

INCLUSIVE | MULTI ACADEMY TRUST

DATA RECORDS MANAGEMENT & RETENTION POLICY

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|-------------------------|-------------------|
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| Section Title | Page No. |
|---|----------|
| Introduction | 3 |
| Scope of the Policy | 3 |
| Responsibilities | 3 |
| Information Security & Business Continuity | 3 |
| Disclosure and Confidentiality | 4 |
| Safe Disposal of Records | 4 |
| Security Breach | 4 |
| Retention guidelines | 4 |
| Section 1: Management of the Trust | 5 |
| Section 2: HR Management of the Trust | 9 |
| Section 3: Financial Management of the Trust | 13 |
| Section 4: Property Management | 16 |
| Section 5: Pupil Management | 19 |
| Section 6: Curriculum Management | 22 |
| Section 7: Extra Curricular Activities | 24 |
| Section 8: Central Government & Local Authority | 25 |

Introduction

The Trust recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the Trust and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

Scope of the policy

This policy applies to all records created, received or maintained by staff of the Trust in the course of carrying out its functions.

Records are defined as all those documents that facilitate the business carried out by the Trust and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

Responsibilities

The Trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Data Protection Officer. The person responsible for records management in the Trust will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way.

The Data Protection Officer will monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the Trust's retention guidelines.

Information Security and Business Continuity

In order to protect the data and records the Trust is responsible for, the following security measures will be implemented.

The storage and security of digital data

Back Up System: The Trust schools have contracts which undertake regular back ups of all information held electronically to enable restoration of the data in the event of an environmental or data corruption incident. The Trust tests that data can be restored from a back up on a regular basis.

Controlling the Storage of Digital Data: Personal information is not to be stored on the hard drive of any laptop or PC unless the device is running encryption software.

Password Control: The Trust will ensure that data is subject to password protection. Password sharing is not encouraged. Staff are required to lock their PCs when they are away from their desks to prevent unauthorised use.

Location of Server Equipment: The Trust will ensure that the server environment is managed to prevent access by unauthorised people.

The storage and security of hard copy data

Storage of Physical Records: The Trust recommends that all physical records are stored in filing cabinets, drawers or cupboards. Sensitive physical records should be kept in a lockable storage area. This is to prevent unauthorised access but also to protect against the risk of fire and flooding.

Unauthorised Access, Theft or Loss: Staff are encouraged not to take personal data on staff or students out of the Trust unless there is no alternative. Records held within the Trust should be in lockable cabinets.

Clear Desk Policy: In order to avoid unauthorised access to physical records which contain sensitive or personal information and will protect physical records from fire and/or flood damage, the Trust operates a clear desk policy. This involves the removal of the physical records to a cupboard or drawer (lockable where appropriate). It does not mean that the desk has to be cleared of all contents.

Disclosure /Confidentiality

Staff are made aware of the importance of ensuring that personal information is only disclosed to people who are entitled to receive it and that consideration has been given to the General Data Protection Regulations. This is outlined in the Staff Handbook.

Safe disposal of records

The General Data Protection Regulations give individuals the Right to Erasure which means that records should not be kept for any longer than is necessary in relation to the purpose for which it was originally collected/processed (see section 6 Retention Guidelines).

All records containing personal information or sensitive policy information should be made either unreadable or unreconstructable.

Paper records should be shredded using a cross-cutting shredder

CDs/DVDs/Floppy Discs should be cut into pieces

Audio/Video Tapes and Fax Rolls should be dismantled and shredded

Hard discs should be dismantled and sanded

When an external company is used, all records must be shredded on site in the presence of an employee. The disposal company must provide a Certificate of Destruction.

Security Breach

In the event of an incident involving the loss of information or records held by the Trust, the data breach procedures contained within the data Protection Policy should be followed.

Retention Guidelines

This retention schedule is based upon the schedule provided by the Information and Records Management Society (v5 01.02.16).

This retention schedule contains recommended retention periods for the different records created and maintained by Trusts in the course of their business. The schedule refers to all information regardless of the media in which it is stored.

Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the Data Protection Act (DPA).

Managing record series using these retention guidelines will be deemed to be 'normal processing' under the legislation mentioned above. If records are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented.

The schedule should be reviewed every three years.

Section 1: Management of the Trust

| 1.1 Governing Body/Trust Board | | | | | |
|--------------------------------|--|--|--------------------------------|--|--|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 1.1.1 | Agendas | 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 |
| 1.1.2 | Minutes of Meetings | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | | | |
| | Principal Set (signed) | | | PERMANENT | |
| | Inspection Copies | | | Date of meeting + 3 years | If the minutes contain any sensitive, personal information they must be shredded |
| 1.1.3 | Reports presented | There may be data protection issues if the report is dealing with confidential issues relating to staff | | Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently. | SECURE DISPOSAL or retain with the signed set of minutes |
| 1.1.4 | Meeting papers relating to annual parents' meeting held under section 33 of the Education Act 2002 | No | Education Act 2002, Section 33 | Date of the meeting + a minimum of 6 years | SECURE DISPOSAL |

| 1.2 Senior Leadership Team | | | | | |
|----------------------------|--|--|----------------------|---|---|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 1.2.1 | Log books of activity in the Trust maintained by the Head Teacher | There may be data protection issues if the log book refers to individual 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 Head Teacher 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 + 3 years then review | SECURE DISPOSAL |
| 1.2.4 | Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | There may be data protection issues if the report refers to individual pupils or members of staff | | Current academic year + 6 years then review | SECURE DISPOSAL |
| 1.2.5 | Correspondence created by head teachers, deputy head teachers. heads of year and other members of staff with administrative responsibilities | There may be data protection issues if the report refers to individual pupils or members of staff | | Date of correspondence + 3years ten review | SECURE DISPOSAL |
| 1.2.6 | Professional Development Plans | Yes | | Life of then plan + 6 years | SECURE DISPOSAL |
| 1.2.7 | Trust Development Plans | No | | Life of the plan + 3 years | SECURE DISPOSAL |

| 1.3 Admissions | | | | | |
|----------------|--|------------------------|--|--|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 1.3.1 | All records relating to the creation and implementation of the Trust Admissions Policy | No | Trust Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, Trust adjudicators and admission appeals panels December 2014 | Life of the policy + 3 years then review | SECURE DISPOSAL |
| 1.3.2 | Admissions – if the admission is successful | Yes | Trust Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, Trust adjudicators and admission appeals panels December 2014 | Date of admission + 1 year | SECURE DISPOSAL |
| 1.3.3 | Admissions – if the appeal is unsuccessful | Yes | Trust Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, Trust adjudicators and admission appeals panels December 2014 | Resolution of case + 1 year | SECURE DISPOSAL |
| 1.3.4 | Register of Admissions | Yes | Trust attendance: Departmental advice for maintained Trusts, academies, independent Trusts and local authorities October 2014 | Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made | |
| 1.3.5 | Admissions – Secondary Trusts – Casual | Yes | | Current year + 1 year | SECURE DISPOSAL |
| 1.3.6 | Proofs of address supplied by parents as part of the admissions process | Yes | Trust Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, Trust adjudicators | Current year + 1 year | SECURE DISPOSAL |

| | | | | | |
|-------|---|-----|---|---|-----------------|
| | | | and admission appeals panels December 2014 | | |
| 1.3.7 | Supplementary Information form including additional information such as religion, medical conditions etc. | Yes | | | |
| | For successful admissions | | | The information should be added to the pupil file | SECURE DISPOSAL |
| | For unsuccessful admissions | | | Until appeals process completed | SECURE DISPOSAL |

