



AAT Data and Records Management Policy

Last reviewed: June 2021

Next Review: June 2022

1 Policy statement and objectives

- 1.1 The Alban Academies 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 academy and provide evidence for demonstrating performance and accountability.
- 1.2 This document provides the policy framework through which this effective management can be achieved and audited. It covers:
 - Scope
 - Responsibilities
 - Digital continuity
 - Relationships with existing policies

2 Scope of policy

2.1 This policy has been developed at Trust level and therefore covers policy that is relevant and followed by all the schools within the Alban Academies Trust (AAT). This policy applies to all records created, received or maintained by permanent and temporary staff of the academy in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the AAT..

The appendices contain the IRMS Records Retention Schedule Toolkit for Schools (IRMS) followed by all schools within the AAT.

2.2 Records are defined as all those documents which facilitate the business carried out by the academy 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 electronic format e.g. paper documents, scanned documents, e-mails which document business activities and decisions, audio and video recordings, text messages, notes of telephone and Skype conversations, spreadsheets, Word documents, presentations etc.

3 Role and responsibilities

- 3.1 The governing body of each school has a statutory responsibility to maintain that school's records and record keeping systems in accordance with the regulatory environment outlined by the AAT. The responsibility is usually delegated to the head teacher of the school but may be delegated to another senior leader.
- 3.2 The person responsible for day-to-day operational management in the school will give guidance on good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- 3.3 The person responsible for records management will also ensure that:
 - records are adequately stored and backed up
 - a tracking system is in place that controls the movement and location of records so that they can be easily retrieved
 - access controls are in place
 - a business recovery plan is in place

- 3.4 The school will manage and document its records disposal process in line with the IRMS Toolkit for Schools Retention Schedule, appendix 1. This will help to ensure that it can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (subject access requests “SARS”).
- 3.5 Individual staff and employees must ensure, with respect to records for which they are responsible, that they:
- 3.5.1 Manage the school’s records consistently in accordance with the AAT’s policies and procedures;
 - 3.5.2 Properly document their actions and decisions;
 - 3.5.3 Hold personal information securely;
 - 3.5.4 Only share personal information appropriately and do not disclose it to any unauthorised third party;
 - 3.5.5 Dispose of records securely in accordance with the AAT’s Data Retention Schedule.

4 Digital continuity

- 4.1 Computerised data that must be kept for six or more years (see appendix 1) will be identified, and stored appropriately:
- 4.1.1 This data will be stored in online backup systems.
 - 4.1.2 The data will be archived to a dedicated location on the school’s server, which is password-protected
 - 4.1.3 This data will be stored on password protected external hard drives.
 - 4.1.4 This data will not be stored on flash drives.
- 4.2 Where possible, other files will be converted to appropriate supported file formats for long-term preservation e.g. Word and Excel files may be converted to PDF files.

5 Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection/GDPR policy
- Information Governance Policy and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the academy.

6 Enquiries

- 6.1 Further information about the AAT’s Data Retention Policy and each school’s practice is available from the DPO. *Ridgeway Academy: Marianna Ring, Verulam School: Mark Kennedy, Sandringham School: Hfl, Wheatfields Junior School: Helen Trenchard and Wheatfields Infants’ and Nursery School: James Rodea*
- 6.2 General information about data protection regulations can be obtained from the Information Commissioner’s Office: www.ico.gov.uk

7 Document Control

Date modified	Description of modification	Modified by

Records Retention Schedule (Academies)

Introduction

Please note that this schedule is based on the retention schedule contained within the Information Record Management Society (IRMS) Toolkit for schools, along with some customisations specific for Hertfordshire. The full document can be viewed at: <https://irms.org.uk/page/AcademiesToolkit>. However, in order to download a customisable version, you need to be a member of the IRMS.

Under the Accountability and Transparency principles of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018), academies are required to set and publish retention periods for the personal data they hold. In addition, under the Freedom of Information Act 2000, academies should maintain a Retention Schedule listing the series of records which the academy creates or maintains in the course of its business.

