INVICTUS

Education Trust

Records Management Policy

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Document Control and Version Control

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Invictus Education Trust
Records Management Policy

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1. Our Mission, Vision and Values

Mission

'Excellence every day, unlimited ambition and transforming lives'

Vision

'To create a community of inclusive schools where people choose to learn with us, work with us and belong with us, so that everyone succeeds'

Values

- Respect
- Resilience
- Relationships

2. Introduction and Scope

Invictus Education Trust recognises records management as a core corporate function that supports the effective management of the organisation. A records management programme improves accountability, transparency, continuity, decision-making, and compliance with relevant legislation and regulations.

This policy provides a framework for ensuring that we comply with the requirements of the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, and information access legislation, including the Freedom of Information Act and other associated guidance and codes of practice.

This policy applies to our entire workforce. This includes employees, trustees, associate governors, contractors, agents and representatives, volunteers and temporary staff working for or on our behalf. Individuals found to knowingly or recklessly infringe this policy may face disciplinary action.

The Records Management Policy applies to all records created, received or maintained by us while carrying out our functions, whether in paper or electronic format. It should be read alongside the other policies within our information governance policy framework.

3. Roles and Responsibilities

Overall responsibility for ensuring that we meet the statutory requirements of any legislation lies with the Board of Trustees. The following roles will have day-to-day responsibility for records management compliance and providing the necessary assurance to the Board.

Senior Information Risk Owner (SIRO)

The SIRO is responsible for overseeing the implementation of this policy and ensuring that effective records management practices are in place across the organisation. The SIRO is also responsible for operational management and will ensure that staff are appropriately trained in records management, supported by the SPOC and IAOs. In our organisation, this role lies with the Director of Strategy and Governance.

Single Point of Contact (SPOC)

The SPOC will support the SIRO in day-to-day operational management. This includes providing guidance on effective records management practices and promoting compliance with this policy so that information can be retrieved easily, appropriately, and in a timely way. In our organisation, this role lies with the Facilities and Operations Managers within our secondary schools and the Headteachers PA in our primary schools.

Information Asset Owner (IAO)

The IAO is responsible for the security and maintenance of a particular record during its lifecycle. IAOs need to understand how information is created, amended, or added over time, who has access to the records, and why. They are also responsible for the appropriate disposal of information when it is no longer required. A record of IAOs is included in our Information Asset Register.

All staff

All staff, including governors or trustees, contractors, agents and representatives, volunteers, and temporary staff working for or on our behalf, will be responsible for managing records consistently in accordance with this policy. Complete and accurate records must be held that adequately document their work.

4. Records Management

A record is 'information created, received, and maintained as evidence and an asset by an organisation in pursuit of legal obligations or in the transaction of business.' Records are retained for a period determined by legal, regulatory, and functional requirements.

A programme will be developed to manage our records throughout their lifecycle. This will include using methods such as version control, naming conventions, and file plans to ensure that records can be easily searched and accessed in the event of an information request.

We will ensure that our records are authentic, reliable, useable and have integrity to fulfil and retain their evidentiary value. Regular reviews of the records management programme will be conducted to ensure compliance and check that records are stored securely and can be accessed appropriately.

Pupil Records

We are required to maintain records for each pupil. This record is the core evidence of an individual's progress through the education system and will accompany them throughout their school career.

Pupil records are held electronically within our management information system (MIS) whenever possible. Information not forming part of the core record may be held outside the MIS in either electronic or paper format. This includes information with shorter retention periods, such as attendance registers, consent forms, medical forms, accident forms, absence notes, and pupil work.

Records relating to pupils involved with child protection or safeguarding are held securely in a designated system accessible to the Designated Safeguarding Lead and designated staff members. These records are stored separately from the core pupil record to ensure confidentiality and restricted accessibility. They may be retained for longer than the core pupil file.

We will ensure that the information in the pupil file is accurate, objectively recorded, expressed in a professional manner, and kept up to date.

Pupil records will be transferred electronically to any new setting the pupil attends. Once securely transferred, we will not keep copies of the pupil record unless there is ongoing legal action. The setting the pupil attends until the statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25.

