



**St Ralph
Sherwin**
Catholic Multi Academy Trust



Information and Records Retention Policy

Version 1
November 2021



One of four Catholic Multi
Academy Trusts in the
Diocese of Nottingham



Document Provenance

Title of policy:	Information and Records Retention Policy	
Author and policy owner in the Executive Team:	Governance Manager	
Version number:	1	
Date approved:	30 November 2021	
Approved by:	Audit, Risk and Governance Committee	
Date of next review:	November 2023 (<i>every two years</i>)	
Document review and editorial updates:		
Version control	Date	Key revisions included
Version 1	30 November 2021	New policy written in relation to all legal requirements for retention and destruction of records. Written with DPO. New Appendix 1 sets out timeframes for retention of records and requirements.



1. Introduction and Purpose

- 1.1. The St Ralph Sherwin Catholic Multi Academy Trust has a statutory responsibility to maintain the records and record keeping systems in accordance with legislation and regulation, to remain fully compliant with General Data Protection Regulation (GDPR).
- 1.2. The Trust recognises that by managing our information records efficiently and effectively in a structured manner that the Trust will comply with our legal and regulatory obligations and also give assurance to staff, pupils, parents and volunteers about how we manage their data. Through high quality records management the Trust has a reliable and effective way to protect legal rights and interests of the Trust and meet the key principles prescribed in value, integrity and accountability.

2. Scope

- 2.1. This policy applies to all records created, received or maintained by both permanent and temporary staff of the St Ralph Sherwin Catholic Multi Academy Trust (The Trust). This policy also applies to agency staff, contractors, and other personnel such as volunteer governors who are acting on behalf of the Trust.
- 2.2. Records are defined as all documents which facilitate the business carried out by the Trust and which thereafter are retained for a set period of time, to provide evidence of its day-to-day activities and transactions. These records may be created, received or maintained in hard copy or in electronic format.

3. Legislation and regulation

- 3.1. This policy meets the legislation that governs how the Trust should retain information records and for what purpose, and the specific retention periods as set out in statute and in best practice. The Policy also draws upon guidance issued by the Information Records Management Society (IRMS)¹. The retention periods are stated in Appendix 1 in this Policy and must be followed at all times.
- 3.2. This policy meets requirements of:
 - The Data Protection Act 2018²
 - General Data Protection Regulations 2018³
 - The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019
- 3.3. The Code of Practice on the Management of Records (The Code)⁴ was issued under Section 46 the Freedom of Information Act 2000 and came into force on 15 July 2021. As a Trust we are bound by The Code which is a statutory Code.

¹ [Information and Records Management Society Ltd \(irms.org.uk\)](http://irms.org.uk)

² [Data Protection Act 2018 \(legislation.gov.uk\)](http://legislation.gov.uk)

³ [Guide to the General Data Protection Regulation - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

⁴ [Code of Practice on the Management of Records issued under section 46 the Freedom of Information Act 2000 - GOV.UK \(www.gov.uk\)](http://www.gov.uk)



3.4. The 'Code' sets out a clear purpose and requirements for authorities (our Trust) to adhere to. It states that:

3.4.1. *The Code provides guidance to authorities which helps them to create a framework for keeping, managing, and destroying their information and therefore records. Complying with this Code will help authorities to account for their activities*

3.4.2. *The Code takes a principles-based approach. The three principles of **value, integrity and accountability** provide a high-level framework for authorities to manage information and maintain a record of their activities. This approach can accommodate the varied procedural and technical environments in which authorities operate by setting out good practice.*

3.4.3. *The principles apply to information in any format or medium that the authority holds or that another body holds on its behalf. The principles inform good practice in the creation, management, and destruction of information and are applicable to the diverse procedural and technical environments in which authorities operate.*

3.5. As a Trust we are required to ensure we have a policy which clearly sets out:

3.5.1. How we as a Trust **collect, store, archive and destroy as required information** having full regard to the key principles of:

- Value of the information
- Integrity of the information
- Accountability for the information.