This Retention Schedule lays down the length of time for which the record may need to be retained and the action which should be taken when it is of no further administrative or legal use. Academies are expected to manage their current record keeping systems using a Retention Schedule and to take account of the different kinds of retention periods when creating new record keeping systems. This will ensure that information is not being stored and processed unnecessarily.

This Retention Schedule contains recommended retention periods for the different record series created and maintained by academies in the course of their business. It refers to series of records regardless of the media in/on which they are stored (e.g. paper/electronic/microfilm/photographic etc.). Where appropriate the Retention Schedule should be reviewed on a regular basis and amended to include any new record series created, and any obsolete record series removed.

Some of the retention periods are governed by statute, others are suggested guidelines based on best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of Data Protection and Freedom of Information legislation. However, please bear in mind that depending on which electronic systems are being used (e.g. for MIS), it may not always be technically possible to carry out some of the data deletion or minimisation in bulk, as required by the schedule. You may sometimes decide that some types of records need to be kept for longer or shorter periods than laid out in this document. If so, then the justification for this (e.g. for operational purposes or business needs) should be documented.

Staff should be aware that once a Freedom of Information request is received, or a legal hold imposed, then records disposal relating to the request or legal hold must be stopped. **Records which may be required by the Independent Inquiry into Child Sexual Abuse (IICSA) should be treated as though they are subject to a legal hold.**

Where there is a recommendation to archive the information this may be in an electronic format. There is no need to convert the information into a hard copy. Such records should be kept in separate electronic folder suitably marked as holding archival material.

Academies should also refer to the guidance given by their Local Authority Designated Officer (LADO) regarding retention of safeguarding records. Hertfordshire academies can find this information here: https://www.thegrid.org.uk/info/welfare/child_protection/policy/local.shtml#pupilsafe

Disclaimer: This document acts as a guideline only, and MUST be customised to your own requirements. Liability is the responsibility of the end user. If in doubt, seek the appropriate legal advice and senior management approval. Best efforts have been made to ensure that the Statutory Provisions quoted are up to date, but please be aware that these may change.

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1. Governing Board

1.1 Governance of the Academy Trust					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.1.1	Annual Statement		Life of governance statement + 6 years	SECURE DISPOSAL	
1.1.2	Articles of Association		Life of the Academy		
1.1.3	Memorandum of Association		This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL	
1.1.4	Memorandum of Understanding of Shared Governance among Schools	Companies Act 2006 section 355	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL	
1.1.5	Articles of Association (Constitution)		Life of the Academy		
1.1.6	Special Resolutions to amend the Constitution		Life of the Academy		
1.1.7	Written Scheme of Delegation	Companies Act 2006 section 355	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL	
1.1.8	Directors – Appointment		Life of appointment + 6 years	SECURE DISPOSAL	
1.1.9	Directors – Disqualification	Company Directors Disqualification Act 1986	Date of disqualification + 15 years	SECURE DISPOSAL	
1.1.10	Directors – Termination of Office		Date of termination + 6 years	SECURE DISPOSAL	
1.1.11	Annual Report – Trustees Report	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL	
1.1.12	Annual Report and Accounts	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL	
1.1.13	Annual Return	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL	
1.1.14	Appointment of Local Boards (where required)		Life of appointment + 6 years	SECURE DISPOSAL	Yes

1.1.15	Statement of Trustees Responsibilities		Life of appointment + 6 years	SECURE DISPOSAL	
1.1.16	Appointment, removal and disqualification of Members		Life of appointment + 6 years	SECURE DISPOSAL	
1.1.17	Strategic Review		Date of the review + 6 years	SECURE DISPOSAL	
1.1.18	Strategic Plan [also known as School Development Plans]		Life of plan + 6 years	SECURE DISPOSAL	
1.1.19	Accessibility Plan	Limitation Act 1980 (Section 2)	Life of plan + 6 years	SECURE DISPOSAL	Potentially
1.1.20	Persons with significant control	https://www.gov.uk/government/publications/guidance-to-the-people-with-significant-control-requirements-for-companies-and-limited-liability-partnerships	Life of appointment + 10 years	SECURE DISPOSAL	Potentially

