

Policy A18 Document Retention

1. Aims

- 1.1 The University of Brighton Academies 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.
- 1.2 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.

2. Scope of the policy

- 2.1 This policy applies to all records created, received or maintained by Trust staff in the course of carrying out its functions.
- 2.2 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.
- 2.3 A small percentage of the Trust's records will be selected for permanent preservation as part of the Trust archives.

3. Responsibilities

- 3.1 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 Trust Data Protection Officer.
- 3.2 Each academy and Professional Services Department will nominate a person to be responsible for records management who will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- 3.3 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the Trust Document retention schedule.

4. Links with other policies

This policy is linked to our:

- Data Protection policy
- Safeguarding in Education and Child Protection policy
- Freedom of information publication scheme
- ICT acceptable use policy
- Social Media policy
- Photography and image sharing

5. Policy status and review

Written by:	Governance Manager
Owner:	Data Protection Officer
Status:	Approved
Approval date:	05-06-18 (Executive Team)
Review Date:	2020

1. Governance and Management

This section contains retention periods connected to the governance and general management of the Trust and academies. This covers the work of the Board of Trustees, Local Boards, Principals and the Senior Leadership Team, the admissions process and operational administration.

1.1 Governance					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.1.1	Agendas for Board of Trustees and Committee meetings including Local Boards	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the signed set of minutes permanently. All other copies can be disposed of.	SECURE DISPOSAL ¹
1.1.2	Minutes of Board of Trustees and Committee meetings including Local Boards	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		The signed set of minutes should be retained permanently together with a copy of the final agenda.	
1.1.3	Reports/papers for Board of Trustees and Committee meetings including Local Boards	There may be data protection issues if the report deals 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 permanently	SECURE DISPOSAL or retain with the signed set of the minutes

¹ In this context SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, external shredding providers or if the academy/trust office has the facility, shredding using a cross cut shredder.

1.1.4	Trust deeds, rules and Articles of Association	No		Permanently	
1.1.5	Expressions of interest/application forms	Yes		6 years after resignation/end of term of office	SECURE DISPOSAL
1.1.6	Declaration of pecuniary interest forms	No		6 years after resignation/end of term of office	SECURE DISPOSAL
1.1.7	Signed Code of Conduct	No		1 year after resignation/end of term of office	SECURE DISPOSAL
1.1.8	Parent/staff Local Board member election paperwork	Yes		1 year	SECURE DISPOSAL
1.1.9	Records relating to complaints dealt with by the Governing Body (Board of Trustees or Local Board)	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
1.1.10	Policy documents	No		Life of the policy + 3years	SECURE DISPOSAL

1.2 Principal and Senior Leadership Team

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.2.1	Log books of activity in the academy maintained by the Principal	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate
1.2.2	Minutes of Senior Leadership 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 Principal or the Leadership 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
1.2.4	Records created by Principal, Vice Principals/senior leaders 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
1.2.5	Correspondence created by Principals, Vice Principals/senior leaders 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
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
1.2.7	Academy Development/Improvement Plans	No		Life of the plan + 3 years	SECURE DISPOSAL

1.3 Admissions Process

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.3.1	All records relating to the creation and implementation of the Trust 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
1.3.2	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
1.3.3	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
1.3.4	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 three 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.
1.3.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL

1.3.6	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
1.3.7	Supplementary Information form including additional information such as religion, medical conditions etc	Yes			
	For successful admissions			This information should be added to the pupil file	SECURE DISPOSAL
	For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL

1.4 Operational Administration					
	Basic file description	Data Prot Issues	Statutory Provision s	Retention Period [Operational]	Action at the end of the administrative life of the record
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 marketing and communication materials including academy prospectuses.	No		2 years	STANDARD DISPOSAL
1.4.3	Pupil images and staff images for marketing purposes	Yes		2 years	SECURE DISPOSAL
1.4.4	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
1.4.5	Printed electronic copy of marketing collateral	Yes		Current year + 5 years then REVIEW	SECURE DISPOSAL
1.4.6	Marketing contact lists	Yes		3 years	SECURE DISPOSAL
1.4.7	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
1.4.8	Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
1.4.9	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

1.5 ICT					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.5.1	Backup – Servers	Yes		1 year	PERMANENTLY DELETED
1.5.2	Backups- Home areas	Yes		90 days	PERMANENTLY DELETED
1.5.3	Backups – E-mail mailboxes	Yes		90 days	PERMANENTLY DELETED
1.5.4	E-Mail Mailboxes (Staff)	Yes		90 days	PERMANENTLY DELETED
1.5.5	E-Mail Mailboxes (Students)	Yes		1 year	PERMANENTLY DELETED
1.5.6	Home Areas (Staff)	Yes		3 months	PERMANENTLY DELETED
1.5.7	Home Areas (Students)	Yes		1 year	PERMANENTLY DELETED
1.5.8	Helpdesk data	No		Indefinitely	
1.5.9	Web filtering data/logs	Yes		Indefinitely	
1.5.10	WiFi logs	Yes		Indefinitely	

