

Staploe Education Trust

Data Retention Policy and Guidance

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Author:	Executive PA & Data Protection Team
Approved by:	Infrastructure Committee
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Introduction

Data protection principles states that "personal data are not kept longer than necessary" (UK GDPR). This guidance sets out the retention period for operational records held by Staploe Education Trust and its schools, to help ensure that we are compliant with business, statutory, regulatory, legal or historical requirements.

This guidance follows the requirements of the:

- IRMS Toolkit for Schools and Academies, 2019
- Information provided by EPM
- ICO Information
- Chartered Institute of Personnel and Development (CIPD)
- Home Office 'An Employers Guide to Right to Work Checks', August 2017
- DFE guidance, 'Data Protection: a toolkit for schools', April 2018
- DFE statutory guidance 'Induction for newly qualified teachers (England)', April 2018
- School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014
- School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014
- "Keeping children safe in education Statutory guidance for schools and colleges September 2022"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children July 2018

Records Manager

Our Trust's Records Manager is the Operations Director. They ensure that records are retained, reviewed and destroyed in accordance with requirements, and as soon as possible once their lifespan has expired.

A local review by each school and the Trust's Record Manager will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained for ongoing business or legal purposes.

Disposal of Data Securely

In line with the Trust's Data Protection policy personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

Paper records

All hard copies of official records and those containing personal data must be destroyed using confidential methods, rather than being placed in general waste bins or skips.

At the Trust secure disposal of paper records will follow two methods:

Office shredding machines

These are useful for small quantities or for highly sensitive and confidential documents that should be shredded immediately.

Confidential waste sacks

These bags must be secured in situ and placed in a secure area while awaiting collection. A log will be kept to record how many bags are awaiting collection and the contents of the bags. A template for this log can be found in <u>Appendix A</u>.

The shredding contractor supplies the confidential waste sacks. As per UK GDPR a contract is in force between the data controller (Trust) and processor (the contractor) which ensures that both parties understand their obligations, responsibilities and liabilities, even if the destruction is taking place on the school site. The school retains the responsibility of data controller as well as the liability for non-compliance caused by the contractor under UK GDPR. If the contractor FOI

Electronic and Other Media Records

In the same way as paper records, electronic should be managed in an auditable process. Records should be routinely identified for deletion and should be authorised by the Records Manager. Electronic records must be securely deleted in accordance with this policy, including all backups and copies.

The method of deletion should be suitable to the type of information and could include: deletion, overwriting, degaussing, physical destruction. The Trust's ICT Services department will advise on which method is suitable

When school ICT equipment is earmarked for destruction or to be recycled, the ICO and National Cyber Security Centre (NCSC) recommend to use an ICT asset disposal company that is fully certified with the industry body, the Asset Disposal Information Security Alliance (ADISA).

Social Media

As with other forms of communication social media is subject to data retention guidelines. When signing up for any tool, the Trust and its schools need to ensure that users are aware of these retention periods and ensure that it checks on a regular basis for changes. At Staploe Education Trust it is the responsibility of the individual or their department, to ensure that posts are deleted as appropriate in relation to the records retention schedule in <u>Appendix H</u>. In addition, the Trust's Marketing team will annually audit social media data (including external and internal formats) to ensure the Trust is compliant with data retention requirements.

Where posts include items which are hard to clearly index (e.g. images, video or audio), then a content register may be needed to manage when items have been shared, when they were shared, who it was in reference to, etc.

Emails

Email is a communication tool rather than a record or filing system. Emails that need to be kept should be identified by content:

- Does is form part of a pupil records?
- Is it part of a contract?
- Does it relate to an employee?

If any of these are applicable then it is subject to the records retention schedule set out in <u>Appendix H</u>. These emails may need to be saved into an appropriate electronic filing system or printed and placed in paper files.

Emails should be deleted in accordance with the records retention schedule in <u>Appendix H</u>. It may be useful to use the search function to find all copies of this email within your folders. Deleted emails generally go to a deleted folder and this copy should also be deleted.

Messaging: Texts, Instant Messaging

Content created and shared by messaging and discussion forums should be regarded as ephemeral and temporary. The Trust would recommend that this format is only used for information which would be considered low risk due to the ease of which it can be redistributed to members of the public. If the content subsequently becomes important (and is something that needs to be retained as a formal record i.e. safeguarding), then is should be copied and moved into the correct filing system, either by saving it in a readable electronic format, printing it out or taking a screenshot. Any existing content is subject to the Freedom of Information Act and Data Protection Act.