1.2 Board of Directors, Members Meetings and Governing Body

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
Board of Directors					
1.2.1	Board Meeting Minutes	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES	Potentially
1.2.2	Board Decisions		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES	Potentially
1.2.3	Board Meeting: Annual Schedule of Business		Current year	SECURE DISPOSAL	
1.2.4	Board Meeting: Procedures for conduct of meeting	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	SECURE DISPOSAL	
Committees					
1.2.5	Minutes relating to audit risk committees set up by the Board of Directors		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES	Potentially

General Members' Meetings					
1.2.6	Records relating to the management of General Members' Meetings	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES	Potentially
1.2.7	Records relating to the management of the Annual General Meeting (<i>not all academies are required to hold an AGM for the Members – the requirement will be stated in the Constitution</i>)	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES	Potentially
Governors					
1.2.8	Agendas for Governing Board meetings		One copy should be retained with the master set of minutes, all other copies can be disposed of	SECURE DISPOSAL	Potentially
1.2.9	Minutes of, and papers considered at, meetings of the Governing Board and its committees		Principal Set (signed): Life of Academy Inspection Copies: Date of meeting + 3 years	SECURE DISPOSAL	Potentially
1.2.10	Reports presented to the Governing Board		Reports should be kept for a minimum of 6 years, unless the minutes refer directly to individual reports, in which case the reports should be kept for the life of the Academy	SECURE DISPOSAL <i>or retain with the signed set of minutes</i>	Potentially
1.2.11	Trusts and Endowments managed by the Governing Board		PERMANENT		
1.2.12	Records relating to complaints dealt with by the Governing Board		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL	Yes
1.2.13	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL	

Statutory Registers					
1.2.14	Register of Directors	Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL	
1.2.15	Register of Directors' interests [this is not a statutory register]		Life of the Academy + 6 years	SECURE DISPOSAL	
1.2.16	Register of Directors' residential addresses	Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL	
1.2.17	Register of gifts, hospitality and entertainments	Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL	
1.2.18	Register of members	Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL	
1.2.19	Register of secretaries	Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL	
1.2.20	Register of Trustees interests		Life of the Academy + 6 years	SECURE DISPOSAL	
1.2.21	Declaration of Interests Statements [Governors] [this is not a statutory register]		Life of the Academy + 6 years	SECURE DISPOSAL	

1.3 Funding and Finance					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
Strategic Finance					
1.3.1	Statement of financial activities for the year		Current financial year + 6 years	SECURE DISPOSAL	
1.3.2	Financial planning		Current financial year + 6 years	SECURE DISPOSAL	
1.3.3	Value for money statement		Current financial year + 6 years	SECURE DISPOSAL	
1.3.4	Records relating to the management of VAT		Current financial year + 6 years	SECURE DISPOSAL	
1.3.5	Whole of government accounts returns		Current financial year + 6 years	SECURE DISPOSAL	
1.3.6	Borrowing powers		Current financial year + 6 years	SECURE DISPOSAL	
1.3.7	Budget plan		Current financial year + 6 years	SECURE DISPOSAL	
1.3.8	Charging and remissions policy		Date policy superseded + 3 years	SECURE DISPOSAL	