3.5.2. A **structure for the records and information management function in our Trust**, with a clear framework for the managing of records and information and a set of procedures for sustaining high standards and quality checks against what is set out in this Policy. This includes:

- the senior management responsibility for information and records retention; written rules in what we keep and destroy, by when and how, with a clear record of all activities across the Trust both at central team level and within the work of each Academy;
- the regular evaluation of the effectiveness of policies and procedures and the extent to which the requirements are being followed;
- a clear set of written rules about access to the Trust's information including personal information and other sensitive information;
- a clear governance framework that takes account of risks and the mitigations in place to reduce risks, both through the central Trust Risk Registers and through the Academy Risk Registers;
- a framework set out in Policy that details the day-to-day responsibility for information management.

4. Upholding principles in The Code.

4.1. The Trust has full and due regard for the **three principles** in the Code as explained below.

4.2. **Value**

4.2.1. The authority, The Trust, must understand, manage and use its information in a way that enables it to understand its value, in order to make effective decisions for the benefit of society. Information can have:



- immediate value - why it was needed in the first instance;
- operational value - working information;
- evidentiary value - for audit, compliance or legal evidence;
- potential value - to create or improve services or generate income;
- permanent value – a historic value, for the organisation or society as a whole.

4.2.2. The Trust will manage information in such a way to assess its current and future value. Information will be retained as long as it can be shown to have value and disposed of when it no longer has value.

4.3. **Integrity.**

4.3.1. The authority, The Trust and all its stakeholders must be able to rely upon and trust the information that it holds.

4.4. **Accountability.**

4.4.1. The authority, the Trust's, information management must enable it to provide a clear and accurate account of its activity in accordance with its legal and other obligations. It covers:

- Scope
- Responsibilities
- Relationship with existing Policies.

5. **Independent Inquiry into Child Sexual Abuse (IICSA)**

5.1. The Independent Inquiry into Child Sexual Abuse commenced in 2015 and is ongoing. The Inquiry issued a Guidance Note⁵ to a range of institutions setting out clear requirements for what authorities and institutions must retain in relation to records about the care of children. The Guidance Note remains in place while the Inquiry is ongoing. Authorities and institutions must not destroy any records which might be relevant to the Inquiry as such records may be requested by the inquiry or can be subject a disclosure order. This means as a Trust, the Trust must consider before destruction and with due diligence, any record that may fall within the remit of the Inquiry. We retain our position in accordance with the IICSA Guidance Note, in the requirements set out in Appendix 1.

6. **Responsibilities.**

- 6.1. The Trust will uphold its statutory responsibilities through the review and approval of this policy and by holding the Executive Team to account for its implementation trust wide.
- 6.2. In each academy there should be a senior leader who is responsible for maintaining implementation of this policy and can draw upon this policy to provide guidance on effective records management practice. The senior leader should promote compliance with this policy so that information will be retrieved easily, appropriately

⁵ [Guidance Note: Retention Instructions and Data Protection requirements | IICSA Independent Inquiry into Child Sexual Abuse](#)



and in a timely way. The GDPR Lead in each academy should also work closely with the senior leaders to implement this policy.

- 6.3. The Headteacher will be required to monitor compliance with this policy by undertaking at least an annual check to determine if records are stored securely and can be accessed appropriately, in accordance with requirements in this policy.
- 6.4. All staff must ensure they have read, understood and adhere to this policy.
- 6.5. Information will be assessed and when it is no longer required, necessary or is to be destroyed or deleted in line with the Records Retention Schedule, the security of data and appropriate measures will be implemented to protect breach, loss or unauthorised sharing of the information.
- 6.6. Information must be managed in line with the Records Retention Schedule in Appendix 1. This will help to ensure that the Trust can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (Subject Access Requests 'SARs').

7. Monitoring, Compliance and Review

- 7.1. The responsibility for monitoring and reviewing the impact of this policy at academy level sits with Headteachers.
- 7.2. The Executive Team, Governance Manager and DPO will make recommendations to the Senior Executive Committee (SET) and the Audit, Risk and Governance Committee.
- 7.3. The Audit, Risk and Governance Committee will review and sign off this policy every two years unless the policy requires changes in the interim as a result of updates to legislation and regulation that the Trust must action.

8. Relationship with existing policies.

- 8.1. This policy must be read in conjunction with the following Trust policies:
 - Freedom of Information Publication Scheme
 - Data Protection Policy
 - IT Acceptable Use Policy
 - Information Security Policy
 - Child Protection and Safeguarding Policy



Annex 1 Records Retention Schedule

Documented on the following pages is the Records Retention Schedule that everyone in the Trust must adhere to.