1.4 Operational Administration

| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
|-------|---|------------------------|----------------------|------------------------------------|---------------------------------------|
| 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 Trust brochure or prospectus | No | | Current year + 3 years | SECURE DISPOSAL |
| 1.4.3 | Records relating to the creation and distribution of circulars to staff, parents or pupils | No | | Current year + 1 year | SECURE DISPOSAL |
| 1.4.4 | Newsletters and other items with a short operational use | No | | Current year + 1 year | SECURE 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 |

Section 2: HR Management of the Trust

| 2.1 Recruitment | | | | | |
|-----------------|--|------------------------|---|--|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 2.1.1 | All records leading up to the appointment of a new headteacher | 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 | | 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 | No | DBS Update Service Employer Guide June 2014: keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74 | The Trust does not have to keep copies of DBS certificates. If the Trust does so the copy must NOT be retained for more than 6 months | |
| 2.1.5 | 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 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 | |
| 2.1.6 | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom | Yes | An employer’s guide to right to work checks [Home Office May 2015] | Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately the Home Office requires that the documents are kept for termination of Employment plus two years | |

| 2.2 Operational Staff Management | | | | | |
|----------------------------------|-------------------------------------|------------------------|---------------------------------|-------------------------------------|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 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 & Grievance Process | | | | | |
|--|---|------------------------|---|--|--|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 2.3.1 | Allegation of a child protection nature against a member of staff including where the allegation is unfounded | Yes | “Keeping children safe in education Statutory guidance for Trusts and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015” | 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 These records must be shredded |
| 2.3.3 | 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] |
| | 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 |

| 2.5 Payroll and Pensions | | | | | |
|--------------------------|--|------------------------|---|------------------------|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 2.5.1 | Maternity pay records | Yes | Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567) | Current year + 3 years | SECURE DISPOSAL |
| 2.5.2 | Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Yes | | Current year + 6 years | SECURE DISPOSAL |

| 2.6 Other Personnel Records | | | | | |
|-----------------------------|---------------------------------------|------------------------|----------------------|--|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 2.6.1 | Volunteer Personnel Records | Yes | | Any relevant papers relating to the engagement of volunteers can be retained (as per 2.1) but only for as long as their engagement with the Trust lasts. | SECURE DISPOSAL |
| 2.6.2 | Governor / Trustee Records | Yes | | Any relevant papers relating to the engagement of governors can be retained (as per 2.1) but only for their term of office plus 1 year. | SECURE DISPOSAL |
| 2.6.3 | Third party workers, supply staff etc | Yes | | The Trust should receive written confirmation that all checks have been | SECURE DISPOSAL |

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|--|--|--|--|---|--|
| | | | | undertaken, but not copies of the evidence, from the employing organisation. Where copies of such documents are received the must not be retained by the Trust. The Trust may retain a copy of the identification documents, but these documents must be destroyed when the individual ceases working at the Trust. | |
|--|--|--|--|---|--|

Section 3: Financial Management of the Trust

3.1 Risk Management & Insurance

| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
|-------|--|------------------------|----------------------|---------------------------------|---------------------------------------|
| 3.1.1 | Employer's Liability Insurance Certificate | No | | Closure of the Trust + 40 years | SECURE DISPOSAL |

3.2 Asset Management

| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
|-------|--|------------------------|----------------------|------------------------|---------------------------------------|
| 3.2.1 | Inventories of furniture and equipment | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.2.2 | Burglary, theft and vandalism report forms | No | | Current year + 6 years | SECURE DISPOSAL |

3.3 Accounts & Statements including Budget Management

| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
|-------|---|------------------------|----------------------|---|---------------------------------------|
| 3.3.1 | Annual Accounts | No | | Current year + 6 years | STANDARD DISPOSAL |
| 3.3.2 | Loans and grants managed by the Trust | 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 statements 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

| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
|-------|---|------------------------|----------------------|-------------------------------------|---------------------------------------|
| 3.4.1 | All records relating to the management of contracts under seal | No | Limitation Act 1980 | Last payment on 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 contract + 6 years | SECURE DISPOSAL |
| 3.4.3 | Records relating to the monitoring of contracts | No | | Current year + 2 years | SECURE DISPOSAL |

