

Watford Grammar School for Girls



Data Retention Policy

Committee Responsible	Resources
Category	Statutory
Approved by Resources Committee	20.2.23
Approved by FGB	20.3.23
Review Cycle	2 Years
Next Review Date:	01.03.25
Template:	WGGS D Steele

1. Introduction

Watford Grammar School for Girls collects a lot of data and information about our pupils so that we can run effectively as a school. We manage this data and information in line with our Data Protection Policy and Information Security Policy. This Data Retention Policy outlines how we make decisions about how long we retain information and data for, and the retention periods for key categories of data.

Watford Grammar School for Girls is an Academy Trust school, company number 07348254, registered office at Lady's Close, Watford, WD18 0AE, registered as a company in England and Wales, and an exempt charity. We are well known for our rich academic curriculum, our strong and supportive pastoral care, and the wide range of extended activities that, taken as a whole, educate, encourage and empower our girls. The school motto is *Sperate Parati* - or 'Go forward with preparation' - which encapsulates our aim for every member of the school community.

We are proud of the strong academic traditions and the importance of service to others that have shaped the ethos of our school since its foundation by Elizabeth Fuller in 1704. We value hard work and nurture scholarship, always encouraging our girls to achieve excellence in all fields of study. The girls have the opportunity to excel at music, drama and sport, as well as to play an active role in the wider community by taking part in many charitable activities. Thus they learn to be their best selves: hard working, compassionate and high achieving in all areas of life.

We are a diverse and thriving community, founded on consideration, toleration and trust. Each girl is given opportunities to develop confidence and resilience both in and outside the classroom, and to develop a sense of personal responsibility that is best summarised in the maxim 'I can do it, and I will do it' - words which every member of the school learns and takes to heart.

As part of ensuring the effective running of our school it is essential that we hold and use data and information about parents/carers, pupils, staff, governors, and others with whom we have relationships. It is important to us that we do this professionally and in line with our statutory, moral and contractual obligations, and this policy is part of how we explain how we do this. Legally the school is a Data Controller under the Data Protection Act 2018 / the General Data Protection Regulation, and the responsible officer at the school is Michael Lewis who is Data Protection Officer.

This policy applies to related organisation the Women of Vision Trust (charity no. 1069040) as well as to the school.

2. Overall Aims

Our data retention policy has been produced in line with industry best practice, and in particular the retention schedule is in line with the Information Management Toolkit for Schools produced by the Information and Records Management Society (www.irms.org.uk).

The School balances its general duty under the General Data Protection Regulation / the Data Protection Act 2018 - to make sure it only retains personal data for so long as is necessary for the purpose for which it was collected – with its responsibilities to retain certain records for periods of time, usually fixed periods, for legal and other reasons. In making decisions about data retention and data destruction, the School has regard to both these responsibilities and takes advice and follows best practice guidance for the education sector where appropriate.

3. Retention of Records

Records are any type of information and/or data created, received or transmitted in the course of the School's operation, regardless of physical format. Examples of where various types of information or data might be located include:

- appointment books and calendars
- audio and video recordings
- computer programs
- contracts
- electronic files
- emails
- handwritten notes
- invoices
- letters and other correspondence
- CCTV recordings
- memory in portable devices including phones
- memory sticks
- social media postings
- voicemails

The School may have a business need, or legal duty, to retain records for a number of reasons, including but not limited to the following:

- a legal, accounting, audit or other regulatory or statutory requirement, including reasons in keeping with the principles of the General Data Protection Regulation / the Data Protection Act 2018

- because it supports an ongoing operational necessity for the running of the school, particularly for records relating to current pupils (and their parents/carers) and recent leavers

- because it serves as the ongoing corporate memory of the school

If records are destroyed during periods in which they should be retained by the School, this could result in the following consequences for the School:

- fines and penalties, including from the Information Commissioner's Office

- contempt of court or obstruction of justice claims
- serious detriment to the School's ability to discharge its responsibility towards staff, pupils and parents/carers

For the avoidance of doubt, the inappropriate destruction of any records or other forms of information or data is prohibited.

The School acknowledges that 'disposable information', data which may be discarded or deleted at the discretion of the user once it has served a temporary useful purpose, is not defined as a Record for the purposes of this policy, and may be safely destroyed. 'Disposable information' could include:

- duplicates of original documents, for example as used at a meeting
- preliminary drafts of documents that don't represent a record of significant change or decision-making
- secondary printed or published materials e/g training course papers, books
- spam and junk mail

4. Responsibility

The governing board has overall responsibility for ensuring that the school complies with its obligations under the General Data Protection Regulation / the Data Protection Act 2018.