Audit Arrangements					
1.3.9	Audit Committee and appointment of responsible officers		Life of the Academy	SECURE DISPOSAL	
1.3.10	Independent Auditor's report on regularity		Financial year report relates to + 6 years	SECURE DISPOSAL	
1.3.11	Independent Auditor's report on financial statements		Financial year report relates to + 6 years	SECURE DISPOSAL	
Funding Agreements					
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements <i>(where there is multi-Academy governance)</i>		Date of last payment of funding + 6 years	SECURE DISPOSAL	
1.3.13	Funding Agreement – Termination of the funding agreement		Date of last payment of funding + 6 years	SECURE DISPOSAL	
1.3.14	Funding Records – Capital Grant		Date of last payment of funding + 6 years	SECURE DISPOSAL	
1.3.15	Funding Records – Earmarked Annual Grant (EAG)		Date of last payment of funding + 6 years	SECURE DISPOSAL	
1.3.16	Funding Records – General Annual Grant (GAG)		Date of last payment of funding + 6 years	SECURE DISPOSAL	
1.3.17	Per pupil funding records		Date of last payment of funding + 6 years	SECURE DISPOSAL	
1.3.18	Exclusions agreement		Date of last payment of funding + 6 years	SECURE DISPOSAL	
1.3.19	Funding records		Date of last payment of funding + 6 years	SECURE DISPOSAL	
1.3.20	Gift Aid and Tax Relief		Date of last payment of funding + 6 years	SECURE DISPOSAL	
1.3.21	Records relating to loans		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	

Payroll and Pensions					
1.3.22	Maternity pay records	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL	Yes
1.3.23	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	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	Yes
1.3.24	Management of the Teachers' Pension Scheme		Date of last payment on the pension + 6 years	SECURE DISPOSAL	Yes
1.3.25	Records relating to pension registrations		Date of last payment on the pension + 6 years	SECURE DISPOSAL	Yes
1.3.26	Payroll records		Date payroll run + 6 years	SECURE DISPOSAL	Yes
Risk Management and Insurance					
1.3.27	Insurance policies		Date the policy expires + 6 years	SECURE DISPOSAL	
1.3.28	Records relating to the settlement of insurance claims		Date claim settled + 6 years	SECURE DISPOSAL	
1.3.29	Employer's Liability Insurance Certificate		Closure of the school + 40 years	SECURE DISPOSAL	
Endowment Funds and Investments					
1.3.30	Investment policies		Life of the investment + 6 years	SECURE DISPOSAL	
1.3.31	Management of Endowment Funds		Life of the fund + 6 years		
Accounts and Statements					
1.3.32	Annual accounts		Current year + 6 years	STANDARD DISPOSAL	
1.3.33	Loans and grants managed by the school		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL	

1.3.34	Student Grant applications		Current year + 3 years	SECURE DISPOSAL	Yes
1.3.35	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers		Life of the budget + 3 years	SECURE DISPOSAL	
1.3.36	Invoices, receipts, order books and requisitions, delivery notices		Current financial year + 6 years	SECURE DISPOSAL	
1.3.37	Records relating to the collection and banking of monies		Current financial year + 6 years	SECURE DISPOSAL	
1.3.38	Records relating to the identification and collection of debt		Current financial year + 6 years	SECURE DISPOSAL	
Contract Management					
1.3.39	All records relating to the management of contracts under seal	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	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL	
1.3.41	Records relating to the monitoring of contracts		Current year + 2 years	SECURE DISPOSAL	
Asset Management					
1.3.42	Inventories of furniture and equipment		Current year + 6 years	SECURE DISPOSAL	
1.3.43	Burglary, theft and vandalism report forms		Current year + 6 years	SECURE DISPOSAL	
1.3.44	Records relating to the leasing of shared facilities, such as sports centres		Current year + 6 years	SECURE DISPOSAL	
1.3.45	Land and building valuations		Date valuation superseded + 6 years	SECURE DISPOSAL	
1.3.46	Disposal of assets		Date asset disposed of + 6 years	SECURE DISPOSAL	
1.3.47	Community School leases for land		Date lease expires + 6 years	SECURE DISPOSAL	
1.3.48	Commercial transfer arrangements		Date of transfer + 6 years	SECURE DISPOSAL	