3.5 Trust Fund

| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
|-------|------------------------------|------------------------|----------------------|------------------------|---------------------------------------|
| 3.5.1 | Trust fund - Cheque books | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.2 | Trust fund - Paying in books | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.3 | Trust fund – Ledger | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.4 | Trust fund – Invoices | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.5 | Trust fund – Receipts | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.6 | Trust fund – Bank statements | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.7 | Trust fund – Journey Books | No | | Current year + 6 years | SECURE DISPOSAL |

| 3.6 Trust Meals Management | | | | | |
|----------------------------|----------------------------|------------------------|----------------------|------------------------|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 3.6.1 | Free Trust Meals Registers | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 3.6.2 | Trust Meals Registers | Yes | | Current year + 3 years | SECURE DISPOSAL |
| 3.6.3 | Trust Meals Summary Sheets | No | | Current year + 3 years | SECURE DISPOSAL |

Section 4: Property Management

| 4.1 Health & Safety | | | | | |
|---------------------|--|------------------------|---|--|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 4.1.1 | Health and Safety Policy Statements | No | | Life of policy + 3 years | SECURE DISPOSAL |
| 4.1.2 | Health and Safety Risk Assessments | No | | Life of Risk assessment + 3 years | SECURE DISPOSAL |
| 4.1.3 | 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 |
| 4.1.4 | Accident Reporting | | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 | | |
| | Adults | | | Date of the incident + 6 years | SECURE DISPOSAL |
| | Children | | | DOB of the child + 25 years | SECURE DISPOSAL |
| 4.1.5 | 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 | SECURE DISPOSAL |
| 4.1.6 | 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 | SECURE DISPOSAL |
| 4.1.7 | 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 |
| 4.1.8 | Fire precautions log books | | | Current year + 6 years | SECURE DISPOSAL |

| 4.2 Property Management | | | | | |
|-------------------------|---|------------------------|----------------------|--|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 4.2.1 | Title deeds of properties belonging to the Trust | No | | PERMANENT These should follow the property unless the property has been registered with the Land Registry | |
| 4.2.2 | Plans of property belonging to the Trust | No | | These should be retained whilst the building belongs to the Trust and should be passed onto any new owners if the building is leased or sold | |
| 4.2.3 | Leases of property leased by or to the Trust | No | | Expiry of lease + 6 years | SECURE DISPOSAL |
| 4.2.4 | Records relating to the letting of Trust premises | No | | Current financial year + 6 years | SECURE DISPOSAL |

| 4.3 Maintenance | | | | | |
|-----------------|---|------------------------|----------------------|------------------------|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 4.3.1 | All records relating to the maintenance of the Trust carried out by contractors | No | | Current year + 6 years | SECURE DISPOSAL |
| 4.3.2 | All records relating to the maintenance of the Trust carried out by Trust employees including maintenance log books | No | | Current year + 6 years | SECURE DISPOSAL |