The Records Retention Schedule is divided into the following sections:

- Section 1: Governance at Trust Level and governance at local academy level, Local Governing Body.
- Section 2: Senior Management
- Section 3: Admissions
- Section 4: Operational Management
- Section 5: Health and Safety
- Section 6: Human Resources and Staffing
- Section 7: Property Management
- Section 8: Finance and Financial Management
- Section 9: Pupil Management
- Section 10: Curriculum and Teaching and learning
- Section 11: Trips and Extra Curricular Activities
- Section 12: Family Liaison officers and home school liaison officers/assistants
- Section 13: Central Government and Local Authority

Please note that the records sections shaded in light green are relevant to the overall Trust and not to each individual academy, and the Trust central team/s with the Governance Manager and Data Protection Officer (DPO) will ensure compliance with those items.

All sections with amber shading apply to all academies and should be followed.

Section 1 - Governance at Trust Level and governance at local academy level, Local Governing Body.

Governance at Trust Level					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.1	Governance Statement	No		Life of governance statement + 6 years	Secure Disposal
1.2	Articles of Association - CMAT	No		Permanent - retain for life of the Academy Trust (while academy/academies are open)	
1.3	Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	
1.4	Memorandum of Understanding of Shared Governance among Schools	No	<i>Companies Act 2006 section 355</i> Companies Act 2006 (legislation.gov.uk)	Life of Memorandum of Understanding + 6 years	Secure Disposal
1.5	Constitution	No		Life of the Academy	Secure Disposal
1.6	Special Resolutions to amend the Constitution	No		Life of the Academy	Secure Disposal
1.7	Governance Statement	No		Life of governance statement + 6 years	Secure Disposal
1.8	Written Scheme of Delegation (and iterations)	No	<i>Companies Act 2006 section 355</i>	Life of Written Scheme of Delegation + 10 years	Secure Disposal
1.9	Directors - Appointment	No		Life of appointment + 6 years	Secure Disposal



1.10	Directors – Disqualification	No	Company Directors Disqualification Act 1986 Company Directors Disqualification Act 1986 (legislation.gov.uk)	Date of disqualification + 15 years	Secure Disposal
1.11	Directors – Termination of Office	No		Date of termination + 6 years	Secure Disposal
1.12	Annual Report – Trustees ⁶ Report	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	Secure Disposal
1.13	Annual Report and Accounts Annual Reports created under the requirements of the Education (Governor’s Annual Reports) (England) (Amendment) Regulations 2002	No	<i>Companies Act 2006 section 355</i>	Date of report + 10 years	Secure Disposal
1.14	Appointment of Trustees (CMAT Foundation Directors) and Governors (LGBs) and Directors (Executive Officers)	Yes		Life of appointment + 6 years	Secure Disposal
1.15	Statement of Trustees (CMAT Foundation Directors) Responsibilities	No		Life of appointment + 6 years	Secure Disposal
1.16	Strategic Action Plans -created and administered by Trust Boards	No		Life of action plan + 3 YEARS	Secure Disposal
1.18	Policy documents created and administered by the Trust Board	No		Life of the policy + 3 years	Secure Disposal

⁶ Trustees – for the St Ralph Sherwin Catholic MAT, Trustees are ‘Foundation Directors’



1.19	Records relating to complaints dealt with by the Trust Board	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	Secure Disposal
1.20	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date proposal accepted or declined + 3 years	Secure Disposal
Trust Board of Foundation Directors and Committees of the Trust Board					
1.21	Trust Board Meeting Minutes	<i>Potentially if the Minutes have reference/s to living personnel</i>	Companies Act 2006 section 248 Companies Act 2006 (legislation.gov.uk)	Minutes must be kept for at least 10 years from the date of the meeting	Secure Disposal
1.22	Trust Board Decisions	<i>Potentially if the Minutes have reference/s to living personnel</i>		Date of the meeting + a minimum of 10 years	Secure Disposal
1.23	Minutes relating to any of the Committees set up by the Trust Board of Foundation Directors	<i>Potentially if the Minutes have reference/s to living personnel</i>		Date of the meeting + a minimum of 10 years	Secure Disposal
1.24	Records of Members Meetings	<i>Potentially if the Minutes have reference/s to living personnel</i>	Companies Act 2006 Section 248	Date of the meeting + a minimum of 10 years	Secure Disposal
1.25	Records relating to the Trust AGM/GM	<i>Potentially if the Minutes /documents have reference/s to living personnel</i>	Companies Act 2006 Section 248	Date of the meeting + a minimum of 10 years	Secure Disposal



