

RECORDS MANAGEMENT POLICY

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Summary	The City Learning Trust (CLT) recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution.
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United by our values, we place children and young people first in everything we do

VERSION CONTROL

Version No:	Type of change	Date	Revisions from previous version
0.1	New Document	April 2020	New Policy
3.0	Annual Review	Sept 2020	Corporate format
3.1	Annual Review	Jan 2022	Reviewed and no changes. Interim re-review scheduled for March 2022
4.0	Annual Review	March 2022	Full review based on IRMS updated guidance (Information & Records Management Society Ltd)

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1. STATUS

- a. Statutory.

2. INTRODUCTION AND PURPOSE

- a. The City Learning Trust (CLT) recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the Trust and member academies, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited and applies to information created and stored in both physical and electronic format.

3. SCOPE

- a. This policy applies to all records created, received or maintained by staff in the Trust and member academies in the course of carrying out their functions.
- b. Records are defined as all those documents which facilitate the business carried out by the Trust and member academies and which are thereafter retained (for a set period, see Appendix 1) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.
- c. A small percentage of the Trust's and member academies' records will be selected for permanent preservation as part of the institution's archives and for historical research.

4. RESPONSIBILITIES

- a. The Trust and member academies has a corporate responsibility to maintain their records and record keeping systems in accordance with the regulatory environment. The City Learning Trust's Board of Directors has overall responsibility for this policy. All member academies are responsible for ensuring compliance with Trust policy and procedures.
- b. The City Learning Trust's Data Protection Officer, Joanne Shaw, will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- c. Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the Trust's Record Management Policy.

5. RELATIONSHIP WITH EXISTING POLICIES

- a. This policy has been drawn up within the context of:
 - i. Freedom of Information policy
 - ii. GDPR Policy
 - iii. Other legislation or regulations (including audit, equal opportunities and ethics) affecting the Trust and member academies.

APPENDIX A

Retention Schedule

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

Academies are governed by the Academy Trust, which will usually be a company limited by guarantee ¹. The Academy Trust may also be a charitable trust.

1.1 Governance of the Academy Trust

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
1.1.1	Governance Statement	No		Life of governance statement + 6 years	SECURE DISPOSAL
1.1.2	Articles of Association	No		Life of the Academy	
1.1.3	Memorandum of Understanding	No		This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL
1.1.4	Memorandum of Understanding of Shared Governance amongst schools	No	Companies Act 2006 Section 355	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL
1.1.5	Constitution	No		Life of the Academy	
1.1.6	Special Resolutions to amend the Constitution	No		Life of the Academy	
1.1.7	Written Scheme of Delegation	No	Companies Act 2006 Section 355	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
	All records relating to the conversion of schools to Academy status			Life of organisation	Consult LA before disposal
1.1.8	Trustee - Appointment	Yes, if contains personal information		Life of appointment + 6 years	PERMANENT DELETION / SECURE DISPOSAL

1. A company limited by guarantee does not usually have a share capital or shareholders, but instead has members who act as guarantors. The guarantors give an undertaking to contribute a nominal amount (typically very small) in the event of winding up the company. In the case of an Academy, the guarantors will guarantee the same of £10 each..