Day-to-day responsibilities rest with the headteacher, or the Assistant Head, Curriculum and Data, in the headteacher's absence. The headteacher will ensure that all staff are aware of their data protection obligations, including the obligation to follow the Data Retention Policy.

In compliance with the GDPR / Data Protection Act, the School has an appointed Data Protection Officer who is responsible for dealing with any queries related to the storing or processing of personal data, and checking to ensure that the School is adhering to this policy and to its wider legal obligations. The Data Protection Officer is Michael Lewis.

Staff are responsible for ensuring that they manage information and data in accordance with this policy. Should staff members have any doubt or questions they are asked to raise it with their line manager in the first instance, then the Information Officer.

5. Privacy/fair processing notices

The School has an obligation to be clear and specific about the data it controls and processes, the basis for this, and what processing or sharing of data can or does take place. This is set out in the Privacy Notices which vary depending on whose data is being processed. Detailed Privacy Notices for the following categories of data set out what data can be collected or processed, on what basis, and how and why it may be shared:

Pupils / Potential Pupils

Parents / Carers of Pupils, Potential Pupils and Past Pupils

School Employees

Governors / Trustees

The Privacy Notices should be read in conjunction with this policy.

6. Retention periods

Records, data and information should be retained in line with the Retention Schedule in the appendix. This retention schedule is taken from the Information Management Toolkit for Schools, prepared by the Information and Records Management Society www.irms.org.uk

If staff have a category of records, data or information not included in the Retention Schedule this should be raised via line managers in the first instance.

7. Training

Our staff and governors are provided with data protection training as part of their induction process. This includes drawing their attention to this Data Retention Policy.

Data protection will also form part of continuing professional development, where changes to legislation or the school's processes make it necessary. The headteacher is responsible for ensuring that staff are trained, aware of their responsibilities, and carry them out.

8. The General Data Protection Regulation

This policy has been updated in line with the General Data Protection Regulation / the Data Protection Act 2018 and reviewed in January 2021.

9. Monitoring arrangements

The Assistant Head, Curriculum and Data, is responsible for monitoring and reviewing this policy.

The designated governor, who is also the Data Protection Officer, checks that the school complies with this policy by, among other things, reviewing school records. The designated governor may also check compliance through random sampling.

This document will be reviewed at least every two years, if there is a significant change in the law or in official guidance on the implementation of the law, if the best practice guidance on which it is based are changed, and following the implementation of the General Data Protection Regulation.

At every review, the policy will be shared with the governing board.

10. Links with other policies

This Data Retention Policy is linked to:

- the Freedom of Information Publication Scheme
- the Privacy Notices described above
- the Data Protection Policy
- the Information Security Policy
- the CCTV Policy

These documents, which may be updated from time to time by the School, are available on the School's website or upon request to the Data Protection Officer, Michael Lewis.

Appendix - Records Retention Schedule

Contents

1.	GOVERNING BODY	9
1.1	Governance of the Academy Trust	9
1.2	Board of Directors, Members Meetings and Governing Body.....	10
1.3	Funding and Finance	13
1.4	Policies, Frameworks and Overarching Requirements	17
2.	HUMAN RESOURCES	18
2.1	Recruitment	18
2.2	Operational Staff Management	20
2.3	Management of Disciplinary and Grievance Processes	21
2.4	Health and Safety.....	21
3.	MANAGEMENT OF THE ACADEMY.....	22
3.1	Admissions	23
3.2	Head Teacher and Senior Management Team.....	24
3.3	Operational Administration.....	24
4.	PROPERTY MANAGEMENT	25
4.1	Property Management	25
4.2	Maintenance	26
4.3	Fleet Management	26
5.	PUPIL MANAGEMENT	26
5.1	Pupil's Educational Record.....	26
5.2	Attendance.....	28
5.3	Special Educational Needs.....	28
6.	CURRICULUM MANAGEMENT.....	29
6.1	Statistics and Management Information.....	29
6.2	Implementation of Curriculum	30

7.	EXTRACURRICULAR ACTIVITIES	30
7.1	Educational Visits outside the Classroom.....	31
7.2	Walking Bus.....	32
8.	CENTRAL GOVERNMENT AND LOCAL AUTHORITY (LA)	32
8.1	Local Authority.....	32
8.2	Central Government.....	32

