

ACCOMPLISH MULTI ACADEMY TRUST



RECORDS MANAGEMENT AND RETENTION SCHEDULE

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1	Introduction	Page 3
2	Scope of the policy	Page 3
3	Responsibilities	Page 3
4	Storage of records	Page 4
5	Safe disposal of records which have reached the end of their administrative life	Page 5
6	Document retention schedule	Page 6
Annex 1		Page 10

Version Control

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1	October 2025		

The Accomplish Multi Academy Trust recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the trust. Records provide evidence for protecting the legal rights and interests of the trust and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

This policy is intended to ensure compliance with the legal duties on the trust, including (but not exclusively):

- The Academy Trust Handbook
- The Education and Skills Funding Agency Funding Agreement.
- The General Data Protection Regulations.
- The Freedom of Information Act.

2 Scope of the policy

This policy applies to all records created, received, or maintained by staff of the trust, its staff, and its constituent schools in the course of carrying out its functions as a school.

Records are defined as all those documents which facilitate the business carried out by the trust 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.

A small percentage trust's records will be selected for permanent preservation as part of the organisation's archives and for historical research.

3 Responsibilities

The trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Data Protection Officer. Management at an individual school level is delegated to the Head Teacher

The person responsible for day-to-day records management in the trust will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily.

The trust will manage and documents its records disposal process in line with the Records Retention Schedule. This will help to ensure that it can meet FoI requests and respond to access personal data under data protection legislation (subject access requests, SARs)

Individual staff and employees must ensure, with respect to records for which they are responsible, that they:

- Manage the trust's records consistently, in accordance with the trust's policies and procedures
- Properly document their actions and decisions
- Hold personal information securely
- Only share personal information appropriately and do not disclose it to any unauthorised third party
- Dispose of records securely, in accordance with the trust's Record Retention Schedule

4 Storage of records

The storage of records should involve:

- Planning the information needs the trust
- Identifying information for retention.

- Creating, approving, and enforcing policies and practices regarding records, including their organisation and disposal.
- Developing a records storage plan, which includes the short and long-term housing of physical records and digital information.
- Identifying, classifying, and storing of records.
- Co-ordinating access to records internally and outside of the organisation, balancing the requirements of confidentiality, data protection and public access.
- Executing a retention policy on the disposal of records which are no longer required for operational purposes according to organisation policies, statutory requirements, and other regulations. This may involve either their destruction or permanent preservation in an archive.
- Records must be stored in such a way that they are accessible and safeguarded against environmental damage. All files in current use must be stored appropriately:
- All pupil records should always be kept securely. Paper records should be kept in locked filing cabinets/storage areas and the contents should be secure within the file. Equally, electronic records should have appropriate security. Records will be maintained according to any model protocol for record keeping on children and young people.
- Access arrangements for pupil records should ensure that confidentiality is maintained whilst equally enabling information to be shared lawfully and appropriately, and to be accessible for those authorised to see it.
- Closed records are kept securely in a locked filing cabinets and access to the files is restricted to authorised personnel.
- Staff records are stored in locked filing cabinet and accessed only by persons authorised by the Head Teacher
- Financial records are stored appropriately by relevant staff and published online in accordance with the requirements of Companies House and the Academies Financial Handbook.
- Management Information Systems –use restricted to relevant staff members and password protected. Passwords should not be divulged to other persons.
- All records to be archived as per the document retention schedule will be stored in appropriate boxes. Boxes will indicate contents and date of disposal. Where applicable, boxes will contain a contents list.

5 Safe disposal of records which have reached the end of their administrative life

The General Data Protection Regulation stipulates that records should be kept for no longer than necessary. Where records have been identified for destruction, they should be disposed of in an appropriate way. All records containing personal information or sensitive policy information will be shredded before disposal using a crosscut shredder or burned. Any other records should be bundled up and disposed of to a wastepaper merchant or disposed of in other appropriate ways.

Records should not be placed in the dustbin or a skip unless there is no other alternative. There are companies who can provide confidential waste bins and other services which can be purchased to ensure that records are disposed of in an appropriate way.