Staff Records

Records relating to our workforce will be held securely electronically, wherever possible, or in paper format. Appropriate security measures are in place to ensure confidentiality and restricted access.

Information related to child protection allegations against staff will be held separately from the core employee record to ensure confidentiality and restricted accessibility. This information may be held for longer than the core employee file.

5. Information Asset Register (IAR)

In accordance with Article 30 of UK GDPR, we will have an Information Asset Register (IAR) that maintains a record of our processing activities. The IAR will document what records we hold, where they are stored, who has access to the information, and the retention periods in place. It will be reviewed, at least annually, to ensure it remains accurate.

6. Email Management

We will have a process in place to ensure that emails are managed in accordance with this policy and our retention schedule. Emails discussing business or reflecting significant actions or decisions concerning our pupils or staff will not be stored in personal email inboxes. These emails must be filed into an appropriate electronic filing system, and the original email deleted.

Where possible, emails are automatically deleted in accordance with our retention schedule. Where this is not possible, staff review personal email inboxes manually to ensure any unnecessary emails are deleted.

7. Security and Access

All records, especially those containing personal data, will be stored securely to maintain confidentiality while keeping the information accessible to those authorised to see it. Electronic records will have appropriate security and access controls, and systems will have robust audit functionality wherever possible.

Paper records will be stored in secure, lockable storage areas with restricted access to key roles.

When sharing or transferring records containing personal information, we will ensure appropriate transmission security controls are in place and align with our Information Security Policy.

8. Information Requests and Data Subject Rights

Requests for information under Data Protection, Freedom of Information, Environmental Information, or other legislation will be handled in line with our Data Protection Policy.

9. Retention and Disposal

Retention is the period a record is kept after it stops being actively used but before it is destroyed. It is a vital part of records management as it allows organisations to retain records only for as long as needed and discourages records being held for long periods 'just in case'.

Legal, regulatory, or functional requirements determine the retention period for particular types of records. We have implemented a Retention Schedule (Appendix One) that outlines our specified retention periods. This schedule will be reviewed at least annually to ensure accuracy.

We will ensure that any records containing personal or confidential information are disposed of appropriately and securely in line with our retention schedule.

Records held in databases or electronic management systems, with the functionality to automatically destroy records after a specified period, will be used wherever possible. A review of the records will be carried out before destruction, where practical.

Where automatic disposal is not in place, for example, for paper records, we will conduct a manual review annually to ensure they are destroyed in line with retention guidelines.

The disposal of all information is documented to ensure that we maintain a record of when it has been deleted and by whom. This allows us to evidence that a record no longer exists or has been transferred to another setting in the event of an information request being received.

10. Archiving

A small percentage of our records may be selected for permanent preservation. This is maintained as a resource to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging, and shared heritage; to prompt memories of school life among many generations; and to serve as a research resource for all interested in the history of the school and the community it serves.

Records containing personal information will only be selected for archive with appropriate safeguards in place to protect the rights and freedoms of individuals. This will include anonymisation or pseudonymisation wherever possible.

Where we retain records for archiving purposes on-site, we will ensure that we have an archiving system in place setting out how this operates.

Parental Impact Assessment

As part of the policy review process, consideration has been given to whether the policy, or any changes to it, has a direct impact on parents and carers. This includes assessing whether changes affect parental responsibilities, required actions, communication processes, or understanding of Trust or school practices.

Decision:

The Trust Executive Team has determined that parental communication is:

- ❖ Not required for this policy

11. Appendices

Appendix 1: Retention Schedule

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

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

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.1.1	Governance Statement	No		Life of governance statement + 6 years	SECURE DISPOSAL
1.1.2	Articles of Association	No		Life of the Academy	
1.1.3	Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL
1.1.4	Memorandum of Understanding of Shared Governance among Schools	No	*Companies Act 2006 section 355*	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.1.5	Constitution	No		Life of the Academy	
1.1.6	Special Resolutions to amend the Constitution	No		Life of the Academy	
1.1.7	Written Scheme of Delegation	No	*Companies Act 2006 section 355*	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
1.1.8	Trustees – Appointment	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.9	Trustees – Disqualification	No	Company Directors Disqualification Act 1986	Date of disqualification + 15 years	SECURE DISPOSAL
1.1.10	Trustees – Termination of Office	No		Date of termination + 6 years	SECURE DISPOSAL
1.1.11	Annual Report – Trustees Report	No	*Companies Act 2006 section 355*	Date of report + 10 years	SECURE DISPOSAL
1.1.12	Annual Report and Accounts	No	*Companies Act 2006 section 355*	Date of report + 10 years	SECURE DISPOSAL
1.1.13	Annual Return	No	*Companies Act 2006 section 355*	Date of report + 10 years	SECURE DISPOSAL
1.1.14	Appointment of Trustees and individuals involved in local governance	Yes		Life of appointment + 6 years	SECURE DISPOSAL
1.1.15	Statement of Trustees Responsibilities	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.16	Appointment and removal of Members	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.17	Strategic Review	No		Date of the review + 6 years	SECURE DISPOSAL
1.1.18	Trust Strategic Plan and School Improvement Plans	No		Life of plan + 6 years	SECURE DISPOSAL
1.1.19	Accessibility Plan	There may be if the plan refers to specific pupils	Limitation Act 1980 (Section 2)	Life of plan + 6 years	SECURE DISPOSAL
1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.2.2	Board Decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.3	Board Meeting: Annual Schedule of Business	No		Current year	SECURE DISPOSAL
1.2.4	Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	SECURE DISPOSAL
1.2.5	Minutes relating to any committees set up by the Trust Board	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.7	Records relating to the management of Annual General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.8	Agendas for local governance meetings	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL
1.2.9	Minutes of, and papers considered at, meetings of the local governance meetings	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		Trust Copy Set (Signed) – Life of Academy Inspection Copies – Date of meeting + 3 years	SECURE DISPOSAL
1.2.10	Reports presented at local	May be data protection issues, if the		Reports should be kept for a minimum of 6 years. However, if	SECURE DISPOSAL or

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
	governance meetings	meeting is dealing with confidential issues relating to staff		the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy	retain with the signed set of minutes
1.2.11	Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
1.2.12	Trusts and Endowments managed by the academy trust	No		PERMANENT	
1.2.13	Records relating to complaints dealt with by the academy trust	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
1.2.14	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
1.2.15	Register of trustees		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.16	Registers of interests			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.17	Register of trustees' residential addresses		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.18	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.19	Register of members		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.20	Register of secretaries		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.2.21	Register of Trustees interests			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.22	Declaration of Interests Statements [Governors] [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL
1.3.1	Statement of financial activities for the year	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.2	Financial planning	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.3	Value for money statement	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.4	Records relating to the management of VAT	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.5	Whole of government accounts returns	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.6	Borrowing powers	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.7	Budget plan	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.8	Charging and remissions policy	No		Date policy superseded + 3 years	SECURE DISPOSAL
1.3.9	Audit Committee and appointment of responsible officers	No		Life of the Academy	SECURE DISPOSAL
1.3.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.13	Funding Agreement – Termination of			Date of last payment of funding + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
	the funding agreement				
1.3.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.15	Funding Records – Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.17	Per pupil funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.18	Exclusions Agreements	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.19	Funding Records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.21	Records relating to loans	No		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	SECURE DISPOSAL
1.3.22	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
1.3.23	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL
1.3.24	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.25	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.26	Payroll records	Yes		Date payroll run + 6 years	SECURE DISPOSAL
1.3.27	Insurance policies	No		Date the policy expires + 6 years	SECURE DISPOSAL
1.3.28	Records relating to the settlement	No		Date claim settled + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
	of insurance claims				
1.3.29	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
1.3.30	Investment policies	No		Life of the investment + 6 years	SECURE DISPOSAL
1.3.31	Management of Endowment Funds	No		Life of the fund + 6 years	
1.3.32	Annual accounts	No		Current year + 6 years	STANDARD DISPOSAL
1.3.33	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
1.3.34	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.35	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL
1.3.36	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.37	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.38	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.39	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
1.3.40	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
1.3.41	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.3.42	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
1.3.43	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL
1.3.44	Records relating to the leasing of shared facilities, such as sports centres	No		Current year + 6 years	SECURE DISPOSAL
1.3.45	Land and building valuations	No		Date valuation superseded + 6 years	SECURE DISPOSAL
1.3.46	Disposal of assets	No		Date asset disposed of + 6 years	SECURE DISPOSAL
1.3.47	Community School leases for land	No		Date lease expires + 6 years	SECURE DISPOSAL
1.3.48	Commercial transfer arrangements	No		Date of transfer + 6 years	SECURE DISPOSAL
1.3.49	Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
1.3.50	Transfers of freehold land	No		Life of land ownership then transfer to new owner	SECURE DISPOSAL
1.3.51	School Fund – Cheque books	No		Current year + 6 years	SECURE DISPOSAL
1.3.52	School Fund – Paying in books	No		Current year + 6 years	SECURE DISPOSAL
1.3.53	School Fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
1.3.54	School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
1.3.55	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
1.3.56	School Fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
1.3.57	School Fund – Journey books	No		Current year + 6 years	SECURE DISPOSAL
1.3.58	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.59	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.60	School meals summary sheets	No		Current year + 3 years	SECURE DISPOSAL
1.4.1	Data Protection Policy, including	No		Date policy superseded + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
	data protection notification				
1.4.2	Freedom of Information Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.3	Information Security Breach Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.4	Special Educational Needs Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.5	Complaints Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.6	Risk and Control Framework	No		Life of framework + 6 years	SECURE DISPOSAL
1.4.7	Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	SECURE DISPOSAL
1.4.8	Home School Agreements	No		Date agreement revised + 6 years	SECURE DISPOSAL
1.4.9	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	SECURE DISPOSAL

