

Data Retention Policy

Policy Monitoring, Evaluation and Review

This policy is effective for all schools within The Mead Educational Trust, the Teaching School, the SCITT and all other activities under the control of the Trust and reporting to the Trust Board.

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1.0	April 2022	EMA/CBR	Updated policy based on the latest version of the Information Management Toolkit for schools
1.0	April 2018	CBR	New policy

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1 Purpose

This Policy sets out the measures adopted by The Mead Educational Trust (referred to as “the Trust”, “we” or “our”) in respect of the retention and disposal of records that contain personal data or other confidential information.

The Policy details the procedures for the retention and disposal of information to ensure that we carry this out consistently and that we fully document any actions taken. Unless otherwise specified, the retention schedule refers to both hard and soft copy documents.

Associated policies:

- TMET Freedom of Information Policy
- TMET Data Protection Policy

2 Review

Review is the examination of closed records to determine whether they should be destroyed, retained for a further period or transferred to an archive for permanent preservation.

3 How long should we keep our records

3.1 Records should be kept for as long as they are needed to meet the operational needs of the Trust, together with legal and regulatory requirements. We have assessed our records to:

3.1.1 Determine their value as a source of information about the Trust, its operations, relationships and environment.

3.1.2 Assess their importance as evidence of business activities and decisions.

3.1.3 Establish whether there are any legal or regulatory retention requirements (including: Public Records Act (1958), the Freedom of Information Act (2000), the Limitation Act (1980), the Data Protection Act (2018).

3.2 Where records are likely to have a historical value, or are worthy of permanent preservation, we may choose to archive them at the end of any statutory retention period.

4 Disposal schedule

4.1 A disposal schedule is a key document in the management of records and information. It is a list of series or collections of records for which predetermined periods of retention have been agreed between the Trust and the DPO.

4.2 The Disposal Schedule for the Trust appears as Section 8 of this Policy.

4.3 Records on disposal schedules will fall into three main categories:

- 4.3.1 Destroy after an agreed period – where the useful life of a series or collection of records can be easily predetermined (for example, destroy after 3 years; destroy 2 years after the end of the financial year).
- 4.3.2 Automatically select for permanent preservation – where certain groups of records can be readily defined as worthy of permanent preservation and transferred to an archive.
- 4.3.3 Review – unknown at present but subject to review in a defined period of time see 2 above.
- 4.4 Records can be destroyed in the following ways:
 - 4.4.1 Non-sensitive information – can be placed in a normal rubbish bin.
 - 4.4.2 Confidential information – crosscut shredded and pulped or burnt.
 - 4.4.3 Highly Confidential information – crosscut shredded and pulped or burnt
 - 4.4.4 Electronic equipment containing information - destroyed using Killdisc or equivalent technology and individual folders will be permanently deleted from the system.
- 4.5 Destruction of electronic records should render them non-recoverable even using forensic data recovery techniques.
- 4.6 The Disposal Schedule will be kept up to date in that new categories of data are added.

5 Data sharing and disposal

- 5.1 Where we share information with other bodies, we will ensure that they have adequate procedures for data retention and disposal to ensure that the information is managed in accordance with the Trust's policies, relevant legislation and regulatory guidance.
- 5.2 Where relevant to do so we will carry out a data protection impact assessment and update our privacy notices to reflect data sharing.

6 Record-Keeping

- 6.1 It is not necessary to document the disposal of records when that has been done in line with the records retention schedule. Documents disposed of outside the schedule, either by being disposed of earlier or kept for longer than listed, will need to be recorded for audit purposes.
- 6.2 This will provide an audit trail for any inspections conducted by the Information Commissioner's Office and will aid in addressing Freedom of Information requests, where we no longer hold the material.

7 Monitoring

- 7.1 Responsibility for monitoring the disposal policy rests with the Trust's Data Protection Lead. The policy will be reviewed as and when necessary and at least once every 3 years.

8 Records retention schedule

1. Management of the School

This section contains retention periods connected to the general management of the school. This covers the work of the Trust Board and academy councils, the principals and the senior management teams, the admissions process and operational administration.

1.1 Governing Body				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.1.1 Agendas for Trust Board and academy council 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 ¹
1.1.2 Minutes of Trust Board and academy council meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff			
Principal Set (signed)			PERMANENT	If the school is unable to store these then they should be offered to the Trust
Inspection Copies ²			Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded.
1.1.3 Reports presented to the Trust Board and academy councils	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

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.

² These are the copies which the clerk 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

1.1 Governing Body (continued)				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.1.4 Instruments of Government including Articles of Association	No		PERMANENT	These should be retained in the school and the Trust.
1.1.5 Trusts and Endowments managed by the Trust Board	No		PERMANENT	These should be retained by the Trust with copies held by the school (if appropriate).
1.1.6 Action plans created and administered by the Trust Board or academy council	No		Life of the action plan + 3 years	SECURE DISPOSAL
1.1.7 Policy documents created and administered by the Trust Board or academy council	No		Life of the policy + 3 years	SECURE DISPOSAL
1.1.8 Records relating to complaints dealt with by the Trust Board or academy council	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
1.1.9 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

Please note that all information about the retention of records concerning the recruitment of principals can be found in the Human Resources section below.