1.3.49	Transfer of land to the Academy Trust		Life of land ownership then transfer to new owner	SECURE DISPOSAL	
1.3.50	Transfers of freehold land		Life of land ownership then transfer to new owner	SECURE DISPOSAL	

School Fund

1.3.51	School Fund – Cheque books		Current year + 6 years	SECURE DISPOSAL	
1.3.52	School Fund – Paying in books		Current year + 6 years	SECURE DISPOSAL	
1.3.53	School Fund – Ledger		Current year + 6 years	SECURE DISPOSAL	
1.3.54	School Fund – Invoices		Current year + 6 years	SECURE DISPOSAL	
1.3.55	School Fund – Receipts		Current year + 6 years	SECURE DISPOSAL	
1.3.56	School Fund – Bank statements		Current year + 6 years	SECURE DISPOSAL	
1.3.57	School Fund – Journey books		Current year + 6 years	SECURE DISPOSAL	

School Meals

1.3.58	Free school meals registers		Current year + 6 years	SECURE DISPOSAL	Yes
1.3.59	School meals registers		Current year + 3 years	SECURE DISPOSAL	Yes
1.3.60	School meals summary sheets		Current year + 3 years	SECURE DISPOSAL	

1.4 Policies, Frameworks and Overarching Requirements

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.4.1	Data Protection Policy, including data protection notification		Date policy superseded + 6 years	SECURE DISPOSAL	
1.4.2	Freedom of Information Policy		Date policy superseded + 6 years	SECURE DISPOSAL	
1.4.3	Information Security Breach Policy		Date policy superseded + 6 years	SECURE DISPOSAL	
1.4.4	Special Educational Needs Policy		Date policy superseded + 6 years	SECURE DISPOSAL	
1.4.5	Complaints Policy		Date policy superseded + 6 years	SECURE DISPOSAL	

1.4.6	Risk and Control Framework		Life of framework + 6 years	SECURE DISPOSAL	
1.4.7	Rules and Bylaws		Date rules or bylaws superseded + 6 years	SECURE DISPOSAL	
1.4.8	Home School Agreements		Date agreement revised + 6 years	SECURE DISPOSAL	
1.4.9	Equality Information and Objectives (public sector equality duty) Statement for publication		Date of statement + 6 years	SECURE DISPOSAL	

2. Human Resources

2.1 Recruitment					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
2.1.1	All records leading up to the appointment of a new Head Teacher		Unsuccessful: date of appointment plus 6 months. Successful: add to personnel file and retain until end of appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years	SECURE DISPOSAL	Yes
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL	Yes
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate		All relevant information should be added to the Staff personnel File (2.2.1) and all other information retained for 6 months	SECURE DISPOSAL	Yes
2.1.4	Pre-employment vetting information – excluding DBS Checks - successful candidates	DBS Update Service Employer Guide July 2018 https://www.gov.uk/government/publications/handling-of-dbs-certificate-information/handling-of-dbs-certificate-information	Application forms, references and other documents – for the duration of the employee's employment + 6 years	SECURE DISPOSAL	Yes

2.1.5	Pre-employment DBS Checks – successful candidates		Do not store DBS Certificate. Note of check date and outcome of check retained separately. Record of trace recorded on risk assessment and saved in personnel file – for the duration of employment + 6 years	SECURE DISPOSAL	Yes
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	An employer's guide to right to work checks (Home Office January 2019) https://www.gov.uk/government/publications/right-to-work-checks-employers-guide	Where possible, add to the Staff personnel File (2.2.1), but if kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL	Yes
2.1.7	Records relating to the employment of overseas teachers		Where possible, add to the Staff personnel File (2.2.1), but kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL	Yes
2.1.8	Records relating to the TUPE process		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL	Yes

2.2 Operational Staff Management

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
2.2.1	Staff personnel File, including employment contract and staff training records	Limitation Act 1980 (Section 2)	Termination of employment + 6 years	SECURE DISPOSAL	Yes
2.2.2	Timesheets		Current year + 6 years	SECURE DISPOSAL	Yes
2.2.3	Annual appraisal/assessment records		Current year + 6 years	SECURE DISPOSAL	Yes
2.2.4	Records relating to the agreement of pay and conditions		Date pay and conditions superseded + 6 years	SECURE DISPOSAL	
2.2.5	Sickness absence monitoring		Sickness records are categorised as sensitive data. There is a legal obligation	SECURE DISPOSAL	Yes

			under statutory sickness pay to keep records for sickness monitoring. Retain on the Staff personnel File (2.2.1)		
2.2.6	Training needs analysis		Current year + 1 year	SECURE DISPOSAL	Potentially
2.2.7	Staff training – where the training leads to continuing professional development		Length of time required by the professional body	SECURE DISPOSAL	Yes
2.2.8	Staff training – except where dealing with children, e.g. first aid or health and safety		This should be retained on the Staff personnel File (2.2.1)	SECURE DISPOSAL	Yes
2.2.9	Staff training – where the training relates to children (e.g. safeguarding or other child related training)		Date of the training + 40 years	SECURE DISPOSAL	Yes

2.3 Management of Disciplinary and Grievance Processes

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
2.3.1	<p>Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded</p> <p><i>Note: it is recommended that all records relating to child abuse are retained until the IICSA is completed.</i></p>	<p>Keeping children safe in education Statutory guidance for schools and colleges March 2015</p> <p>Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015</p>	<p>Until the person's normal retirement age or 10 years from the date of the allegation (whichever is longer) then REVIEW.</p> <p><i>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 UNLESS the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete</i></p>	SECURE DISPOSAL	Yes
2.3.2	<p>Disciplinary Proceedings</p> <p><i>Note: Where the warning relates to child protection issues, it is recommended that all records relating to child abuse are retained until the IICSA is completed. If the disciplinary proceedings relate to a child protection</i></p>		<p>Oral warning: Date of warning + 6 months</p> <p>Written warning – level 1: Date of warning + 6 months</p> <p>Written warning – level 2: Date of warning + 12 months</p>	SECURE DISPOSAL [When a warning expires. give consideration whether to retain this on the personnel file, but they	Yes

	<i>matter, please contact your Safeguarding Children Officer for further advice</i>		Final warning: Date of warning + 18 months Case not found: dispose of at the conclusion of the case	are not live for the purposes of further sanction]	
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2.4 Health and Safety

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
2.4.1	Health and Safety policy statements		Life of policy + 3 years	SECURE DISPOSAL	
2.4.2	Health and Safety risk assessments		Life of risk assessment + 3 years	SECURE DISPOSAL	
2.4.3	Records relating to accident/injury at work		Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL	Yes
2.4.4	Accident reporting	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book, in paper or electronic format The incident reporting form may be retained as below: Adults: Date of incident + 6 years Children: Date of birth + 25 years	SECURE DISPOSAL	Yes
2.4.5	Control of Substances Hazardous to Health (COSHH)		Current year + 10 years then REVIEW	SECURE DISPOSAL	Yes
2.4.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos		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		Last action + 50 years	SECURE DISPOSAL	
2.4.8	Fire precautions log books		Current year + 6 years	SECURE DISPOSAL	
2.4.9	Fire risk assessments	Fire Service Order 2005	Life of the risk assessment + 6 years	SECURE DISPOSAL	
2.4.10	Incident reports		Current year + 20 years	SECURE DISPOSAL	Yes

3. Management of the Academy

3.1 Admissions					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
3.1.1	All records relating to the creation and implementation of the School Admissions Policy	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	
3.1.2	Admissions – if the admission is successful	As 3.1.1	Date of admission + 1 year	SECURE DISPOSAL	Yes
3.1.3	Admissions – if the appeal is unsuccessful	As 3.1.1	Resolution of case + 1 year	SECURE DISPOSAL	Yes
3.1.4	Register of admissions	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 <i>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</i>	REVIEW	Yes
3.1.5	Admissions – Secondary Schools – Casual		Current year + 1 year	SECURE DISPOSAL	Yes
3.1.6	Proofs of address supplied by parents as part of the admissions process	As 3.1.1	Current year + 1 year	SECURE DISPOSAL	Yes
3.1.7	Supplementary information form, including additional information such as religion and medical conditions		For successful admissions: this information should be added to the pupil file (5.1.1) For unsuccessful admissions: until appeals process completed	SECURE DISPOSAL	Yes