2. Human Resources

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
2.1	**Recruitment**				
2.1.1	All records leading up to the appointment of a new Head Teacher	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 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 June 2014	The organisation should take a copy of the DBS certificate when it is shown to	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
				them by the individual and should be added to the Staff Personal File	
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 was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File	SECURE DISPOSAL
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	An employer's guide to right to work checks [Home Office May 2015]	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
2.1.7	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
2.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL
2.2	**Operational Staff Management**				
2.2.1	Staff Personal File, including employment contract and staff training records	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
2.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
2.2.5	Training needs analysis	No		Current year + 1 year	SECURE DISPOSAL
2.3	**Management of Disciplinary and Grievance Processes**				
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded	Yes	"Keeping children safe in education Statutory guidance for schools 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 longer, then REVIEW	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	Oral warning			Date of warning + 6 months	SECURE DISPOSAL
	Written warning – level 1			Date of warning + 6 months	SECURE DISPOSAL
	Written warning – level 2			Date of warning + 12 months	SECURE DISPOSAL
	Final warning			Date of warning + 18 months	SECURE DISPOSAL
	Case not found			If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL
2.4	**Health and Safety**				
2.4.1	Health and Safety policy statements	No		Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety risk assessments	No		Life of risk assessment + 3 years	SECURE 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	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in	

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
			Security Administration Act 1992 Section 8. Limitation Act 1980	paper or electronic format The incident reporting form may be retained as below	
	Adults *Children*			*Date of incident + 6 years* *Date of birth of the child + 25 years*	*SECURE DISPOSAL* *SECURE DISPOSAL*
2.4.5	Control of Substances Hazardous to Health (COSHH)	No		Current year + 10 years then REVIEW	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No		Last action + 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire precautions logbooks	No		Current year + 6 years	SECURE DISPOSAL
2.4.9	Fire risk assessments	No	Fire Service Order 2005	Life of the risk assessment + 6 years	SECURE DISPOSAL
2.4.10	Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL

3. Management of the Academy

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
3.1	**Admissions**				
3.1.1	All records relating to the creation and implementation of the School Admissions' Policy	No	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then REVIEW	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
3.1.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL
3.1.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
3.1.4	Register of admissions	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	SECURE DISPOSAL
3.1.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
3.1.6	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
3.1.7	Supplementary information form, including additional information such as religion and medical conditions	Yes			
	For successful admissions			This information should be added to the pupil file	SECURE DISPOSAL
	For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL
3.2	**Headteacher and Senior Management Team**				
3.2.1	Logbooks of activity in the school maintained by the Head Teacher	There may be data protection issues if the logbook refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the County Archives Service, if appropriate – suitable anonymisation should take place
3.2.2	Minutes of Senior Management Team meetings and 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
3.2.3	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 + a minimum of 3 years then REVIEW	SECURE DISPOSAL
3.2.4	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 records refer to individual pupils or members of staff		Current academic year + 6 years then REVIEW	SECURE DISPOSAL
3.2.5	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 correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
3.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
3.3	**Operational Administration**				
3.3.1	Management of complaints	Yes		Date complaint resolved + 3 years	SECURE DISPOSAL
3.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL
3.3.3	Records relating to the management of software licences	No		Date licence expires + 6 years	SECURE DISPOSAL
3.3.4	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
3.3.5	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
3.3.6	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
3.3.7	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
3.3.8	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
3.3.9	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

4. Property Management

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
4.1	**Property Management**				
4.1.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
4.1.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.1.5	Business continuity and disaster recovery plans	No		Date the plan superseded + 3 years	SECURE DISPOSAL
4.2	**Maintenance**				
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school employees, including maintenance logbooks	No		Current year + 6 years	SECURE DISPOSAL
4.3	**Fleet Management**				
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.2	The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, maintenance	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.3	Service logs and vehicle logs	N	Limitation Act 1980 (Section 2)	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	SECURE DISPOSAL
4.3.4	GPS tracking data relating to the vehicles	N	Limitation Act 1980 (Section 2)	Date of journey + 6 years	SECURE DISPOSAL

5. Pupil Management

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
5.1	**Pupil's Educational 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			Retain whilst the child remains at the primary school	The file should follow the pupil when they leave the primary school. This will include: To another primary school To a secondary school To a pupil referral unit 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 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 LA, as it is more likely that the pupil will request the

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
					record from the LA
	Secondary		Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
5.1.3	Management of examination registration	Yes		The examination board will usually mandate how long these records need to be retained	
5.1.4	Examination results – pupil copies	Yes			
	Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	Internal			This information should be added to the pupil file	
5.1.5	Child protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools 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"	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
5.1.6	Child protection information held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools 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"	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	SECURE DISPOSAL – these records MUST be shredded
5.2	Attendance				

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at 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 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	SECURE DISPOSAL
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				
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	SECURE DISPOSAL, unless the document is subject to a legal hold
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

6. Curriculum Management

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
6.1	**Statistics and Management Information**				
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 –	Yes		Current year + 6 years	SECURE DISPOSAL
	Results			The SATS results should be recorded on the pupil's educational file	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
				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	
	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				
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	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.3	Class record books	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
6.2.4	Mark books	No		Current year + 1 year	It may be appropriate to review these records at the end

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
					of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.5	Record of homework set	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
6.2.6	Pupils' work	No		Where possible, 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. Extracurricular Activities

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
7.1	**Educational Visits outside the Classroom**				
7.1.1	Records created by schools in order 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 in order 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	Yes		Conclusion of the trip	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
	has been no major incident				
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	Date of birth 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	
7.1.5	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL
7.2	**Walking Bus**				
7.2.1	Walking bus registers	Yes		Date of register + 3 years. This takes into account the fact that, if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]

8. Central Government and Local Authority

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
8.1	**Local Authority**				
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
8.2	Central Government				
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

9. Email Retention

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
8.1	Emails not discussing business or reflecting significant actions or decisions concerning our pupils or staff	Yes if contains personal data		Emails are autodeleted after 14 months.	AUTO DELETE- controlled by ICT team
8.2	Emails discussing business or reflecting significant actions or decisions concerning our pupils or staff	Yes		For as long as required, depending on the nature of the information- should be saved and filed accordingly – not stored in email inboxes	Staff member should save the information and file it accordingly so that the autodelete will not lose data before correct retention period