Section 5: Pupil Management

| 5.1 Pupil's Educational Record | | | | | |
|--------------------------------|---|------------------------|---|--|---|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 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 | | | Retain whilst the child remains at primary Trust | <p>The files should follow the pupil when he/she leaves the primary Trust. This will include:</p> <ul style="list-style-type: none"> • To another primary Trust • To a secondary Trust • To a pupil referral unit • If the pupil dies whilst at primary Trust the file should be returned to the Local Authority for the statutory retention period. <p>If the pupil transfers to an independent Trust, 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 Trusts 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 | | Limitation Act 1980 (Section 2) | Date of Birth of the pupil + 25 years | SECURE DISPOSAL |
| 5.1.2 | Examination Results – Pupil Copies | Yes | | | |
| | Public | | | This information should be added to the pupil file | All uncollected certificates should be returned to the examination board |
| | Internal | | | This information should be added to the pupil file | |
| 5.1.3 | Child Protection information held on pupil file | Yes | “Keeping children safe in education Statutory guidance for Trusts and colleges March 2015”; “Working together to safeguard and promote the welfare of children March 2015 | 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 | SECURE DISPOSAL – these records MUST be shredded |
| 5.1.4 | Child Protection information held in separate files | Yes | “Keeping children safe in education Statutory guidance for Trusts and colleges March 2015”; “Working together to safeguard and promote the welfare of children March 2015 | DOB of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record | SECURE DISPOSAL – these records MUST be shredded |
| 5.2 Attendance | | | | | |
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 5.2.1 | Attendance Registers | Yes | Trust attendance: Departmental advice for maintained Trusts, academies independent Trusts and local authorities October 2014 | Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made. | SECURE DISPOSAL |
| 5.2.2 | Correspondence relating to authorised absence | | Education Act 1996 Section 7 | Current academic year + 2 years | SECURE DISPOSAL |

| 5.3 Special Educational Needs | | | | | |
|-------------------------------|---|------------------------|--|---|--|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 5.3.1 | Special Educational Needs files, reviews and Individual Education Plans | Yes | Limitation Act 1980 (Section 2) | Date of birth of pupil + 25 years | |
| 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 by 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 |

Section 6: Curriculum Management

| 6.1 Statistics and Management Information | | | | | |
|---|--|------------------------|----------------------|--|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 6.1.1 | Curriculum returns | No | | Current year + 3 years | SECURE DISPOSAL |
| 6.1.2 | Examination Results (Trusts 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 therefore be retained until the pupil reaches the age of 25 years. The Trust may wish to keep a composite record of all the whole year SAT's results. These could be kept for current year + 6 years to allow suitable comparison | SECURE DISPOSAL |
| | Examination Papers | | | The examination papers should be kept until any appeals/validation process is complete | SECURE DISPOSAL |
| 6.1.3 | Published Admission Number (PAN) Reports | Yes | | Current year + 6 years | 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 | | | | | |
|----------------------------------|-----------------|------------------------|----------------------|-----------------------|---|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 6.2.1 | Schemes of Work | No | | Current Year + 1 year | It may be appropriate to review these records at the end of |
| 6.2.2 | Timetable | No | | Current Year + 1 year | |

| | | | | | |
|-------|------------------------|----|--|---|--|
| 6.2.3 | Class Record Books | No | | Current Year + 1 year | each year and allocate a further retention period or SECURE DISPOSAL |
| 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 | Pupil's Work | No | | Where possible pupil's work should be returned to the pupil at the end of the academic year. If this is not the Trust's policy then current year + 1 year | SECURE DISPOSAL |

Section 7: Extra Curricular Activities

| 7.1 Educational Visits outside the Classroom | | | | | |
|--|---|------------------------|--|--|--|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 7.1.1 | Records created by Trusts to obtain approval to run an Educational Visit outside the Classroom – Primary Trusts | 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 Trusts to obtain approval to run an Educational Visit outside the Classroom – Secondary Trusts | 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 Trust trips where there has been no major incident | Yes | | Conclusion of the trip | Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most Trusts do not have the storage capacity to retain every single consent form issued by the Trust for this period of time |
| 7.1.4 | Parental permission slips for Trusts trips – where there has been a major incident | Yes | Limitation Act 1980 (Section 2) | DOB of the pupil involved in the incident + 25 years. The permission slips for all the pupils on the trip need to be retained to show the rules had been followed for all pupils | |

Section 8: Central Government & Local Authority

| 8.1 Local Authority | | | | | |
|---------------------|---|------------------------|----------------------|------------------------|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 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 | Trust 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 | | | | | |
|------------------------|--|------------------------|----------------------|-------------------------------|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 8.2.1 | OFSTED reports and papers | No | | Life of the report the 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 | | Operation use | SECURE DISPOSAL |