The Societas Trust

Data Retention Policy

Date of Policy	2024
Reviewed and Agreed by	The Directors' Board
Last Review Date	9 July 2025
Next Review Date	Summer 2026

The Trust and Academies therein have a responsibility to maintain its records and record keeping systems in line with statutory requirements. Records are defined as all those documents that facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically. Records provide evidence for protecting the legal rights and interests of the school and provide evidence or demonstrating performance and accountability. When doing this, the Trust will take account of the following factors: -

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Their accessibility.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the Trust's policy framework and current practice, the requirements of current legislation and best practice and guidance. It may be amended by the Trust from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect. The Trust may also vary any parts of this procedure, including any time limits, as appropriate in any case.

Individual staff and employees must ensure that records for which they are responsible are accurate and ae maintained and disposed of in accordance with the school's retention guidelines.

RESPONSIBILITY AND MONITORING

The CEO is responsible for monitoring the effectiveness of this policy and dealing with any queries on its interpretation in conjunction with the headteacher at each academy. The suitability and adequacy of this policy will be evaluated on an annual basis in liaison with the DPO, and any recommended improvements will be carried out as part of the policy review process.

The Trust has appointed SBM Services (uk) Ltd as the Data Protection Officer who will advise and update the Trust on the UK GDPR and other data protection laws. They will monitor the Schools compliance with the UK GDPR and recommend internal data protection activities are performed through annual Audits. Their contact details are Unit 12 Park Lane Business Centre, Park Lane, Langham, Colchester. CO4 5WR Tel 01206 671103 info@sbmservices.co.uk

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

This policy is implemented in accordance with the following school policies and procedures:

- Freedom of Information Policy
- Data Protection Act 2018
- UK GDPR Data Protection Regulation
- Data (Information) Security Policy
- CCTV Policy
- Online Safety Policy
- Safeguarding and Child Protection Policy
- ICT UK GDPR Guide
- Social Networking Policy
- Mobile Phone and Photography Policy

DATA PROTECTION

This policy sets out how long data including employment-related and pupil data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the UK General Data Protection Regulation (UKGDPR), the Freedom of Information Act 2000 and the Data Protection Act 2018. Data will be stored and processed to allow for the efficient operation of the Trust and the Academies therein. The Trust's Data Protection Policy outlines its duties and obligations under the UK GDPR not to retain data longer than for the purpose to which the data was originally collected.

.

THE STORAGE AND SECURITY OF DIGITAL DATA

(Please see Information Security Policy for extended details)

Back- up system: The school will ensure in liaison with the IC Technicians/Consultants that there are regular back-ups of all information held electronically to enable restoration of the data in the event of an environmental or data corruption incident.

The IT Technicians tests the integrity of the back- ups and restoration on a regular basis.

Personal information is not to be stored on the hard drive of any PC unless the device is running encryption software.

Password Control: The school will ensure that data is subject to a robust password protection regime. Password sharing is not encouraged and staff are required to lock their PC's when they are away from their desks to prevent unauthorised use.

THE STORAGE AND SECURITY OF HARD COPY DATA

Storage of Physical records: The Trust recommends that all physical records are stored in lockable filing cabinets drawers and storage areas. Not only is this to protect against unauthorised access but also from Fire and Water Damage. Clear Desk Policy; a clear desk policy is encouraged to avoid unauthorised access to sensitive or personal information.

DISCLOSURE/CONFIDENTIALITY

Staff are made aware of the importance of ensuring that personal information is only disclosed to people who are entitled to receive it and that consideration has been given to the UK General Data Protection Regulations. This is outlined in the Staff Code of Conduct Policy.

If the school receives a request for information from a third party, then the process outlined in the Third Party Requests for Information process should be followed, this is outlined in the Data Protection Policy.

DISPOSAL OF DATA AND DESTRUCTION OF RECORDS

Where disposal of information is outlined as secure disposal, this will be shredded and electronic information will be archived. If the record is in need of review prior to disposal then information will be checked for administrative value, a record kept and then destroyed.