CDs/DVDs/floppy disks should be cut into pieces. Audio/video tapes and fax rolls should be dismantled and shredded. Hard disks should be dismantled and sanded. The Freedom of Information Act 2000 requires Rose Learning Trust to maintain a list of records which have been destroyed and who authorised their destruction.

Members of staff should record at least:

- file reference (or another unique identifier).
- file title (or brief description).
- number of files and date range.
- the name of the authorising officer.
- date action taken.

This record will be kept and maintained by each individual school.

6 Document retention schedule

The retention schedule has been drawn up by Information Records Management Society. The schedule covers the main categories of documents/records held in school, the appropriate retention period and type of disposal required.

Recommendations from the Information and Records Management Society:

Do not dispose of records about child sexual abuse.

Currently, **it is an offence to destroy** any records that might be relevant to the [Independent Inquiry into Child Sexual Abuse](#) (IICSA). This requirement overrides any UK data protection laws – see section 21 of the [Inquiries Act 2005](#).

This applies to schools, as set out in the latest version of the [toolkit for schools](#) from the Information and Records Management Society (IRMS) (see page 36).

It includes any materials regarding:

- Allegations (substantiated or not) about anyone who may have been involved in or had knowledge of child sexual abuse or exploitation
- Allegations (substantiated or not) about individuals engaging in sexual activity with, or having a sexual interest in, children
- Institutional failures to protect children from sexual abuse or other exploitation
- Statutory responsibilities for the care of children in public or private care
- Development of policies or legislation on child protection
- The determination of an Honours award to anyone now demonstrated to have had a sexual interest in children, or suspected of having such an interest

Even if a pupil has transferred out of your school and you intend to move these child protection files with them, you should consider retaining a copy of these records.

The inquiry continues to consider whether records will be kept in the future. However, until this inquiry closes you must follow the guidelines above.

Records stored on the pupil file

If you keep child protection reports or disclosures in the pupil file, store them in a separate area of the record or in a separate, linked file.

Keep the records for the same length of time as the pupil file, which is:

- **Until the child has left the school** – for primary schools
- **For 25 years from the child's date of birth** – for the school where the child completes their compulsory education

When the pupil leaves primary school, send the pupil's file to the new school.

Records stored in separate files

- If you keep child protection information in separate files, keep them for 25 years from the child's date of birth and then review whether you still need them.
- Keeping copies once pupils have transferred
- There is no specific statutory guidance on how long you should keep records for after a pupil transfers to another school – LAs have differing policies. You should keep a copy of the file in case, for example, it is later lost by another body. Keeping records of allegations made against

staff. If allegations of abuse made about a member of staff were found to be malicious or false, remove details of those allegations from personnel records.

For all other allegations:

- Keep a clear and comprehensive summary of the allegation, including details of how it was followed up; how it was resolved; any action taken; any decisions reached; and the outcome
- Provide a copy of the report to the person concerned, where agreed by children's social care or the police
- Keep a declaration on whether the information will be referred to in any future reference

This is to make sure:

- Accurate information can be given in response to requests for a reference in future
- Clarification can be given where future DBS checks reveal information about allegations that did not result in criminal convictions
- Records of allegations should be retained at least until the accused person has reached normal pension age, or for a period of 10 years from the date of the allegation if that is longer (unless they fall under the remit of the IICSA – see the first section, above).
- This is set out in paragraphs 416 to 410 (Record Keeping) of the statutory safeguarding guidance, Keeping Children Safe in Education (KCSIE) 2023.

Keeping court orders relating to pupils

Under the requirements of UK data protection law, you must not keep more personal information on file than is absolutely necessary. Therefore, you should only keep a copy of a court order relating to a pupil if having this extra information would be useful.

The DfE recommends that if the order relates to a specific safeguarding issue, you may wish to see and retain a copy of the court order to make sure you have enough information to keep the pupil safe

In most cases, the DfE and [Information Commissioner's Office](#) both said, it would be better for schools to record:

- That there is a court order in place for the pupil
- Who informed the school of the court order?
- What arrangements the school needs to have in place to support the court order
- Whether you keep a copy of the order, or just records relating to it, you must:
- Make sure that this information is kept securely
- Put arrangements in place to prevent unauthorised access
- Abide by the other [data protection principles](#) when handling sensitive personal data of this nature

The purpose of the retention guidelines

Under the Freedom of Information Act 2000, schools are required to maintain a retention schedule, listing the record series which the school creates in the course of its business. The retention schedule lays down the length of time over which the record needs to be retained, and the action which should be taken when it is of no further administrative use. The retention schedule lays down the basis for normal processing under the General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000.