1.26	Declaration of Interests – Foundation Directors (FDs)	Yes		Life of Declaration + 6 years	Secure Disposal
1.27	Register of Directors (FDs)		Companies Act 2006	Life of the Academy + 6 years	Secure Disposal
1.28	Register of Directors’ (FDs)residential addresses		Companies Act 2006	Life of the Academy + 6 years	Secure Disposal
1.29	Register of gifts and hospitality		Companies Act 2006	Life of the Academy + 6 years	Secure Disposal
1.30	Register of Members		Companies Act 2006	Life of the Academy + 6 years	Secure Disposal

Governance – Local Governing Body					
1.31	Agendas for Local Governing Body (LGBS) meetings	<i>May be data protection issues, if the meeting is dealing with confidential issues relating to staff</i>		One copy should be retained with the master set of minutes. All other copies can be disposed of- can be electronic	
1.32	Minutes of, and papers considered at, meetings of the Local Governing Body	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		Signed Master set of Minutes – retain	If these contain any sensitive, personal information they must be shredded.
				Permanent	
				Copies of minutes retained for inspection purposes – Academic year + 3 Years	



1.33	Reports presented to the Local Governing Body	There may be data protection issues if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently	Secure disposal or retain with the signed set of the minutes Secure Disposal
1.34	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No		Date of the meeting + a minimum of 6 years	Secure Disposal
1.35	Action plans created and administered by the Local Governing Body	No		Life of the action plan + 3 years	Secure Disposal
1.36	Policy documents created and administered by the Local Governing Body	No		Life of the policy + 3 years	Secure Disposal
1.37	Records relating to complaints dealt with by the Governing Body	yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	Secure Disposal
1.38	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002		Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002, No 1171	Date of report + 10 years	Secure Disposal
1.39	Declaration of Interests Governors -	Yes		Life of the Academy + 6 years	Secure Disposal

Section 2 Senior Management

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.1	Log books of activity	Potentially		Date of last entry in the book + 6 YEARS, then REVIEW	These could be of permanent historical value and, if appropriate, should be offered to County Archives Service.
2.2	Minutes of senior management meetings and those of other internal administrative bodies	Potentially		Academic year + 3 YEARS, then REVIEW	Secure disposal
2.3	Reports created by senior management teams	Potentially		Academic year + 3 YEARS, then REVIEW	Secure disposal
2.4	Records created by senior management	Potentially		Academic year + 6 YEARS, then REVIEW	Secure disposal
2.5	Professional Development Plans	Yes		Life of the plan + 6 YEARS	Secure disposal
2.6	School Development Plans	No		Life of the plan + 3 YEARS	Secure disposal
2.7	Records created by headteachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then review	Secure disposal



2.8	Correspondence created by head teachers, deputy head teachers, heads of year	There may be data protection issues if the correspondence refers	Date of correspondence + 3 years then review	Correspondence created by head teachers, deputy head teachers, heads of year	Secure disposal
	and other members of staff with administrative responsibilities	to individual pupils or members of staff		and other members of staff with administrative responsibilities	

Section 3: 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	All records relating to the creation and implementation of the School Admissions Policy/ Admissions Statements including In Year Admissions statement	No	School admissions code - GOV.UK (www.gov.uk)	Life of the policy + 3 YEARS, then REVIEW	Secure disposal
3.2	Admissions – if successful	Yes	School admissions code - GOV.UK (www.gov.uk)	Date of admission + 1 YEAR	Secure disposal
3.3	Admissions – if the appeal is unsuccessful	Yes	School admissions code - GOV.UK (www.gov.uk)	Resolution of case + 1 YEAR	Secure disposal
3.4	Register of Admissions	Yes	School attendance: guidance for schools - GOV.UK (www.gov.uk)	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 schools often receive enquiries from past pupils to confirm dates they attended
3.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	Secure disposal