Where records have been identified for destruction they should be disposed of in an appropriate way. Where information must be kept permanently this information is exempt from review procedures All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information, or sensitive policy information should be shredded before disposal using a cross cutting shredder where possible. All other paper records should be disposed of by an appropriate waste paper merchant. All electronic information will be deleted. When using external providers, records should be shredded on site and a certificate of destruction be issued. This also applies to destruction of hardware; the disposal company must provide a certificate of destruction. When performed by the ICT Technicians, a Certificate of Destruction should also be signed and dated.

Records and information that might be of relevance to the Independent inquiry into child sexual abuse will not be disposed of or destroyed.

Electronic copies of any information and files will also be destroyed in line with the retention periods.

- CDs/DVDs/Floppy Discs should be cut into pieces
- Hard discs should be dismantled and sanded.
- Audio/Video Tapes should be dismantled and shredded.

The Trust and Academies therein maintain a record of documents on the Trust Data Destruction Log which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in this list at least: -

- Description of data Format of data Method of Destruction
- Who the data was destroyed by.

ARCHIVING

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. A database of the records sent to the archives is maintained by the Business Manager at each academy. The appropriate staff member, when archiving documents should record in this list the following information: -

- File reference (or other unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising officer.

TRANSFERRING INFORMATION TO OTHER MEDIA

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered. Advice should be sought from the IT Representative/Business Manager within the academy.

Retention of Emails

1. All Staff members with an email account will be responsible for managing their inbox.
2. The school's expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in the school's Online Safety Policy
3. Group email addresses will have an assigned member of staff who takes responsibility for managing the account and ensuring the correct disposal of all sent and received emails
4. E mails can act as evidence of the school's activities in fulfilling statutory duties so all relevant emails will be retained for 2 years.
5. Invoices received and sent in emails will be printed off and retained or saved in dropbox
6. Emails will be automatically or manually deleted after 2 years.
7. Staff members will review and delete any emails they no longer require at the end of every term

8. Staff members will be aware that the emails they send could be required to fulfil a SAR or FoI request. Emails will be drafted carefully and staff members will review the content before sending
9. Individuals including children have the right to submit an SAR to gain access to their personal data to verify the lawfulness of the processing – this includes accessing emails
10. All SAR's will be handled in accordance with the school's data protection policy
11. Where a SAR has been made electronically, the information will be provided in a commonly used electronic format
12. All FoI requests will be handled in accordance with the school's freedom of information policy
13. Staff members will discuss any queries regarding email retention with the headteacher, or DPO
14. Staff leavers will have access to their email accounts removed immediately and an auto-reply generated saying the staff member has left and to whom emails should be directed.
15. Access to the staff leavers account will be maintained for 3 months after the date of leaving and then the account will be permanently deleted.(For headteachers and heads of school this should be after 6 months).

Please note that reference can be made to the Information Records Management Society www.irms.org.uk .

RETENTION SCHEDULE

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the School will adhere to the standard retention times listed within that schedule.

Paper and Electronic records will be regularly monitored by the CEO, C&TM and through the Internal Audit Process.

The schedule is a relatively lengthy document listing the many types of records used by the academies and the applicable retention periods for each record type. The retention periods of some of the records are governed by statute and every effort has been made to ensure that they comply with the UK GDPR Guidelines and the Data Protection Act 2018

RETENTION SCHEDULE

Section 1: Management of the School

1.1 Governance					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
1.1.1	Agendas for Governing Body	There 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
1.1.2	Minutes of Governing Body Meetings (principal set – signed)	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		PERMANENT Although generally kept for life of organisation, Local Authority only required to make available for 10 years from date of meeting.	If the school is unable to store these then they should be offered to the County Archives Service.
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the report is dealing with confidential issues relating to staff		Although generally kept for life of organisation, Local Authority only required to make available for 10 years from date of meeting.	SECURE DISPOSAL or retain with the signed set of minutes
1.1.4	Meeting papers relating to annual parents' meeting held under section 33 of the Education Act 2002	Yes	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
1.1.5	Instruments Of Government, including articles of association	No		Life of the Academy	
1.1.6	Trusts and Endowments managed by the Governing Board	No		PERMANENT	

1.1.7	Register of attendance at full governing board meetings	Yes		Date of the last meeting in the book + 6 years	SECURE DISPOSAL
1.1.8	Records relating to Governor monitoring visits	Yes		Date of the visit + 3 years	SECURE DISPOSAL
1.1.9	Annual reports required by the DfE	No		Date of report + 10 years	SECURE DISPOSAL
1.1.10	All records relating to the conversion of schools to Academy status	No		For the life of the academy	Consult local archives before disposal
1.1.11	Records relating to complaints made to and investigated by the governing body or head teacher	Yes		Major complaints: current year + 6 years. If negligence involved, then: current year + 15 years. If child protection or safeguarding issues are involved, then: current year + 40 years	SECURE DISPOSAL
1.1.12	Correspondence sent and received by the governing body or head teacher	Potential		General correspondence should be retained current + 3 years	SECURE DISPOSAL
1.1.13	Action plans created and administered by the governing body			Until superseded or whilst relevant	SECURE DISPOSAL
1.1.14	Policy documents created and administered by the governing body			Until superseded (the school should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the IICSA has issued its recommendations)	

1.1.15	Records relating to the appointment of a clerk to the governing body	Yes		Date on which clerk appointment ceases + 6 years	SECURE DISPOSAL
1.1.16	Records relating to the terms of office of serving governors, including evidence of appointment	Yes		Date appointment ceases + 6 years	
1.1.17	Records relating to the appointment of Governors	Yes		Life of appointment + 6 years	SECURE DISPOSAL
1.1.18	Records relating to governor declaration against disqualification criteria	Yes		Date appointment ceases + 6 years	SECURE DISPOSAL
1.1.19	Register of Business Interests	Yes		Date appointment ceases + 6 years	SECURE DISPOSAL
1.1.20	Governors Code of Conduct			This is expected to be a dynamic document; one copy of each version should be kept for the life of the organisation	
1.1.21	Records relating to the training required and received by Governors	Yes		Date Governor steps down + 6 years	SECURE DISPOSAL
1.1.22	Records relating to the induction programme for new governors	Yes		Date appointment ceases + 6 years	SECURE DISPOSAL
1.1.23	Records relating to DBS checks carried out on clerk and members of the governing body	Yes		Date of DBS check + 6 months	SECURE DISPOSAL
1.1.24	Governor personnel files	Yes		Date appointment ceases + 6 years	SECURE DISPOSAL

1.1.25	Scheme of Delegation and Terms of Reference for committees	Yes		Until superseded + 10 years	SECURE DISPOSAL

1.2 Senior Leadership Team					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
1.2.1	Logbooks of activity in the school maintained by the Head Teacher	There may be data protection issues if the logbook refers to individual 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.
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	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
1.2.3	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 + 3 years then review	SECURE DISPOSAL
1.2.4	Records 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 report refers to individual pupils or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL
1.2.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with	There may be data protection issues if the report refers to individual pupils or members of staff		Date of correspondence + 3 years then review	SECURE DISPOSAL

	administrative responsibilities				
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
1.2.7	School Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL

1.3 Admissions					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
1.3.1	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, school adjudicators and admission appeals panels December 2014	Life of the policy + 7 years then review	SECURE DISPOSAL
1.3.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL
1.3.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission	Resolution of case + 1 year	SECURE DISPOSAL

			appeals panels December 2014		
1.3.4	Register of Admissions	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 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 Or Transfer to the appropriate County Archives Service
1.3.5	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL
1.3.6	Supplementary Information form including additional information such as religion, medical conditions etc.	Yes			
	For successful admissions			The information should be added to the pupil file	SECURE DISPOSAL
	For unsuccessful admissions			Until appeals process completed (GDPR)	SECURE DISPOSAL

1.4 Operational Administration					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
1.4.1	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
1.4.2	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	SECURE DISPOSAL
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	SECURE DISPOSAL
1.4.4	Newsletters and other items with a short operational use	No		Current year + 1 year	SECURE DISPOSAL
1.4.5	Visitors' Books and Signing in Sheets, electronic visitors' management systems.	Yes		Last entry + 1 years then REVIEW	SECURE DISPOSAL
1.4.6	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
1.4.7	School Privacy Notice which is sent to parents as of GDPR compliance			Until superseded + 6 years	
1.4.8	Consents relating to school activities as part of GDPR compliance (for example consent to be sent circulars or mailings)	Yes		Consent will last whilst the pupil attends the school it can therefore be destroyed when the pupil leaves	SECURE DISPOSAL

Section 2: HR Management of the School

2.1 Recruitment					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
2.1.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records (including application forms, Online search checks and interview records) leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months (Unless the academy has applicants consent to keep CV for future reference)	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate (including application forms, Online search checks and interview records)	Yes		All the relevant information should be added to the staff personal file (see below) All other information retained for 6 months.	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS checks	Yes	DBS Update Service Employer Guide June 2014: keeping children safe in education 2019 (Statutory Guidance from Dept. of Education) Sections 73, 74	The school does not have to keep copies of DBS certificates. If the school does so (for example to allow consideration and resolution of any dispute or complaints) the copy must NOT be retained for more than 6 months	SECURE DISPOSAL

2.1.5	Proofs of identity collected as part of the DBS process	Yes		Where possible these should be checked, and a note kept of what has been checked. If it is felt necessary to keep copy documentation, then this should be placed on the member of staff's 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 [Home Office May 2015]	Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately the Home Office requires that the documents are kept for termination of Employment + 2 years	SECURE DISPOSAL
2.1.8	Records relating to the employment of overseas teachers			Where possible these records should be kept in the staff personnel file, but if they are kept separately then the home office requires that the documentation are kept for termination of employment plus not less than two years	SECURE DISPOSAL

2.2 Operational Staff Management					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
2.2.1	Staff Personal File	Yes	Limitation Act 1980 (section 2)	Termination of Employment + 6 years	SECURE DISPOSAL

	(including Written particulars of employment, contracts of employment and changes to terms and conditions)			Unless the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case, then the file will need to be retained until IICSA enquiries are complete.	
2.2.2	Annual appraisal/assessment records	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Sickness Absence Monitoring	Yes		Keep Separate from accident records. Where sickness pay is not paid then current year + 3 is acceptable. Where sickness pay is paid, becomes a financial record so current year + 6 applies.	SECURE DISPOSAL
2.2.4	Staff Training – where training leads to continuing professional development	Yes		Length of time required by the professional body	SECURE DISPOSAL
2.2.5	Staff Training – except where dealing with children e.g. first aid or health and safety	Yes		Retained on the personnel file (Termination of employment + 6 years)	SECURE DISPOSAL
2.2.6	Staff Training - where the training relates to children e.g. safeguarding or other child related training.	Yes		Date of the training + 40years. The IICSA may wish to see training records as part of an investigation	SECURE DISPOSAL
2.2.7	Emergency contact details	Yes		Destroyed on termination of employment	SECURE DISPOSAL
2.2.8	Annual Leave records	No		6 years after the end of the tax year they relate or possibly longer if leave can	SECURE DISPOSAL

				be carried over from year to year	
2.2.9	Consent for the processing of personal and sensitive data	Yes		For as long as the data is being processed and up to 6 years afterwards	SECURE DISPOSAL

2.3 Management of Disciplinary & Grievance Process					
Note: The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record on an important event in the course of the employer's relationship with the employee. Should the same employee be accused on similar misconduct five years down the line, and then defend him or herself by saying 'I would never do something like that', reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence then claim at tribunal that he or she had 'fifteen years of unblemished service' the record of the disciplinary proceedings would be effective evidence to counter this claim.					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2019"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018"	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned UNLESS the member of staff is part of any case which falls under	SECURE DISPOSAL These records must be shredded

				the terms of reference of IICSA, then the files will need to be retained until IICSA enquiries are complete.	
2.3.2	Disciplinary Proceedings	Yes			
	Oral warning			Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file]
	Written warning – level 1			Date of warning + 6 months	
	Written warning – level 2			Date of warning + 12 months	
	Final warning			Date of warning + 18 months	
	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 Payroll and Pensions					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
2.4.1	Maternity/Adoption/Paternity records/payment	Yes		Current year + 3 years	SECURE DISPOSAL
2.4.2	National Insurance schedule of payments	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.3	Retirement Benefit Schemes – notifiable events (for example relating to incapacity)	Yes		Current academic year + 6 years from the end of the scheme year in which the event took place	SECURE DISPOSAL
2.4.4	Payroll and Salary awards	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.5	Payroll records/ reports, Payslips, Pensions and	Yes		Current year + 6 years	SECURE DISPOSAL