1.1 Governance of the Academy Trust

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.1.9	Trustee/Governor disqualification	Yes, if contains personal information		Date of disqualification + 15 years	PERMANENT DELETION / SECURE DISPOSAL
1.1.10	Trustees - Termination of Office	Yes, if contains personal information		Date of termination + 6 years	PERMANENT DELETION / SECURE DISPOSAL
1.1.11	Annual Report and Trustee Report	No	Companies Act 2006 Section 355	Date of report + 10 years	PERMANENT DELETION/SECURE DISPOSAL
1.1.12	Annual Report and Accounts	No	Companies Act 2006 Section 355	Date of report + 10 years	PERMANENT DELETION/SECURE DISPOSAL
1.1.13	Annual Return	No	Companies Act 2006 Section 355	Date of report + 10 years	PERMANENT DELETION/SECURE DISPOSAL
1.1.14	Appointment of Trustees, Governors, Directors and Clerk to Governors	Yes, will contain personal information		Life of appointment + 6 years	PERMANENT DELETION/SECURE DISPOSAL
	Records relating to the election of Chair and Vice Chair	Yes, will contain personal information		Once the decision has been recorded in the minutes, the data relating to the election can be destroyed	
	Records relating to the appointment of Co-opted Governors	Yes, will contain personal information		Life of appointment + 6 years	PERMANENT DELETION/SECURE DISPOSAL
	Records relating to the terms of office of serving Governors/ Trustees including evidence of appointment	Yes, will contain personal information		Life of appointment + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.1.15	Statement of Trustee Responsibilities	No		Life of appointment + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.1.16	Appointment and removal of Members	No		Life of appointment + 6 years	PERMANENT DELETION/SECURE DISPOSAL
	Register of business interests			Life of appointment + 6 years	PERMANENT DELETION/SECURE DISPOSAL

1.1 Governance of the Academy Trust

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.1.16 contd...	Records relating to DBS check carried out on Clerk, Trustees and LGCs			Life of appointment + 6 years	PERMANENT DELETION/SECURE DISPOSAL
	Governor/Trustee File			Life of appointment + 6 years	PERMANENT DELETION/SECURE DISPOSAL
	Governors' Code of Conduct			This is expected to be a dynamic document, one copy of each version to be kept for the life of the organisation	
1.1.17	Strategic Review	No		Date of the review + 6 years	PERMANENT DELETION/SECURE DISPOSAL
	Annual reports required by the DoE			Date of the report + 10 years	PERMANENT DELETION/SECURE DISPOSAL
1.1.18	Strategic Plan (also known as School Development Plans)	No		Life of plan + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.1.19	Accessibility Plan	There may be if the plan refers to specific pupils. If so refer to: 5.3.4 otherwise 1.1.19	Limitation Act 1980 (Section 2)	Life of plan + 6 years	PERMANENT DELETION/SECURE DISPOSAL

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Board of Directors					
1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Companies Act 2006 Section 248	Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
	Meeting schedules	No		Current year	Standard Disposal
1.2.2	Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.3	Board Meeting: Annual Schedule of Business	No		Current year	SECURE DISPOSAL
1.2.4	Board Meeting: Procedures for conduct at meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	SECURE DISPOSAL
Committees					
1.2.5	Minutes relating to an committees set up by the Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
General Members' Meeting					
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 Section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.7	Records relating to the management of the Annual General Meeting	Could be if the minutes refer to living individuals	Companies Act 2006 Section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES

1.2 Board of Directors, Members Meetings and Local Governing Committees

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Governors					
1.2.8	Agendas for Local Governing committee meetings	May be data protection issues, if the meeting is dealing with confidential issues relating to staff.		One copy should be retained with the master set of minutes. All other copies can be disposed of	PERMANENT DELETION/SECURE DISPOSAL
1.2.9	Minutes of, and papers considered at, meetings of the Local Governing Committees	May be data protection issues, if the meeting is dealing with confidential issues relating to staff.			
	Principal Set (signed)			Life of Academy	
1.2.10	Inspection copies			Date of meeting + 3 years	PERMANENT DELETION/SECURE DISPOSAL
	Reports presented to the Local Governing Committees	May be data protection issues, if the meeting is dealing with confidential issues relating to staff.		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy	SECURE DISPOSAL or retain with set of signed minutes.
	Records relating to Governor monitoring visits			Date of the visit + 3 years	PERMANENT DELETION/SECURE DISPOSAL
1.2.11	Meeting papers, relating to the annual parents' meeting held under Section 33 of the Education Act 2002	No	Education Act 2002, Section 33.	Date of the meeting _ a minimum of 6 years	SECURE DISPOSAL
1.2.12	Trusts and Endowments managed by the Trust	No		PERMANENT	These should be retained at the Trust Head Office while the MAT is operational and then offered to the DfE if the MAT ceases to operate

1.2 Board of Directors, Members Meetings and Local Governing Committees

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Governors contd...					
1.2.13	Records relating to complaints dealt with by the CLT Board of Directors/LGC/Headteacher/ Principal	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes. If negligence involved then; current year + 15 years. If child protection or safeguarding issues, then current year + 40 years	PERMANENT DELETION/SECURE DISPOSAL
1.2.14	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
Statutory Registers					
1.2.15	Register of Directors		Companies Act 2006	Life of the Academy + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.2.16	Register of Directors' interests (this is not a statutory register)			Life of the Academy + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.2.17	Register of Directors' residential addresses		Companies Act 2006	Life of the Academy + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.2.18	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.2.19	Register of Members		Companies Act 2006	Life of the Academy + 6 years	PERMANENT DELETION/SECURE DISPOSAL

1.2 Board of Directors, Members Meetings and Local Governing Committees

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Statutory Registers contd...					
1.2.20	Register of Secretaries		Companies Act 2006	Life of the Academy + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.2.21	Register of Trustees interests			Life of the Academy + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.2.22	Declarations of Interests Statements (Governors) (this is not a statutory register)			Life of the Academy + 6 years	PERMANENT DELETION/SECURE DISPOSAL

1.3 Funding & Finance					
Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Strategic Finance					
1.3.1	Statement of financial activities for the year	No		Current financial year _+ 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.2	Financial Planning	No		Current financial year _+ 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.3	Value for money statement	No		Current financial year _+ 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.4	Records relating to the management of VAT	No		Current financial year _+ 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.5	Whole of government accounts return	No		Current financial year _+ 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.6	Borrowing powers	No		Current financial year _+ 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.7	Budget Plan	No		Current financial year _+ 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.8	Charging and Remissions Policy	No		Date policy superseded + 3 years	PERMANENT DELETION/SECURE DISPOSAL
Audit Arrangements					
1.3.9	Audit Committee and appointment of responsible officers	No		Life of the Academy	PERMANENT DELETION/SECURE DISPOSAL
1.3.10	Independent Auditor's report on regulatory	No		Financial year report relates to + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	PERMANENT DELETION/SECURE DISPOSAL

1.3 Funding & Finance

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Funding Agreements					
1.3.12	Funding aAgreement with Secretary of State and supplemental funding agreements	No		Date of last payment of funding + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.13	Funding Agreement - termination of the funding agreement	No		Date of last payment of funding + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.14	Funding Records - Capital Grant	No		Date of last payment of funding + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.15	Finding Records - Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.16	Finding Records - General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.17	Per pupil funding records	No		Date of last payment of funding + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.18	Exclusions agreement	No		Date of last payment of funding + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.19	Funding records	No		Date of last payment of funding + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.21	Records relating to loans	No		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	PERMANENT DELETION/SECURE DISPOSAL

1.3 Funding & Finance

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Payroll and Pensions					
1.3.22	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/911960), revises 1999 (SI 1999/567)	Current year + 3 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.23	Records held under retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.24	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6	SECURE DISPOSAL
1.3.25	Records relating to pension registrations	Yes		Date of last payment on the pension + 6	PERMANENT DELETION/SECURE DISPOSAL
1.3.26	Payroll records	Yes		Date of payroll run + 6 years	
Risk Management and Insurance					
1.3.27	Insurance Policies	No		Date the policy expires + 6 years	SECURE DISPOSAL
1.3.28	Records relating to the settlement of insurance claims	No		Date claim settled + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.29	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	PERMANENT DELETION/SECURE DISPOSAL
Endowment Funds and Investments					
1.3.30	Investment Polocoes	No		Life of the investment + 6 years	SECURE DISPOSAL
1.3.31	Mangement of Endowment Funds	No		Life of the fund + 6 years	