3.6	Proofs of address supplied by parents as part of the admissions process	Yes		Current year + 1 year	Secure disposal
3.7	Supplementary Information form including additional information such as religion, medical conditions etc	Yes			
	For successful admissions			This information should be added to the pupil file	Secure disposal
	For unsuccessful admissions			Until appeals process completed	Secure disposal

Section 4 – Operational 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	General file series	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 year + 3 YEARS	Secure disposal
4.3	Records relating to the creation and distribution of circulars to staff, parents of pupils	No		Current year + 1 YEAR	Secure disposal



4.4	Newsletters and other items with a short operational use /such as to parents	No		Current year + 1 YEAR School bulletins and newsletters are generally published online and must be available for one year. Additional hard copies are not required to be retained.	Secure disposal
4.5	Visitors' Books and Signing in /Signing out Sheets/Records	Yes		Current year + 6 YEARS, then REVIEW	Secure disposal
4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 YEARS, then REVIEW	Secure disposal

Section 5 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
5.1	Control of substances hazardous to health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002 SI 2002 No 2677 Regulation 11. Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2).	Last entry + 40 YEARS	Secure disposal
5.2	Process of monitoring areas where employees and persons are likely to have come in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 YEARS	Secure disposal
5.3	Process of monitoring areas where employees and persons are likely to have come in contact with radiation	No		Last action + 50 YEARS	Secure disposal
5.4	Fire precautions log book	No		Current year + 6 YEARS	Secure disposal
5.5	Health and safety Policy/ Policy Statements	No		Life of policy + 3 YEARS	



5.6	Health and Safety Risk Assessments	No		Life of risk assessment + 3 YEARS	
5.7	Records relating to accident or injury at work	Yes		Academic year + 25 YEARS	
5.8	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25 Social Security Administration Act 1992 s8 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	
	Adults			Academic year + 25 YEARS	SECURE DISPOSAL
	Children			Academic year + 25 YEARS	SECURE DISPOSAL

Section 6: Human Resources and Staffing

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
6.1	All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
6.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
6.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL
6.4	Pre-employment vetting information – DBS Checks ⁷	No	<u>Disclosure and Barring Service - GOV.UK (www.gov.uk)</u>	DBS numbers onto the SCR -	SECURE DISPOSAL
6.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible, these should be checked, and a note kept of what was seen and what has been checked.	SECURE DISPOSAL

⁷ Academies are bound by the legislation that applies to independent schools NOT maintained schools.



6.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ⁸	Yes	An employer’s guide to right to work checks [Home Office May 2015]	Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
6.7	Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
6.8	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980 (Section 2)	Termination of employment + 6 years	SECURE DISPOSAL
6.9	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
6.10	Annual appraisal/assessment records	Yes		Current year + 5 years	SECURE DISPOSAL

⁸ Employers are required to take a “clear copy” of the documents which they are shown as part of this process.



6.10	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	SECURE DISPOSAL
6.12	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded ⁹	Yes	Keeping children safe in education Working together to safeguard children	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW Allegations found to be malicious should be removed from personnel files. If substantiated, they are to be kept on file and a copy given to person concerned.	SECURE DISPOSAL These records must be shredded
6.13	Disciplinary Proceedings:	yes			
	oral warning			Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file]

⁹This review took place when the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to consider any recommendations the Inquiry might make concerning record retention. ¹⁷ - see note in the Policy also. Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice.



	written warning - level 1			Date of warning + 6 months	
	written warning - level 2			Date of warning + 12 months	
	final warning			Date of warning + 18 months	
	case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL

Section 7 Property 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	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-	
7.2	Plans of property belonging to the school	No		PERMANENT – belonging to the church	
7.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
	Records relating to the letting of school premises	No		Current financial year + 6 years Please refer to the Trust wide Lettings Policy	SECURE DISPOSAL
7.4	Business continuity and disaster recovery plans	No		Date the plan superseded + 3 years Please refer to the Trust wide Policies/procedures for Business Continuity planning/Disaster recovery Planning	SECURE DISPOSAL
7.5	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	



Maintenance					
7.6	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
7.7	All records relating to the maintenance of the school carried out by school employees, including maintenance log books	No		Current year + 6 years	SECURE DISPOSAL