	Superannuation Reports and Adjustments				
2.4.6	Personal bank details	Yes		Until superseded + 3 years If employment ceases then end of employment + 6 years	SECURE DISPOSAL
2.4.7	Sickness Records	Yes		Current year + 3 years (not paid) Current year + 6 years (paid)	SECURE DISPOSAL
2.4.8	Staff returns	Yes		Current year + 3 years	SECURE DISPOSAL
2.4.9	Income tax form P60	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.10	Tax forms P6, P11, P11D, P35, P45, P46, P48	Yes		Corporate decision to retain for current + 6 years	SECURE DISPOSAL
2.4.11	Time sheets, overtime, flexitime, bonus sheets and car allowance claims	Yes		Current year + 3 years	SECURE DISPOSAL

2.5 Other Personnel Records					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
2.5.1	Volunteer Personnel Records	Yes		Any relevant papers relating to the engagement of volunteers can be retained (as per 2.1) but only for as long as their engagement with the school lasts.	SECURE DISPOSAL

2.5.2	Governor / Trustee Records	Yes		Any relevant papers relating to the engagement of governors can be retained (as per 2.1) but only for their term of office + 1 year.	SECURE DISPOSAL
2.5.3	Third party workers, supply staff etc	Yes		The school should r see evidence that all checks have been undertaken, but not take copies of the evidence.. Where copies of such documents are received, they must not be retained by the school. The school may retain a copy of the identification documents, but these documents must be destroyed when the individual ceases working at the school.	SECURE DISPOSAL

Section 3: Financial Management of the School

3.1 Risk Management & Insurance					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
3.1.1	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years. Passed to the LA if academy closes	SECURE DISPOSAL

3.2 Asset Management					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL

3.3 Accounts & Statements including Budget Management					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
3.3.1	Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
3.3.2	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
3.3.3	All records relating to the creation and management of budgets including the Annual Budget statements and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL

3.3.4	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.5	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.6	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL

3.4 Pupil Finance					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
3.4.1	Pupil Premium Grant records	Yes		Date pupil leaves the provision + 6 years	SECURE DISPOSAL

3.5 Contract Management					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
3.5.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on contract + 12 years	SECURE DISPOSAL
3.5.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on contract + 6 years	SECURE DISPOSAL
3.5.3	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL

3.56 School Fund					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
3.6.1	School fund - Cheque books	No		Current year + 6 years	SECURE DISPOSAL
3.6.2	School fund - Paying in books	No		Current year + 6 years	SECURE DISPOSAL
3.6.3	School fund - Ledger	No		Current year + 6 years	SECURE DISPOSAL
3.6.4	School fund - Invoices	No		Current year + 6 years	SECURE DISPOSAL
3.6.5	School fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
3.6.6	School fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
3.6.7	School fund – Journey Books	No		Current year + 6 years	SECURE DISPOSAL

3.7 School Meals Management					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
3.7.1	Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.7.2	School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
3.7.3	School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL

Section 4: Property Management

4.1 Health & Safety					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
4.1.1	Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL
4.1.2	Health and Safety Risk Assessments	No		Life of Risk assessment + 3 years	SECURE DISPOSAL
4.1.3	Accident Reporting (Adults and Children detailed separately below)	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 Allows the information to be kept electronically		
	Adults (Over 18 years of age at time of incident)	Yes		Due to the possibility of negligence allegations reports should be kept for date of incident + 15 years or date of settlement + 6 years.	SECURE DISPOSAL
	Children (Under 18 years of age at time of incident)	Yes		The Accident Book – 3 years after last entry.	SECURE DISPOSAL