1.3 Funding & Finance

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Accounts and Statements					
1.3.32	Annual Accounts	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.33	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	PERMANENT DELETION/SECURE DISPOSAL
1.3.34	Student Grant Applications	Yes		Current year + 3 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.35	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No		Life of the budget + 3 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.36	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.37	Records relating to the collection and banking of monies	No		Current financial year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.38	Records relating to the identification and collection of debt	No		Current financial year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
Contract Management					
1.3.39	All records relating to the managements of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.40	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.41	Records relating to the monitoring of contracts	No		Current year + 2 years	PERMANENT DELETION/SECURE DISPOSAL

1.3 Funding & Finance

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Asset Management					
1.3.42	Inventories of furniture and equipment	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.43	Burglary, theft and vandalism report forms	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.44	Records relating to the leasing of shared facilities, such as sports centres	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.45	Land and buildings valuationsq	No		Date valuation superseded + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.46	Disposal of assets	No		Date asset disposed of + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.47	Community School leases for land	No		Date lease expires + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.48	Commercial transfer arrangements	No		Date of transfer + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.49	Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	PERMANENT DELETION/SECURE DISPOSAL
1.3.50	Transfer of freehold land	No		Life of land ownership then transfer to new owner	PERMANENT DELETION/SECURE DISPOSAL
School Fund					
1.3.51	School Fund - Cheque Books	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.52	School Fund - Paying In Books	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL

1.3 Funding & Finance					
Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
School Fund contd...					
1.3.53	School Fund - Ledger	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.54	School Fund - Invoices	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.55	School Fund - Receipts	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.56	School Fund - Bank Statements	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.57	School Fund - Journey Books				
School Meals					
1.3.58	Free school meals resisters	Yes		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.59	School meals registers	Yes		Current year + 3 years	PERMANENT DELETION/SECURE DISPOSAL
1.3.60	School meals summary sheets	No		Current year + 3 years	PERMANENT DELETION/SECURE DISPOSAL

As a charity, an Academy is not permitted to trade and make a profit. It is, however, possible to set up a subsidiary trading company, which can sell products or services and Gift Aid profits back to the Academy. If the Academy operates a subsidiary company, it is expected that these records will be managed in line with standard business practice.

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.4.1	Data Protection Policy, including data protection notification	No		Date policy superseded + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.4.2	Freedom of Information Policy	No		Date policy superseded + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.4.3	Information Security Breach Policy (incorporated in CLT UP GDPR Policy)	No		Date policy superseded + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.4.4	Special Educational Needs Policy	No		Date policy superseded + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.4.5	Complaints Policy	No		Date policy superseded + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.4.6	Risk and Control Framework	No		Life of framework + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.4.7	Rules and Bylaws (We don't have one)	No		Date rules or bylaws superseded+ 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.4.8	Home School Agreements	No		Date of agreement revised + 6 years	PERMANENT DELETION/SECURE DISPOSAL
1.4.9	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	PERMANENT DELETION/SECURE DISPOSAL

2. Human Resources

2.1 Recruitment

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.1.1 All records leading up to the appointment of a new Headteacher/Principal	Yes		Date of appointment + 6 years except in cases of negligence out claims of child abuse then at least 15 years	PERMANENT DELETION/ SECURE DISPOSAL
2.1.2 All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	PERMANENT DELETION/ SECURE DISPOSAL
2.1.3 All records leading up to the appointment of a new member of staff - successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	PERMANENT DELETION/ SECURE DISPOSAL
2.1.4 Pre-employment vetting information – DBS Checks	No	DBS Update Service Employer Guide June 2014	The Academies do not keep copies of DBS certificates	PERMANENT DELETION/ SECURE DISPOSAL
2.1.5 Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		These should be checked and a note kept of what was seen and what has been checked and a copy retained for the member of staff’s personal file	PERMANENT DELETION/ SECURE DISPOSAL
2.1.6 Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	An employer’s guide to right to work checks (Home Office May 2015)	These documents should be added to the Staff Personal File and kept until termination of employment + 2 years (Home Office request)	PERMANENT DELETION/ SECURE DISPOSAL
2.1.7 Records relating to the employment of overseas teachers	Yes		These documents should be added to the Staff Personal File and kept until termination of employment + 2 years (Home Office request)	PERMANENT DELETION/ SECURE DISPOSAL
2.1.8 Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	PERMANENT DELETION/ SECURE DISPOSAL

2.2 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
2.2.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years Unless the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete.	PERMANENT DELETION/SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
2.2.3	Annual appraisal/ assessment records	Yes		Current year + 5 years	PERMANENT DELETION/SECURE DISPOSAL
2.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	SECURE DISPOSAL
2.2.5	Training needs analysis	No		Current year + 1 year	SECURE DISPOSAL

2.3 Management of Disciplinary and Grievance Processes

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	"Keeping children safe in education Statutory guidance for schools and colleges "Current guidance"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children Current guidance"	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW NOTE: Allegations that are found to be malicious should be removed from personnel files. However for all other allegations, full details should be kept on the personnel file of the accused and a copy provided to the person concerned. Unless the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until the IICSA enquiries are complete.	PERMANENT DELETION/SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	• Oral warning			Date of warning + 6 months	PERMANENT DELETION/SECURE DISPOSAL (If warnings are placed on personal files then they must be weeded from the file)
	• Written warning – level 1			Date of warning + 6 months	
	• Written warning – level 2			Date of warning + 12 months	
	• Final warning			Date of warning + 18 months	
	• Case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	PERMANENT DELETION/SECURE DISPOSAL

2.4 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
2.4.1	Health and Safety Policy Statements	No		Life of policy + 3 years	PERMANENT DELETION/SECURE DISPOSAL
2.4.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	PERMANENT DELETION/SECURE DISPOSAL
2.4.3	Records relating to accident/injury at work (RIDDOR reported)	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	PERMANENT DELETION/SECURE DISPOSAL
2.4.4	Accident Reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below	
	• Adults			Date of the incident + 6 years	PERMANENT DELETION/SECURE DISPOSAL
	• Children			DOB of the child + 25 years	PERMANENT DELETION/SECURE DISPOSAL

2.4 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
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if 2002 Regulations had not been made. Regulation 18 (2)	Current year + 10 years then review (Previously 40 years)	PERMANENT DELETION/SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No		Last action + 40 years	PERMANENT DELETION/SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	PERMANENT DELETION/SECURE DISPOSAL
2.4.8	Fire precaution log books	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
2.4.9	Fire risk assessments	No	Fire Service Order 2005	Life of the risk assessment + 6 years	PERMANENT DELETION/SECURE DISPOSAL
2.4.10	Incident reports	Yes		Current year + 20 years	PERMANENT DELETION/SECURE DISPOSAL

3. Management of the Academy

3.1 Admissions

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.1.1	All records relating to the creation and implementation of the Schools Admissions' Policy	No	School Admissions Code	Life of the policy + 3 years then REVIEW	PERMANENT DELETION/SECURE DISPOSAL
3.1.2	Admission - if the admission is successful	Yes	Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Date of admission + 1 year	PERMANENT DELETION/SECURE DISPOSAL
3.1.3	Admission - if the admission is unsuccessful	Yes	Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 2 years	PERMANENT DELETION/SECURE DISPOSAL
3.1.4	Register of admissions	Yes	Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	REVIEW - Schools may wish to consider keeping the admission register permanently, as after schools receive enquiries from past pupils to confirm the dates they attended the school.
3.1.5	Admissions - Secondary Schools - Casual	Yes		Current year + 1 year	PERMANENT DELETION/SECURE DISPOSAL

3.1 Admissions

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.1.6	Proof of address supplied by parents as part of the admissions process	Yes	Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Current year + 1 year	PERMANENT DELETION/SECURE DISPOSAL
3.1.7	Supplementary information form, including additional information such as religion and medical conditions	Yes			
	<ul style="list-style-type: none"> For successful admissions 			This information should be added to the pupil file	PERMANENT DELETION/SECURE DISPOSAL
	<ul style="list-style-type: none"> For unsuccessful admissions 			Until appeals process completed	PERMANENT DELETION/SECURE DISPOSAL

3.2 Headteacher/Principal and Senior Management Team

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.2.1	Log books of activity in the school maintained by the Headteacher/Principal	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the Local Authority if appropriate
3.2.2	Minutes of Senior Management Team meetings and meeting of other internal administrative bodies	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of the meeting + 3 years then REVIEW	PERMANENT DELETION/ SECURE DISPOSAL
3.2.3	Reports created by the Headteacher or the Senior Management Team	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then REVIEW	PERMANENT DELETION/ SECURE DISPOSAL
3.2.4	Records created by the Headteacher/Principal, Deputy Headteacher, Heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the log book refers to individual pupils or members of staff		Current academic year + 6 years then REVIEW	PERMANENT DELETION/ SECURE DISPOSAL
3.2.5	Correspondence created by the Headteacher/Principal, Deputy Headteacher, Heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of correspondence + 6 years then REVIEW	PERMANENT DELETION/ SECURE DISPOSAL
3.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	PERMANENT DELETION/ SECURE DISPOSAL

3.3 Operational Administration

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.3.1	Management if complaints	Yes		Date complaint received + 3 years	PERMANENT DELETION/SECURE DISPOSAL
3.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	PERMANENT DELETION/SECURE DISPOSAL
3.3.3	Records relating the the management of software licences	No		Date licence expires + 6 years	PERMANENT DELETION/SECURE DISPOSAL
3.3.4	General file series	No		Current year + 5 years then REVIEW	PERMANENT DELETION/SECURE DISPOSAL
3.3.5	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
3.3.6	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
3.3.7	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
3.3.8	Visitors' books and signing in sheets (including, electronic systems, visitors books and signing in sheets)	Yes		Current year + 6 years then REVIEW	PERMANENT DELETION/SECURE DISPOSAL
3.3.9	Rewcords relations to the creation and management of Parent Teacher Associations and/or Alumni	No		Current year + 6 years then REVIEW	PERMANENT DELETION/SECURE DISPOSAL

4. Property Management

This section covers the management of buildings and property

4.1 Property Management					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
4.1.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	
4.1.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.	
4.1.3	Leases of property belonging to the school	No		Expiry of lease + 6 years	PERMANENT DELETION/SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises			Current financial year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
4.1.5	Business continuity and disaster recovery plans			Date the plan superseded + 3 years	PERMANENT DELETION/SECURE DISPOSAL

4.2 Maintenance					
Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
4.2.1	All records relating to the maintenance of the academies carried out by contractors	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the academies carried out by academy employees including maintenance log books	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL

4.3 Fleet Management					
Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	No	Limitation Act 19080 (Section 2)	Disposal of the vehicle + 6 years	PERMANENT DELETION/SECURE DISPOSAL
4.3.2	The process of managing allocation and maintenance of vehicles, e.g. jurists of who was driving the vehicles and when, maintenance	No	Limitation Act 19080 (Section 2)	Disposal of the vehicle + 6 years	PERMANENT DELETION/SECURE DISPOSAL
4.3.3	Service logs and vehicle logs	No	Limitation Act 19080 (Section 2)	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	PERMANENT DELETION/SECURE DISPOSAL
4.3.4	GPS tracking data relating to the vehicles	No	Limitation Act 19080 (Section 2)	Date of journey + 6 years	PERMANENT DELETION/SECURE DISPOSAL

5. Pupil Management

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

5.1 Pupil's Education Record					
Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		PERMANENT DELETION/SECURE DISPOSAL
5.1.1	<ul style="list-style-type: none"> Primary 			Retain whilst the child remains at the primary school	<p>The file should follow the pupil when they leave the primary school. This will include:</p> <ul style="list-style-type: none"> To another primary school To a secondary school To a pupil referral unit <p>If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period.</p> <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA.</p>
	<ul style="list-style-type: none"> Secondary 		Limitation Act 1990 (Section2)	Date of birth of the pupil + 25 years	PERMANENT DELETION/SECURE DISPOSAL
5.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil + 25 years	PERMANENT DELETION/SECURE DISPOSAL
5.1.3	Management of examination registrations	Yes		the examination board will usually mandate how long these records need to be retained	

5.1.4	Examination results - pupil copies	Yes			
	• Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	• Internal			This information should be added to the pupil file	

This review took place when the Independent Inquiry on Historical Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention.

5.1.5	Child protection information held on pupil file	Yes	"Keeping children safe in education statutory guidance for schools and colleges.; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children.	In any records relating to child protection issues are placed on a pupil file, it should be in a sealed envelope and then retained for the same period as the pupil file.	PERMANENT DELETION/SECURE DISPOSAL 0 these records MUST be shredded
5.1.6	Child protection information held on separate files	Yes	"Keeping children safe in education statutory guidance for schools and colleges.; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children.	Date of birth of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	PERMANENT DELETION/SECURE DISPOSAL 0 these records MUST be shredded

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

5.2 Attendance					
Basic file description			Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.2.1	Attendance registers		School attendance: Department advice for maintained schools, Academies, independent schools and local authorities August 2020	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	PERMANENT DELETION/SECURE DISPOSAL
5.2.2	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	PERMANENT DELETION/SECURE DISPOSAL

5.3 Special Educational Needs					
Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	Review Note: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time in order to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period - this should be documented.
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years (This would normally be retained on the pupil file)	PERMANENT DELETION/SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Education Act 1996 Special Educational needs and Disability Act 2001 Section 2	Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.4	Accessibility strategy	Yes	Education Act 1996 Special Educational needs and Disability Act 2001 Section 14	Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL, unless the document is subject to a legal hold

6. Curriculum Management

6.1 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
6.1.1	Curriculum returns	No		Current year + 3 years	PERMANENT DELETION/SECURE DISPOSAL
6.1.2	Examination Results (Schools Copy)	Yes		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
	SATS records –	Yes			
	Results			The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	PERMANENT DELETION/SECURE DISPOSAL
	Examination Papers			The examination papers should be kept until any appeals/ validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
6.1.4	Value Added and Contextual Data	Yes		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
6.1.5	Self Evaluation Forms	Yes		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL

7. Extra Curricular Activities

7.1 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
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 14 years	PERMANENT DELETION/SECURE DISPOSAL
7.1.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 10 years	PERMANENT DELETION/SECURE DISPOSAL
7.1.3	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	PERMANENT DELETION/SECURE DISPOSAL
7.1.5	Records relating to residential trips	Yes		Date of birth of the youngest pupil involved + 25 years	PERMANENT DELETION/SECURE DISPOSAL

7.2 Walking Bus

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

8. Central Government and Local Authority

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

8.1 Local Authority

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	PERMANENT DELETION/SECURE DISPOSAL
8.1.2	Attendance Returns	Yes		Current year + 1 year	PERMANENT DELETION/SECURE DISPOSAL
8.1.3	School Census Returns	No		Current year + 5 years	PERMANENT DELETION/SECURE DISPOSAL

8.2 Central Government

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
8.2.1	OFSTED reports and papers	No		Life of the report then REVIEW	PERMANENT DELETION/SECURE DISPOSAL
8.2.2	Returns made to central government	No		Current year + 6 years	PERMANENT DELETION/SECURE DISPOSAL
8.2.3	Circulars and other information sent from central government	No		Operational use	PERMANENT DELETION/SECURE DISPOSAL