Section 8 Finance and Financial Management

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
8.1	Statement of financial activities for the year	No		Current financial year + 6 years	SECURE DISPOSAL
8.2	Financial planning	No		Current financial year + 6 years	SECURE DISPOSAL
8.3	Value for money statement	No		Current financial year + 6 years	SECURE DISPOSAL
8.4	Records relating to the management of VAT	No		Current financial year + 6 years	SECURE DISPOSAL
8.5	Whole of government accounts returns	No		Current financial year + 6 years	SECURE DISPOSAL
8.6	Borrowing powers	No		Current financial year + 6 years	SECURE DISPOSAL
8.7	Budget plan	No		Current financial year + 6 years	SECURE DISPOSAL
8.8	Charging and remissions policy – SRS trust wide policy	No		Date policy superseded + 3 years	SECURE DISPOSAL
8.9	Audit Committee and appointment of responsible officers	No		Life of the Academy	SECURE DISPOSAL
8.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	SECURE DISPOSAL
8.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	SECURE DISPOSAL



8.12	Funding Agreement with Secretary of State and supplemental funding agreements	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
8.13	Funding Agreement – Termination of the funding agreement			Date of last payment of funding + 6 years	SECURE DISPOSAL
8.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
8.15	Per pupil funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
8.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
8.17	Exclusions agreement	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
8.18	Funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
8.18	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
8.19	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	SECURE DISPOSAL



8.20	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
8.21	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	SECURE DISPOSAL
8.22	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
8.23	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
8.24	Payroll records	Yes		Date payroll run + 6 years	SECURE DISPOSAL
8.25	Insurance policies	No		Date the policy expires + 6 years	SECURE DISPOSAL
8.26	Records relating to the settlement of insurance claims	No		Date claim settled + 6 years	SECURE DISPOSAL
8.27	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
8.28	Management of Endowment Funds	No		Life of the fund + 6 years	



8.29	Annual accounts	No		Current year + 6 years	STANDARD DISPOSAL
8.30	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
8.31	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
8.32	Invoices, receipts, orders and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
8.33	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
8.34	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL
8.35	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
8.36	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
8.37	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL
8.38	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
8.39	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL



8.40	Records relating to the leasing of shared facilities, such as sports centres /halls	No		Current year + 6 years	SECURE DISPOSAL
In Academy/school					
8.42	Cheque books	No		Current year + 6 YEARS	SECURE DISPOSAL
8.43	Paying in books	No		Current year + 6 YEARS	SECURE DISPOSAL
8.44	Ledger	No		Current year + 6 YEARS	SECURE DISPOSAL
8.45	Invoices	No		Current year + 6 YEARS	SECURE DISPOSAL
8.46	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
8.47	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL

Section 9 Pupil Management

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
9.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	Primary			Retain whilst the child remains at the primary school	<p>The file should follow the pupil when 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. 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</p>



					retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely the pupil will request the record from there
	Secondary pupil		Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	Secure Disposal
9.2	Examination results - pupil copies	Yes			
	<i>Public</i>			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	<i>Internal</i>			This information should be added to the pupil file	
Child Protection and Safeguarding					
9.3	Child protection information held on pupil file	Yes	Keeping children safe in education Working together to safeguard children	If records relating to child protection issues are placed on the pupil file, place in a sealed envelope and then retain for the same period as the pupil file	SECURE DISPOSAL These records must be shredded



9.4	Child protection information held in separate files	Yes	Keeping children safe in education Working together to safeguard children	Until pupil is at age 25 YEARS, then REVIEW.	SECURE DISPOSAL These records must be shredded
9.5	Attendance registers	Yes	School attendance: guidance	Every entry in the attendance register must be preserved for 3 YEARS after the date on which the entry was made	SECURE DISPOSAL
9.6	Correspondence relating to authorised absence		Education Act 1996, s7	Academic year + 2 YEARS	SECURE DISPOSAL
Special Educational Needs and Disabilities					
9.7	SEN files, reviews and Individual Education Plans	Yes	Limitation Act 1980, s2	Until pupil is at age 25 YEARS	REVIEW This is minimum. Some authorities keep SEN files longer to defend legal case.
9.8	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, s1	Until pupil is at age 25 YEARS This would normally be retained on the pupil file	SECURE DISPOSAL unless document is subject to legal hold