				Due to the possibility of negligence allegations, where a further incident report has been completed following a visit to a walk in centre/hospital, the report should be kept until the child reaches the age of 21	
4.1.4	Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see http://www.hse.gove.uk/RIDDOR/	Yes	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12 (2)	Adults - Due to the possibility of negligence allegations reports should be kept for date of incident + 15 years or date of settlement + 6 years. Child - Due to the possibility of negligence allegations reports should be kept until the child reaches the age of 21	
4.1.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations	COSHH sheets should be kept whilst the substance is in use + 6 years COSHH policy documents should be kept until the policy is superseded + 6 years.	SECURE DISPOSAL

			had not been made. Regulation 18(2)		
4.1.6	Process of monitoring of areas where employees and persons are likely to have come in to contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
4.1.7	Process of monitoring of areas where employees and persons are likely to have come in to contact with radiation	No	The Ionising Radiation Regulations 2017	2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. To keep the records made and maintained or a copy of these records until the person to whom the record relates has or would have attained the age of 75 years but in any event for at least 30 years from when the record was made.	SECURE DISPOSAL
4.1.8	Fire precautions logbooks			Current year + 6 years	SECURE DISPOSAL
4.1.9	Health and safety file to show current state of building including all alterations (wiring, plumbing, building works etc), to be passed on in the case of change of ownership	No		Pass to new owner on sale or transfer of building	
4.1.10	Medication Permission slips	Yes		For the duration of the period that medication is	SECURE DISPOSAL

				given plus one month or at the end of the academic year	
4.1.11	Medical Incidents that have a behavioural or safeguarding influence	Yes		Added to pupil's record and transferred to next school.	

4.2 Property Management					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
4.2.1	Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry	
4.2.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold	
4.2.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.2.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.2.5	Property Valuations	No		Date valuation superseded + 6 years	SECURE DISPOSAL

4.2.6	Business Continuity and disaster recovery plans	No		Date the plan superseded plus 3 years	SECURE DISPOSAL

4.3 Maintenance					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
4.3.1	All records relating to the maintenance of the school carried out by contractors	No		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold	SECURE DISPOSAL
4.3.2	All records relating to the maintenance of the school carried out by school employees including maintenance logbooks	No		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold	SECURE DISPOSAL

Section 5: Pupil Management

Please note that any record containing pupil information may be subject to the requirements of IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.

5.1 Pupil's Educational Record					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
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 As amended by SI 2018 No 688		
	Primary			Retain whilst the child remains at primary school Electronic Records on Academy MIS (Arbor)	The files should follow the pupil when he/she leaves the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit For those pupils moving to an independent school, home schooling or moving abroad the file should be returned to the LA. Electronic Record on MIS (Arbor) should be deleted

				As per data retention period on Arbor. After the greater of: • (a) 6 years after the student's leaving date from the school, or • (b) if relating to a child, the 24th birthday of the child, or • (c) if relating to more than one child, the 24th birthday of the youngest child.	once Arbor has flagged for deletion
5.1.2	Examination Results	Yes		This information should be added to the pupil file & transferred to next school	
5.1.3	Child Protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges 2018"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 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 as the pupil file. Note: these records will be subject to any instruction given by IICSA	The files should follow the pupil when he/she leaves the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit

					Secondary schools - SECURE DISPOSAL – these records MUST be shredded
5.1.4	Child Protection information held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges 2018"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018	Primary schools - Retain whilst the child remains at primary school Secondary schools- DOB 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 Local Authority Social Services record. Note: These records will be subject to any instruction given by IICSA	The files should follow the pupil when he/she leaves the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit Secondary schools -SECURE DISPOSAL – these records MUST be shredded
5.1.5	Behaviour and Exclusions Records	Yes		Added to the pupil's record and transferred to the next school. Copies are held whilst the pupil is a school + 1 year	SECURE DISPOSAL

5.2 Attendance					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
5.2.1	Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL
5.2.2	Correspondence relating to any absence (authorised or unauthorised)	Potential	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL

5.3 Special Educational Needs					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
5.3.1	Special Educational Needs files, reviews and Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Yes	Children and Family's Act 2014: Special Educational Needs and Disability Act 2001 Section 14	Primary schools - Retain whilst the child remains at primary school	The files should follow the pupil when he/she leaves the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit

				Secondary schools - Date of birth of the pupil + 31 years (Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act	Secondary schools - SECURE DISPOSAL

Section 6: Curriculum Management

6.1 Statistics and Management Information					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	SATS records	Yes			
	SATS Results			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. The school may wish to keep a composite record of all the whole year SAT's results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL
	SATS Papers			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
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
6.1.6	Internal Moderation	Yes		Academic year + 1 academic year	SECURE DISPOSAL
6.1.7	External Moderation	Yes		Until superseded	SECURE DISPOSAL