Members of staff are expected to manage their current recordkeeping systems using the retention schedule and to take account of differing retention periods when creating new recordkeeping systems.

The retention schedule refers to record series, regardless of the media in which they are stored.

Benefits of a retention schedule

There are numerous benefits which arise from the use of a complete retention schedule:

- Managing records against the retention schedule is deemed to be “normal processing” under the General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000. Members of staff should be aware that once a Freedom of Information request is received or a legal hold imposed, then records disposal must be stopped.
- Members of staff can be confident that information has been disposed of safely and at the appropriate time.
- Information which is subject to the General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000 legislation will be available when required.
- The school is not maintaining and storing information unnecessarily.

Maintaining and amending the retention schedule

Where appropriate, the retention schedule should be reviewed and amended to include any new record series created, as well as to remove any obsolete record series.

This retention schedule contains recommended retention periods for the various record series created and maintained by schools in the course of their business. The schedule refers to all information, regardless of the media in which it is stored.

Some of the retention periods are governed by statute; others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000.

Managing record series using these retention guidelines will be deemed to be “normal processing” under the legislation mentioned above. If record series are to be kept for longer or shorter periods than those laid out in this document, the reasons for this need to be documented.

This schedule should be reviewed on a regular basis.

Please refer to Annex 1

Appendix A – Retention Schedule

1. Governance, Funding and Financial Management of the Academy Trust

Academies are governed by the Academy Trust, which will usually be a company limited by guarantee. The Academy Trust may also be a charitable 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 of the Academy Trust					
1.1.1	Governance Statement	No		Life of governance statement + 6 years	SECURE DISPOSAL
1.1.2	Articles of Association	No		Life of the Academy	
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	Constitution	No		Life of the Academy	
1.1.6	Special Resolutions to amend the Constitution	No		Life of the Academy	
1.1.7	Written Scheme of Delegation	No	<i>Companies Act 2006 section 355</i>	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
1.1.8	Directors – Appointment	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.9	Directors – Disqualification	No	Company Directors Disqualification Act 1986	Date of disqualification + 15 years	SECURE DISPOSAL
1.1.10	Directors – Termination of Office	No		Date of termination + 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
1.1.11	Annual Report – Trustees Report	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.12	Annual Report and Accounts	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.13	Annual Return	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	SECURE DISPOSAL
1.1.14	Appointment of Trustees and Governors and Directors	Yes		Life of appointment + 6 years	SECURE DISPOSAL
1.1.15	Statement of Trustees Responsibilities	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.16	Appointment and removal of Members	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.17	Strategic Review	No		Date of the review + 6 years	SECURE DISPOSAL
1.1.18	Strategic Plan [also known as School Development Plans]	No		Life of plan + 6 years	SECURE DISPOSAL
1.1.19	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 Body					
1.2.1	Board Meeting Minutes	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
1.2.2	Board Decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.3	Board Meeting: Annual Schedule of Business	No		Current 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
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		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 Governing Body 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
	Minutes of, and papers considered at, meetings of the Governing Body and its 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 Governing Body	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	Meeting papers relating to the annual parents' meeting held	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 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
	under Section 33 of the Education Act 2002				
1.2.12	Trusts and Endowments managed by the Governing Body	No		PERMANENT	
1.2.13	Records relating to complaints dealt with by the Governing Body	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	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
1.2.15	Register of Directors		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.16	Register of Directors' interests [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.17	Register of Directors' residential addresses		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.18	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.19	Register of members		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.20	Register of secretaries		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.21	Register of Trustees interests			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.22	Declaration of Interests Statements [Governors] [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL
1.3 Funding and Finance					

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
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
1.3.8	Charging and remissions policy	No		Date policy superseded + 3 years	SECURE DISPOSAL
1.3.9	Audit 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