Governing Body

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. Governance of the Academy Trust					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
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

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

2. Board of Directors, Members Meetings and Governing Body					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
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 Body 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 Body 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 Body		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

2. Board of Directors, Members Meetings and Governing Body

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.2.11	Trusts and Endowments managed by the Governing Body		PERMANENT		
1.2.12	Records relating to complaints dealt with by the Governing Body		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	

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	

3. Funding and Finance

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
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

3. Funding and Finance

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
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	

3. Funding and Finance

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
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	

3. Funding and Finance					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
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	
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	

4. Policies, Frameworks and Overarching Requirements

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
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	

1. Human Resources**5. Recruitment**

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.5.1	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
1.5.2	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
1.5.3	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

5. Recruitment

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.5.4	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
1.5.5	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
1.5.6	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
1.5.7	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
1.5.8	Records relating to the TUPE process		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL	Yes

6. Operational Staff Management

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.6.1	Staff personnel File, including employment contract and staff training records	Limitation Act 1980 (Section 2)	Termination of employment + 6 years	SECURE DISPOSAL	Yes
1.6.2	Timesheets		Current year + 6 years	SECURE DISPOSAL	Yes
1.6.3	Annual appraisal/assessment records		Current year + 6 years	SECURE DISPOSAL	Yes
1.6.4	Records relating to the agreement of pay and conditions		Date pay and conditions superseded + 6 years	SECURE DISPOSAL	
1.6.5	Sickness absence monitoring		Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring. Retain on the Staff personnel File (2.2.1)	SECURE DISPOSAL	Yes
1.6.6	Training needs analysis		Current year + 1 year	SECURE DISPOSAL	Potentially
1.6.7	Staff training – where the training leads to continuing professional development		Length of time required by the professional body	SECURE DISPOSAL	Yes
1.6.8	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
1.6.9	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

7. Management of Disciplinary and Grievance Processes

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.7.1	<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
1.7.2	<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 matter, please contact your Safeguarding Children Officer for further advice</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> <p>Final warning: Date of warning + 18 months</p> <p>Case not found: dispose of at the conclusion of the case</p>	<p>SECURE DISPOSAL</p> <p>[When a warning expires. give consideration whether to retain this on the personnel file, but they are not live for the purposes of further sanction]</p>	Yes

8. Health and Safety

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.8.1	Health and Safety policy statements		Life of policy + 3 years	SECURE DISPOSAL	
1.8.2	Health and Safety risk assessments		Life of risk assessment + 3 years	SECURE DISPOSAL	
1.8.3	Records relating to accident/injury at work		<p>Date of incident + 12 years</p> <p>In the case of serious accidents, a further retention period will need to be applied</p>	SECURE DISPOSAL	Yes

8. Health and Safety

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.8.4	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
1.8.5	Control of Substances Hazardous to Health (COSHH)		Current year + 10 years then REVIEW	SECURE DISPOSAL	Yes
1.8.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos		Last action + 40 years	SECURE DISPOSAL	
1.8.7	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation		Last action + 50 years	SECURE DISPOSAL	
1.8.8	Fire precautions log books		Current year + 6 years	SECURE DISPOSAL	
1.8.9	Fire risk assessments	Fire Service Order 2005	Life of the risk assessment + 6 years	SECURE DISPOSAL	
1.8.10	Incident reports		Current year + 20 years	SECURE DISPOSAL	Yes

2. Management of the Academy

9. Admissions

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.9.1	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	
1.9.2	Admissions – if the admission is successful	As 3.1.1	Date of admission + 1 year	SECURE DISPOSAL	Yes
1.9.3	Admissions – if the appeal is unsuccessful	As 3.1.1	Resolution of case + 1 year	SECURE DISPOSAL	Yes
1.9.4	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
1.9.5	Admissions – Secondary Schools – Casual		Current year + 1 year	SECURE DISPOSAL	Yes
1.9.6	Proofs of address supplied by parents as part of the admissions process	As 3.1.1	Current year + 1 year	SECURE DISPOSAL	Yes
1.9.7	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

10. Head Teacher and Senior Management Team

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.10.1	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
1.10.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies		Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL	Potentially
1.10.3	Reports created by the Head Teacher or the Management Team		Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL	Potentially
1.10.4	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
1.10.5	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
1.10.6	Professional Development Plans		Life of the plan + 6 years	SECURE DISPOSAL	Yes