3.2 Head Teacher and Senior Management Team					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
3.2.1	Log books of activity in the school maintained by the Head Teacher		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	Potentially
3.2.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies		Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL	Potentially
3.2.3	Reports created by the Head Teacher or the Management Team		Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL	Potentially
3.2.4	Records created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities		Current academic year + 6 years then REVIEW	SECURE DISPOSAL	Potentially
3.2.5	Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities		Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL	Potentially
3.2.6	Professional Development Plans		Life of the plan + 6 years	SECURE DISPOSAL	Yes

3.3 Operational Administration					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
3.3.1	Management of complaints		Date complaint resolved + 3 years	SECURE DISPOSAL	Yes
3.3.2	Records relating to the management of contracts with external providers		Date of last payment on contract + 6 years	SECURE DISPOSAL	
3.3.3	Records relating to the management of software licences		Date licence expires + 6 years	SECURE DISPOSAL	
3.3.4	General file series		Current year + 5 years then REVIEW	SECURE DISPOSAL	

3.3.5	Records relating to the creation and publication of the school brochure or prospectus		Current year + 3 years	STANDARD DISPOSAL	
3.3.6	Records relating to the creation and distribution of circulars to staff, parents or pupils		Current year + 1 year	STANDARD DISPOSAL	
3.3.7	Newsletters and other items with a short operational use		Current year + 1 year	STANDARD DISPOSAL	
3.3.8	Visitors' books and signing in sheets		Current year + 6 years then REVIEW	SECURE DISPOSAL	Yes
3.3.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations		Current year + 6 years then REVIEW	SECURE DISPOSAL	

4. Property Management

4.1 Property Management					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
4.1.1	Title deeds of properties belonging to the school		These should follow the property, unless the property has been registered with the Land Registry		
4.1.2	Plans of property belonging to the school		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		Expiry of lease + 6 years	SECURE DISPOSAL	
4.1.4	Records relating to the letting of school premises		Current financial year + 6 years	SECURE DISPOSAL	
4.1.5	Business continuity and disaster recovery plans		Date the plan superseded + 3 years	SECURE DISPOSAL	
4.2 Maintenance					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?

4.2.1	All records relating to the maintenance of the school carried out by contractors		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 log books		Current year + 6 years	SECURE DISPOSAL	

4.3 Fleet Management

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	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	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL	
4.3.3	Service logs and vehicle logs	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	Limitation Act 1980 (Section 2)	Date of journey + 6 years	SECURE DISPOSAL	

5. Pupil Management

5.1 Pupil's Educational Record

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437			Yes
	Primary		Retain whilst the child remains at the primary school <i>The file should follow the pupil when they leave the primary school. This will include</i>	SECURE TRANSFER	Yes

			<i>moving to: another primary school; a secondary school; a pupil referral unit If the pupil transfers to an independent school, transfers to home schooling, dies or leaves the country, the file may be returned to the LA to be retained for the statutory retention period.</i>		
	Secondary	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL	Yes
5.1.2	Records relating to the management of exclusions		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL	Yes
5.1.3	Management of examination registrations		The examination board will usually mandate how long these records need to be retained		Yes
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 <i>Note: it is recommended that all records relating to child abuse are retained until the IICSA is completed</i>	“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	Yes
5.1.6	Child protection information held in separate files	As 5.1.5	Date of birth of the child + 25 years then REVIEW	SECURE DISPOSAL	Yes

			<i>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</i>		
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5.2 Attendance

