

# Records Management Policy 2025-28

Document Control	
Owning Function:	Data Protection
Date Approved by Executive:	June 2025
Next Revision Date:	Summer Term 2027/2028 or earlier if changes are required.

Change History	
Date	Description
May 2025	Rewrite of Policy that included complete revision of retention periods based on current information from the Information & Records Management Society. The Trust's Digital continuity statement has been included within this Policy which forms part of a suite of data protection policies.

## 1. Introduction

Well-managed information and records improve efficiency and decision-making. Records have strict compliance requirements regarding their retention, access and destruction. The Trust risks financial, legal and reputational damage if it does not manage its information, and therefore its records, properly.

Information can become a liability if it is not properly managed and we are responsible for knowing what information we hold, why we hold it, how sensitive it is, and how it should be managed. Information must only be kept for as long as it is needed and then disposed of when there is no longer a reason to keep it. Disposal of information can be through destroying it, transferring it to another body or by transferring it to an archive.

## 2. Purpose

This Policy sets out the measures adopted by the University of Chichester Academy Trust ('the Trust') in respect of its records management including the retention and disposal of records that contain personal data, special category data or other confidential information. Reference to the Trust is reference to the academies which comprise the Trust and its SCITT.

## 3. Scope

All documents and records (electronic and paper) should be maintained in accordance with this Policy.

For consistency and clarity all staff or third-party processors must adhere to this Policy and ensure records are only kept for the period set out in this policy that aligns to Trust and regulatory requirements.

Information can be in any format or medium that the Trust holds, or that another body holds, on its behalf.

## 4. Legislation and Guidance

The Policy considers the requirements laid out in the UK GDPR, the Public Records Act (1958), the Limitation Act (1980), the Environmental Information Regulations and the Freedom of Information Act 2000, section 46 and the statutory Code of Practice which provides guidance on the keeping, management and destruction of records.

### 4.1. Relationship with Existing Policies

This policy is part of a suite of policies to support data protection:

- Information Governance Policy
- Data Protection Policy
- Freedom of Information Policy
- Digital Information and Security Policy
- Privacy Notice

The Trust supports the principles that will inform its approach to reviewing information held and as set out in the code of conduct:

**Value** of the information:

We recognise there are differing values to information and this changes over time. In understanding the different values, it will help us to make effective decisions.

- **Immediate value** - when first created, satisfying its initial purpose.
- **Operational value** – after created for working information.
- **Evidentiary value** – for audit accountability or regulatory purposes.
- **Future value** - if it can be used to create new knowledge, improve services or generate income.
- **Historic value** - for the long-term memory of society, as well as the corporate memory. Where records are likely to have a historical value, or are worthy of permanent preservation, we may choose to archive them at the end of any statutory retention period.

**Integrity** of the information so that our stakeholders can trust and rely on the information we hold.

## Accountability:

The management of our information will provide a clear and accurate account of our activity in accordance with our legal and other obligations.

## 5. Record Maintenance

Staff should save in electronic format wherever possible.

Paper file storage must be secured from unauthorised access, meet fire regulations and stored in a manner that will not deteriorate the paper record e.g. through sunlight, mould or water damage. The movement and location of paper records must be controlled and tracked end to end to ensure that a record can be retrieved easily. Records of processing activity and location are held in the central, academy or SCITT ROPA. The tracking history must be held in a shared location.

Staff should only retain those records where there is a legitimate reason to do so. Opinions should only be made about an individual if it is in a professional capacity. All individuals have the right to gain access to any communication, in any format, that identifies them through a subject access request under UK GDPR. Job references are excluded.

## 6. Record Retention Schedule

Some of the retention periods are governed by statute and every effort has been made to ensure the retention periods are compliant with the requirements of the Data Protection Act 2018 and the Freedom of Information Act 2000. The Trust is a member of the Information and Records Management Society (IRMS) and has drawn on its guidance.

Any queries regarding retention periods should be sent to Data Protection Officer at [l.birch@chi.ac.uk](mailto:l.birch@chi.ac.uk)

## 7. Record Keeping

It is not necessary to document the disposal of records if it has been completed in line with the retention schedule. Documents disposed of outside the schedule either by being disposed of earlier or kept for longer than listed must be recorded for audit purposes on the Disposal log. Refer to **Appendix 2** for the Disposal log template.

This will provide an audit trail for any inspections conducted by the Information Commissioner's Office and will aid in addressing Freedom of Information requests, where we no longer hold the material.

## 8. Disposal Categories

The records for disposal will fall into three main categories:

1. Destroy after an agreed period – where the useful life of a series or collection of records can be easily predetermined (for example, destroy after 3 years; destroy 2 years after the end of the financial year).
2. Automatically select for permanent preservation – where certain groups of records can be readily defined as worthy of permanent preservation and transferred to an archive.
3. Review is the examination of closed records to determine whether they should be destroyed, retained for a further period or transferred to an archive for permanent preservation.

If an employee is due to leave their role or organisation, they, with their line manager, as part of the exit procedure, should identify any specific records they have responsibility for, or hold, that should be retained as detailed above.

When information has reached the end of its retention period it will need to be reviewed to ensure that it is no longer required. Information should only be retained beyond its retention period in limited circumstances. Before destructing a piece of information and recording this in the Destruction log, the following factors should be considered:

- Is the information required to fulfil statutory or regulatory requirements?
- Is the information relevant to ongoing litigation / subject to a legal hold?
- Is the information the subject of an information request or relate to information recently disclosed in a response?

- Is retention required to evidence events in the case of a dispute?
- Is the information required for a Public Inquiry?
- Is there another demonstrable business need for retaining the information?

## 9. Legal Hold

Staff must notify the academy's Data Champion if they have been notified of an actual or potential legal claim, investigation, incident, or inquiry which could result in a legal hold.

When a legal hold is in place, relevant information must be preserved within the scope of the hold. This means that the record must not be disposed of within the scope of the hold. When a legal hold comes to an end, records which had been covered by the legal hold should be maintained and disposed of in accordance with the retention schedule.

## 10. Sanitisation

Any media that stored data which contained personal or special category data should be sanitised before the device leaves the Trust. Hitting the 'Delete' key is not sufficient; if media is not sanitised, sensitive data may remain on it.

Some forms of sanitisation will allow you to re-use the media, while others are destructive in nature and render the media unusable. When considering sanitisation, the Trust will consider the impact on the environment obligations.

## 11. Methods of Disposal

The method of disposal will depend on the content of the information and options will include:

<b>Physical</b>	
Physical records or equipment must be stored in a locked and restricted area prior to disposal.	
Non-sensitive information	Placed in a normal rubbish bin
Confidential or Highly Confidential information	Crosscut shredded and pulped or burnt Confidential waste bin If using a third-party provider, a certificate of destruction must be obtained and logged.
<b>Note:</b> Physical records should be stored in a way that protects them from loss, damage or theft. The storage of physical information should not create health and safety risks and consideration to mitigate the risk of fire, water damage or environmental damage e.g. sunlight, mould or pests to the information must be given. When identifying a supplier, the accreditation relating to the management of confidential waste is BS EN 157 13:2009	
<b>Electronic</b>	
Destruction of electronic records should render them non-recoverable even using forensic data recovery techniques.	
Documents and Files	Permanently deleted from the system
Mailbox	Ensure information is deleted from all mailboxes, i.e inbox, sent, junk or files held within the mailbox
Electronic Equipment	Destroyed using Killdisc or equivalent technology. Inform central IT to determine whether the equipment can be re-used, sold or disposed of and method of sanitisation.
Legacy information (floppy disk)	Cover on floppy disk should be removed. The magnetic sheet should then be removed and put into a standard shredder.
Legacy information (CD/DVD or optical disks)	Cut up or shred if possible and disposed of responsibly.

**Note:**

**Email:** Where the contents of an email warrant longer retention, that email (or its content) should be moved to an appropriate records retention system and the email then deleted.

Storage media (e.g HDD, SSD, USB, SD and micro SD cards): If personal or sensitive personal data was stored then the storage media should be destroyed to ensure the data is not retrievable.

## 12. Digital Continuity Statement

Any record which needs to be held for longer than six years must have a Digital Continuity Statement in line with the Limitation Act 1980. The purpose of a digital continuity statement, also referred to as a data retention statement, is to outline how the Trust will manage and retain its digital information to ensure it remains usable, findable, understandable, and trustworthy over time, even as technology evolves. The Trust understands that managing digital continuity is essential to protect the digital information that we depend on to conduct our work.

- **Appendix 4** details the Trust's Digital Continuity Statement and includes a statement of business purpose and statutory requirements for keeping records; and
- a description of the business purpose for the information asset and any statutory requirements, including the retention period for the records, including a brief description of the consequences of any data loss.

Memory sticks or Flash drives must not be used to store any records which are subject to a digital continuity statement. This storage medium is prone to corruption and can be easily lost or stolen.

Storage methods will be reviewed on a regular basis to ensure that new technology and storage methods are assessed.

## 13. Storage of Electronic Documents

To mitigate the risk of losing electronic records through becoming corrupted, or the storage medium becoming unstable, when electronic records are transferred from the main system to an external storage device, the data should be backed up and two secure copies of the data should be made. The data on the original device and the backups should be checked periodically to ensure that it is still accessible. Additional backups of the data should be made at least once a year and more frequently, if appropriate.

Where possible, digital records should be archived within a current system. For example: a designated server where 'archived' material is stored, or designated storage areas within collaborative working tools, such as SharePoint.

## 14. Monitoring

The person who has responsibility for the data will be responsible for its disposal in line with the Retention schedule laid down in this policy. Permission from the Headteacher must be sought and logged in the Academy's Destruction log prior to destroying records, should it be determined the information has value beyond the retention period.

The Data Champions will periodically check the Disposal log and report to the Data Protection Officer if records are not being destroyed in accordance with Policy.

## 15. Data Sharing and Disposal

Where we share information with other bodies, we will ensure that they have adequate procedures for data retention and disposal to ensure that the information is managed in accordance with the Trust's policies, relevant legislation and regulatory guidance.

Where relevant to do so we will carry out a data protection impact assessment and update our privacy notice to reflect data sharing.

**Section 1: Governance**

Governance – Framework				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Constitution	No	Companies Act 2006 s.355  This section refers to Records of Resolutions and meetings etc. it does not mention Constitutions. Resolutions and minutes under this section to be retained for at least 10 years from date of meeting or decision as appropriate (Section 355(2))	Date constitution superseded + 10 years.  It may be appropriate to retain one copy of each constitution for archival purposes	Secure Disposal
Articles of Association	No		Life of the Company	Secure Disposal
Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	Secure Disposal
Memorandum of Understanding of Shared Governance among Schools	No		Life of Memorandum of Understanding + 6 years	Secure Disposal
Governance Statement	No		Life of governance statement + 6 years. One copy of each iteration may need to be retained for archive purposes	Secure Disposal
Written Scheme of Delegation	Yes	Companies Act 2006 s. 355	Life of Written Scheme of Delegation + 10 years	Secure Disposal
Special Resolutions to amend the	No	Companies Act 2006 s. 355 Resolutions and minutes	Date constitution superseded + 10	

Constitution		under this section to be retained for at least 10 years from the date of meeting or decision as appropriate (Section 355 (2))	years. It may be appropriate to retain one copy of each constitution for archival purposes	
Annual Report and Accounts	No	Companies Act 2006 s. 355	Date of report + 10 years	Secure Disposal
Annual Report Trustees Report	No	Companies Act 2006 s. 355	Date of report + 10 years	Secure Disposal
Annual Reports created under the requirements of the Education (Governors Annual Reports) (England) (Amendment) Regulations 2002	No		Date of report + 10 years	Secure Disposal
Annual Return	No	Companies Act 2006 s. 355	Date of report + 10 years	Secure Disposal
Instruments of Government	No		For the life of the school	Consult local archives before disposal
Register of Directors	Yes	Companies Act 2006	Date Director resigns + 10 years	Secure Disposal
		Removal of entries relating to former members. An entry relating to a former member of the company may be removed from the register after the expiration of ten years from the date on which he ceased to be a member		
Scheme of Delegation and Terms of Reference for Committees	No	Until superseded or whilst relevant		These could be offered to the archives if appropriate
		Schools may wish to retain these records for reference purposes in case decisions need to be justified		
Records relating to complaints dealt with by the Governing Body	Yes		Date complaint resolved + 3 years then review. If the complaint relates to negligence or safeguarding then	Secure Disposal

			date the complaint resolved + 15 years. If the complaint relates to child sexual abuse then the complaint resolved + 75 years (this retention period will be reviewed once the government and the ICO have issued guidance about the implementation of the IICSA recommendations)	
All records relating to the conversion of schools to Academy status	No	Companies Act 2006 s.355	For the life of the organization	Consult local archives before disposal

Governance – Appointment, Records, Induction and Training				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Appointment of Directors/Trustees and Governors	Yes	Companies Act 2006 s.355	Life of appointment + 6 years	Secure Disposal
Records relating to the election of parent and staff governors not appointed by the governors	Yes		Date of election + 6 months	Secure Disposal
Records relating to the appointment of co-opted governors	Yes		Provided that the decision has been recorded in the minutes the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office, except where there have been allegations concerning children. In this case retain for 25 years.	Secure Disposal
Records relating to the terms of office of serving governors including evidence of appointment	Yes		Date appointment ceases plus 6 years except where there have been allegations concerning children. In this case retain for 25 years.	Secure Disposal

Records relating to Governor Declaration against disqualification criteria	Yes		Date appointment ceases + 6 years	Secure Disposal
Governors Code of Conduct	No		This is expected to be a dynamic document, one copy of each version should be kept for the life of the organisation	Secure Disposal
Records relating to DBS checks carried out on clerk and members of the governing body	Yes		Date of DBS check + 6 months (but need to retain a record of the date of the DBS check if you are renewing every 3-5 years depending on policy)	Secure Disposal
Governor personnel files	Yes		Date appointment ceases + 6 years except where there have been allegations concerning children. In this case retain for 25 years	Secure Disposal
Records relating to the induction programme for new Trustees and governors	Yes		Date appointment ceases + 6 years	Secure Disposal
Records relating to the training required and received by Trustees and governors	Yes		Date Governor steps down + 6 years	Secure Disposal
Appointment and removal of Members	No		Life of appointment + 6 years	Secure Disposal
Register of Members		Companies Act 2006	Date Member resigns + 10 years	Secure Disposal
Statement of Trustees Responsibilities	No		Life of statement + 6 years	Secure Disposal
Register of Trustees interests	Yes	Companies Act 2006	Date Trustee resigns + 10 years	Secure Disposal
Declaration of Interests Statements [Governors] [this is not a statutory register]	Yes		Date Governor resigns + 10 years	Secure Disposal

## Governance – Meetings, Minutes and Papers

Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Trust Board Meeting agenda, papers and minutes	Yes	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	Offer to Archives
Board Decisions	Maybe		Date of the meeting + a minimum of 10 years	Offer to Archives
Board Meeting: Annual Schedule of Business	No		Current year	Secure Disposal
Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980 s.2	Date procedures superseded + 6 years	Secure Disposal
Records relating to the management of General Members Meetings	No	Companies Act 2006 s.248	Minutes must be kept for at least 10 years from the date of the meeting	Offer to Archives
Minutes relating to any committees set up by the Board of Directors	Maybe		Date of the meeting + a minimum of 10 years	Offer to Archives
Records relating to the management of the Annual General Meeting	Maybe	Companies Act 2006 s.248	Minutes must be kept for at least 10 years from the date of the meeting	Offer to Archives
Meetings Schedule	No		Current year	Standard Disposal
Agendas for Governing Body meetings	Maybe		One copy should be retained with the master set of minutes. All other copies can be disposed of	Secure Disposal
Agendas Additional Copies	No		Date of Meeting	Standard Disposal
Minutes of, and papers considered at, meetings of the Governing Body Principal Set (signed)	Maybe		Date of meeting + 10 years	Offer to Archives
Minutes of, and papers considered at, meetings of the Governing Body Inspection Copies	Yes		Date of meeting + 10 years	Secure Disposal
Reports presented to the Governing Body	Yes		Date of meeting the report was presented to + 10 years	Secure Disposal or retain with the signed set of minutes

Reports made to the Governors Meeting which are referred to in the minutes	Maybe	Companies Act 2006	Keep for the life of the organization or 10 years from the date of the meeting, whichever is the longest	Consult local archives before disposal
Register of attendance at Full Governing Board meetings	Yes		Date of last meeting + 6 years	Secure Disposal
Papers relating to the management of the Annual Parents Meeting	Yes		Date of meeting + 6 years	Secure Disposal

Local Governing Bodies - Activities				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Records relating to Governor Monitoring Visits	Yes		Date of the visit + 3 years	Secure Disposal
Policy documents created and administered by the Governing Body	No		Until superseded. The School should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the government and ICO have published guidance about the implementation of the recommendations made in the IICSA report Refer to Trust's Policy Register	SECURE DISPOSAL

## Section 2: Liaison with DfE

Liaison with DfE				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
OFSTED reports and papers	No		Life of the report then Review	Secure Disposal
Returns made to central government	No		Current year + 6 years	Secure Disposal
School census returns	No		Current year + 5 years	Secure Disposal
Circulars and other information sent from the LA	No		Operational use	Secure Disposal
Circulars and other information sent from central government	No		Operational use	Secure Disposal
Attendance Returns	Yes		Academic year + 1 year	Secure Disposal
Secondary transfer sheets (Primary)	Yes		Academic year + 2 years	Secure Disposal

## Section 3: Policies and Frameworks

Policies and Frameworks				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Complaints Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	Secure Disposal
Data Protection Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	Secure Disposal
Freedom of Information Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	Secure Disposal
Information Security Breach Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	Secure Disposal
Special Educational Needs Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	Secure Disposal
Equality Information and Objectives (PSED). Statement for Publication	No		Life of statement or date statement superseded + 3 years	Secure Disposal
Risk and Control Framework	No		Life of framework or framework superseded + 3 years. If major changes are made to the framework then an archive copy of previous policies should be retained	Secure Disposal
Rules and Bylaws	No		Life of rules or bylaws or rules or bylaws superseded + 3 years. If major changes are made to the rules or bylaws then an archive copy of previous policies should be retained	Secure Disposal
Charging and Remissions Policy	No		Date policy superseded + 3 years	Secure Disposal

## Section 4: Human Resources

Recruitment				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
All records leading up to the appointment of a new headteacher	Yes		Length of appointment + 6 years	Secure Disposal
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
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
Pre-employment vetting information DBS Checks	Yes	DBS Update Service Employer Guide; KCSIE latest versions 73-74	If copy retained must only be for up to 6 months but must retain: <ul style="list-style-type: none"> <li>• Date of issue of a disclosure</li> <li>• Name of the subject</li> <li>• Type of the disclosure request; the position for which the disclosure was requested</li> <li>• Unique reference number of disclosure</li> <li>• Details of the recruitment decision taken</li> </ul>	Secure Disposal Academies are bound by legislation that applies to independent schools and not maintained schools.
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 added to Staff personal file.	Secure Disposal
Pre-employment vetting information. Evidence proving the right to work in the United Kingdom <sup>4</sup>	Yes	An employer's guide to right to work checks [Home Office May 2015] Last updated 27 April 2022	Where possible these documents should be added to the Staff Personal File, but if kept separately the Home Office requires the documents are kept for termination of Employment plus not less than 2 years	Secure Disposal

Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff Personal File, but if kept separately, the Home Office requires the documents are kept for termination of employment plus not less than 2 years	Secure Disposal
Professional Development Plans	Yes		Life of the plan or plan superseded + 6 years	Secure Disposal

Staff Management				
Basic file description	Personal Info.	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Staff Personal File, incl. employment contract and staff training records	Yes	Limitation Act 1980	Termination of Employment + 6 years	Secure Disposal
Timesheets	Yes		Current year + 3 years	Secure Disposal
Annual appraisal/ assessment records	Yes		Current year + 3 years	Secure Disposal
Absence record	Yes		Current year + 3 years	Secure Disposal
Sickness Absence monitoring	Yes		<p>Sickness records are classed as sensitive data. There is a legal obligation to keep records for sickness monitoring.</p> <p>Sickness records should be kept separate from accident records.</p> <p>It could be argued where sickness pay is not paid then current year + 3 years is acceptable.</p> <p>If sickness pay is made then it becomes a financial record and the current year + 6 years applies.</p> <p>The actual retention may depend on the internal auditors. Most seem to accept the current year+ 3 years as being</p>	Secure Disposal

			acceptable as this gives them, 'Benefits' and Inland Revenue time to investigate if they need to.	
Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organization + 6 years	Secure Disposal
Training needs analysis	No		Current year + 1 year	Secure Disposal
Staff Training where the training leads to Continuing Professional Development	Yes		Length of time required by the professional body	Secure Disposal
Staff Training, except where dealing with children, e.g. First Aid or Health and Safety			This should be retained on the personnel file	Secure Disposal
Staff Training where the training relates to children (e.g. safeguarding or other child related training)	Yes		Date of the training + 40 years	Secure Disposal This retention period will be reviewed when the government and ICO have published guidance about how to implement the recommendations made by IICSA.

Staff Disciplinary Proceedings				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Allegation which is child protection in nature against a member of staff including where the allegation is unfounded	Yes	KCSiE	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer, then REVIEW.	Secure Disposal  All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, discuss with DSL.

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To be reviewed once government and ICO implement recommendations made by IICSA has been published.

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Disciplinary Proceedings	Yes		Secure Disposal
Oral Warning		Date of warning + 6 months	
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	

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Case not found		If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	Secure Disposal
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**Note:**

If the warning or disciplinary proceedings relate to a child protection matter, contact HR. The employee should be told how long a disciplinary warning will remain current – refer to Trust policy. However, this does not mean the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line and defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim.

You should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.

## Section 5: Payroll and Pensions

Payroll and Pensions				
Basic file description	Personal Info.	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	Secure Disposal
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103) Regulation 15	From the end of the year in which the accounts were signed for a minimum of 6 years	Secure Disposal
Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	Secure Disposal
Payroll records	Yes		Date payroll run + 6 years	Secure Disposal
Payroll reports	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	Secure Disposal
Payroll awards	Yes		Current year + 6 years	Secure Disposal
Payroll gross / net weekly or monthly	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	Secure Disposal
Payslips copies	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	Secure Disposal
Pay packet receipt by employee	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 2 years	Secure Disposal
Part time fee claims	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	Secure Disposal
Overtime	Yes		Current year + 3 years	Secure Disposal
NI Schedule of payments	Yes		Current year + 6 years	Secure Disposal

Insurance	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	Secure Disposal
Car allowance claims	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 3 years	Secure Disposal
Car mileage output	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	Secure Disposal
Time sheets / flexi-time	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 3 years	Secure Disposal
Staff returns	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 3 years	Secure Disposal
Sickness records	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 3 years	Secure Disposal
Tax forms P6 /P11 /P11D / P35 /P45 /P46 /P48	Yes		Current year + 6 years	Secure Disposal
Personal bank details	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Until superseded + 3 years	Secure Disposal
Income tax form P60	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Employees should keep your records for at least 22 months from the end of the tax year they relate to.	Secure Disposal
Pension payroll	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	Secure Disposal
Superannuation adjustments	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	Secure Disposal
Superannuation reports	Yes		Completion of loan + 6 years	Secure Disposal
Members allowance register	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 6 years	Secure Disposal
Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	Secure Disposal
Management of TPS	Yes		Date of last payment on the pension + 6 years	Secure Disposal

## Section 6: Health & Safety

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
Health and Safety Policy Statements	No	The Health and Safety at Work etc. Act 1974	Life of policy + 3 years	Secure Disposal
Health and safety file to show current state of building including all alterations (wiring, plumbing, building works etc) and to be passed on in the case of change of ownership)	No		Pass to new owner on sale or transfer of building	
Health and Safety Risk Assessments	No	The Management of Health and Safety at Work Regulations 1999	Life of risk assessment + 3 years	Secure Disposal
Accident Reporting: Adults	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of last entry in the accident book + 3 years but if there is possibility of negligence allegation then date of incident + 15 years or date of settlement + 6 years	Secure Disposal
Records relating to accident/injury at work including incident reports	Yes		Date of incident plus 6 years unless the injury is serious - broken limb, more than 3 days in hospital etc then date of incident plus 15 years (Negligence)	Secure Disposal
Accident Reporting: Children	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 COSHH entry. Do not keep completed entries in the book.	Secure Disposal

			They must be removed and kept in a locked location.	
Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health (COSHH) 2002	COSHH sheets should be kept whilst the substance is in use + 6 years COSHH policy documents should be kept until the policy is superseded + 6 years	Secure Disposal
Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR)	Yes	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2)	Date of incident + 3 years provided that all records relating to the incident are held on personnel file. Refer to accident reporting above	Secure Disposal
Process of monitoring of areas where employees and persons have or are likely to have come in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	Secure Disposal
Process of monitoring of areas where employees and persons are likely to have become in contact with radiation: Dose assessment and recording	No	The Ionising Radiations Regulation 2017	2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. To keep the records made and maintained or a copy of these records until the person to whom the record relates has or would have attained the age of 75 years but in any event for at least 30 years from when the record was made	Secure Disposal
Fire Precautions log books	No		Current year + 6 years	Secure Disposal
Fire risk assessments	No	The Regulatory Reform (Fire Safety) Order 2005	Life of the risk assessment + 3 years	Secure Disposal

## Section 7: Risk and Financial Management

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
Employer's Liability Insurance Certificate	No	Employers' Liability (Compulsory Insurance) Regulations 1998	Year of issue + 40 years. Pass to the Local Authority if the school closes  Under the new provisions, the requirements for the display of the certificate will be satisfied if the certificate is made available in electronic form and is reasonably accessible to the relevant employees.	Secure Disposal
Insurance policies	No	Employers' Liability (Compulsory Insurance) Regulations 1998	Year of issue + 40 years. Pass to the Local Authority if the school closes  Under the new provisions, the requirements for the display of the certificate will be satisfied if the certificate is made available in electronic form and is reasonably accessible to the relevant employees.	Secure Disposal
Records relating to the settlement of insurance claims	Yes		Date claim settled + 6 years	Secure Disposal
Burglary, theft and vandalism report forms			Current year + 6 years	Secure Disposal
Audit Committee and appointment of responsible officers	No		As long as necessary  Under the Companies Act members can have their details removed after a certain time. Details should be removed on request.	Secure Disposal

## School Asset Management

Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Community School leases for land	No		Date lease expires + 6 years	Secure Disposal
Commercial transfer arrangements	No		Date of transfer + 6 years	Secure Disposal
Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	Secure Disposal
Transfers of freehold	No		Life of land ownership then transfer to new owner	Secure Disposal
Records relating to the leasing of shared facilities, such as sports centres	No		End of lease + 6 years	Secure Disposal
Land and Building Valuations	No		Date valuation superseded + 6 years	Secure Disposal
Disposal of assets	No		Date asset disposed of + 6 years	Secure Disposal
Burglary, theft and vandalism report forms	No		Date of insurance settlement + 6 years	Secure Disposal
Inventories of furniture and equipment	No		Life of equipment + 6 years. Equipment will have write-down value over several years - the time depending on the type of equipment	Secure Disposal

## School Assets

Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Log books of activity in the school maintained by the Headteacher	Possible		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
Visitor Management Systems (including electronic systems, visitors books and signing-in sheets)	Yes		Academic Year + 1 year You may decide to archive one copy	Secure Disposal
School Privacy Notice sent to parents as part of GDPR compliance (if different to Trust-wide Privacy notice)	No		Life of the privacy notice + 6 years	Secure Disposal
Consents relating to school activities as part of GDPR compliance (for example, consent to be sent circulars or mailings)	Yes		Consents should be retained for as long as the consent is relied on.	Secure Disposal
Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL - Schools should decide whether items published on the school website are retained as an archive or whether they should be deleted at the same time as the master copy
Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	Possible		Date of the meeting + 3 years then REVIEW	Secure Disposal

Records relating to the creation and publication of the school brochure or prospectus	No	Current year + 3 years	Standard Disposal You should consider archiving one copy for historical reasons
Records relating to the creation and distribution of circulars to staff, parents or pupils	No	Current year + 1 year	STANDARD DISPOSAL You should consider archiving one copy for historical reasons
Newsletters and other items with a short operational use	No	Current year + 1 year	Secure Disposal You should decide whether items published on the website are retained as an archive or whether they should be deleted at the same time as the master copy
Log books of activity in the school maintained by the Head Teacher	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
Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff	Date of the meeting + 3 years then review	Secure Disposal
Reports created by the Head Teacher or the Management Team	Possible	Date of the report + a minimum of 3 years then REVIEW	Secure Disposal
Records created by HTs, DHTs, Heads of Year and other members of staff with administrative responsibilities	Possible	Current academic year + 3 years then review	Secure Disposal
Correspondence created by HTs, DHTs, Head of Year and other members of staff with administrative responsibilities	Possible	Date of correspondence + 3 years then review	Secure Disposal
Management of Complaints	Yes	Date complaint resolved + 3 years then review. If the complaint relates to negligence or safeguarding	period will be reviewed once the and the ICO have issued guidance lementation of the IICSA

then date the complaint resolved + 15 years. ions  
 If the complaint relates to child sexual abuse then the  
 complaint resolved + 75 years  
 Secure Disposal

Finance – Strategic Finance				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Annual Accounts	No		Current year + 6 years	Secure Disposal
Statement of financial activities for the year	No		Current financial year + 6 years	Secure Disposal
Financial Planning	No		Current financial year + 6 years	Secure Disposal
Value for money statement	No		Current financial year + 6 years	Secure Disposal
Borrowing powers	No		Until superseded + 6 years	Secure Disposal
Independent Auditors report on regularity	No		Financial year report relates to + 6 years	Secure Disposal
Independent Auditors report on financial statements	Yes		Financial year report relates to + 6 years	Secure Disposal
Records relating to the management of VAT	No		Current financial year + 6 years	Secure Disposal
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
Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	Secure Disposal
Records relating to the collection and banking of monies	No		Current financial year + 6 years	Secure Disposal
Records relating to the identification and collection of debt	Yes		Payment or write off of debt + 6 years	Secure Disposal

## Contract Management

Basic file description	Personal Info	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years or End of contract + 12 years, whichever is the longer	Secure Disposal
All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years or End of contract + 6 years whichever is the longer	Secure Disposal
Records relating to the management of contracts with external providers	No		End of contract + 6 years or date of last payment on contract + 6 years whichever is the longer	Secure Disposal
Records relating to the monitoring of contracts	No		End of the contract or until the final payment has been made whichever is the longer	Secure Disposal
All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years. This may vary on the type of maintenance. Records relating to rewiring, major alterations etc must be retained in the health and safety file whilst the building belongs to the school and must be passed onto any new owners if the building is leased or sold.	Secure Disposal
All records relating to the maintenance of the school carried out by school employees, including maintenance log books	No		Life of equipment + 6 years. Alterations to wiring and major modifications must be entered in to the health and safety file	Secure Disposal
Records relating to the management of software licences	No		Date licence expires + 6 years	

Finance – Operational				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	Secure Disposal
Records relating to the collection and banking of monies	No		Current financial year + 6 years	Secure Disposal
Records relating to the identification and collection of debt	Yes		Payment or write off of debt + 6 years	Secure Disposal

Finance – Funding				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Funding Agreement with Secretary of State and supplemental funding agreements	No		Date of last payment of funding + 6 years	Secure Disposal
Funding Agreement Termination of the funding agreement	No		Date of last payment of funding + 6 years	Secure Disposal
Funding Records Capital Grant	No		Date of last payment of funding + 6 years	Secure Disposal
Funding Records Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	Secure Disposal
Funding Records General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	Secure Disposal
Per pupil funding records	No		Date of last payment of funding + 6 years	Secure Disposal
Funding records	No		Date of last payment of funding + 6 years	Secure Disposal
Gift Aid and Tax Relief	Yes		Date of last payment of funding + 6 years	Secure Disposal
Exclusions Agreement	No		Date of last payment of funding + 6 years	Secure Disposal
The Academy can enter an arrangement with a Local Authority (LA), so payment will flow between the Academy and LA, in same way as it would if Academy was a maintained school.				

Records relating to loans	No	Date of last payment on loan + 6 years if the loan is under 10k OR date of last payment on loan + 12 years if loan is over 10k	Secure Disposal
Management of Endowment Funds	No	Life of the fund + 6 years	Secure Disposal
Investment policies	No	Life of investment + 6 years	Secure Disposal
Pupil Premium Fund records	Yes	Date pupil leaves the provision + 6 years	Secure Disposal
Student Grant applications	Yes	Current year + 3 years	Secure Disposal

Finance – School Fund				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
School Fund Ledger	Yes		Current financial year + 6 years	Secure Disposal
Whole of government accounts returns	No		Current financial year + 6 years	Secure Disposal
School Fund Journey books	No		Current financial year + 6 years	Secure Disposal
School Fund Invoices	No		Current financial year + 6 years	Secure Disposal
School Fund Receipts	No		Current financial year + 6 years	Secure Disposal
School Fund Bank statements	No		Current financial year + 6 years	Secure Disposal
School Fund Cheque books	No		Current financial year + 1 year	Secure Disposal
School Fund Paying in books	No		Current financial year + 6 years	Secure Disposal

Finance - School Meals				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Free School Meals Registers	Yes		Current financial year + 3 years	Secure Disposal
School Meals Registers	Yes		Current financial year + 3 years	Secure Disposal
School Meals Summary Sheets	No		Current financial year + 6 years	Secure Disposal

## Section 8: Premises

Property				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Title deeds of properties belonging to the school	No		These should follow the property unless the property has been registered with the Land Registry	Transfer to new owner
Plans of property belong to the school, including any alterations.  This is also a health and safety requirement and includes rewiring diagrams and additional fire safety features	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.	Transfer to new owner
Leases of property leased by or to the school	No		Expiry of lease + 6 years	Secure Disposal
Records relating to the letting of school premises	No		Current financial year + 6 years	Secure Disposal
Business continuity and disaster recovery plans (Critical Incident Plan)	Yes		These are dynamic documents which should be kept up to date	Secure Disposal of old plans

## Section 9: Transport

Transport Educational				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	No	Limitation Act 1980	Disposal of the vehicle + 6 years	Secure Disposal
The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, and maintenance	No	Limitation Act 1980	Disposal of the vehicle + 6 years	Secure Disposal
Service logs and vehicle logs	No	Limitation Act 1980	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	Secure Disposal
GPS tracking data relating to the vehicles	No	Limitation Act 1980	Current year + 12 months	Secure Disposal
Tachograph: Analogue and electronic including driver's cards	Yes	Transport Act 1968, Passenger & Goods Vehicles Regulations, EC Regulation	Current year + 12 months	Secure Disposal
Driver's records book	Yes	Transport Act 1968, Drivers' Hours Regs	12 months from date of return of book to employer or in the case of owner driver 12 months from date of completion of book or it ceased to be used Driver to retain book for 14 days after all weekly record sheets have been used.	Secure Disposal
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 (incl. back up copies if stored electronically)

## Section 10: Admissions

Admissions				
Basic file description	Personal Info.	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
All records relating to the creation and implementation of the School Admissions Policy	No	School Admissions Code Statutory guidance	Life of the policy + 7 years. 15(2) of the regulation refers to the 7 preceding years	Secure Disposal
Admissions – if the admission is successful	Yes	School Admissions Code Statutory guidance	Date of admission + 1 year	Secure Disposal
Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory guidance	Resolution of case + 1 year	Secure Disposal
Register of Admissions	Yes	School attendance: Departmental advice for academies  School Attendance (Pupil Registration) (England) Regulations 2024	Every entry in the attendance register must be preserved for a period of 6 years after the date on which the entry was made.  Every back up copy of the register must be preserved for 6 years after the end of the school year to which it relates.	You 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.
Admissions – Secondary Schools Casual	Yes		Current academic year + 1 year	Secure Disposal

Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory guidance	Current academic year + 1 year	Secure Disposal
Supplementary Information form including additional information such as religion and medical conditions: <b>For successful admissions</b>	Yes		This information should be added to the pupil file	Secure Disposal
Supplementary Information form including additional information such as religion and medical conditions: <b>For unsuccessful admissions</b>	Yes		Until appeal process completed	Secure Disposal
Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	Secure Disposal

## Section 11: Education Management

Education Management – Strategy				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Strategic Review	No		Life of the review or until review superseded + 3 years. If major changes are made to the review then an archive copy of previous review should be retained	Secure Disposal
Strategic Plan [School Development Plan]	No		Life of plan or until plan superseded + 3 years. If major changes are made to the plan then an archive copy of previous plans should be retained	Secure Disposal
Accessibility Plan	No	Equality Act 2010	Life of plan or plan superseded + 3 years the review. If major changes are made to the plan then an archive copy of previous policies should be retained	Secure Disposal

Examinations				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
SATs records Examination Papers	Yes		The examination papers should be kept until any appeals/validation process is complete	Secure Disposal
SATs records 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
Examination Results Pupil Copies – Public	Yes		This information should be added to the pupil file	Schools should follow the instructions of the Examination Board about disposing of uncollected certificates

Examination Results Pupil Copies – Internal	Yes	This information should be added to the pupil file	
Examination Results – School’s copy	Yes	Current year + 6 years	Secure Disposal
Management of examination registrations	Yes	The examination board will usually mandate how long these records need to be retained	

## Section 12: Curriculum and Extra Curricula Management

### 6.1 Statistics and Management Information

Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Curriculum returns	No		Current year + 3 years	Secure Disposal
Published Admission Number (PAN) Reports	Yes		Current year + 6 years	Secure Disposal
Value Added and Contextual Data	Yes		Current year + 6 years	Secure Disposal
Self Evaluation Forms	Yes		Current year + 6 years	Secure Disposal
Self Evaluation Forms – External moderation	Yes		Until superseded	Secure Disposal
Self Evaluation Forms – Internal moderation	Yes		Academic year plus one academic year	Secure Disposal

### Teaching and the Curriculum

Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Schemes of Work	No		Current year + 1 year	
Timetable	No		Academic year + 1 year	
Class Record Books	No		Academic 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
Mark Books	No		Academic year + 1 year	
Record of homework set	No		Academic year + 1 year	
Pupils Work	Yes		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

## 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
Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Limitation Act 1980	Date of visit + 15 years	Secure Disposal
Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Limitation Act 1980	Date of visit + 15 years	Secure Disposal
Parental consent forms for school trips where there has been no major incident	Yes		<p>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.</p> <p>The Department for Education (DfE) has prepared a one-off consent form to be signed by the parent on enrolment of their child in a school. This form is intended to cover all types of visits and activities where parental consent is required. The form is available on the DfE website for establishments to adopt and adapt, as appropriate, at <a href="https://www.gov.uk/government/publications/consent-for-school-trips-and-other-off-site-activities">https://www.gov.uk/government/publications/consent-for-school-trips-and-other-off-site-activities</a>. A similar form could be used for other establishments, such as Early Years Foundation Stage (EYFS) providers and youth groups, or at the start of programmes for young people.</p>	Secure Disposal

Parental permission slips for school trips where there has been a major incident	Yes	Limitation Act 1980	Date of birth of the pupil involved in the incident + 25 years or 15 years after the incident whichever is the longer. 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.	Secure Disposal
Records relating to residential trips	Yes	Limitation Act 1980	Date of birth of youngest pupil involved + 25 years or if there is a major incident then date of incident + 15 years whichever is the longer	Secure Disposal

## Section 13: Pupils and Student Records

Guidance on the content of the Educational Record can be found at **Appendix 3**.

Pupils and Students				
Basic file description	Personal Info	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 - Primary	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	The file should follow the pupil when they leave school for whatever reason incl. move to PRU.	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.  If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the school should discuss with the LA about where the file should be stored for the remainder of the statutory retention period.
Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 - Secondary		Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	Secure Disposal  Section 2: An action founded on tort shall not be brought after the expiration of 6 years from the date on which the cause of action accrued.
Examination Results – Pupil Copies	Yes			
Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.
Internal			This information should be added to the pupil file	
Attendance Registers	Yes	School attendance Guidance for academies updated and re-published annually  School Attendance (Pupil Registration) (England) Regulations 2024	Every entry in the attendance register must be preserved for a period of 6 years after the date on which the entry was made.  Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it	Secure Disposal

relates.

Correspondence relating to any absence – authorised or unauthorised	Possible	Education Act 1996 Section 7	Current academic year + 2 years	Secure Disposal
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### Special Educational Needs and Disabilities

Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980	Date of Birth of the pupil + 25 years	Secure Disposal
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 [Normally retained on the pupil file] unless the document is subject to a legal hold then 6 years after legal action ended.	Secure Disposal (IICSA recommendations awaited)
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 [Normally retained on pupil file] unless the document is subject to a legal hold then date legal action ceases + 6 years	Secure Disposal
Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [Normally retained on pupil file] unless the document is subject to a legal hold then date legal action ceases + 6 years	Secure Disposal

## Family Liaison Officers and Home School Liaison Assistants

Basic file description	Personal Info	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Day Books	Yes		Current year + 2 years then review	Secure Disposal
Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	Secure Disposal
Referral forms	Yes		While the referral is current	Secure Disposal
Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	Secure Disposal
Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	Secure Disposal
Group Registers	Yes		Current year + 2 years	Secure Disposal
Accessibility Plan relating to individual pupils	Yes	Limitation Act 1980	The plan should be included on the pupil file	Secure Disposal
Child protection information held on pupil file	Yes	KCSiE, Guide to inter-agency working	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 Retention period will be reviewed following IICSA published recommendations
Child protection information held in separate files	Yes	KCSiE, Guide to inter-agency working	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	Secure Disposal – must be shredded Retention period will be reviewed following IICSA published recommendations.
Correspondence relating to authorised absence	Yes	Education Act 1996 s.7	Current academic year + 2 years	Secure Disposal

## Section 14: PTA

Parent Teacher Association (PTA)				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Records relating to the creation and management of Parent Teacher Associations and/or Alumni	Yes		Current year + 6 years then review	Secure Disposal

## Appendix 2

### Guidance on Record Disposal and Destruction

#### **Record Disposal**

Disposal of a record is not the same as destruction. Refer to the Disposal categories section within this Policy for further information.

#### **Records to note on the Destruction Log**

Only records that are to be destroyed outside of the retention schedule must be noted on the Destruction log. Records destroyed within the retention schedule do not need to be noted, but you must adhere to any requirements detailed in the method of disposal section of this policy.

#### **Completion of the Destruction Log**

**Appendix 2** provides the template for the Destruction log that must be held by each academy, including the SCITT, and maintained for currency and accuracy.

#### **General Description**

This should clearly state the information that has been destroyed, only the folder is required, it is not necessary to list each individual document.

**Covering/Closing date:** date range of records to be deleted/destroyed may generally be entered. Where file closure is the trigger for the retention period, a closing date may be entered instead.

#### **Method**

State method of disposal – refer to p.4.

#### **Reason**

You should ensure you have followed the Policy and if the information is to be logged, you will need to provide sufficient detail as to why the information is no longer required for audit purposes or inspection by the ICO.

#### **Compiled by**

Name of person who prepared the records or a list of the records for destruction authorisation.

#### **Authorised by**

Who in authority gave permission for the destruction of the records.

#### **Destruction Date**

It is important that this information is accurate as it will act as evidence that the Trust is adhering to the ICO and Government guidelines on retention and destruction.

#### **Destruction Certificate**

Where applicable, note Certificate reference and ensure retained with log.

**Destruction Log Template Form**

**Name of Academy** Destruction Log

<b>Ref.</b>	<b>General Description</b>	<b>Covering dates/ Closing Date</b>	<b>Hard Copy Y / N</b>	<b>Digital Y / N</b>	<b>Method</b>	<b>Reason</b>	<b>Compiled by</b>	<b>Authorised by</b>	<b>Destruction Date</b>	<b>Destruction Certificate Y / N</b>

## Appendix 3 Educational (Pupil) Record Guide

The following list contains some practical guidance to consider what should form part of an Educational (Pupil) Record. Please note that this is guidance only, and what should be stored and then transferred for each pupil will depend on any individual circumstances.

An Educational (Pupil) Record may include the following:

- Record of transfer from Early Years setting
- Personal Data collected at admission
- Data Collection/Checking Form – current (This should be checked regularly by parents to ensure details are accurate)
- Annual written report to parents
- National Curriculum and Religious Education locally agreed syllabus record sheets
- Any information relating to a major incident involving the child
- Statements/Plans, reports, etc. for educational support, e.g. SEN, Speech and Language (store in a separate area of the record or keep in a separate linked file)
- Medical information relevant to the child's on-going education/behaviour (store in a separate area of the record or keep in a separate linked file)
- Child protection reports/disclosures and supporting documentation (store in a separate area of the record or keep in a separate linked file)
- Any information relating to exclusions - fixed or permanent (store in a separate area of the record or keep in a separate linked file)
- Specific correspondence with parents or outside agencies relating to major issues (This may be in e-mail form. Once matter is closed save any correspondence that records sequence of events, pertinent issues and outcomes to pupil record)
- Summary details of complaints made by the parents or the pupil relevant to the child's on-going education/behaviour (This may be in e-mail form, see note above. Most complaints records are retained by the school and not as part of the pupil record)
- Examination Results – pupil copy (Send uncollected certificates back to exam board after all reasonable efforts to contact the pupil have been exhausted)
- SATS Results (A note of the result should be recorded)
- Destination data

The following list may **not** normally form part of the record for forwarding to the next school:

- Attendance Registers and Information (this would be included in the CTF file)
- Absence (authorised) notes and correspondence
- Parental consent forms for trips/outings
- Accident forms (a copy can be placed on the pupil record if it is a major incident)
- Medicine consent and administering records (this is the school's record)
- Copies of birth certificates, passports, etc.
- Generic correspondence with parents about minor issues (i.e. 'Dear Parent')
- Pupil work, drawings, etc.
- Previous data collection forms which have been superseded (there is no need to retain these)
- Photography (image) consents (this is the school's record).

-end-

## Appendix 4 Digital Continuity Statement

In compliance with legislation and regulations set out in the Data Protection Act 2018 and GDPR, this statement outlines how the Trust intends to retain digital data that should be kept for six or more years. The retention periods and method of disposal (**appendix 1**) detail the records that fall within this requirement.

The Trust is committed to the protection and security of all data held and will manage its information as an asset, ensuring that it is sourced and managed for as long as required and in line with the Records Management Policy. The Trust recognises the importance that digital data remains accessible yet secure, so that it is available to use, when necessary, in the future, e.g. if there is a legitimate basis to share the information. In some cases, this may be beyond a student, employee, volunteer or trustee/governor's tenancy within the Trust. It is recognised that without active management of digital continuity there is a risk that over time the Trust would be unable to find and use the digital information required to operate and carry out our public service or maintain accountability.

Measures taken to secure data including special category data are detailed in this and the Trust's Data Protection Policy and Digital Information and Security Policy. In addition, each academy and the central team has its own Cyber Response Plan and adhere to the requirements laid out by the RPA for cyber security cover.

Should the Trust fail to retain this data, the Trust understands that legal action, action by the ICO or other relevant government department or regulatory body may take place, and which may result in a financial fine and/or reputational damage to the Trust.

Data retention is the responsibility of all staff and will be overseen by the:

- Leadership team
- Senior or Middle leader, including phase, year or subject lead
- CEO
- Central function heads
- Data Protection Officer

### Supported File Formats for Long-term Preservation

Microsoft word documents should be converted into pdf files, although both formats may be stored.

Type of File	To be converted to
Microsoft Word document	PDF
Microsoft Powerpoint document	PDF
Microsoft Excel document	PDF
Images	JPEG
Videos and film, incl. CCTV	MOV/MP4

## **Monitor and Review of Information**

The Trust has invested in a data protection software system which holds its ROPA and the location of its information assets. This should be regularly reviewed, and record management maintained to ensure the Trust only holds relevant data, aligning to GDPR Principle 5, in which personal data should be 'kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed'.

-end-