1.2 CEO/Principal and Trust/School Senior Management Team

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.2.1	Log books of activity in the school maintained by the Principal	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then review	SECURE DISPOSAL
1.2.3	Reports created by the CEO/Principal or the Management 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	SECURE DISPOSAL
1.2.4	Records created by CEO, central Trust staff, principals, vice principals, other senior leaders, 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
1.2.5	Correspondence created by CEO, central Trust staff, principals, vice principals, other senior leaders, 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		Date of correspondence + 3 years then review	SECURE DISPOSAL
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
1.2.7	School Improvement Plans	No		Life of the plan + 3 years	SECURE DISPOSAL
1.2.8	Information disclosed under a Subject Access Request (SAR)	Yes		1 year from response to SAR	SECURE DISPOSAL

1.3 Admissions Process					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
1.3.1 All records relating to the creation and implementation of the School Admissions' Policy	No	School Admissions Code, September 2021	Life of the policy + 3 years then review	SECURE DISPOSAL	
1.3.2 Admissions – if the admission is successful	Yes	School Admissions Code, September 2021	Date of admission + 1 year	SECURE DISPOSAL	
1.3.3 Admissions – if the appeal is unsuccessful	Yes	School Admissions Code, September 2021	Resolution of case + 1 year	SECURE DISPOSAL	
1.3.4 Register of Admissions	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities, August 2020	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 Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school.	
1.3.5 Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL	
1.3.6 Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code, September 2021	Current year + 1 year	SECURE DISPOSAL	
1.3.7 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

³ School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities August 2020 p7

1.4 Operational Administration

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.4.1 General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
1.4.2 Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
1.4.3 Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
1.4.4 Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
1.4.5 Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
1.4.6 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

2. Human Resources

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

2.1 Recruitment					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
2.1.1	All records leading up to the appointment of a new principal	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes	Part 4 of The Education (Independent School Standards) Regulations 2014	All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks	Yes	DBS Update Service Employer Guide Keeping Children Safe in Education	Do not keep copies of DBS certificates.	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		These should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file	SECURE DISPOSAL
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ⁴	Yes	An employer’s guide to right to work checks [Home Office May 2015]	These documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years	SECURE DISPOSAL

⁴ Employers are required to take a “clear copy” of the documents which they are shown as part of this process

2.2 Operational Staff Management

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.2.1 Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	SECURE DISPOSAL
2.2.2 Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3 Annual appraisal/ assessment records	Yes		Current year + 5 years	SECURE DISPOSAL

2.3 Management of Disciplinary and Grievance Processes

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.3.1 Allegation of a child protection nature against a member of staff including where the allegation is unfounded ⁵	Yes	Keeping Children Safe in Education Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2018	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned.	SECURE DISPOSAL
2.3.2 Disciplinary Proceedings:	Yes			
oral warning			Date of warning ⁶ + 6 months	
written warning – level 1			Date of warning + 6 months	SECURE DISPOSAL
written warning – level 2			Date of warning + 12 months	[If warnings are placed on personal files then they must be weeded from the file]
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

⁵ This review took place as 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 take into account any recommendations the Inquiry might make concerning record retention.

⁶ 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

2.4 Health and Safety					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
2.4.1 Health and Safety Policy Statements	No		Life of policy + 3 years	STANDARD DISPOSAL	
2.4.2 Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	STANDARD DISPOSAL	
2.4.3 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	
2.4.4 Accident Reporting - adults	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8.	Date of the incident + 6 years	SECURE DISPOSAL	
Accident Reporting - children	Yes	Limitation Act 1980	DOB of the child + 25 years	SECURE DISPOSAL	
2.4.5 Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	Current year + 40 years	STANDARD DISPOSAL	
2.4.6 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	STANDARD DISPOSAL	
2.4.7 Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	STANDARD DISPOSAL	
2.4.8 Fire Precautions log books	No		Current year + 6 years	STANDARD DISPOSAL	

2.5 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
2.5.1 Wages/salary records (including overtime, bonuses and expenses)	Yes	Taxes Management Act 1970	6 years	SECURE DISPOSAL
2.5.2 Income tax and National Insurance returns/records	Yes	The Income Tax (Employments) Regulations 1993	Current year = 3 years	SECURE DISPOSAL
2.5.3 National Minimum Wage compliance records	Yes	National Minimum Wages Act 1998	3 years	SECURE DISPOSAL
2.5.4 Sickness (Statutory SSP) Records	Yes	Chartered Institute of Personnel and Development (CIPD)	Term of Employment + 6 years	SECURE DISPOSAL
2.5.5 Maternity pay records, calculations, medical evidence etc	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	3 years after the end of the tax year in which the maternity leave ends	SECURE DISPOSAL
2.5.6 Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	The Pensions Regulator	Current year + 6 years	SECURE DISPOSAL