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
5.2.1	Attendance registers	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	Yes
5.2.2	Correspondence relating to authorised absence	Education Act 1996 (Section 7)	Current academic year + 2 years	SECURE DISPOSAL	Potentially

5.3 Special Educational Needs

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years <i>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 in order 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 – this should be documented</i>	REVIEW / SECURE DISPOSAL	Yes

5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years <i>[This would normally be retained on the pupil file]</i>	SECURE DISPOSAL, unless the document is subject to a legal hold	Yes
5.3.3	Advice and information provided to parents regarding educational needs	As 5.3.2	Date of birth of the pupil + 25 years <i>[This would normally be retained on the pupil file]</i>	SECURE DISPOSAL, unless the document is subject to a legal hold	Yes
5.3.4	Accessibility strategy	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years <i>[This would normally be retained on the pupil file]</i>	SECURE DISPOSAL, unless the document is subject to a legal hold	Yes

6. Curriculum Management

6.1 Statistics and Management Information					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
6.1.1	Curriculum returns		Current year + 3 years	SECURE DISPOSAL	
6.1.2	Examination results (school copy)		Current year + 6 years	SECURE DISPOSAL	Yes
6.1.3	SATs records				
	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 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	Yes
	Examination papers		The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL	Yes
6.1.4	Published Admission Number (PAN) reports		Current year + 6 years	SECURE DISPOSAL	Yes
6.1.5	Value added and contextual data		Current year + 6 years	SECURE DISPOSAL	Yes

6.1.6	Self-evaluation forms		Current year + 6 years	SECURE DISPOSAL	Yes
6.2 Implementation of Curriculum					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
6.2.1	Schemes of work		Current year + 1 year <i>It may be appropriate to review these records at the end of each year and allocate a further retention period</i>	SECURE DISPOSAL	
6.2.2	Timetable		Current year + 1 year <i>It may be appropriate to review these records at the end of each year and allocate a further retention period</i>	SECURE DISPOSAL	
6.2.3	Class record books		Current year + 1 year <i>It may be appropriate to review these records at the end of each year and allocate a further retention period</i>	SECURE DISPOSAL	
6.2.4	Mark books		Current year + 1 year <i>It may be appropriate to review these records at the end of each year and allocate a further retention period</i>	SECURE DISPOSAL	
6.2.5	Record of homework set		Current year + 1 year <i>It may be appropriate to review these records at the end of each year and allocate a further retention period</i>	SECURE DISPOSAL	
6.2.6	Pupils' work		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

7.1 Educational Visits outside the Classroom					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
7.1.1	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Primary schools	Outdoor Education Advisers' Panel National Guidance 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	As 7.1.1	Date of visit + 10 years	SECURE DISPOSAL	
7.1.3	Parental consent forms for school trips where there has been no major incident		Conclusion of the trip <i>Although the consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form for this period of time</i>	SECURE DISPOSAL	Yes
7.1.4	Parental permission slips for school trips – where there has been a major incident	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years <i>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</i>	SECURE DISPOSAL	Yes
7.1.5	Records relating to residential trips		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL	Yes
7.2 Walking Bus					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
7.2.1	Walking bus registers		Date of register + 3 years	SECURE DISPOSAL	Yes

			<i>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</i>		
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8. Central Government and Local Authority (LA)

8.1 Local Authority					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
8.1.1	Secondary transfer sheets (Primary)		Current year + 2 years	SECURE DISPOSAL	Yes
8.1.2	Attendance returns		Current year + 1 year	SECURE DISPOSAL	Yes
8.1.3	School census returns		Current year + 5 years	SECURE DISPOSAL	Yes
8.2 Central Government					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
8.2.1	OFSTED reports and papers		Life of the report then REVIEW	SECURE DISPOSAL	
8.2.2	Returns made to central government		Current year + 6 years	SECURE DISPOSAL	
8.2.3	Circulars and other information sent from central government		Operational use	SECURE DISPOSAL	