1.5.11	Voicemails	There may be data protection issues if the voicemail refers to individual pupils or members of staff		Users would be expected to delete all voicemail once the information has been passed on or actioned and not later than 30 days following receipt	
1.5.12	Print logs (required for inter-departmental billing)	No		2 years	PERMANENTLY DELETED
1.5.13	Shared Drive data	Yes		Ad hoc with annual clean ups	PERMANENTLY DELETED

2. Human Resources

This section deals with all matters of Human Resources management

2.1 Recruitment					
	Basic file description	Data Prot Issues	Statutory Provision	Retention Period [Operational]	Action at the end of the administrative life of the record
2.1.1	All records leading up to the appointment of a new Principal	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 + 1 year	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All the 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	No	DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74	The Trust/academy does not have to keep copies of DBS certificates. If it does so the copy must NOT be retained for more than 6 months	
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible these should be checked and a note kept of what was seen and 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 then the Home Office requires that the documents are kept for termination of Employment plus not less than two years	
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2.2 Operational Staff Management					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.2.1	Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	SECURE DISPOSAL
2.2.2	Staff photographs for identification purposes	Yes		Termination of employment	SECURE DISPOSAL
2.2.3	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.4	Annual appraisal/ assessment records	Yes		Current year + 5 years	SECURE DISPOSAL
2.2.5	National minimum wage records	Yes	National Minimum Wage Act 1998.	3 years after the end of the pay reference period following the one that the records cover.	SECURE DISPOSAL
2.2.6	Retirement Benefits Schemes – records of notifiable events, for example, relating to incapacity	Yes	The Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	6 years from the end of the scheme year in which the event took place	SECURE DISPOSAL
2.2.7	Statutory Maternity Pay records,	Yes	The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) as amended	3 years after the end of the tax year in which the maternity period ends	SECURE DISPOSAL

	calculations, certificates (Mat B1s) or other medical evidence				
2.2.8	Wage/salary records (also overtime, bonuses, expenses)	Yes	Taxes Management Act 1970. HMRC records	6 years plus current year	SECURE DISPOSAL
2.2.9	Working time records	Yes	The Working Time Regulations 1998 (SI 1998/1833).	2 years from date on which they were made	SECURE DISPOSAL
2.2.10	Personnel files and training records	Yes		6 years after employment ceases	SECURE DISPOSAL
2.2.11	Redundancy details, calculations of payments, refunds, notification to the Secretary of State	Yes		6 years from the date of redundancy	SECURE DISPOSAL
2.2.12	Statutory Sick Pay records, calculations, certificates, self-certificates	Yes		6 years after employment ceases	SECURE DISPOSAL
2.2.13	Parental leave	Yes		18 years from the birth of the child	SECURE DISPOSAL

2.2.14	Trade Union agreements	Yes		10 years after ceasing to be effective	SECURE DISPOSAL
2.2.15	Senior executives' records (that is, those on a senior management team or their equivalents)	Yes		Permanently for historical purposes	
2.2.16	Pensions – employee records (name, NI no.,opt-in notice and joining notice)	Yes	Pension Regulator	6 years	SECURE DISPOSAL
2.2.17	Pension – opt out	Yes	Pension Regulator	4 years	
2.2.18	Pensions – employer records (scheme name address and reference)	No	Pension regulator	6 years	SECURE DISPOSAL
2.2.19	Pensions – scheme data	Yes	HMRC	6 years plus the current year	SECURE DISPOSAL BY PROVIDER In the event of the contract ending there will be the option of having the data returned for retention/destruction or for the provider to hold for that period (hard or soft copy) and continue to do so and destroy as each year passes

2.3 Management of Disciplinary and Grievance Processes

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded ²	Yes	“Keeping children safe in education Statutory guidance for schools and colleges September 2018”; “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 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	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	oral warning			Date of warning ³ + 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 This review took place as the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention

³ Where the warning relates to child protection issues see above. If the disciplinary proceedings relate to a child protection matter please contact the DPO for further advice

2.4 Health and Safety					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.4.1	Health and Safety Policy Statements	No	Health & Safety at Work Act See Trust H&S policy for further information	Life of policy + 3 years	SECURE DISPOSAL
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	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended, and Limitation Act 1980. Special rules apply concerning incidents involving hazardous substances	Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
2.4.4	Accident Reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended, and Limitation Act 1980. Special rules apply concerning incidents involving hazardous substances		
	Adults			Date of the incident + 6 years	SECURE DISPOSAL
	Children			DOB of the child + 25 years	SECURE DISPOSAL