6.2 Implementation of Curriculum					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
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	
6.2.3	Class Record Books	No		Current Year + 1 year	
6.2.4	Mark Books	No		Current Year + 1 year	
6.2.5	Record of Homework set	No		Current Year + 1 year	
6.2.6	Pupil's Work	No		Where possible pupil's work should be returned to the pupil at the end of the academic year or retained for the current academic year + 1 year	SECURE DISPOSAL

Section 7: Extra Curricular Activities

7.1 Educational Visits outside the Classroom					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
7.1.1	Parental consent forms for school trips where there has been no major incident	Yes		At the end of the trip or at the end of the academic year.	SECURE DISPOSAL
7.1.2	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB 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 the rules had been followed for all pupils	
7.1.3	Records created to obtain approval to run an outside classroom	No		Date of visit + 14 years	SECURE DISPOSAL
7.1.4	Records relating to residential trips	Yes		DOB of youngest pupil + 25 years	SECURE DISPOSAL

7.2 Family Liaison Officers and Home School Liaison Assistants					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
7.2.1	Day Books	Yes		Current year + 2 years then review	SECURE DISPOSAL

7.2.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	SECURE DISPOSAL
7.2.3	Referral Forms	Yes		While the referral is current	SECURE DISPOSAL
7.2.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
7.2.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
7.2.6	Group Registers	Yes		Current year + 2 years	SECURE DISPOSAL

7.3 Parent Teacher Associations					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
7.3.1	Records relating the creation and management of Parent Teacher Associations			Current year + 6 years then review	SECURE DISPOSAL

Section 8: Central Government & Local Authority

8.1 Local Authority					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
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
8.1.3	School Census Returns	No		Current year + 5 years	SECURE DISPOSAL
8.1.4	Circulars and other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL

8.2 Central Government					
	Record Type	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at the end of the records life**
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

Digital continuity statement

Digital data that is retained for longer than six years will be identified by the academy named as part of a digital continuity statement. The data will be archived to dedicated files on the school's server, which are password-protected – this will be backed-up in accordance with information security policy.

Removable data are stored in line with the Information Security Policy as below:

The designated person will review new and existing storage methods at least annually, where appropriate add them to this statement.

1. Removable Media storing Data must only be used as a last resort, when all other options have been considered, including the need to store or process the data or the secure network service is not available.
2. Only Removable Media provided by the Academy or Trust that has been encrypted should be used for the storing of Data
3. Removable Media should not be used for the storing of Personal Data, Special Category or Sensitive Data unless the device is capable of and has been encrypted.
4. Removable Media must be stored securely
5. If Removable Media used for, or in connection with Academy business is lost or stolen, the loss/theft should be reported to Data Protection Officer and IT Support Team immediately. Where possible the Personal Device should be remotely accessed and the information erased.

The following information will be included within the digital continuity statement:

- A statement of the business purposes and statutory requirements for keeping the records
- The names of the individuals responsible for long term data preservation
- A description of the information assets to be covered by the digital preservation statement
- A description of when the record needs to be captured into the approved file formats
- A description of the appropriate supported file formats for long-term preservation
- A description of the retention of all software specification information and licence information
- A description of how access to the information asset register is to be managed in accordance with the GDPR

Information audit

The school conducts information audits on an **annual** basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the GDPR. This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Microfilm or microfiche
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information
- Knowledge
- Apps and portals

The information audit may be completed in a number of ways, including, but not limited to:

Interviews with staff members with key responsibilities – to identify information and information flows, etc.

Questionnaires to key staff members to identify information and information flows, etc.

A mixture of the above

The Head Teacher or someone appointed by them is responsible for completing the information audit. The information audit will include the following:

- The school's data needs
- The information needed to meet those needs
- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

The Head Teacher or someone appointed by them will consult with staff members involved in the information audit process to ensure that the information is accurate.

Once it has been confirmed that the information is accurate, the Academy Business Manager will record all details on the school's Data Asset Register.

An information asset owner is assigned to each asset or group of assets. They will be responsible for managing the asset appropriately, ensuring it meets the school's requirements, and for monitoring risks and opportunities.

The information displayed on the Data Asset Register will be shared with the headteacher to gain their approval