



Personal Data Retention Policy

March 2021

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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 databases, 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.

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. The Policy clarifies the different roles within Delta for the retention and use of personal data.

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 databases, 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 databases, 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 March 2024, 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. Key changes – additional guidance provided: <ul style="list-style-type: none"> • Email use and retention periods (section 7.1) • User areas (section 7.2) • Board of Trustees section added (Appendix1, Section1) • Maternity pay records (Appendix 1, section 10.4) • Overtime claims and supporting documents (App 1, section 10.6) • Budget preparation and supporting documents (App 1, section 14.5) • Contract monitoring (Appendix 1, section 15.3) 	Emma Mayor
3	Mar 2021	Policy revised.	Emma Mayor/Amie Carlyle

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 shall 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.

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 Data Protection Act (DPA) and UK GDPR. 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 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 customer 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 shall 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. Please consult the Data Protection Policy and Procedures before disposing of personal data.
- 2.4.2** Please consider what the best method will be 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 should be recorded as a data processor on GDPRiS.
- 2.4.4** Where deletion/destruction is not practical, we shall 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 will be raised with the Data Protection Officer for prior written approval. The Data Protection Officer can be contacted via 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 periodically review our email inboxes with the goal of reducing the amount of data we store there

4.1.2 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

4.1.3 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.

4.1.4 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

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

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. IT USER ACCOUNTS

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

4.1.7 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

4.1.8 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.

6. UPDATING THIS POLICY

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

6.1.1 The relevant legislation;

6.1.2 Any guidance issued by any relevant regulatory body, including the ICO;

6.1.3 Good industry practice;

6.1.4 The method(s) of processing of personal data; and

6.1.5 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. Board of Trustees					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
1.1	Records relating to the appointment of Trustees .	YES		Period of appointment + 6 months.	SECURE DISPOSAL ¹
1.2	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
1.3	Scheme of delegation and terms of reference for committees.			Until superseded or whilst relevant.	

¹ 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. Board of Trustees					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
1.4	Meetings schedule.			Current year.	SECURE DISPOSAL
1.5	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
1.6	Minutes of Board of Trustees meetings.	There may be data protection issues if the meeting is dealing with confidential issues relating to staff.		PERMANENT	
1.7	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.
1.8	Register of attendance at Full Board of Trustee meetings.			Date of last meeting in the book + 6 years.	SECURE DISPOSAL

1. Board of Trustees					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
1.9	Action plans created and administered by the Board of Trustees.	No		Until superseded or whilst relevant.	SECURE DISPOSAL
1.10	Policy documents created and administered by the Board of Trustees.	No		Until superseded.	SECURE DISPOSAL
1.11	Correspondence sent and received by the Board of Trustees.			General correspondence should be retained for current year + 3 years.	SECURE DISPOSAL
1.12	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
2.1	Records relating to the appointment of AAB members.	YES		Period of appointment + 6 months.	SECURE DISPOSAL
2.2	Records relating to the appointment of co-opted AAB members.	YES		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
2.4	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	

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
				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	
	Inspection Copies ²			Date of meeting + 3 years	If these minutes contain any sensitive, personal

² 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
					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 (The Academy should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the IICSA has issued its recommendations).	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
2.12	Records relating to complaints made to and investigated by the Academy Advisory Body.	Yes		A secure and confidential record of all complaints, decisions and findings will be kept for one (1) year 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.	SECURE DISPOSAL
2.18	Register of business interests.			Date appointment ceases + 6 years.	SECURE DISPOSAL
2.19	AAB members Code of Conduct.			This is expected to be a dynamic document; one copy of each version should be kept.	
2.20	Records relating to the training required and received by AAB members.			Date AAB member steps down + 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
2.21	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 soon as the Delta DBS is</p>	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
				seen and recorded on the SCR.	
2.23	AAB member personnel files.			Date appointment ceases + 6 years.	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
3.1	Log books of activity in the school maintained by the Head Teacher.	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
3.2	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. 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
3.3	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 staff with administrative responsibilities.	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
3.6	Professional Development Plans.	Yes		These should be held on the individual's personnel record. If not then	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
				termination of employment + 6 years.	
3.7	Academy Development Plans.	No		Life of the plan + 3 years.	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
4.1	General file series which does not fit under any other category.	No		Current year + 5 years then review.	SECURE DISPOSAL
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	No		Current academic year + 1 year.	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
	circulars to staff, parents or pupils.				
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
4.7	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 Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014.	Life of the policy + 3 years then review.	SECURE DISPOSAL
5.2	Admissions – if the admission is successful.	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014.	Date of admission + 1 year.	SECURE DISPOSAL
5.3	Admissions – if the appeal is unsuccessful.	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools	Resolution of case + 1 year.	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
			adjudicators and admission appeals panels December 2014.		
5.4	Register of Admissions.	Yes	School attendance: Guidance for maintained schools, academies, independent schools and local authorities September 2018.	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made ³	REVIEW SECURE DISPOSAL
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 Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014.	Current year + 1 year.	SECURE DISPOSAL