2.4.5	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 had not been made. Regulation 18 (2)	Current year + 40 years	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation and medical records	No	The Ionising Radiations Regulations 1999 (SI 1999/3232)	In the case of medical records until the person reaches 75 years of age, but in any event for at least 50 years	SECURE DISPOSAL
2.4.8	Fire Precautions log books	No		Current year + 6 years	SECURE DISPOSAL
2.4.9	DSE assessments	No		5 years	SECURE DISPOSAL
2.4.10	Manual handling assessments, etc. (including their reviews and updates) and details of any actions taken including associated training records	No		5 years	SECURE DISPOSAL
2.4.11	All site maintenance, examination and testing records	No		5 years	SECURE DISPOSAL
2.4.12	Records of local and site safety inspections, meetings, safety committee	No		5 years	SECURE DISPOSAL

	records etc				
2.4.13	Associated safety training records	No		5 years	SECURE DISPOSAL
2.4.14	LEV testing and air sampling	No		5 years	SECURE DISPOSAL
2.4.15	Health surveillance records	Yes		60 years	SECURE DISPOSAL
2.4.16	Medical records and details of biological tests under the Control of Lead at Work Regulations	Yes		40 years from the date of the last entry	SECURE DISPOSAL
2.4.17	Assessments under health and safety regulations and records of consultations with safety representatives and committees	No		Permanently	SECURE DISPOSAL

3. Financial management

This section deals with all aspects of financial management including the administration of academy catering.

3.1 Risk Management and Insurance				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.1.1 Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL

3.2 Asset Management				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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 and Statements including Budget Management				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.3.1 Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
3.3.2 Loans and grants managed by the academy	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
3.3.3 Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL

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

3.4 Contract Management

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
3.4.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
3.4.3	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL

3.5 School Fund

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.5.1	School Fund - Cheque books	No		Current year + 6 years	SECURE DISPOSAL
3.5.2	School Fund - Paying in books	No		Current year + 6 years	SECURE DISPOSAL

3.5.3	School Fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
3.5.4	School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
3.5.5	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
3.5.6	School Fund - Bank statements	No		Current year + 6 years	SECURE DISPOSAL
3.5.7	School Fund – Journey Books	No		Current year + 6 years	SECURE DISPOSAL

3.6 Academy Catering					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.6.1	Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.6.2	School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
3.6.3	School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL

4. Property Management

This section covers the management of buildings and property.

4.1 Property Management					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
4.1.1	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	
4.1.2	Plans of property belong 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

4.2 Maintenance					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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 log books	No		Current year + 6 years	SECURE DISPOSAL

5. Pupil Management

This section includes all records which are created during the time a pupil spends at the academy. For information about accident reporting see under Health and Safety above.

5.1 Pupil's Educational Record					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	Primary			Retain whilst the child remains at the primary school	<p>The file should follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> to another primary school to a secondary school to a pupil referral unit <p>If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period.</p> <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority 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 Local Authority as it is more likely that the pupil will request the record from the Local Authority</p>

	Secondary		Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2	Examination Results – Pupil Copies	Yes			
	Public		JCQ (Joint Council of Qualifications)	This information should be added to the pupil file. Certificates should be retained for 5 years	SECURE DISPOSAL
	Internal			This information should be added to the pupil file	

5.1 Pupil's Educational Record

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.1.3	Child Protection information held on pupil file ⁴	Yes	<p>“Keeping children safe in education Statutory guidance for schools and colleges September 2018”;</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>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.</p>	SECURE DISPOSAL – these records MUST be shredded

⁴ In light of the Independent Inquiry on Child Sexual Abuse it is recommended that all records relating to child abuse are retained until the Inquiry is completed.

5.1.4	Child protection information held in separate files	Yes	<p>“Keeping children safe in education Statutory guidance for schools and colleges September 2018”;</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>DOB 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 Local Authority Social Services record</p>	SECURE DISPOSAL – these records MUST be shredded
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5.2 Attendance					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.2.1	Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Six years	SECURE DISPOSAL
5.2.2	Correspondence relating to authorized absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL

5.3 Special Educational Needs

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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 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 and this should be documented.
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold
5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold

6. Curriculum management

6.1 Statistics and Management Information					
	Basic file description	Data Prot Issues	Statutory Provision s	Retention Period [Operational]	Action at the end of the administrative life of the record
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 – Results	Yes		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
	Examination 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

6.2 Implementation of Curriculum

	Basic file description	Data Prot Issues	Statutory Provision s	Retention Period [Operational]	Action at the end of the administrative life of the record
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 + 2 years	
6.2.3	Class Record Books	No		Current year + 2 years	
6.2.4	Mark Books	No		Current year + 2 years	
6.2.5	Record of homework set	No		Current year + 1 year	
6.2.6	Pupils' Work	No		Where possible pupils' 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. Extra-curricular activities

7.1 Educational Visits outside the Classroom					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary 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 + 14 years	SECURE DISPOSAL
7.1.2	Records created by schools 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 DOB + 22 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)	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 that the rules had been followed for all pupils	

7.2 Walking Bus					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.2.1	Walking Bus Registers	Yes		Date of register + 3 years This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]

7.3 Family Liaison Officers and Home School Liaison Assistants					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.3.1	Day Books	Yes		Current year + 2 years then review	
7.3.2	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	
7.3.3	Referral forms	Yes		While the referral is current	
7.3.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	
7.3.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	
7.3.6	Group Registers	Yes		Current year + 2 years	

8. Central Government and Local Authority

This section covers records created in the course of interaction between the academy and Local Authority

8.1 Local Authority					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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