3. Financial Management of the Trust and Schools

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

3.1 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
3.1.1 Employer's Liability Insurance Certificate	No		Closure of the school/Trust + 40 years	STANDARD DISPOSAL
3.2 Asset Management				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.2.1 Inventories of furniture and equipment	No		Current year + 6 years	STANDARD DISPOSAL
3.2.2 Burglary, theft and vandalism report forms	No		Current year + 6 years	STANDARD DISPOSAL
3.2 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
3.3.1 Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
3.3.2 Loans and grants managed by the Trust/school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
3.3.3 Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
3.3.4 All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL
3.3.5 Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL

3.3.6	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.7	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL

3.4 Contract Management

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
3.4.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
3.4.3	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL

3.5 School Fund

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.5.1	School Fund - Cheque books	No		Current year + 6 years	SECURE DISPOSAL
3.5.2	School Fund - Paying in books	No		Current year + 6 years	SECURE DISPOSAL
3.5.3	School Fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
3.5.4	School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
3.5.5	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
3.5.6	School Fund - Bank statements	No		Current year + 6 years	SECURE DISPOSAL
3.5.7	School Fund – Journey Books	No		Current year + 6 years	SECURE DISPOSAL

3.6 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
3.6.1 Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.6.2 School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
3.6.3 School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL

4. Property Management

This section covers the management of buildings and property.

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

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

5. Pupil Management

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

5.1 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
5.1.1	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		Limitation Act 1980 (Section 2)	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 <p>If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period.</p> <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority</p>
	Secondary			Date of Birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2	Examination Results – Public	Yes		This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.
	Examination Results – Internal			This information should be added to the pupil file	
5.1.3	Child Protection information held on pupil file	Yes	Keeping Children Safe in Education	Date of Birth of the pupil + 25 years	SECURE DISPOSAL – these records MUST be shredded If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.
5.1.4	Child Protection information held in separate file	Yes	Education Act 2022 s 175 Keeping Children Safe in Education	Date of Birth of the pupil + 25 years then review	SECURE DISPOSAL – these records MUST be shredded This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record.

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

5.2 Attendance					
Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.2.1	Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2016	3 years from the date entry was made	SECURE DISPOSAL
5.2.2	Correspondence relating to authorised absence	Yes	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL

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

5.4 Biometric Data

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.4.1	Pupil biometric data including fingerprints for library or meal payment systems	Yes	Protection of biometric information of children in schools and colleges – DfE March 2018	Whilst pupils use the system only. Delete when pupil no longer uses the system including when he or she leaves the school or where a parent withdraws consent or the pupil objects.	SECURE DISPOSAL

5.5 Pupil and Workforce Electronic Images including Photographs and Videos

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.5.1	Photographs used in identity management	Yes		Deleted once a pupil leaves the school	SECURE DISPOSAL
5.5.2	Photographs in the Trust/school environment	Yes		Deleted once a pupil leaves the school	STANDARD DISPOSAL
5.5.3	Photographs used for learning resources or promotion of the academy or Trust including website, or prospectus	Yes		Permission must be sought to retain images beyond the time the pupil leaves the school. Consent form allows for consent to be given for use after a pupil leaves the school. Every attempt should be used to replace these images as soon as reasonably possible for websites, prospectus or notice board etc.	STANDARD DISPOSAL

5.5.4	CCTV images	Yes		Unless CCTV records a specific incident then it is unlikely to be justifiable to retain any recorded images for more than 28 days	SECURE DISPOSAL
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6. Curriculum Management

6.1 Statistics and Management Information					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination Results (Schools Copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	SATS records – Results	Yes		The SATS results should be recorded on the pupil’s educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL
	SATS records – Examination Papers	Yes		The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL

6.2 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
6.2.1	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
6.2.2	Timetable	No		Current year + 1 year	
6.2.3	Class Record Books	No		Current year + 1 year	
6.2.4	Mark Books	No		Current year + 1 year	
6.2.5	Record of homework set	No		Current year + 1 year	
6.2.6	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.	SECURE DISPOSAL

7. Extra Curricular Activities

7.1 Educational Visits outside the Classroom

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 14 years	SECURE DISPOSAL

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

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

7.3 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
7.3.1	Day Books	Yes		Current year + 2 years then review	
7.3.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	
7.3.3	Referral forms	Yes		While the referral is current	
7.3.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	
7.3.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	
7.3.6	Group Registers	Yes		Current year + 2 years	

8. Central Government and Local Authority

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

8.1 Local Authority					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
8.1.2	Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
8.1.3	School Census Returns	No		Current year + 5 years	SECURE DISPOSAL
8.1.4	Circulars and other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL

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

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