³ School attendance: Guidance for maintained schools, academies, independent schools and local authorities September 2018 p6

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

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 of Academy/ Principal.	Yes		<p>Unsuccessful candidates. Date of appointment to post + 6 months.</p> <p>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.</p>	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	Yes		All the relevant information should be added to the staff	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
	member of staff – successful candidate.			<p>personal file (see below) and all other information retained for 6 months.</p> <p>Staff personal file - Termination of Employment + 6 years except in the event of ongoing claims/ investigations – see relevant sections below.</p>	
6.4	Pre-employment vetting information – DBS Checks – successful candidates.	Yes	DBS Update Service Employer Guide September 2018: Keeping children safe in education. September 2020 (updated in January 2021).	<p>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.</p> <p>The Delta Safer Recruitment policy requires that schools</p>	<p>SECURE DISPOSAL</p> <p>SECURE DISPOSAL</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
				<p>must record the number on the SCR following sight of the original certificate.</p> <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>	

6.	Recruitment				
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
				Application forms, references and other documents – for the duration of the employee's employment + 6 years.	
6.5	Forms of proof of identity collected as part of the process of checking "portable" enhanced DBS disclosure.	Yes		Where possible this process should be carried out using the online system or ID should be checked and a note kept of what was seen and what has been checked. If it is necessary to take a copy of documentation then it should be retained on the staff personal file.	SECURE DISPOSAL
6.6	Pre-employment vetting information – Evidence proving the right to work in	Yes	An employer's guide to right to work checks [Home Office, June 2018].	These documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that	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
	the United Kingdom ⁴ - successful candidates.			<p>the documents are kept for termination of employment plus not less than two years.</p> <p>Evidence documents should be photocopied rather than scanned, and signed / dated on the back by the person who verified them.</p> <p>Staff personal file - Termination of Employment + 6 years.</p>	
6.7	Risk assessment of any criminal or other information that casts doubt on suitability.	Yes	Home Office / Disclosure & Barring Service code of practice KCSiE.	Staff personal file (NB the details of the criminal offence must not be recorded).	SECURE DISPOSAL

⁴ 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.	
6.8	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.	<p>For teachers with a DfE number, the individual teacher record should be printed and retained in the personal file.</p> <p>For unqualified teachers and HLTAs, the date on which 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</p>	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
				not be printed or retained in any format. Staff personal file - Termination of Employment + 6 years.	
6.10	Single central record of vetting checks – individual entries.	Yes	Independent School Standards (Regs) 2014.	Until date of leaving.	N/A

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.	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	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
				IICSA . If this is the case then the file will need to be retained until IICSA enquiries are complete.	
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	Sickness absence monitoring.	Yes		<p>Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring.</p> <p>N.B. Sickness records should be kept separate from accident records.</p> <p>No associated payment - current year + 3 years sickness payment made -</p>	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
				current year + 6 years applies.	
7.5	Staff training – where training leads to continuing professional development.			Length of time required by the professional body.	SECURE DISPOSAL
7.6	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
7.7	Staff training – where the training relates to children (e.g. safeguarding or other child related training).			Date of the training + 40 years This retention period reflects that the IICSA may wish to see training records as part of an investigation.	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 of a child protection nature against a member of staff including where the allegation is deemed ⁵ to be founded, unfounded, unsubstantiated or false ⁶	Yes	<p>"Keeping children safe in education Statutory guidance for schools and colleges September 2020" (Updated January 2021)</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>Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW.</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</p>	<p>SECURE DISPOSAL</p> <p>These records must be shredded.</p>

⁵ The outcome must be determined in agreement with the LADO

⁶The Independent Inquiry into Child Sexual Abuse (IICSA) is on-going as at October 2018. Since the beginning of this Inquiry into historical sexual abuse, organisations should not destroy any records that might be relevant. This has been reinforced by Keeping Children Safe in Education (DfE, 2020), updated in January 2021. **Schools and colleges have an obligation to preserve records, which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website).**

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
				<p>hearing/appeal pack issued to them.</p> <p>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.</p>	
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	<p>All records relating to an allegation that has been found to be malicious should be removed from personal files.</p> <p>An allegation can only be deemed malicious in agreement with the LADO.</p>	

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
<p>Note:</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> <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	
8.5	Second written warning	Yes		Date of warning + 9 months	
8.6	Final written warning	Yes		Date of warning + 12 months	

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	Accident Reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
9.4	Adults			Date of the incident + 6 years	SECURE DISPOSAL
9.5	Children			DOB of the child + 25 years	SECURE DISPOSAL
9.6	Records relating to any reportable death, injury, disease or dangerous occurrence	Yes	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations	Date of incident + 3 years provided that all records	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
	(RIDDOR). For more information see http://www.hse.gov.uk/RIDDOR .		2013 SI 2013 No 1471 Regulation 12 (2).	relating to the incident are held on personal file.	
9.7	Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
9.8	Accident Reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
9.9	Adults			Date of the incident + 6 years	SECURE DISPOSAL
9.10	Children			DOB of the child + 25 years	SECURE DISPOSAL
9.11	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002	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
			No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)		
9.12	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
9.13	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
9.14	Fire Precautions log books	No		Current year + 6 years	SECURE DISPOSAL
9.15	Health and safety file to show current state of building including all alterations (wiring, plumbing, building works etc.)	No		Pass to new owner on sale or transfer of the building.	