11. Operational Administration

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

11. Operational Administration

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.11.5	Records relating to the creation and publication of the school brochure or prospectus		Current year + 3 years	STANDARD DISPOSAL	
1.11.6	Records relating to the creation and distribution of circulars to staff, parents or pupils		Current year + 1 year	STANDARD DISPOSAL	
1.11.7	Newsletters and other items with a short operational use		Current year + 1 year	STANDARD DISPOSAL	
1.11.8	Visitors' books and signing in sheets		Current year + 6 years then REVIEW	SECURE DISPOSAL	Yes
1.11.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations		Current year + 6 years then REVIEW	SECURE DISPOSAL	

3. Property Management

12. Property Management

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.12.1	Title deeds of properties belonging to the school		These should follow the property, unless the property has been registered with the Land Registry		
1.12.2	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		
1.12.3	Leases of property leased by or to the school		Expiry of lease + 6 years	SECURE DISPOSAL	
1.12.4	Records relating to the letting of school premises		Current financial year + 6 years	SECURE DISPOSAL	
1.12.5	Business continuity and disaster recovery plans		Date the plan superseded + 3 years	SECURE DISPOSAL	

13. Maintenance

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.13.1	All records relating to the maintenance of the school carried out by contractors		Current year + 6 years	SECURE DISPOSAL	
1.13.2	All records relating to the maintenance of the school carried out by school employees, including maintenance log books		Current year + 6 years	SECURE DISPOSAL	

14. Fleet Management

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.14.1	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	
1.14.2	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	
1.14.3	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	
1.14.4	GPS tracking data relating to the vehicles	Limitation Act 1980 (Section 2)	Date of journey + 6 years	SECURE DISPOSAL	

4. Pupil Management**15. Pupil's Educational Record**

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.15.1	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

15. Pupil's Educational Record

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
	Secondary	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL	Yes
1.15.2	Records relating to the management of exclusions		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL	Yes
1.15.3	Management of examination registrations		The examination board will usually mandate how long these records need to be retained		Yes
1.15.4	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		
1.15.5	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
1.15.6	Child protection information held in separate files	As 5.1.5	Date of birth of the child + 25 years then REVIEW <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>	SECURE DISPOSAL	Yes

16. Attendance

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.16.1	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
1.16.2	Correspondence relating to authorised absence	Education Act 1996 (Section 7)	Current academic year + 2 years	SECURE DISPOSAL	Potentially

17. Special Educational Needs

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.17.1	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
1.17.2	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
1.17.3	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
1.17.4	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

5. Curriculum Management

18. Statistics and Management Information					
	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.18.1	Curriculum returns		Current year + 3 years	SECURE DISPOSAL	
1.18.2	Examination results (school copy)		Current year + 6 years	SECURE DISPOSAL	Yes
1.18.3	SATs records				
	Results		<p>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</p> <p>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</p>	SECURE DISPOSAL	Yes
	Examination papers		The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL	Yes
1.18.4	Published Admission Number (PAN) reports		Current year + 6 years	SECURE DISPOSAL	Yes
1.18.5	Value added and contextual data		Current year + 6 years	SECURE DISPOSAL	Yes
1.18.6	Self-evaluation forms		Current year + 6 years	SECURE DISPOSAL	Yes

19. Implementation of Curriculum

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.19.1	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	
1.19.2	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	
1.19.3	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	
1.19.4	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	
1.19.5	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	
1.19.6	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	

6. Extracurricular Activities

20. Educational Visits outside the Classroom

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.20.1	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Secondary 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 + 10 years	SECURE DISPOSAL	
1.20.2	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
1.20.3	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
1.20.4	Records relating to residential trips		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL	Yes

21. Walking Bus

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.21.1	Walking bus registers		Date of register + 3 years <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>	SECURE DISPOSAL	Yes

7. Central Government and Local Authority (LA)

22. Local Authority

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.22.1	Attendance returns		Current year + 1 year	SECURE DISPOSAL	Yes
1.22.2	School census returns		Current year + 5 years	SECURE DISPOSAL	Yes

23. Central Government

	Basic file description	Statutory Provisions	Recommended Retention Period	Action at end of period	DP Issue?
1.23.1	OFSTED reports and papers		Life of the report then REVIEW	SECURE DISPOSAL	
1.23.2	Returns made to central government		Current year + 6 years	SECURE DISPOSAL	
1.23.3	Circulars and other information sent from central government		Operational use	SECURE DISPOSAL	