9.9.	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001, s2	Until pupil is at age 25 YEARS This would normally be retained on the pupil file	SECURE DISPOSAL unless document is subject to legal hold
9.10	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
Exclusions					
9.11	Records relating to the management of exclusions		Yes	Date of birth of the pupil involved + 25 years	SECURE DISPOSAL

Section 10 Curriculum and Teaching and learning

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
10.1	Curriculum returns	No		Current year + 3 YEARS	SECURE DISPOSAL
10.2	Examination results – school copy	Yes		Current year + 6 YEARS	SECURE DISPOSAL
10.3	<i>SATs records</i>	Yes			
	<i>Results</i>			The SATs results should be recorded on the pupil's educational file and will therefore be retained until the pupil is at age 25 YEARS The school may wish to keep a composite record of all whole year SATs results. These could be retained for current year + 6 YEARS to allow suitable comparison	SECURE DISPOSAL
	<i>Examination papers</i>			These should be kept until any appeals/validation process is complete	SECURE DISPOSAL
10.4	Published Admission Number reports	Yes		Current year + 6 YEARS	SECURE DISPOSAL



10.5	Schemes of work	No		Current year + 1 YEAR	It may be appropriate to REVIEW these at the end of each YEAR and allocate a further retention period or SECURE DISPOSAL
10.6	Timetable	No		Current year + 1 YEAR	It may be appropriate to REVIEW these at the end of each YEAR and allocate a further retention period or SECURE DISPOSAL
10.7	Class record books	No		Current year + 1 YEAR	It may be appropriate to REVIEW these at the end of each YEAR and allocate a further retention period or SECURE DISPOSAL
10.8	Mark books	No		Current year + 1 YEAR	It may be appropriate to REVIEW these at the end of each YEAR and allocate a further retention period or SECURE DISPOSAL
10.9	Pupils' Work	No		Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year	SECURE DISPOSAL



10.10	Record homework set	No		Current year + 1 year	It may be appropriate to REVIEW these at the end of each YEAR and allocate a further retention period or SECURE DISPOSAL
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Section 11 Trips and Extra Curricular Activities

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
11.1	Records created by schools to obtain approval to run an educational visit outside the classroom – primary	No	Outdoor Education Advisers' Panel National Guidance website , especially s3: Legal Framework and Employer Systems and s4: Good Practice .	Date of visit + 14 YEARS	SECURE DISPOSAL
11.2	Records created by schools to obtain approval to run an educational visit outside the classroom – secondary	No	Outdoor Education Advisers' Panel National Guidance website , especially s3: Legal Framework and Employer Systems and s4: Good Practice .	Date of visit + 10 YEARS	SECURE DISPOSAL



11.3	Parental consent forms for school trips were there has been no major incident	Yes		Conclusion of the trip	Although 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
Walking bus					
11.4	Walking bus registers	Yes		Academic year + 3 YEARS	SECURE DISPOSAL
				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 required for accident reporting	

Section 12 Family Liaison officers and home school liaison officers/assistants

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
12.1	Day books	Yes		Current year + 2 YEARS, then REVIEW	Day books
12.2	Reports for outside agencies - where the report has been included on the case file created by the agency	Yes		While child is attending school	Reports for outside agencies - where the report has been included on the case file created by the agency
12.3	Referral forms	Yes		While the referral is current	Referral forms
12.4	Contact data sheets	Yes		Current year, then REVIEW If contact inactive, destroy	Contact data sheets
12.5	Contact database entries	Yes		Current year, then REVIEW If contact inactive, destroy	Contact database entries
12.6	Group registers	Yes		Current year + 2 YEARS	Group registers

Section 13 Central Government and Local Authority

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
Local Authority					
13.1	Secondary transfer (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
13.2	Attendance returns	Yes		Current year + 1 year Electronically – a hard copy is not required.	SECURE DISPOSAL
13.3	School census returns	No		Current year + 5 years Held electronically	SECURE DISPOSAL
13.4	Circulars and other information sent from the local authority	No		Operational use	SECURE DISPOSAL
Central Government					
13.6	Ofsted reports and papers	No		Life of the report then REVIEW Ofsted report must be published on the school website	SECURE DISPOSAL
13.6	Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL
13.5	Circulars and other information sent from central government	No		Operational use Do not retain beyond operational use	SECURE DISPOSAL