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
	to be passed on in the case of change of ownership.				

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. 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
10.5	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
10.7	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. 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
10.11	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 P6/P11/P11D/P35/P45/P46/P48.	Yes	The minimum requirement – as stated in Inland Revenue Booklet 490 – is 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.	Current year + 6 years.	SECURE DISPOSAL
10.15	Time sheets/flexitime.	Yes		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
10.16	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

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 To be passed to the Local Authority if the school closes

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
13.2	Burglary, theft and vandalism report forms.	No		Current year + 6 years.	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 Accounts.	No		Current year + 6 years.	STANDARD DISPOSAL
14.2	Loans and grants managed by the school.	No		Date of last payment on the loan + 12 years then REVIEW.	SECURE DISPOSAL
14.3	Student Grant applications.	Yes		Current year + 3 years.	SECURE DISPOSAL
14.4	Pupil Premium Fund records.	Yes		Date pupil leaves the provision + 6 years	SECURE DISPOSAL
14.5	All records relating to the creation and management of budgets including background papers.	No		Life of the budget + 6 years.	SECURE DISPOSAL
14.6	Invoices, receipts, order books and requisitions, delivery notices and bank statements.	No		Current financial year + 6 years.	SECURE DISPOSAL
14.7	Records relating to the collection and banking of monies.	No		Current financial year + 6 years.	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
14.8	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 + 6 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 [operational]	Action at the end of the administrative life of the record
17.1	Free School Meals Registers (where the register is used 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 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 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

19.	Maintenance				
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
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"> • to another primary school • to a secondary school • to a pupil referral unit.

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
20.3	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	Public.		<p>Non statutory guidance JCQ 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</p>	SECURE DISPOSAL

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
				<p>of 12 months from their date of issue.</p> <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	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
	<p>Schools and colleges have an obligation to preserve records, which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2020 paragraph 242, updated in January 2021.)</p>				
21.1	Child Protection information held on pupil file.	Yes	Keeping children safe in education Statutory guidance for schools and colleges September 2020" (Updated in January 2021) 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. Note: These records will be subject to any instruction given by IICSA.	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 2020" (Updated in January 2021).	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	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
				<p>of the chronology for DOB + 25 years.</p> <p>(Review at the end of the relevant academic year).</p> <p>Note; it makes no difference whether the CP files are paper or electronic.</p>	
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.	Attendance & Behaviour				
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
	Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this retention schedule. If any school is unsure about what records should be retained, they should seek advice of their own local authority or take independent legal advice.				
22.1	Attendance Registers.	Yes	School attendance: Guidance 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.	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	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 NOTE: This retention period is the minimum 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. 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
23.4	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.			The SATS results should be recorded on the pupil's educational file and will	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
				<p>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>	
	Examination Papers.			The examination papers should be kept until any appeals/validation process is complete.	SECURE DISPOSAL
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.	
25.5	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 – Primary Schools.	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 14 years.	SECURE DISPOSAL
26.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools.	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 10 years.	SECURE DISPOSAL
26.3	Parental consent forms for school trips where there has been no major incident.	Yes		Conclusion of the trip + 6 months	REVIEW NOTE: This retention period is the minimum 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	Yes		Whilst child is attending school and then destroy.	SECURE DISPOSAL

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
	case file created by the outside agency.				
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. Parent Teacher Associations and Old Pupil Associations					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
28.1	Records relating to the creation and management of Parent Teacher	Yes		Current year + 6 years then REVIEW.	SECURE DISPOSAL

28.	Parent Teacher Associations and Old Pupil Associations				
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
	Associations and /or Old Pupils Associations.				

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.	Local Authority				
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
29.4	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
30.2	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. You must seek approval from the Trust Data Protection Officer via dpo@deltatrust.org.uk prior to disposal of any document which is disposed of before 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 on the Trust VLE.	

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 in to 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 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 th birthday (or the end of that school year)
A referral was made / social care involved / other agencies involved	35 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	75 years from date the child left the school
Records relating to allegation against staff / harm to a pupil by staff / visitor / volunteer	Usually retirement age or 10 years, whichever is longer BUT for duration of IICSA, it is a criminal offence to destroy any records that could be called as evidence so retain everything

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 Business/Finance Manager/ Data Protection Lead or Head/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.

Data disposal log number	
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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.

3. Authorisation (Business /Finance Manager/ DPL or Head)		
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.

4. Authorisation for disposal of records		
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 (Destruction must be in accordance with level of sensitivity)	<input type="checkbox"/> Non-sensitive waste disposal <input type="checkbox"/> Shredding Strip <input type="checkbox"/> Pulping <input type="checkbox"/> Incineration <input type="checkbox"/> Outside Vendor <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			

6. Notes on destruction			

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