and date of issue are recorded on SCR.	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		these should be checked, authorised and record on SCR what was seen and what has been checked and	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
				date of checks. copies of d documentation, should be added to the Staff Personal File	
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	An employer's guide to right to work checks October 2023	these documents should be added to the Staff Personal File, kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.7	Records relating to the employment of overseas teachers	Yes		, these documents should be added to the Staff Personal File kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL
2.2 Operational Staff Management					
2.2.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980 (Section 2)	Termination of employment + 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal/assessment records	Yes		Current year + 5 years	SECURE DISPOSAL
2.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
2.2.5	Training needs analysis	No		Current year + 1 year	SECURE DISPOSAL
2.3 Management of Disciplinary and Grievance Processes					
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2023”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2018”	Until the person’s normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	•				SECURE DISPOSAL
	• Written warning – level 1			Date of warning + 12 months	SECURE DISPOSAL
	• Final warning • Level 2			Date of warning + 24 months	SECURE DISPOSAL
	• Case not found			If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL
2.4 Health and Safety					
2.4.1	Health and Safety policy statements	No		Life of policy + 3 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
2.4.2	Health and Safety risk assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL
2.4.4	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended, Special rules apply concerning incidents involving hazardous substances	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below	
	• Adults			Date of incident + 6 years	SECURE DISPOSAL
	• Children			Date of birth of the child + 25 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No		Current year + 10 years then REVIEW	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees	No		Last action + 40 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
	and persons are likely to have come into contact with asbestos				
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire precautions logbooks	No		Current year + 6 years	SECURE DISPOSAL
2.4.9	Fire risk assessments	No	Fire Service Order 2005	Life of the risk assessment + 6 years	SECURE DISPOSAL
2.4.10	Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL

3. Management of the Academy

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
3.1 Admissions					
3.1.1	All records relating to the creation and implementation of the School Admissions Policy	No	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then REVIEW	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
3.1.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL
3.1.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
3.1.4	Register of admissions	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	REVIEW Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates they attended the school
3.1.5	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory Guidance for admission authorities,	Current year + 1 year	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
			governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014		
3.1.6	Supplementary information form, including additional information such as religion and medical conditions	Yes			
	For successful admissions			This information should be added to the pupil file	SECURE DISPOSAL
	For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL
3.2 Headteacher and Senior Management Team					
3.2.1	School Celendar maintained by the Head Teacher	There may be data protection issues if the logbook refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the County Archives Service, if appropriate
3.2.2	Minutes of Senior Management Team meetings and meetings	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
3.2.3	Reports - (e.g. Termly Head Teacher Reports) created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL
3.2.4	Communication correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL
3.2.5	Professional Development Plans (Trust & School CPD Offers)	Yes		Life of the plan + 6 years	SECURE DISPOSAL
3.3 Operational Administration					
3.3.1	Management of complaints	Yes		Date complaint resolved + 3 years	SECURE DISPOSAL
3.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL
3.3.3	Records relating to the management of software licences	No		Date licence expires + 6 years	SECURE DISPOSAL
3.3.4	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
3.3.5	Records relating to the creation and publication of	No		Current year + 3 years	STANDARD DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
	the school brochure or prospectus				
3.3.6	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
3.3.7	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
3.3.8	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
3.3.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL

4. Property Management

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
4.1 Property Management					
4.1.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	
4.1.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be	

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
				passed onto any new owners if the building is leased or sold	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.1.5	Business continuity and disaster recovery plans	No		Date the plan superseded + 3 years	SECURE DISPOSAL
4.2 Maintenance					
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school employees, including maintenance logbooks	No		Current year + 6 years	SECURE DISPOSAL
4.3 Fleet Management					
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.2	The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, maintenance	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
4.3.3	Service logs and vehicle logs	N	Limitation Act 1980 (Section 2)	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	SECURE DISPOSAL

5. Pupil Management

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
5.1 Pupil's Educational Record					
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	<ul style="list-style-type: none"> Primary 			Retain whilst the child remains at the primary school	<p>The file should follow the pupil when they leave the primary school. This will include:</p> <ul style="list-style-type: none"> To another primary school To a secondary school To a pupil referral unit

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
					<p>If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period.</p> <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the</p>

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
					LA, as it is more likely that the pupil will request the record from the LA
	<ul style="list-style-type: none"> Secondary 		Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
5.1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
5.1.4	Examination results – pupil copies	Yes			
	<ul style="list-style-type: none"> Public 			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	<ul style="list-style-type: none"> Internal 			This information should be added to the pupil file	
5.1.5	Child protection information held on pupil file	Yes	“Keeping children safe in education Statutory guidance for schools and colleges 2023”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children – March 2018“	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file	SECURE DISPOSAL – these records MUST be shredded

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
5.1.6	Child protection information held in separate files	Yes	“Keeping children safe in education Statutory guidance for schools and colleges 2023”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2018”	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	SECURE DISPOSAL – these records MUST be shredded
5.2 Attendance					
5.2.1	Attendance registers	Yes	School attendance: Departmental advice 'Working together to improve attendance' September 2023	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	SECURE DISPOSAL
5.2.2	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL
5.3 Special Educational Needs					
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time in order to

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
					defend themselves in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period – this should be documented
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.4	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
					document is subject to a legal hold

6. Curriculum Management

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
6.1 Statistics and Management Information					
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination results (school's copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	SATs records –	Yes			
	<ul style="list-style-type: none"> Results 			<p>The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years</p> <p>The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison</p>	SECURE DISPOSAL
	<ul style="list-style-type: none"> Examination papers 			The examination papers should be kept until any	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
				appeals/validation process is complete	
6.1.3	Published Admission Number (PAN) reports	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value added and contextual data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self-evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL
6.2 Implementation of Curriculum					
6.2.1	Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.2	Timetable	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.3	Class record books	No		Current year + 1 year	It may be appropriate to review these records at the end

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
					of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.4	Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.5	Pupils' work	No		Where possible, work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	SECURE DISPOSAL

7. Extracurricular Activities

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
7.1 Educational Visits outside the Classroom					
7.1.1	Records created by schools in order to obtain approval to run an educational visit outside	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info	Date of visit + 14 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
	the classroom – Primary schools		specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice".		
7.1.2	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Secondary schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice".	Date of visit + 10 years	SECURE DISPOSAL
7.1.3	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	
7.1.5	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL
7.2 Walking Bus					
7.2.1	Walking bus registers	Yes		Date of register + 3 years. This takes into account the fact that, if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]

8. Central Government and Local Authority

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
8.1 Local Authority					
8.1.1	Secondary transfer sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
8.1.2	Attendance returns	Yes		Current year + 1 year	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
8.1.3	School census returns	No		Current year + 5 years	SECURE DISPOSAL
8.2 Central Government					
8.2.1	OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
8.2.2	Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL
8.2.3	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL