



# Personal Data Retention Policy

September 2023

# CONTENTS

|   |    |
|---|----|
| Contents.....                                       | 1  |
| Document Control.....                               | 2  |
| 1. Legal Background .....                           | 4  |
| 2. Our Retention Obligations .....                  | 4  |
| 3. Retention Periods .....                          | 5  |
| 4. Email Retention And Automated Deletion.....      | 6  |
| 5. TEAMS Retention And Automated Deletion.....      | 6  |
| 6. IT User Accounts.....                            | 7  |
| 7. Child Protection Files – Manual and CPOMS.....   | 7  |
| 8. Updating This Policy .....                       | 8  |
| Appendix 1 - Data Retention Periods .....           | 8  |
| Appendix 2 – Disposal And Retention Checklist ..... | 71 |
| Appendix 3 – Safeguarding Records .....             | 72 |
| Appendix 4 – Data Disposal Log .....                | 75 |

# DOCUMENT CONTROL

## Introduction

This Personal Data Retention Policy (the "Policy") governs the periods for which Delta Academies Trust ("Delta") will retain personal data. This will include all personal data held by the organisation to enable it to achieve its objectives and to carry out its various functions. The Policy applies to all Delta employees and to all Trust systems, which contain personal data. If you consider that the Policy has not been followed in respect of personal data you should raise the matter with your manager or contact the Trust Data Protection Officer via [DPO@deltatrust.org.uk](mailto:DPO@deltatrust.org.uk).

## Purpose of This Policy

This Policy defines our requirements for the period during which we process and retain personal data. The retention periods set out in this Policy will ensure our compliance with the law, regulatory guidance and good industry practice and will enable us to meet our needs in respect of actual or prospective legal action or regulatory investigation.

## What Personal Data Does This Policy Affect?

This Policy applies to all personal data created, received, maintained or held by Delta (or its staff, both permanent or temporary and contractors, agents, consultants or third parties acting on its behalf). This includes:

- personal data within correspondence including letters, emails, texts (where retained), faxes, audio and video recordings;
- personal data relating to employees and prospective employees including CVs, information relating to applications including forms, drawings and photographs, information within employee systems, and information within employment files including risk assessments, notes relating to health, career progression information and end of employment information;
- information relating to pupils, students, parents and carers, including information within systems, queries and complaints and transactions relating to identifiable individuals; and
- information relating to suppliers including contact details and other information about suppliers kept within supplier databases or elsewhere within the business.

"Document" means data or records held both in electronic and paper form and can include (but is not limited to) handwritten notes, scanned documents, emails which document business activities and decisions, photographs, video and audio

recordings, text messages, notes of telephone or online video conferencing conversations, spreadsheets, Word documents and presentations etc.

### Protective marking

Not protectively marked.

### Review date

This policy will next be reviewed before the end of September 2026, or sooner if there are changes to legislation or other related requirements.

### Revision History

| REVISION | DATE     | DESCRIPTION  | AUTHOR                   |
|----------|----------|--|--------------------------|
| 1        | Nov 2018 | Policy issued.                                       | Emma Mayor               |
| 2        | Nov 2019 | Revised policy approved by Audit and Risk Committee. | Emma Mayor               |
| 3        | Mar 2021 | Policy revised.                                      | Emma Mayor/Amie Wagstaff |
| 4        | Sep 2023 | Policy revised.                                      | Emma Mayor/Amie Wagstaff |

# 1. LEGAL BACKGROUND

## 1.1 INTRODUCTION

The legal requirements regarding personal data processing and retention are set out in legislation. These requirements are clarified by the accompanying guidance produced by the Information Commissioner's Office (the "ICO").

These obligations impact on the length of time we can retain personal data. Where we hold personal data in accordance with this Policy, we will process it in accordance with our legal obligations. Failure to comply with our legal obligations could result in certain circumstances with substantial regulatory fines, other enforcement action, reputational damage and significant internal and external costs.

## 2. OUR RETENTION OBLIGATIONS

### 2.1 RESPONSIBILITY FOR THIS POLICY

The Data Protection Officer is the owner of this Policy. If you have any questions regarding the processing of personal data, the Data Protection Officer will provide advice and, where necessary, seek legal advice, in relation to the proper processing of the personal data. You should first contact your local academy Data Protection Lead, who will then contact the Trust Data Protection Officer as appropriate, via [DPO@deltatrust.org.uk](mailto:DPO@deltatrust.org.uk).

### 2.2 DATA RETENTION

**2.2.1** We will only retain personal data for as long as we need to, either to satisfy a legal requirement, or for operational reasons. In any decision to retain personal data, we will take into consideration our requirements under the UK General Data Protection Regulation, (the "UK GDPR") and the Data Protection Act 2018 (the "Data Protection Legislation"). Premature destruction of documentation may result in a breach of legislation, an inability to defend legal claims or operational difficulties. In any event, it is impractical to retain all corporate data permanently and appropriate disposal is necessary.

**2.2.2** The periods of time which we retain specific types of personal data for are set out in the Personal Data Retention Schedule at **Appendix 1**. We will retain the minimum amount of personal data necessary for the purpose(s) for which it is retained. We will destroy or delete excess data.

## 2.3 DATA SECURITY

We must keep personal data secure in order to prevent unauthorised or unlawful disclosure. We will make sure that information systems (both electronic and paper based) are designed and operated to keep data secure whilst it is being used and once it is no longer required, to facilitate the destruction and deletion of third party personal data in accordance with this Policy and the Trust Data Protection Policy and Procedures.

## 2.4 DELETION AND DESTRUCTION OF DATA

- 2.4.1** We will securely delete or destroy personal data when we no longer need to retain the data for processing, or when the data reaches its maximum retention period. Key considerations before disposing of personal data and procedures to be followed can be found in Section 10 of the Trust Data Protection Policy and Procedures.
- 2.4.2** Please consider the most appropriate method for document destruction. A record should be kept of the destruction method applied to all documentation which is destroyed at the end of its retention period and the date of destruction (A template data disposal log is provided at **Appendix 4** – Data Disposal Log).
- 2.4.3** Any contractor involved in data destruction must be recorded as a data processor on the Trust/ Academy Register of Processing Activities (RoPA).
- 2.4.4** Where deletion/destruction is not practical, we will ensure the data is put 'beyond use'. Where this occurs the data will no longer be accessible for use in the organisation and we commit to the permanent deletion of the data as soon as possible.
- 2.4.5** All personal data must be deleted/destroyed in accordance with its classification. This is set out in the data retention schedule.

## 3. RETENTION PERIODS

**3.1** The minimum retention periods for documents and records are contained in the Schedule to this document.

**3.2** Further information about general retention periods can be obtained from the Data Protection Officer. Requests for exceptions to this Policy must be raised with the Data Protection Officer for prior written approval. The Data Protection Officer can be contacted via [DPO@deltatrust.org.uk](mailto:DPO@deltatrust.org.uk).

## 4. EMAIL RETENTION AND AUTOMATED DELETION

**4.1** Under the UK GDPR, the obligation to erase personal data we no longer need also applies to emails and the documents stored within them, where they contain personal data.

**4.1.1** We should use email as a communication tool not a document repository.

**4.1.2** We should periodically review our email inboxes with the goal of reducing the amount of data we store there.

**4.1.3** We may need to save and refer to some emails in the future where they contain relevant business information or as a record of our activities.

**4.1.4** Emails that need to be saved should not be left in mailboxes, but filed in the most appropriate area i.e. the Delta network or personal drives.

**4.1.5** When determining whether an email or its contents should be saved or deleted, we are required to demonstrate that we are balancing our legitimate business interests against our data protection obligations.

**4.1.6** From a technical standpoint, Delta has an automated email erasure system in place which deletes emails after a designated length of time. This timescale is currently 4 terms.

The above measures help us as an organisation to comply with the UK GDPR in terms of personal data retention within emails.

## 5. TEAMS RETENTION AND AUTOMATED DELETION

**5.1** Under the UK GDPR, the obligation to erase personal data we no longer need also applies to Teams and the documents stored within them, where they contain personal data.

**5.1.1** We should use Teams as a communication tool and not a document repository.

**5.1.2** Teams calls should only be recorded for a specific purpose. Active consent from all participants must be secured before any recording commences. In the event that any individual participant does not consent, the meeting cannot be recorded.

**5.1.3** The transcription function should not be used on Trust Teams calls.

**5.1.4** All class-related Teams will be deleted at the end of the academic year to which they relate. Resources and student work should not be stored within the Team as a storage or reference solution as this information will also be deleted.

## 6. IT USER ACCOUNTS

**6.1** IT user accounts will be retained for the following time periods, after which they will be deleted:

**6.1.1 STAFF** – IT user areas and outlook accounts for members of staff will be deleted at staff leaving date. Any handover process must therefore be completed before the staff leaving date. This will ensure any required documentation is kept and stored appropriately.

**6.1.2 STUDENTS** – IT user areas to be deleted 1 year following leaver date. This means that should the student return for further study, their profile can be reinstated if required.

## 7. CHILD PROTECTION FILES – MANUAL AND CPOMS

**7.1** Schools and colleges have an obligation to preserve records, which contain information about allegations of sexual abuse, at least until the accused person has reached normal pension age, or for a period of 10 years from the date of the allegation, if that is longer. This is set out in paragraphs 415 to 417 of the statutory safeguarding guidance, Keeping Children Safe in Education (KCSiE) 2023.

**7.2** When a child moves to another school, the child protection file should be passed to the new school as soon as possible, in line with DfE guidance, and a record kept of when and how the transfer was completed. The school should retain a copy of the chronology for DOB + 25 years. Note; this applies for both paper and electronic CP files.

**7.3** Where there has been an s47 referral, or children's social care have been involved, the file should be kept for 35 years from the child's date of leaving our school.

**7.4** For additional guidance on record keeping for manual child protection files, please see Appendix 3, Section 1.

**7.5** For additional guidance on record keeping for child protection information recorded on CPOMS, please see Appendix 3, Section 2.

**7.6** Concerns relating to child protection / safeguarding should not be emailed between staff; members of staff with concerns should either use a cfc or input directly to CPOMS;

- 7.7** Children's CP records, whether paper or e-files, should be accessible only to the designated staff and the Head of Academy/Principal. Any access to these records by other people (e.g. class teacher, Ofsted inspector, auditor) should be recorded on the chronology with an explanation.
- 7.8** Regardless of paper / e-systems, all staff should understand that if they believe a child is at risk of significant harm they must have a face to face discussion with the designated staff without delay.

## **8. UPDATING THIS POLICY**

**8.1** We will review this policy at least triennially and upon any significant change to:

- 8.1.1** The relevant legislation;
- 8.1.2** Any guidance issued by any relevant regulatory body, including the ICO;
- 8.1.3** Good industry practice;
- 8.1.4** The method(s) of processing of personal data; and
- 8.1.5** The volume of personal data processed by us, in order to review the effectiveness of this Policy following such changes to ensure it is achieving its stated objectives.

## APPENDIX 1 - DATA RETENTION PERIODS

This section contains retention periods connected to the general management of academies. This covers the work of the Academy Advisory Body, the Principal / Head of Academy and the senior leadership team, the admissions process and operational administration. For information that does not have a legal minimum retention period, the information owner should periodically review the Personal Data held and if it is no longer required for the purpose(s) for which it was collected and processed, then it should be deleted, or anonymised.

| 1. Trust Governance |   |                                  |                                |   |  |
|---------------------|---|----------------------------------|--------------------------------|---|--|
|                     | Basic file description                            | Data Protection Issues           | Statutory Provisions           | Retention Period [operational]                  | Action at the end of the administrative life of the record |
| 1.1                 | Governance Statement/ Constitution                |                                  |                                | PERMANENT / Life of the Trust + 6 years         | SECURE DISPOSAL <sup>1</sup>                               |
| 1.2                 | Articles of Association                           |                                  |                                | PERMANENT / Life of the Trust + 6 years         |  |
| 1.3                 | Memorandum of Association                         |                                  |                                | PERMANENT / Life of the Trust + 6 years         | SECURE DISPOSAL  |
| 1.4                 | Special Resolutions to amend the Constitution     |                                  |                                | PERMANENT / Life of the Trust + 6 years         |  |
| 1.5                 | Written Scheme of Delegation                      |                                  | Companies Act 2006 section 355 | Life of Written Scheme of Delegation + 10 years | SECURE DISPOSAL  |
|                     | <b>Trustees</b>                                   |                                  |                                |   |  |
| 1.6                 | Annual Report – Trustees Report                   |                                  | Companies Act 2006 section 355 | Date of report + 10 years                       | SECURE DISPOSAL  |
| 1.7                 | Records relating to the appointment of Trustees . | YES – will include personal data |                                | Life of appointment + 6 years                   | SECURE DISPOSAL  |

<sup>1</sup> In this context SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross cut shredder.

| 1. Trust Governance |  |   |                                |  |  |
|---------------------|--|---|--------------------------------|--|--|
|                     | Basic file description   | Data Protection Issues  | Statutory Provisions           | Retention Period [operational]   | Action at the end of the administrative life of the record |
| 1.8                 | Records relating to the election of Chair and Vice Chair of the Board. |   |                                | Once the decision has been recorded in the minutes, the records relating to the election can be destroyed. | SECURE DISPOSAL  |
| 1.9                 | Terms of reference for committees.                                     |   |                                | Until superseded or whilst relevant.   |  |
| 1.10                | Meetings schedule.   |   |                                | Current year.  | SECURE DISPOSAL  |
| 1.11                | Agendas for Board of Trustees meetings.                                | There may be data protection issues if the meeting is dealing with confidential issues relating to staff. |                                | One copy should be retained with the master set of minutes. All other copies can be disposed of.           | SECURE DISPOSAL  |
|                     | Agendas – additional copies  |   |                                | Date of meeting  | SECURE DISPOSAL  |
| 1.12                | Minutes of Board of Trustees meetings.                                 | There may be data protection issues if the meeting is dealing with confidential issues relating to staff. | Companies Act 2006 section 248 | PERMANENT  |  |

| 1. Trust Governance |   |   |                      |   |  |
|---------------------|---|---|----------------------|---|--|
|                     | Basic file description  | Data Protection Issues  | Statutory Provisions | Retention Period [operational]  | Action at the end of the administrative life of the record |
| 1.13                | Reports presented to the Board of Trustees, which are referred to in the minutes. | There may be data protection issues if the report deals with confidential issues relating to staff. |                      | PERMANENT   | Retain with the signed set of the minutes.                 |
| 1.14                | Register of attendance at Full Board of Trustee meetings.                         |   |                      | Date of last meeting in the book + 6 years.                           | SECURE DISPOSAL  |
| 1.15                | Action plans created and administered by the Board of Trustees.                   |   |                      | Until superseded or whilst relevant.                                  | SECURE DISPOSAL  |
| 1.16                | Policy documents created and administered by the Board of Trustees.               |   |                      | Until superseded.   | SECURE DISPOSAL  |
| 1.17                | Correspondence sent and received by the Board of Trustees.                        |   |                      | General correspondence should be retained for current year + 3 years. | SECURE DISPOSAL  |
| 1.18                | All records relating to the conversion of schools to Academy status.              |   |                      | PERMANENT   | SECURE DISPOSAL  |
|                     | <b>Audit</b>  |   |                      |   |  |

| 1. Trust Governance |   |                        |                      |  |  |
|---------------------|---|------------------------|----------------------|--|--|
|                     | Basic file description  | Data Protection Issues | Statutory Provisions | Retention Period [operational]             | Action at the end of the administrative life of the record |
| 1.19                | Audit Committee and appointment of responsible officers                       |                        |                      | Life of the Trust                          | SECURE DISPOSAL  |
| 1.20                | Independent Auditor's report on regularity                                    |                        |                      | Financial year report relates to + 6 years | SECURE DISPOSAL  |
| 1.21                | Independent Auditor's report on financial statements                          |                        |                      | Financial year report relates to + 6 years | SECURE DISPOSAL  |
|                     | <b>Funding Agreements</b>   |                        |                      |  |  |
| 1.22                | Funding Agreement with Secretary of State and supplemental funding agreements |                        |                      | Date of last payment of funding + 6 years  | SECURE DISPOSAL  |
| 1.23                | Funding Agreement – Termination of the funding agreement                      |                        |                      | Date of last payment of funding + 6 years  | SECURE DISPOSAL  |
| 1.24                | Funding Records – Capital Grant   |                        |                      | Date of last payment of funding + 6 years  | SECURE DISPOSAL  |
| 1.25                | Funding Records – Earmarked Annual Grant (EAG)                                |                        |                      | Date of last payment of funding + 6 years  | SECURE DISPOSAL  |
| 1.26                | Funding Records – General Annual Grant (GAG)                                  |                        |                      | Date of last payment of funding + 6 years  | SECURE DISPOSAL  |
| 1.27                | Per pupil funding records   |                        |                      | Date of last payment of funding + 6 years  | SECURE DISPOSAL  |
| 1.28                | Funding records   |                        |                      | Date of last payment of funding + 6 years  | SECURE DISPOSAL  |
| 1.29                | Gift Aid and Tax Relief   |                        |                      | Date of last payment of funding + 6 years  | SECURE DISPOSAL  |
|                     | <b>Policies, Frameworks and Overarching Requirements</b>                      |                        |                      |  |  |

| 1. Trust Governance |   |   |                                 |  |  |
|---------------------|---|---|---------------------------------|--|--|
|                     | Basic file description  | Data Protection Issues  | Statutory Provisions            | Retention Period [operational]         | Action at the end of the administrative life of the record |
| 1.30                | Data Protection Policy, including data protection notification                              |   |                                 | Date policy superseded + 6 years       | SECURE DISPOSAL  |
| 1.31                | Special Educational Needs Policy  |   |                                 | Date policy superseded + 6 years       | SECURE DISPOSAL  |
| 1.32                | Complaints Policy   |   |                                 | Date policy superseded + 6 years       | SECURE DISPOSAL  |
| 1.33                | Risk and Control Framework  |   |                                 | Life of framework + 6 years            | SECURE DISPOSAL  |
| 1.34                | Policies and procedures   |   |                                 | Date policies and procedures + 6 years | SECURE DISPOSAL  |
| 1.35                | Home School Agreements  |   |                                 | Date agreement revised + 6 years       | SECURE DISPOSAL  |
| 1.36                | Equality Information and Objectives (public sector equality duty) Statement for publication |   |                                 | Date of statement + 6 years            | SECURE DISPOSAL  |
| 1.37                | Accessibility Plan  | Plan should not refer to specific pupils but may be indirectly identifiable | Limitation Act 1980 (Section 2) | Life of plan + 6 years                 | SECURE DISPOSAL  |

| 2. Academy Advisory Body |  |                             |                      |   |  |
|--------------------------|--|-----------------------------|----------------------|---|--|
|                          | Basic file description                                       | Data Protection Issues      | Statutory Provisions | Retention Period [operational]  | Action at the end of the administrative life of the record |
| 2.1                      | Records relating to the appointment of AAB members.          | YES – include personal data |                      | Period of appointment + 6 months (except where there have been allegations concerning children. In this case, retain for 25 years).   | SECURE DISPOSAL  |
| 2.2                      | Records relating to the appointment of co-opted AAB members. | YES – include personal data |                      | Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted AAB member has finished their term of office (except where there have been allegations concerning children). In this case, retain for 25 years. | SECURE DISPOSAL  |
| 2.3                      | Records relating to the election of Chair and Vice Chair.    |                             |                      | Once the decision has been recorded in the minutes, the records relating to the election can be destroyed.  | SECURE DISPOSAL  |

| 2. Academy Advisory Body |   |   |                      |   |  |
|--------------------------|---|---|----------------------|---|--|
|                          | Basic file description  | Data Protection Issues  | Statutory Provisions | Retention Period [operational]  | Action at the end of the administrative life of the record |
| 2.4                      | Scheme of delegation and terms of reference for committees.         |   |                      | Until superseded or whilst relevant (Academies may wish to retain these records for reference purposes in case decisions need to be justified). |  |
| 2.5                      | Meetings schedule.  |   |                      | Current year.   | SECURE DISPOSAL  |
| 2.6                      | Agendas for Academy Advisory Body meetings – principal copy.        | There may be data protection issues if the meeting is dealing with confidential issues relating to staff. |                      | One copy should be retained with the master set of minutes. All other copies can be disposed of.  | SECURE DISPOSAL  |
|                          | Agendas – additional copies   |   |                      | Date of meeting   | SECURE DISPOSAL  |
| 2.7                      | Minutes of Academy Advisory Body meetings – principal set (signed). | There may be data protection issues if the meeting is dealing with confidential issues relating to staff. |                      | PERMANENT   |  |

| 2. Academy Advisory Body |  |   |                      |   |   |
|--------------------------|--|---|----------------------|---|---|
|                          | Basic file description   | Data Protection Issues  | Statutory Provisions | Retention Period [operational]              | Action at the end of the administrative life of the record                          |
|                          | Inspection Copies <sup>2</sup>   |   |                      | Date of meeting + 3 years                   | If these minutes contain any sensitive, personal information they must be shredded. |
| 2.8                      | Reports presented to the Academy Advisory Body which are referred to in the minutes. | There may be data protection issues if the report deals with confidential issues relating to staff. |                      | PERMANENT                                   | Retain with the signed set of the minutes.  |
| 2.9                      | Register of attendance at Full Academy Advisory Body meetings.                       |   |                      | Date of last meeting in the book + 6 years. | SECURE DISPOSAL   |
| 2.10                     | Action plans created and administered by the Academy Advisory Body.                  | No  |                      | Until superseded or whilst relevant.        | SECURE DISPOSAL   |
| 2.11                     | Policy documents created and administered by the Academy Advisory Body.              | No  |                      | Until superseded.                           | SECURE DISPOSAL   |

<sup>2</sup> These are the copies which the clerk to the AAB may wish to retain so that requestors can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

| 2. Academy Advisory Body |  |                        |                      |   |  |
|--------------------------|--|------------------------|----------------------|---|--|
|                          | Basic file description   | Data Protection Issues | Statutory Provisions | Retention Period [operational]  | Action at the end of the administrative life of the record |
| 2.12                     | Records relating to complaints made to the Academy Advisory Body.    | Yes                    |                      | A secure and confidential record of all complaints, decisions and findings will be kept for <b>one (1) year</b> after the individual leaves the organisation. All records will be made available for inspection and indicate whether the complaint was resolved at the preliminary stage or proceeded to a panel hearing. | SECURE DISPOSAL  |
| 2.13                     | Correspondence sent and received by the Academy Advisory Body.       |                        |                      | General correspondence should be retained for current year + 3 years.   | SECURE DISPOSAL  |
| 2.14                     | All records relating to the conversion of schools to Academy status. |                        |                      | PERMANENT   | SECURE DISPOSAL  |

| 2 Academy Advisory Body |  |                        |                      |  |  |
|-------------------------|--|------------------------|----------------------|--|--|
|                         | Basic file description   | Data Protection Issues | Statutory Provisions | Retention Period [operational]   | Action at the end of the administrative life of the record |
| 2.15                    | Records relating to the appointment of a Clerk to the Academy Advisory Body.                       |                        |                      | Date on which clerk appointment ceases + 6 years.  | SECURE DISPOSAL  |
| 2.16                    | Records relating to the terms of office of serving AAB members, including evidence of appointment. |                        |                      | Date appointment ceases + 6 years.   | SECURE DISPOSAL  |
| 2.17                    | Records relating to AAB member declaration against disqualification criteria.                      |                        |                      | Date appointment ceases + 6 years (except where there have been allegations concerning children. In this case, retain for 25 years). | SECURE DISPOSAL  |
| 2.18                    | Register of business interests.  |                        |                      | Date appointment ceases + 6 years.   | SECURE DISPOSAL  |
| 2.19                    | AAB members Code of Conduct.   |                        |                      | This must be completed at least annually or when there are any updates ; one copy of each signed version should be kept.             |  |

| 2 Academy Advisory Body |   |                        |                      |  |  |
|-------------------------|---|------------------------|----------------------|--|--|
|                         | Basic file description  | Data Protection Issues | Statutory Provisions | Retention Period [operational]   | Action at the end of the administrative life of the record |
| 2.20                    | Records relating to the training required and received by AAB members.                        |                        |                      | Date AAB member steps down + 6 years.  | SECURE DISPOSAL  |
| 2.21                    | Records relating to the induction programme for new AAB members.                              |                        |                      | Date appointment ceases + 6 years.   | SECURE DISPOSAL  |
| 2.22                    | Records relating to DBS checks carried out on clerk and members of the Academy Advisory Body. |                        |                      | <p>Date of DBS check + 6 months.</p> <p>In accordance with the Delta Safer recruitment policy, we always see the original certificate and then record the information on the SCR in the academy.</p> <p>Should there be a delay in obtaining a DBS certificate for their role with Delta, we would retain a previous DBS along with a risk assessment whilst waiting for the Delta one to come through (max 6 months) but destroy as</p> | SECURE DISPOSAL  |

|      |                               |                               |                             |  |   |
|------|-------------------------------|-------------------------------|-----------------------------|--|---|
| 2    | <b>Academy Advisory Body</b>  |                               |                             |  |   |
|      | <b>Basic file description</b> | <b>Data Protection Issues</b> | <b>Statutory Provisions</b> | <b>Retention Period [operational]</b>  | <b>Action at the end of the administrative life of the record</b> |
|      |                               |                               |                             | soon as the Delta DBS is seen and recorded on the SCR.   |   |
| 2.23 | AAB member personnel files.   |                               |                             | Date appointment ceases + 6 years (except where there have been allegations concerning children. In this case, retain for 25 years). | SECURE DISPOSAL   |

|     |  |   |                             |  |   |
|-----|--|---|-----------------------------|--|---|
| 3.  | <b>Head of Academy / Principal/ Senior Leadership Team</b>                       |   |                             |  |   |
|     | <b>Basic file description</b>  | <b>Data Protection Issues</b>   | <b>Statutory Provisions</b> | <b>Retention Period [operational]</b>                              | <b>Action at the end of the administrative life of the record</b> |
| 3.1 | Log books of activity in the school maintained by the Head of Academy/Principal. | There may be data protection issues if the logbook refers to individual pupils or members of staff. |                             | Date of last entry in the book + a minimum of 6 years then review. | SECURE DISPOSAL   |

| 3. Head of Academy / Principal/ Senior Leadership Team |   |  |                      |  |  |
|--|---|--|----------------------|--|--|
|  | Basic file description  | Data Protection Issues   | Statutory Provisions | Retention Period [operational]   | Action at the end of the administrative life of the record |
| 3.2  | Minutes of Senior Leadership Team meetings and the meetings of other internal administrative bodies.  | There may be data protection issues if the minutes refer to individual pupils or members of staff.         |                      | Date of the meeting + 3 years then review annually, or as required if not destroyed.             | SECURE DISPOSAL  |
| 3.3  | Reports created by the Head of Academy/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 annually, or as required if not destroyed. | SECURE DISPOSAL  |
| 3.4  | Records created by Head of Academy / Principal / Vice Principal/ Assistant Principal, Heads of Year and other members of staff with administrative responsibilities which do not fall under any other category. | There may be data protection issues if the records refer to individual pupils or members of staff.         |                      | Current academic year + 6 years then review annually, or as required if not destroyed.           | SECURE DISPOSAL  |
| 3.5  | Correspondence created by Head of Academy / Principal / Vice Principal/ Assistant Principal, Heads of Year and other members of   | There may be data protection issues if the correspondence refers to individual pupils or members of staff. |                      | If not relevant to individual pupils/ staff files, then current year + 3 years.                  | SECURE DISPOSAL  |

|     |  |                               |                             |   |   |
|-----|--|-------------------------------|-----------------------------|---|---|
| 3.  | <b>Head of Academy / Principal/ Senior Leadership Team</b> |                               |                             |   |   |
|     | <b>Basic file description</b>                              | <b>Data Protection Issues</b> | <b>Statutory Provisions</b> | <b>Retention Period [operational]</b>   | <b>Action at the end of the administrative life of the record</b> |
|     | staff with administrative responsibilities.                |                               |                             |   |   |
| 3.6 | Professional Development Plans.                            | Yes                           |                             | These should be held on the individual's personnel record. If not then termination of employment + 6 years. | SECURE DISPOSAL   |
| 3.7 | Academy Development Plans.                                 |                               |                             | Life of the plan + 3 years.   | SECURE DISPOSAL   |

|     |  |                               |                             |                                       |   |
|-----|--|-------------------------------|-----------------------------|---------------------------------------|---|
| 4.  | <b>Operational Administration</b>                                |                               |                             |                                       |   |
|     | <b>Basic file description</b>                                    | <b>Data Protection Issues</b> | <b>Statutory Provisions</b> | <b>Retention Period [operational]</b> | <b>Action at the end of the administrative life of the record</b> |
| 4.1 | General file series which does not fit under any other category. | No                            |                             | Current year + 5 years then review.   | SECURE DISPOSAL   |

| 4. Operational Administration |  |                        |                      |   |  |
|-------------------------------|--|------------------------|----------------------|---|--|
|                               | Basic file description   | Data Protection Issues | Statutory Provisions | Retention Period [operational]  | Action at the end of the administrative life of the record                       |
| 4.2                           | Records relating to the creation and publication of the school brochure or prospectus.                                     | No                     |                      | Current academic year + 3 years.  | The school should preserve a copy for their archive otherwise STANDARD DISPOSAL. |
| 4.3                           | Records relating to the creation and distribution of circulars to staff, parents or pupils.                                | No                     |                      | Current academic year + 1 year.   | SECURE DISPOSAL  |
| 4.4                           | School Privacy Notice which is sent to parents as part of GDPR compliance.   | No                     |                      | Until superseded + 6 years.   | STANDARD DISPOSAL  |
| 4.5                           | Consents relating to school activities as part of GDPR compliance (for example, consent to be sent circulars or mailings). |                        |                      | Consent will last whilst the pupil attends the school, unless withdrawn. Retain while pupil/ student on roll plus 6 months. | SECURE DISPOSAL  |
| 4.6                           | Newsletters and other items with a short operational use.  | No                     |                      | Current academic year + 1 year (Schools may decide to archive one copy).  | STANDARD DISPOSAL  |

| 4. Operational Administration |   |                        |                      |   |  |
|-------------------------------|---|------------------------|----------------------|---|--|
|                               | Basic file description  | Data Protection Issues | Statutory Provisions | Retention Period [operational]                                    | Action at the end of the administrative life of the record |
| 4.7                           | Visitor management systems (including electronic systems, visitor books and signing in sheets). | Yes                    |                      | Last entry in the visitor book + 6 years (in case of any claims). | SECURE DISPOSAL  |
| 4.8                           | Walking bus register.   |                        |                      | Date of register + 6 years.                                       | SECURE DISPOSAL  |

| 5. Admissions Process |   |                        |   |   |  |
|-----------------------|---|------------------------|---|---|--|
|                       | Basic file description  | Data Protection Issues | Statutory Provisions  | Retention Period [operational]            | Action at the end of the administrative life of the record |
| 5.1                   | All records relating to the creation and implementation of the School Admissions' Policy. | No                     | School Admissions Code<br>Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and | Life of the policy + 3 years then review. | SECURE DISPOSAL  |

| 5. Admissions Process |  |                        |  |   |  |
|-----------------------|--|------------------------|--|---|--|
|                       | Basic file description                       | Data Protection Issues | Statutory Provisions   | Retention Period [operational]  | Action at the end of the administrative life of the record |
|                       |  |                        | admission appeals panels September 2021.   |   |  |
| 5.2                   | Admissions – if the admission is successful. | Yes                    | School Admissions Code<br>Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels September 2021. | Date of admission + 1 year.   | SECURE DISPOSAL  |
| 5.3                   | Admissions – if the appeal is unsuccessful.  | Yes                    | School Admissions Code<br>Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels September 2021. | Resolution of case + 1 year.  | SECURE DISPOSAL  |
| 5.4                   | Register of Admissions.                      | Yes                    | Working together to improve school attendance: Guidance for maintained schools,  | Every entry in the admission register must be preserved for a period of three years | REVIEW<br>SECURE DISPOSAL                                  |

| 5. Admissions Process |   |                        |   |   |  |
|-----------------------|---|------------------------|---|---|--|
|                       | Basic file description  | Data Protection Issues | Statutory Provisions  | Retention Period [operational]                          | Action at the end of the administrative life of the record |
|                       |   |                        | academies, independent schools, and local authorities, September 2022.  | after the date on which the entry was made <sup>3</sup> |  |
| 5.5                   | Admissions – Secondary Schools – in-year.   | Yes                    |   | Current year + 1 year.                                  | SECURE DISPOSAL  |
| 5.6                   | Proofs of address supplied by parents as part of the admissions process.                                  | Yes                    | School Admissions Code<br>Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels<br>September 2021. | Current year + 1 year.                                  | SECURE DISPOSAL  |
| 5.7                   | Supplementary Information form including additional information such as religion, medical conditions etc. | Yes                    |   |   |  |

<sup>3</sup> Working together to improve school attendance: Guidance for maintained schools, academies, independent schools, and local authorities, section 7.

|    |                               |                               |                             |   |   |
|----|-------------------------------|-------------------------------|-----------------------------|---|---|
| 5. | <b>Admissions Process</b>     |                               |                             |   |   |
|    | <b>Basic file description</b> | <b>Data Protection Issues</b> | <b>Statutory Provisions</b> | <b>Retention Period<br/>[operational]</b>           | <b>Action at the end of the<br/>administrative life of the<br/>record</b> |
|    | For successful admissions.    |                               |                             | This information should be added to the pupil file. | SECURE DISPOSAL   |
|    | For unsuccessful admissions.  |                               |                             | Until appeals process completed.                    | SECURE DISPOSAL   |

## HUMAN RESOURCES

This section deals with all matters of Human Resources management within the school.

| 6. Recruitment |   |                        |                      |   |  |
|----------------|---|------------------------|----------------------|---|--|
|                | Basic file description  | Data Protection Issues | Statutory Provisions | Retention Period [operational]  | Action at the end of the administrative life of the record |
| 6.1            | All records leading up to the appointment of a new Head Teacher/Principal                     | Yes                    |                      | Unsuccessful candidates. Date of appointment to post + 6 months.<br><br>Successful candidates. Add to personnel file and retain until end of appointment + 6 years, except in the event of ongoing claims / investigations – see relevant sections below. | SECURE DISPOSAL  |
| 6.2            | All records leading up to the appointment of a new member of staff – unsuccessful candidates. | Yes                    |                      | Date of appointment of successful candidate + 6 months.   | SECURE DISPOSAL  |
| 6.3            | 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  |

| 6. Recruitment |  |                        |   |   |  |
|----------------|--|------------------------|---|---|--|
|                | Basic file description                           | Data Protection Issues | Statutory Provisions  | Retention Period [operational]  | Action at the end of the administrative life of the record |
|                |  |                        |   | Staff personal file - Termination of Employment + 6 years except in the event of ongoing claims/ investigations – see relevant sections below.  |  |
| 6.4            | Pre-employment vetting information – DBS Checks. | Yes                    | DBS Update Service Employer Guide September 2018<br><br>Keeping Children Safe in Education. September 2023. | Schools should not copy any DBS certificates except where criminal information disclosed requires further consideration / assessment; in this situation the copy must be destroyed as soon as a recruitment decision has been made and always within 6 months.<br><br>The Delta Safer Recruitment policy requires that schools must record the number on the SCR following sight of the original certificate. | SECURE DISPOSAL<br><br>SECURE DISPOSAL                     |

| 6. | Recruitment            |                        |                      |  |  |
|----|------------------------|------------------------|----------------------|--|--|
|    | Basic file description | Data Protection Issues | Statutory Provisions | Retention Period<br>[operational]  | Action at the end of the<br>administrative life of the<br>record |
|    |                        |                        |                      | <p>For candidates registered with the update service, a record of the check should be made on the SCR (Date, initials of member of staff performing the check, DBS number)</p> <p>In exceptional circumstances, where there is an issue with the DBS a copy would be retained whilst a new one is obtained/problem rectified at which point the copy of DBS certificate is shredded (no longer than 6 months).</p> <p>Application forms, references and other documents – for the duration of the employee's employment + 6 years.</p> |  |

| 6. Recruitment |   |                        |   |  |  |
|----------------|---|------------------------|---|--|--|
|                | Basic file description  | Data Protection Issues | Statutory Provisions  | Retention Period [operational]   | Action at the end of the administrative life of the record |
| 6.5            | Forms of proof of identity collected as part of the process of checking “portable” enhanced DBS disclosure.                         | Yes                    | KCSiE 2023, paragraph 276.  | Copies of documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.  | SECURE DISPOSAL  |
| 6.6            | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom <sup>4</sup> - successful candidates. | Yes                    | An employer's guide to right to work checks [Home Office, February 2023]. | 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.<br><br>Evidence documents should be photocopied rather than scanned, and signed / dated on the back by the person who verified them. | SECURE DISPOSAL  |

<sup>4</sup> Employers are required to take a “clear copy” of the documents they are shown as part of this process.

| 6. Recruitment |   |                        |   |   |  |
|----------------|---|------------------------|---|---|--|
|                | Basic file description  | Data Protection Issues | Statutory Provisions  | Retention Period [operational]  | Action at the end of the administrative life of the record |
|                |   |                        |   | Staff personal file - Termination of Employment + 6 years.  |  |
| 6.7            | Risk assessment of any criminal or other information that casts doubt on suitability. | Yes                    | Home Office / Disclosure & Barring Service code of practice<br><br>KCSiE. | Staff personal file (NB the details of the criminal offence must not be recorded).<br><br>Staff personal file - Termination of Employment + 6 years.                            | SECURE DISPOSAL  |
| 6.8            | References received for successful candidate.   | Yes                    | KCSiE / Ofsted.   | Staff personal file - Termination of Employment + 6 years.  | SECURE DISPOSAL  |
| 6.9            | Teacher suitability checks (Teacher Services website).                                | Yes                    | DfE / TRA / KCSiE.  | For teachers with a DfE number, the individual teacher record should be printed and retained in the personal file.<br><br>For unqualified teachers and HLTAs, the date on which | SECURE DISPOSAL  |

| 6. Recruitment |   |                        |   |  |  |
|----------------|---|------------------------|---|--|--|
|                | Basic file description  | Data Protection Issues | Statutory Provisions                      | Retention Period [operational]   | Action at the end of the administrative life of the record |
|                |   |                        |   | <p>the Teachers Services website was checked for prohibitions should be recorded in the personal file and on the SCR with the name of the person who checked – the screen should not be printed or retained in any format.</p> <p>Staff personal file - Termination of Employment + 6 years.</p> |  |
| 6.10           | Single central record of vetting checks – individual entries. | Yes                    | Independent School Standards (Regs) 2014. | Until date of leaving.   | N/A  |
| 6.11           | Records relating to the employment of overseas teachers       | Yes                    |   | Date last member of staff transfers or leaves the organisation + 6 years   | SECURE DISPOSAL  |
| 6.12           | Records relating to the TUPE process                          | Yes                    |   | Date last member of staff transfers or leaves the organisation + 6 years   | SECURE DISPOSAL  |

| 7. Operational Staff Management |  |                        |                                  |   |  |
|---------------------------------|--|------------------------|----------------------------------|---|--|
|                                 | Basic file description   | Data Protection Issues | Statutory Provisions             | Retention Period [operational]  | Action at the end of the administrative life of the record |
| 7.1                             | Staff Personal File, including employment contract and staff training records. | Yes                    | Limitation Act 1980 (Section 2). | Termination of Employment + 6 years   | SECURE DISPOSAL  |
| 7.2                             | Timesheets.  | Yes                    |                                  | Current year + 6 years.   | SECURE DISPOSAL  |
| 7.3                             | Annual appraisal/ assessment records.  | Yes                    |                                  | Current year + 6 years.   | SECURE DISPOSAL  |
| 7.4                             | Records relating to the agreement of pay and conditions                        | No                     |                                  | Date pay and conditions superseded + 6 years  | SECURE DISPOSAL  |
| 7.5                             | Sickness absence monitoring.   | Yes                    |                                  | Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring.<br><br>N.B. Sickness records should be kept separate from accident records. | SECURE DISPOSAL  |

| 7. Operational Staff Management |  |                        |                      |   |  |
|---------------------------------|--|------------------------|----------------------|---|--|
|                                 | Basic file description   | Data Protection Issues | Statutory Provisions | Retention Period [operational]  | Action at the end of the administrative life of the record |
|                                 |  |                        |                      | No associated payment - current year + 3 years<br>sickness payment made - current year + 6 years applies. |  |
| 7.6                             | Staff training – where training leads to continuing professional development.                                |                        |                      | Length of time required by the professional body.   | SECURE DISPOSAL  |
| 7.7                             | Staff training – except where dealing with children, e.g. first aid or health and safety.                    |                        |                      | Staff personal file - Termination of Employment + 6 years.  | SECURE DISPOSAL  |
| 7.8                             | Staff training – where the training relates to children (e.g. safeguarding or other child related training). |                        |                      | Date of the training + 40 years   | SECURE DISPOSAL  |

| 8.  | Management of Disciplinary and Grievance Process   |                        |  |   |   |
|-----|--|------------------------|--|---|---|
|     | Basic file description   | Data Protection Issues | Statutory Provisions   | Retention Period [operational]  | Action at the end of the administrative life of the record    |
| 8.1 | Records relating to any allegation or case of a child protection nature against a member of staff including where the allegation is deemed <sup>5</sup> to be founded, unfounded, unsubstantiated or false | Yes                    | <p>“Keeping Children Safe in Education Statutory guidance for schools and colleges September 2023, paragraphs 416 to 419.”</p> <p>“Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children July 2018”</p> | <p>Records of allegations should be retained at least until the accused person has reached normal pension age, or for a period of <u>10 years</u> from the date of allegation if that is longer.</p> <p>Note 1 - Records of the allegation, investigation and outcome are to be kept on the file and a copy provided to the person concerned</p> <p>Note 2 - If anyone is taken through a disciplinary process to a hearing/appeal, they would always have a full hearing/appeal pack issued to them.</p> | <p>SECURE DISPOSAL</p> <p>These records must be shredded.</p> |

<sup>5</sup> The outcome must be determined in agreement with the LADO

| 8. Management of Disciplinary and Grievance Process   |  |                        |                      |  |  |
|---|--|------------------------|----------------------|--|--|
|   | Basic file description   | Data Protection Issues | Statutory Provisions | Retention Period [operational]   | Action at the end of the administrative life of the record |
|   |  |                        |                      | Note 3 – if the individual was suspended, a written review of the decision to suspend (agreed with the LADO) should be retained in the personal file once the case is resolved.                |  |
| 8.2   | Allegation of a child protection nature against a member of staff that was found to be malicious and recorded as such by the LADO. | Yes                    | KCSiE                | All records relating to an allegation that has been found to be malicious should be removed from personal files.<br><br>An allegation can only be deemed malicious in agreement with the LADO. |  |
| <p><b>Note:</b></p> <p>The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.</p> |  |                        |                      |  |  |

| 8.  | <b>Management of Disciplinary and Grievance Process</b>  |                               |                             |                                       |   |
|-----|--|-------------------------------|-----------------------------|---------------------------------------|---|
|     | <b>Basic file description</b>  | <b>Data Protection Issues</b> | <b>Statutory Provisions</b> | <b>Retention Period [operational]</b> | <b>Action at the end of the administrative life of the record</b> |
|     | <p>Within the Trust Disciplinary policy, we state that a record of any sanctions will be retained in the personnel files until the warning has expired. We also outline that where the sanctions relate to safety and wellbeing of children/young people, records will be kept for the duration of employment. Where no action is taken, there will not be a record retained in the employee's file, but central HR will retain a record in accordance with our data retention policy.</p> |                               |                             |                                       |   |
| 8.3 | Disciplinary Proceedings   | Yes                           |                             |                                       |   |
| 8.4 | First written warning  | Yes                           |                             | Date of warning + 6 months            | SECURE DISPOSAL   |
| 8.5 | Second written warning   | Yes                           |                             | Date of warning + 9 months            | SECURE DISPOSAL   |
| 8.6 | Final written warning  | Yes                           |                             | Date of warning + 12 months           | SECURE DISPOSAL   |

## HEALTH & SAFETY

This section deals with all matters of H&S management within the school.

| 9. Health and Safety |  |                        |   |  |  |
|----------------------|--|------------------------|---|--|--|
|                      | Basic file description   | Data Protection Issues | Statutory Provisions  | Retention Period [operational]   | Action at the end of the administrative life of the record |
| 9.1                  | Health and Safety Policy Statements.   | No                     |   | Life of policy + 3 years.  | SECURE DISPOSAL  |
| 9.2                  | Health and Safety Risk Assessments.  | No                     |   | Life of risk assessment + 3 years provided that a copy of the risk assessment is stored with the accident report, if an accident has occurred. | SECURE DISPOSAL  |
| 9.3                  | Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see <a href="http://www.hse.gov.uk/RIDDOR">http://www.hse.gov.uk/RIDDOR</a> . | 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 personal file.                                       | SECURE DISPOSAL  |
| 9.4                  | Records relating to accident/ injury at work   | Yes                    |   | Date of incident + 12 years<br>In the case of serious accidents a further retention period will need to be applied                             | SECURE DISPOSAL  |

| 9. Health and Safety |   |                        |   |                                |  |
|----------------------|---|------------------------|---|--------------------------------|--|
|                      | Basic file description                            | Data Protection Issues | Statutory Provisions  | Retention Period [operational] | Action at the end of the administrative life of the record |
| 9.5                  | Accident Reporting                                | Yes                    | The Social Security (Amendment) Regulations 2021.<br><br>Social Security (Claims and Payments) Regulations 1979 Regulation 25.<br><br>Social Security Administration Act 1992 Section 8.<br><br>Limitation Act 1980 |                                |  |
| 9.6                  | Adults  |                        |   | Date of the incident + 6 years | SECURE DISPOSAL  |
| 9.7                  | Children  |                        |   | DOB of the child + 25 years    | SECURE DISPOSAL  |
| 9.8                  | 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   | Current year + 40 years        | SECURE DISPOSAL  |

| 9. Health and Safety |  |                        |   |  |  |
|----------------------|--|------------------------|---|--|--|
|                      | Basic file description   | Data Protection Issues | Statutory Provisions  | Retention Period [operational]                         | Action at the end of the administrative life of the record |
|                      |  |                        | if the 2002 Regulations had not been made.<br>Regulation 18 (2)           |  |  |
| 9.9                  | 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  |
| 9.10                 | Process of monitoring of areas where employees and persons are likely to have become in contact with radiation   | No                     |   | Last action + 50 years                                 | SECURE DISPOSAL  |
| 9.11                 | Fire Precautions log books   | No                     |   | Current year + 6 years                                 | SECURE DISPOSAL  |
| 9.12                 | Health and safety file to show current state of building including all alterations (wiring, plumbing, building works etc.) to be passed on in the case of change of ownership. | No                     |   | Pass to new owner on sale or transfer of the building. |  |

## PAYROLL AND PENSIONS

| 10. Payroll and Pensions |  |                        |  |                                |  |
|--------------------------|--|------------------------|--|--------------------------------|--|
|                          | Basic file description                     | Data Protection Issues | Statutory Provisions   | Retention Period [operational] | Action at the end of the administrative life of the record |
| 10.1                     | Absence record.                            | Yes                    |  | Current year + 3 years.        | SECURE DISPOSAL  |
| 10.2                     | Car loans.                                 | Yes                    | Taxes Management Act 1970 Income and Corporation Taxes 1988.                                 | Completion of loan + 6 years.  | SECURE DISPOSAL  |
| 10.3                     | Car mileage.                               | Yes                    | Taxes Management Act 1970 Income and Corporation Taxes 1988.                                 | Current year + 6 years.        | SECURE DISPOSAL  |
| 10.4                     | Maternity pay records.                     | Yes                    | Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567). | Current year + 3 years.        | SECURE DISPOSAL  |
| 10.5                     | National Insurance – schedule of payments. | Yes                    | Taxes Management Act 1970 Income and Corporation Taxes 1988.                                 | Current year + 6 years.        | SECURE DISPOSAL  |
| 10.6                     | Overtime.                                  | Yes                    | Taxes Management Act 1970 Income and Corporation Taxes 1988.                                 | Current year + 6 years.        | SECURE DISPOSAL  |

| 10. Payroll and Pensions |   |                        |  |                                |  |
|--------------------------|---|------------------------|--|--------------------------------|--|
|                          | Basic file description                    | Data Protection Issues | Statutory Provisions   | Retention Period [operational] | Action at the end of the administrative life of the record |
| 10.7                     | Payroll awards.                           | Yes                    | Taxes Management Act 1970 Income and Corporation Taxes 1988.           | Current year + 6 years.        | SECURE DISPOSAL  |
| 10.8                     | Payroll – gross/net weekly or monthly.    | Yes                    | Taxes Management Act 1970 Income and Corporation Taxes 1988.           | Current year + 6 years.        | SECURE DISPOSAL  |
| 10.9                     | Payroll reports.                          | Yes                    | Taxes Management Act 1970 Income and Corporation Taxes 1988.           | Current year + 6 years.        | SECURE DISPOSAL  |
| 10.10                    | Payslips – copies.                        | Yes                    | Taxes Management Act 1970 Income and Corporation Taxes 1988.           | Current year + 6 years.        | SECURE DISPOSAL  |
| 10.11                    | Personal bank details.                    | Yes                    | If employment ceases then end of employment + 6 years.                 | Until superseded + 6 years.    | SECURE DISPOSAL  |
| 10.12                    | Pension service history                   | Yes                    |  | Until retirement date          |  |
| 10.13                    | Sickness records.                         | Yes                    |  | Current year + 6 years.        | SECURE DISPOSAL  |
| 10.14                    | Tax forms<br>P6/P11/P11D/P35/P45/P46/P48. | Yes                    | The minimum requirement – as stated in Inland Revenue Booklet 490 – is | Current year + 6 years.        | SECURE DISPOSAL  |

| 10. Payroll and Pensions |   |                        |   |   |  |
|--------------------------|---|------------------------|---|---|--|
|                          | Basic file description  | Data Protection Issues | Statutory Provisions  | Retention Period [operational]  | Action at the end of the administrative life of the record |
|                          |   |                        | for at least 3 years after the end of the tax year to which they apply. Originals must be retained in paper/electronic format. It is a corporate decision to retain for current year + 6 years. Employees should retain records for 22 months after current tax year. |   |  |
| 10.15                    | Time sheets/flexitime.  | Yes                    |   | Current year + 6 years.   | SECURE DISPOSAL  |
| 10.16                    | Records held under Retirement Benefits Schemes - Teachers Pension and Local Government Pension Scheme | Yes                    |   | Until employee's 100 birthday or 6 years after cessation of associated benefits.    | SECURE DISPOSAL  |
| 10.17                    | Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995                  | Yes                    | Regulation 15 Retirement Benefits Scheme (Information Powers) Regulations 1995 (SI 1995/3103)   | From the end of the year in which the accounts were signed for a minimum of 6 years | SECURE DISPOSAL  |
| 10.18                    | Management of the Teachers' Pension Scheme  | Yes                    |   | Date of last payment on the pension + 6 years                                       | SECURE DISPOSAL  |

|       |   |                               |                             |   |   |
|-------|---|-------------------------------|-----------------------------|---|---|
| 10.   | <b>Payroll and Pensions</b>               |                               |                             |   |   |
|       | <b>Basic file description</b>             | <b>Data Protection Issues</b> | <b>Statutory Provisions</b> | <b>Retention Period<br/>[operational]</b>     | <b>Action at the end of the<br/>administrative life of the<br/>record</b> |
| 10.19 | Records relating to pension registrations | Yes                           |                             | Date of last payment on the pension + 6 years | SECURE DISPOSAL   |

## INFORMATION TECHNOLOGY

| 11.  | Information Technology                 |                        |                      |                                   |  |
|------|--|------------------------|----------------------|-----------------------------------|--|
|      | Basic file description                 | Data Protection Issues | Statutory Provisions | Retention Period [operational]    | Action at the end of the administrative life of the record |
| 11.1 | Internal emails.                       | Yes                    |                      | Automated deletion after 4 terms. | AUTOMATED DELETION   |
| 11.2 | IT user account and outlook – STAFF.   | Yes                    |                      | Deleted on leaving date.          | IT DELETION  |
| 11.3 | IT user account and outlook – STUDENT. | Yes                    |                      | Leaving date + 1 year.            | IT DELETION  |

## FINANCIAL MANAGEMENT OF THE SCHOOL

This section deals with all aspects of the financial management of the school including the administration of school meals.

| 12. Risk Management and Insurance |  |                        |                      |  |   |
|-----------------------------------|--|------------------------|----------------------|--|---|
|                                   | Basic file description                                 | Data Protection Issues | Statutory Provisions | Retention Period [operational]                                 | Action at the end of the administrative life of the record                      |
| 12.1                              | Employer's Liability Insurance Certificate.            | No                     |                      | Closure of the school + 40 years (May be kept electronically). | SECURE DISPOSAL<br><br>To be passed to the Local Authority if the school closes |
| 12.2                              | Insurance policies                                     |                        |                      | Date the policy expires + 6 years                              | SECURE DISPOSAL   |
| 12.3                              | Records relating to the settlement of insurance claims |                        |                      | Date claim settled + 6 years                                   | SECURE DISPOSAL   |

| 13. Asset Management |   |                        |                      |                                |  |
|----------------------|---|------------------------|----------------------|--------------------------------|--|
|                      | Basic file description                  | Data Protection Issues | Statutory Provisions | Retention Period [operational] | Action at the end of the administrative life of the record |
| 13.1                 | Inventories of furniture and equipment. | No                     |                      | Current year + 6 years.        | SECURE DISPOSAL  |

| 13.  | <b>Asset Management</b>  |                               |                             |   |   |
|------|--|-------------------------------|-----------------------------|---|---|
|      | <b>Basic file description</b>  | <b>Data Protection Issues</b> | <b>Statutory Provisions</b> | <b>Retention Period [operational]</b>             | <b>Action at the end of the administrative life of the record</b> |
| 13.2 | Burglary, theft and vandalism report forms.                                  | No                            |                             | Current year + 6 years.                           | SECURE DISPOSAL   |
| 13.3 | Records relating to the leasing of shared facilities, such as sports centres | No                            |                             | Current year + 6 years                            | SECURE DISPOSAL   |
| 13.4 | Land and buildings   | No                            |                             | Date valuation superseded + 6 years               | SECURE DISPOSAL   |
| 13.5 | Disposal of assets   | No                            |                             | Date asset disposed of + 6 years                  | SECURE DISPOSAL   |
| 13.6 | Community School leases for land   | No                            |                             | Date lease expires + 6 years                      | SECURE DISPOSAL   |
| 13.7 | Commercial transfer arrangements   | No                            |                             | Date of transfer + 6 years                        | SECURE DISPOSAL   |
| 13.8 | Transfer of land to the Academy Trust  | No                            |                             | Life of land ownership then transfer to new owner | SECURE DISPOSAL   |
| 13.9 | Transfers of freehold land   | No                            |                             | Life of land ownership then transfer to new owner | SECURE DISPOSAL   |

| 14. Accounts and Statements Including Budget Management |  |                        |                                |  |  |
|---|--|------------------------|--------------------------------|--|--|
|   | Basic file description                         | Data Protection Issues | Statutory Provisions           | Retention Period [operational]                           | Action at the end of the administrative life of the record |
| 14.1  | Annual Report and Accounts.                    | No                     | Companies Act 2006 section 355 | Date of report + 10 years                                | SECURE DISPOSAL  |
| 14.2  | Annual Return                                  |                        | Companies Act 2006 section 355 | Date of report + 10 years                                | SECURE DISPOSAL  |
| 14.3  | Statement of financial activities for the year |                        |                                | Current financial year + 6 years                         | SECURE DISPOSAL  |
| 14.4  | Financial planning                             |                        |                                | Current financial year + 6 years                         | SECURE DISPOSAL  |
| 14.5  | Value for money statement                      |                        |                                | Current financial year + 6 years                         | SECURE DISPOSAL  |
| 14.6  | Records relating to the management of VAT      |                        |                                | Current financial year + 6 years                         | SECURE DISPOSAL  |
| 14.7  | Whole of government accounts returns           |                        |                                | Current financial year + 6 years                         | SECURE DISPOSAL  |
| 14.8  | Borrowing powers                               |                        |                                | Current financial year + 6 years                         | SECURE DISPOSAL  |
| 14.9  | Budget plan                                    |                        |                                | Current financial year + 6 years                         | SECURE DISPOSAL  |
| 14.10   | Loans and grants managed by the school.        | No                     |                                | Date of last payment on the loan + 12 years then REVIEW. | SECURE DISPOSAL  |
| 14.11   | Student Grant applications.                    | Yes                    |                                | Current year + 3 years.                                  | SECURE DISPOSAL  |
| 14.12   | Pupil Premium Fund records.                    | Yes                    |                                | Date pupil leaves the provision + 6 years                | SECURE DISPOSAL  |

| 14.   | <b>Accounts and Statements Including Budget Management</b>                                  |                               |                             |   |   |
|-------|---|-------------------------------|-----------------------------|---|---|
|       | <b>Basic file description</b>   | <b>Data Protection Issues</b> | <b>Statutory Provisions</b> | <b>Retention Period<br/>[operational]</b> | <b>Action at the end of the<br/>administrative life of the<br/>record</b> |
| 14.13 | All records relating to the creation and management of budgets including background papers. | No                            |                             | Life of the budget + 3 years.             | SECURE DISPOSAL   |
| 14.14 | Invoices, receipts, order books and requisitions, delivery notices and bank statements.     | No                            |                             | Current financial year + 6 years.         | SECURE DISPOSAL   |
| 14.15 | Records relating to the collection and banking of monies.                                   | No                            |                             | Current financial year + 6 years.         | SECURE DISPOSAL   |
| 14.16 | Records relating to the identification and collection of debt.                              | No                            |                             | Current financial year + 6 years.         | SECURE DISPOSAL   |

| 15. Contract Management |  |                        |                      |  |  |
|-------------------------|--|------------------------|----------------------|--|--|
|                         | Basic file description   | Data Protection Issues | Statutory Provisions | Retention Period [operational]           | Action at the end of the administrative life of the record |
| 15.1                    | All records relating to the management of contracts under seal.      | No                     | Limitation Act 1980. | Last payment on the contract + 12 years. | SECURE DISPOSAL  |
| 15.2                    | All records relating to the management of contracts under signature. | No                     | Limitation Act 1980. | Last payment on the contract + 6 years.  | SECURE DISPOSAL  |
| 15.3                    | Records relating to the monitoring of contracts.                     | No                     |                      | Life of the contract + 2 years.          | SECURE DISPOSAL  |

| 16. School Fund |  |                        |                      |                                |  |
|-----------------|--|------------------------|----------------------|--------------------------------|--|
|                 | Basic file description   | Data Protection Issues | Statutory Provisions | Retention Period [operational] | Action at the end of the administrative life of the record |
| 16.1            | All documentation relating to School Fund, including cheque books, paying in books, invoices, receipts, bank statements. |                        |                      | Current year + 6 years.        | SECURE DISPOSAL  |

| 17.  | School Meals Management  |                        |                      |                                   |  |
|------|--|------------------------|----------------------|-----------------------------------|--|
|      | Basic file description   | Data Protection Issues | Statutory Provisions | Retention Period<br>[operational] | Action at the end of the<br>administrative life of the<br>record |
| 17.1 | Free School Meals Registers<br>(where the register is used<br>as the basis for funding). | Yes                    |                      | Current year + 6 years.           | SECURE DISPOSAL  |
| 17.2 | School Meals Registers.  | Yes                    |                      | Current year + 3 years.           | SECURE DISPOSAL  |
| 17.3 | School Meals Summary<br>Sheets.  | No                     |                      | Current year + 3 years.           | SECURE DISPOSAL  |

## PROPERTY MANAGEMENT

This section covers the management of buildings and property.

| 18. Property Management |   |                        |                      |  |  |
|-------------------------|---|------------------------|----------------------|--|--|
|                         | Basic file description                              | Data Protection Issues | Statutory Provisions | Retention Period [operational]   | Action at the end of the administrative life of the record |
| 18.1                    | Title deeds of properties belonging to the school.  | No                     |                      | PERMANENT<br>These should follow the property unless the property has been registered with the Land Registry.                                  |  |
| 18.2                    | Plans of property belonging to the school.          | No                     |                      | These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold. |  |
| 18.3                    | Leases of property leased by or to the school.      | No                     |                      | Expiry of lease + 6 years.   | SECURE DISPOSAL  |
| 18.4                    | Records relating to the letting of school premises. | No                     |                      | Current financial year + 6 years.  | SECURE DISPOSAL  |
| 18.5                    | Business continuity and disaster recovery plans     | No                     |                      | Date the plan superseded + 3 years.  | SECURE DISPOSAL  |

| 19.  | <b>Maintenance</b>  |                               |                             |   |   |
|------|---|-------------------------------|-----------------------------|---|---|
|      | <b>Basic file description</b>   | <b>Data Protection Issues</b> | <b>Statutory Provisions</b> | <b>Retention Period<br/>[operational]</b>   | <b>Action at the end of the<br/>administrative life of the<br/>record</b> |
| 19.1 | All records relating to the maintenance of the school carried out by contractors.                                     | No                            |                             | These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. | SECURE DISPOSAL   |
| 19.2 | All records relating to the maintenance of the school carried out by school employees including maintenance logbooks. | No                            |                             | These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. | SECURE DISPOSAL   |

## PUPIL MANAGEMENT

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

| 20. Pupil's Educational Record |   |                        |  |  |   |
|--------------------------------|---|------------------------|--|--|---|
|                                | Basic file description  | Data Protection Issues | Statutory Provisions   | Retention Period [operational]                         | Action at the end of the administrative life of the record  |
| 20.1                           | <p>Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005.</p> <p>(Pupil records may be held in paper form, or else electronically, for instance as part of the school management information system (MIS)).</p> | Yes.                   | The Education (Pupil Information) (England) Regulations 2005 SI 2005 No 1437 As amended by SI 2018 No 688. | (See below)  | (See below)   |
| 20.2                           | Pupil Educational Record - Primary.   | Yes                    |  | 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"> <li>• to another primary school</li> <li>• to a secondary school</li> <li>• to a pupil referral unit.</li> </ul> |

| 20.  | Pupil's Educational Record            |                        |  |  |  |
|------|---------------------------------------|------------------------|--|--|--|
|      | Basic file description                | Data Protection Issues | Statutory Provisions   | Retention Period<br>[operational]  | Action at the end of the administrative life of the record |
| 20.3 | Pupil Educational Record - Secondary. | Yes                    | Limitation Act 1980 (Section 2)  | Date of Birth of the pupil + 25 years (Review at the end of the relevant academic year).   | SECURE DISPOSAL  |
| 20.4 | Examination Results – Pupil Copies.   | Yes                    |  |  |  |
| 20.5 | Examination results - Public.         |                        | <p>Non statutory guidance<br/>JQC April 2007</p> <p>The Awarding Bodies have agreed to implement a standard procedure for dealing with unclaimed certificates.</p> | <p>This information should be added to the pupil file.</p> <p>All uncollected certificates should be returned to the examination board after reasonable attempts to contact the pupil have failed.</p> <p>Centres may destroy any unclaimed certificates by a secure method after holding them for a period of 12 months from their date of issue.</p> | SECURE DISPOSAL  |

| 20.  | Pupil's Educational Record    |                        |                      |  |  |
|------|-------------------------------|------------------------|----------------------|--|--|
|      | Basic file description        | Data Protection Issues | Statutory Provisions | Retention Period<br>[operational]  | Action at the end of the<br>administrative life of the<br>record |
|      |                               |                        |                      | <p>A record of all certificates destroyed should be kept for a further period of four years from the date of their destruction.</p> <p>Any queries concerning the destruction or secure disposal of unclaimed certificates should be directed to the awarding body that issued the certificates.</p> |  |
| 20.6 | Examination results Internal. |                        |                      | This information should be added to the pupil file.  | SECURE DISPOSAL  |

| 21.  | Pupil's Educational Record  |                        |  |   |  |
|------|---|------------------------|--|---|--|
|      | Basic file description  | Data Protection Issues | Statutory Provisions   | Retention Period [operational]  | Action at the end of the administrative life of the record |
|      | <b>Schools and colleges have an obligation to preserve records, which contain information about allegations of sexual abuse, at least until the accused person has reached normal pension age, or for a period of 10 years from the date of the allegation if that is longer. This is set out in paragraphs 415 to 417 of the statutory safeguarding guidance, Keeping Children Safe in Education (KCSiE) 2023.</b> |                        |  |   |  |
| 21.1 | Child Protection information held on pupil file.  | Yes                    | Keeping Children Safe in Education Statutory guidance for schools and colleges September 2023. Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children July 2018. | If any records relating to child protection issues are placed on the pupil file (for exceptional reasons), these should be in a sealed envelope and then retained for the same period of time as the pupil file.                | SECURE DISPOSAL – these records MUST be shredded           |
| 21.2 | Child protection files – child moves to another school.   | Yes                    | "Keeping Children Safe in Education Statutory guidance for schools and colleges September 2023."   | The file should be passed to the new school as soon as possible, in line with DfE guidance, and a record kept of when and how the transfer was completed. The school should retain a copy of the chronology for DOB + 25 years. | SECURE DISPOSAL – these records MUST be shredded.          |

| 21. Pupil's Educational Record |  |                        |                      |   |  |
|--------------------------------|--|------------------------|----------------------|---|--|
|                                | Basic file description                           | Data Protection Issues | Statutory Provisions | Retention Period [operational]  | Action at the end of the administrative life of the record |
|                                |  |                        |                      | (Review at the end of the relevant academic year).<br><br>Note; it makes no difference whether the CP files are paper or electronic.  |  |
| 21.3                           | Child protection files – child leaves education. |                        |                      | DOB of the child + 25 years then review. Where there has been an s47 referral, or children's social care have been involved, the file should be kept for 35 years from date of leaving. |  |

N.B. Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule.

| 22.  | <b>Attendance &amp; Behaviour</b>                                    |                               |   |  |   |
|------|--|-------------------------------|---|--|---|
|      | <b>Basic file description</b>  | <b>Data Protection Issues</b> | <b>Statutory Provisions</b>   | <b>Retention Period [operational]</b>  | <b>Action at the end of the administrative life of the record</b> |
| 22.1 | Attendance Registers.  | Yes                           | Working together to improve school attendance: Guidance for maintained schools, academies, independent schools, and local authorities, September 2022 | Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made. | SECURE DISPOSAL   |
| 22.2 | Correspondence relating to any absence (authorised or unauthorised). | Yes                           | Education Act 1996 Section 7.   | Current academic year + 2 years.   | SECURE DISPOSAL   |
| 22.3 | Bound and numbered book/ record of positive handling                 | Yes                           |   | Date of birth + 31 years.  | SECURE DISPOSAL   |

| 23.  | Special Educational Needs and Medication/Healthcare Plans  |                        |   |   |  |
|------|--|------------------------|---|---|--|
|      | Basic file description   | Data Protection Issues | Statutory Provisions  | Retention Period [operational]  | Action at the end of the administrative life of the record   |
| 23.1 | Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy. | Yes                    | Children and Family's Act 2014; Special Educational Needs and Disability Act 2001 Section 14. | Date of birth of the pupil + 31 years (Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act). | REVIEW<br><br>NOTE: This retention period is the <b>minimum</b> retention period that any pupil file should be kept. Any decision to keep the records longer than the minimum retention period should be documented. In the event of a "failure to provide a sufficient education" case, SEN files should be retained. |
| 23.2 | Permission slips from parents for the administration of medication.  | Yes                    |   | Retain from event + 1 month.  | SECURE DISPOSAL unless the document is subject to a legal hold.  |
| 23.3 | Medical conditions with ongoing management.  | Yes                    |   | Retain for pupil's time at school + 5 years.  | SECURE DISPOSAL unless the document is subject to a legal hold.  |

|      |  |                               |                             |  |   |
|------|--|-------------------------------|-----------------------------|--|---|
| 23.  | <b>Special Educational Needs and Medication/Healthcare Plans</b> |                               |                             |  |   |
|      | <b>Basic file description</b>                                    | <b>Data Protection Issues</b> | <b>Statutory Provisions</b> | <b>Retention Period [operational]</b>  | <b>Action at the end of the administrative life of the record</b> |
| 23.4 | Medical incidents.   | Yes                           |                             | Date of birth of the pupil + 25 years. | SECURE DISPOSAL unless the document is subject to a legal hold.   |

## CURRICULUM MANAGEMENT

| 24.  | Statistics and Management Information |                        |                      |   |  |
|------|---------------------------------------|------------------------|----------------------|---|--|
|      | Basic file description                | Data Protection Issues | Statutory Provisions | Retention Period [operational]  | Action at the end of the administrative life of the record |
| 24.1 | Curriculum returns.                   | No                     |                      | Current year + 3 years.   | SECURE DISPOSAL  |
| 24.2 | Examination Results (School's Copy).  | Yes                    |                      | Current year + 6 years.   | SECURE DISPOSAL  |
|      | SATS records –                        | Yes                    |                      |   |  |
|      | Results.                              |                        |                      | <p>The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years.</p> <p>The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison.</p> | SECURE DISPOSAL  |
|      | Examination Papers.                   |                        |                      | The examination papers should be kept until any appeals/validation process is complete.   | SECURE DISPOSAL  |

| 24. Statistics and Management Information |   |                        |                      |                                  |  |
|---|---|------------------------|----------------------|----------------------------------|--|
|   | Basic file description                    | Data Protection Issues | Statutory Provisions | Retention Period [operational]   | Action at the end of the administrative life of the record |
| 24.3                                      | Published Admission Number (PAN) Reports. | Yes                    |                      | Current year + 6 years.          | SECURE DISPOSAL  |
| 24.4                                      | Self-Evaluation Forms.                    | Yes                    |                      | Current year + 6 years.          | SECURE DISPOSAL  |
| 24.5                                      | Internal moderation.                      | Yes                    |                      | Academic year + 1 academic year. | SECURE DISPOSAL  |
| 24.6                                      | External moderation.                      |                        |                      | Until superseded.                | SECURE DISPOSAL  |

| 25. Implementation of Curriculum |                        |                        |                      |                                |  |
|----------------------------------|------------------------|------------------------|----------------------|--------------------------------|--|
|                                  | Basic file description | Data Protection Issues | Statutory Provisions | Retention Period [operational] | Action at the end of the administrative life of the record   |
| 25.1                             | 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 |
| 25.2                             | Timetable.             | No                     |                      | Current year + 1 year.         |  |
| 25.3                             | Class Record Books.    | No                     |                      | Current year + 1 year.         |  |
| 25.4                             | Mark Books.            | No                     |                      | Current year + 1 year.         |  |

| 25.  | Implementation of Curriculum |                        |                      |  |  |
|------|------------------------------|------------------------|----------------------|--|--|
|      | Basic file description       | Data Protection Issues | Statutory Provisions | Retention Period<br>[operational]  | Action at the end of the<br>administrative life of the<br>record |
| 25.5 | Record of homework set.      | No                     |                      | Current year + 1 year.   |  |
| 25.6 | 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. | REVIEW then SECURE DISPOSAL                                      |

**EXTRA CURRICULAR ACTIVITIES**

| 26. Educational Visits Outside the Classroom |   |                        |  |                                   |   |
|--|---|------------------------|--|-----------------------------------|---|
|  | Basic file description  | Data Protection Issues | Statutory Provisions   | Retention Period [operational]    | Action at the end of the administrative life of the record  |
| 26.1   | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – <b>Primary</b> Schools.   | No                     | <a href="http://oeapng.info">Outdoor Education Advisers' Panel National Guidance website http://oeapng.info</a> specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice". | Date of visit + 14 years.         | SECURE DISPOSAL   |
| 26.2   | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – <b>Secondary</b> Schools. | No                     | <a href="http://oeapng.info">Outdoor Education Advisers' Panel National Guidance website http://oeapng.info</a> specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice". | Date of visit + 10 years.         | SECURE DISPOSAL   |
| 26.3   | Parental consent forms for school trips where there has been no major incident.   | Yes                    |  | Conclusion of the trip + 6 months | REVIEW<br><br>NOTE: This retention period is the <b>minimum</b> retention period. If the decision is to keep the records longer |

| 26.  | Educational Visits Outside the Classroom  |                        |                                  |   |  |
|------|---|------------------------|----------------------------------|---|--|
|      | Basic file description  | Data Protection Issues | Statutory Provisions             | Retention Period [operational]                        | Action at the end of the administrative life of the record       |
|      |   |                        |                                  |   | than the minimum retention period and this should be documented. |
| 26.4 | 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. | SECURE DISPOSAL  |

## SCHOOL SUPPORT ORGANISATIONS

| 27. Family Liaison Officers and Home School Liaison Assistants |   |                        |                      |  |  |
|--|---|------------------------|----------------------|--|--|
|  | Basic file description  | Data Protection Issues | Statutory Provisions | Retention Period [operational]   | Action at the end of the administrative life of the record |
| 27.1   | Day Books.  | Yes                    |                      | Current year + 2 years then review.                                    | SECURE DISPOSAL  |
| 27.2   | Reports for outside agencies - where the report has been included on the case file created by the outside agency. | Yes                    |                      | Whilst child is attending school and then destroy.                     | SECURE DISPOSAL  |
| 27.3   | Referral forms.   | Yes                    |                      | While the referral is current.   | SECURE DISPOSAL  |
| 27.4   | Contact data sheets.  | Yes                    |                      | Current year then review, if contact is no longer active then destroy. | SECURE DISPOSAL  |
| 27.5   | Contact database entries.   | Yes                    |                      | Current year then review, if contact is no longer active then destroy. | SECURE DISPOSAL  |
| 27.6   | Group Registers.  | Yes                    |                      | Current year + 2 years.  | SECURE DISPOSAL  |

| 28.  | <b>Parent Teacher Associations and Old Pupil Associations</b>   |                               |                             |   |   |
|------|---|-------------------------------|-----------------------------|---|---|
|      | <b>Basic file description</b>   | <b>Data Protection Issues</b> | <b>Statutory Provisions</b> | <b>Retention Period<br/>[operational]</b> | <b>Action at the end of the<br/>administrative life of the<br/>record</b> |
| 28.1 | Records relating to the creation and management of Parent Teacher Associations and /or Old Pupils Associations. | Yes                           |                             | Current year + 6 years then REVIEW.       | SECURE DISPOSAL   |

## CENTRAL GOVERNMENT AND LOCAL AUTHORITY

This section covers records created in the course of interaction between the school and the local authority.

| 29. Local Authority |  |                        |                      |                                |  |
|---------------------|--|------------------------|----------------------|--------------------------------|--|
|                     | Basic file description   | Data Protection Issues | Statutory Provisions | Retention Period [operational] | Action at the end of the administrative life of the record |
| 29.1                | Secondary Transfer Sheets (Primary).                           | Yes                    |                      | Current year + 2 years.        | SECURE DISPOSAL  |
| 29.2                | Attendance Returns.  | Yes                    |                      | Current year + 1 year.         | SECURE DISPOSAL  |
| 29.3                | School Census Returns.   | No                     |                      | Current year + 5 years.        | SECURE DISPOSAL  |
| 29.4                | Circulars and other information sent from the Local Authority. | No                     |                      | Operational use.               | SECURE DISPOSAL  |

| 30. Central Government |                            |                        |                      |                                 |  |
|------------------------|----------------------------|------------------------|----------------------|---------------------------------|--|
|                        | Basic file description     | Data Protection Issues | Statutory Provisions | Retention Period [operational]  | Action at the end of the administrative life of the record |
| 30.1                   | OFSTED reports and papers. | No                     |                      | Life of the report then REVIEW. | SECURE DISPOSAL  |

| 30.  | <b>Central Government</b>                                     |                               |                             |   |   |
|------|---|-------------------------------|-----------------------------|---|---|
|      | <b>Basic file description</b>                                 | <b>Data Protection Issues</b> | <b>Statutory Provisions</b> | <b>Retention Period<br/>[operational]</b> | <b>Action at the end of the<br/>administrative life of the<br/>record</b> |
| 30.2 | Returns made to central government.                           | No                            |                             | Current year + 6 years.                   | SECURE DISPOSAL   |
| 30.3 | Circulars and other information sent from central government. | No                            |                             | Operational use.                          | SECURE DISPOSAL   |

## APPENDIX 2 – DISPOSAL AND RETENTION CHECKLIST

Prior to disposal of any set of documents which have come to the end of the relevant retention period please consider the following checklist:

| Question   | Notes |
|--|-------|
| 1. Has the document been subject to a review?  |       |
| 2. Is the document being disposed of in accordance with the time period set out in the document retention policy?  |       |
| 3. If the document is being disposed of before the time period set out in the document retention policy, please record the justification for its early disposal.<br><br>You must seek approval from the Trust Data Protection Officer via <a href="mailto:dpo@deltatrust.org.uk">dpo@deltatrust.org.uk</a> prior to disposal of any document which is disposed of <b>before</b> the period set out in the document retention policy. |       |
| 4. Was the document stored to satisfy a statutory or regulatory obligation?  |       |
| 5. If the answer to question 4 is yes, please record why the statutory or regulatory obligation has now ended.   |       |
| 6. Is the document required as evidence of a transaction?  |       |
| 7. Do we need to keep the document for operational reasons?  |       |
| 8. Is there any other organisational reason why the data should be retained?   |       |
| 9. Consider if anyone needs to be consulted with prior to document disposal.   |       |
| 10. Have you sought approval of the relevant person responsible for the document prior to disposal?  |       |
| 11. Please ensure you complete the 'Data Disposal Log' available at Appendix 4.  |       |

## APPENDIX 3 – SAFEGUARDING RECORDS

### Advice note on child protection record keeping

#### Record keeping – paper CP files

- 'Cause for concern' (cfc) forms should be signed and dated by the person who raised the concern / observed the incident, and handed to a DSL or deputy;
- Any initial notes / scribbles should be signed / dated on the back and *securely* attached to the cfc;
- If the initial notes are written on a member of staff's hand, arm or similar then the body part should be photocopied, signed / dated on the back and attached to the cfc;
- If the concern relates to a child's drawing / written work, this should be signed and dated on the back by the member of staff who saw it, and attached to the cfc;
- The designated staff should record in the relevant section of the cfc what action has been taken, who by and when;
- If designated staff believe that no action is needed, the rationale for this should be recorded;
- The CP file should contain a front sheet with contact details of those with parental responsibility and any professionals / agencies involved;
- There should be a chronology at the front of the file, and cause for concern forms, actions, records of meetings, etc. should be placed behind this, most recent records at the top.

#### Record keeping – CPOMS

- If staff are not able to input to the e-system directly, they should be provided with cfc's to record their concerns as above;
- Paper cfc's may be scanned into the e-system and an entry generated outlining the concern and any actions taken;
- If no action is to be taken, the designated staff should record the rationale for this on the child's e-file;
- Paper cfc's must not be destroyed, even if they have been scanned; write the CPOMS log number on the back and file securely as above;

- Any initial notes may be scanned into the e-system but must be retained; the person who wrote the notes should sign and date the original on the back and the log number should also be recorded;
- Similarly, if the initial notes are on a person's arm, hand, etc., a photocopy of the relevant body part can be scanned into CPOMS but the original photocopy should be signed and dated on the back by the person who made the initial notes and the log number should also be recorded;
- If the concern relates to a child's drawing / written work, this may be scanned into the e-system but the original must be retained as above; the log number should be noted on the back;

### **General guidance**

- Concerns relating to child protection / safeguarding should not be emailed between staff; members of staff with concerns should either use a cfc or input directly to the e-system;
- Regardless of paper / e-systems, all staff should understand that if they believe a child is at risk of significant harm they *must* have a face to face discussion with the designated staff without delay;
- Do not take photos of children's injuries, even if asked to do so by children's social care; use a gingerbread person or the CPOMS body map to describe an injury if you think it necessary;
- When a copy is needed of initial notes, written items or drawings, a photocopy or scanned document is always preferable to a digital photograph;
- At transition points, the last entry on a chronology will be who / where the CP file was passed to, how and when. Where a child is leaving education and there is no new school, the last entry on the chronology will be whether and where the file was archived;
- Children's CP records, whether paper or e-files, should be accessible only to the designated staff and Head of Academy/ Principal. Any access to these records by other people (e.g. class teacher, Ofsted inspector, auditor) should be recorded on the chronology with an explanation.

## Record retention schedules

|  |   |
|--|---|
| Child leaves school and does not transfer to a new school / FE setting                                   |   |
| Concerns were at low level / threshold for referral to social care not met / no inter-agency involvement | CP file should be retained until child's 25 <sup>th</sup> birthday (or the end of that school year)                     |
| A referral was made / social care involved / other agencies involved                                     | <b>35</b> years from date the child left the school   |
| Child leaves school and moves to another school / FE setting   |   |
| Chronology   | Should be kept for at least the periods stated above. They may be archived for longer if this is stated in your policy  |
| CP file has been posted to a new setting   | A copy of the entire file should be kept until the new setting confirms safe receipt. The copy should then be shredded. |
| All  |   |
| Looked after child   | <b>75</b> years from date the child left the school   |
| Records relating to allegation against staff / harm to a pupil by staff / visitor / volunteer            | Retirement age or 10 years, whichever is longer.  |

It is important to note that the retention requirements are two-fold; that is, records must be retained as specified above but should not be retained for any longer unless there is a good reason to do so (for example, because legal action is pending).

Written following discussion with CPOMS, GDPR Sentry and advisers on 'Achieving Best Evidence' (Crown Prosecution Service 2015)

See also [Information sharing advice for practitioners](#) (DfE 2018)

With thanks to Carolyn Eyre, Eyre Safeguarding Services Limited.

## APPENDIX 4 – DATA DISPOSAL LOG

[Insert your Academy name here]

|               |                  |
|---------------|------------------|
| Internal Ref: |                  |
| Review date   | [Review Date]    |
| Version No.   | [Version Number] |

### Data disposal

When the Academy is destroying records, authorisation must be given from either the Finance Manager/ Data Protection Lead or Head of Academy/Principal. The minimum record retention period must have been met as specified in the Personal Data Retention Policy and the record must no longer be required for legal, business or audit purposes.

|                                 |  |
|---------------------------------|--|
| <b>Data disposal log number</b> |  |
|---------------------------------|--|

#### 1. Person making the request

|                     |  |      |  |
|---------------------|--|------|--|
| Responsible Officer |  |      |  |
| Position            |  |      |  |
| Team or Class       |  |      |  |
| E-mail              |  |      |  |
| Telephone           |  | Date |  |

#### 2. Details of records for destruction

| Entry No | Box/ Folder / ID number | Classification number | Record class and description | Inclusive Date Range | Retention Period | Security Classification | Format |
|----------|-------------------------|-----------------------|------------------------------|----------------------|------------------|-------------------------|--------|
| 1        |                         |                       |                              |                      |                  |                         |        |
| 2        |                         |                       |                              |                      |                  |                         |        |
| 3        |                         |                       |                              |                      |                  |                         |        |

|   |  |  |  |  |  |  |  |
|---|--|--|--|--|--|--|--|
| 4 |  |  |  |  |  |  |  |
| 5 |  |  |  |  |  |  |  |
| 6 |  |  |  |  |  |  |  |
| 7 |  |  |  |  |  |  |  |
| 8 |  |  |  |  |  |  |  |
| 9 |  |  |  |  |  |  |  |

Alternatively please attach a separate electronic document detailing this information.

| <b>3. Authorisation (Business /Finance Manager/ DPL or Head)</b>   |     |    |
|--|-----|----|
| Please certify that:   | Yes | No |
| The records have passed their required minimum retention period?   |     |    |
| A sample of the records, if required by the Retention & Disposal Schedule, has been offered for permanent retention and has either been transferred to or refused by the place of permanent storage? |     |    |
| The records are no longer required to support the business activities of the educational establishment?  |     |    |
| All audit requirements have been satisfied in relation to the activities and time periods covered by the records?  |     |    |
| All legal requirements (including Data Protection Subject Access and Freedom of Information / Environmental Information Regulation requests) have been satisfied?                                    |     |    |

If NO has been ticked for any of these requirements, the records must be retained.

| <b>4. Authorisation for disposal of records</b>                |     |    |
|--|-----|----|
| Have the records satisfied the minimum retention requirements? | Yes | No |
| If No the records must be retained                             |     |    |
| Destruction of the records is authorised by:                   |     |    |
| Name   |     |    |
| Position   |     |    |
| Team or Class  |     |    |

|  |   |           |  |
|--|---|-----------|--|
| E-mail   |   |           |  |
| Telephone  |   | Date      |  |
| Date of destruction  |   |           |  |
| Method of destruction<br><br>(Destruction must be in accordance with level of sensitivity) | <input type="checkbox"/> Non-sensitive waste disposal<br><input type="checkbox"/> Shredding Strip<br><input type="checkbox"/> Pulping<br><input type="checkbox"/> Incineration<br><input type="checkbox"/> Outside Vendor<br><input type="checkbox"/> Other, please specify _____ |           |  |
| If an Outside Vendor was used, please provide their  |   |           |  |
| Business Name  |   |           |  |
| Address  |   |           |  |
|  |   |           |  |
|  |   |           |  |
|  |   |           |  |
|  |   | Post Code |  |
| Contract ref   |   |           |  |
| Destruction Certificate Reference  |   |           |  |

|                                |  |  |  |
|--------------------------------|--|--|--|
| <b>6. Notes on destruction</b> |  |  |  |
|                                |  |  |  |

**This form must be retained by the Academy and stored appropriately to provide evidence of the disposal of documents.**