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
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	Exclusions agreement	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
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

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
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
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, order books 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
1.3.38	Records relating to the identification and collection of debt	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
1.3.39	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 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
1.3.50	Transfers of freehold land	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
1.3.51	School Fund – Cheque books	No		Current year + 6 years	SECURE DISPOSAL
1.3.52	School Fund – Paying in books	No		Current 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
1.3.53	School Fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
1.3.54	School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
1.3.55	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
1.3.56	School Fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
1.3.57	School Fund – Journey books	No		Current year + 6 years	SECURE DISPOSAL
1.3.58	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.59	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.60	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 Breach Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.4	Special Educational Needs 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 and Control Framework	No		Life of framework + 6 years	SECURE DISPOSAL
1.4.7	Rules and Bylaws	No		Date rules or bylaws 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
1.4.8	Home School Agreements	No		Date agreement revised + 6 years	SECURE DISPOSAL
1.4.9	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	SECURE DISPOSAL

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 Update Service Employer Guide June 2014	The organisation should take a copy of the DBS certificate when it is shown to them by the individual and should be added to the Staff Personal File	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process of	Yes		Where possible, these should be checked, and a note kept 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
	checking "portable" enhanced DBS disclosure			what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this 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 [Home Office May 2015]	Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are 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		Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are 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

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
2.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	SECURE DISPOSAL
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 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	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			
	<ul style="list-style-type: none"> Oral warning 			Date of warning + 6 months	SECURE DISPOSAL
	<ul style="list-style-type: none"> Written warning – level 1 			Date of warning + 6 months	SECURE DISPOSAL
	<ul style="list-style-type: none"> Written warning – level 2 			Date of warning + 12 months	SECURE DISPOSAL
	<ul style="list-style-type: none"> Final warning 			Date of warning + 18 months	SECURE DISPOSAL
	<ul style="list-style-type: none"> 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 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	
	<ul style="list-style-type: none"> Adults 			Date of incident + 6 years	SECURE DISPOSAL
	<ul style="list-style-type: none"> 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 and persons are likely to have come into contact with asbestos	No		Last action + 40 years	SECURE DISPOSAL
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

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
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
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

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
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	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
3.1.6	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, schools' adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL
3.1.7	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	Logbooks of activity in the school maintained by the Head Teacher	There may be data protection issues if the logbook refers		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

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
		to individual pupils or members of staff			County Archives Service, if appropriate
3.2.2	Minutes of Senior Management Team meetings and 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
3.2.3	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 + a minimum of 3 years then REVIEW	SECURE DISPOSAL
3.2.4	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 records refer to individual pupils or members of staff		Current academic year + 6 years then REVIEW	SECURE DISPOSAL
3.2.5	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
3.2.6	Professional Development Plans	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

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
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 the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
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	

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
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 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
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	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
				or to be returned to lease company	
4.3.4	GPS tracking data relating to the vehicles	N	Limitation Act 1980 (Section 2)	Date of journey + 6 years	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 <ul style="list-style-type: none"> Primary 	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	Retain whilst the child remains at the primary school	The file should follow the pupil when they leave the primary school. This will include: <ul style="list-style-type: none"> To another primary school To a secondary school To a pupil referral unit If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period.

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
					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 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			

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
	<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	<p>“Keeping children safe in education Statutory guidance for schools and colleges March 2015”;</p> <p>“Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”</p>	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
5.1.6	Child protection information held in separate files	Yes	<p>“Keeping children safe in education Statutory guidance for schools and colleges March 2015”;</p> <p>“Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”</p>	<p>Date of birth of the child + 25 years then REVIEW</p> <p>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</p>	SECURE DISPOSAL – these records MUST be shredded
5.2 Attendance					
5.2.1	Attendance registers	Yes	<p>School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities</p> <p>October 2014</p>	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

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
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 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

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
					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 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 (schools copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	SATs records –	Yes			
	<ul style="list-style-type: none"> 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 SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL
	<ul style="list-style-type: none"> Examination papers 			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
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 of each year and allocate a further retention period, or, SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
6.2.4	Mark books	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	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
6.2.6	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	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 –	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
	outside the classroom – Primary schools		"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
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.	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
				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	[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
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