Data distributed in this way should be deleted in accordance with the Trust's records retention schedule by whomever posted it. If this data is on a private group (i.e. staff from one school) it is the responsibility of the senior member of staff in that group to ensure the group compliance with data protection and retention guidance.

Long Term Data Retention

Transfer of paper records to electronic format

Where lengthy retention periods have been allocated to records, the Trust may make the decision to convert paper records to an alternative format, e.g. scanning. Where this takes places consideration will be taken to the legal admissibility of records. The records will be converted in a standardised fashion, ensuring the quality of the electronic version. Further guidelines for scanning documents can be found in <u>Appendix F.</u>

When conversion of a paper record to an electronic version takes place, the convertor must provide evidence that the electronic version is a genuine copy of the original and that the integrity of the data has not been compromised. The original version of the records will be retained for six months after transfer to an alternative media.

A proforma for individual pupil records to be converted into electronic media is available in <u>Appendix G</u>.

If a specialist company is used to transfer information (as recommended for large scale projects), the Trust will ensure that the contractor is UK GDPR compliant and conforms to all security and staff vetting requirements, and have a Data Processing Agreement in place.

Appropriate Storage of Physical Records

Records must be stored in a way that does not cause a health and safety hazard. Records must not be stored in corridors and must not impede or block fire exits. There should be, where appropriate, heat/smoke detectors connected to fire alarms, a sprinkler system and the required number of fire extinguishers. The area in which records are stored should be secured against intruders and have controlled access to the working space.

The potential for environmental damage should be considered when storing records such as water, sunlight, high levels of humidity, areas subject to insect/rodent problems. Electronic equipment within physical storage areas should be kept to a minimum.

Documenting of all Archiving, Destruction, Deletion and Digitisation of Records

The Trust, and as appropriate its schools will keep a record of all archiving, destruction, deletion and digitisation of records (see <u>Appendix C</u>), in line with the Freedom of Information Act 2000 which requires all schools to maintain a list of records which have been destroyed and a record of who authorised their destruction.

The record will follow the IRMS Toolkit for Schools recommendations that these include:

- File reference (or another unique identifier)
- File tile (or brief description)
- Number of files or volumes
- Data range
- Reference to the applicable retention period
- The name of the authorising officer
- Date approved for disposal
- Date destroyed or deleted from system
- Method of disposal

- Place of disposal (whether onsite or off site by a contractor)
- Person(s) who undertook destruction

If personal information (such as names) are recorded on destruction records, the Trust is aware that this is considered Personal Identifiable Information.

Transfer of Records to Local Record Office

At times it may be identified by the Trust that records warrant permanent preservation. In these cases, arrangements should be made to transfer records to the Local Record Office. The Trust will retain details of what has been transferred to the Local Record Office to enable their identification, see <u>Appendix D</u>. The Trust can decide to retain achieve on site for the use of pupils and parents. In these cases, the Local Record Office may be contacted for specialist advice on storage and preservation requirements.

Information Audit

Information audits will be carried out periodically by the Data Protection team to ensure that information created throughout a workflow is created for a purpose (business need) and is created and stored in a way that supports that business need. Further information about the Information Audit process can be found in the Information Management Toolkit for Academies.

Digital Continuity

In order to ensure that digital records are retained in a way that ensures they can be retrieved in an accessible format when they are required, all records which are required to be retained for longer than 6 years should be part of a digital continuity statement.

The retention schedule indicates which records need to be subject to the Trust's digital continuity statement. These types of records will be identified as early as possible in their life cycle.

The responsibility for the management of the digital continuity strategy, including the completion of the digital continuity statement rests with the ICT Systems and Strategy Manager with support from senior members of the ICT Services department.

Review of these Guidelines

This policy will be reviewed every 3 years or earlier if changes to guidance or retention periods takes place.

Appendix A: Record of Confidential Waste Storage

Date Confidential Waste Collected	Location it was Collected From	Collected by

Appendix B: Social Media Content Register

Date content was shared	Does the post reference an individual? If so name/year group	Does the post include images, video or audio?	Platform content was shared on

Appendix C: Schedule of Records Destroyed/Deleted by Staploe Education Trust

[Name of School]

Unique Identifier	File Title/Brief Description	No. of Files	Date Range	Applicabl e reference period	Authorisi ng Officer	Date Approved for Disposal	Date Destroyed	Disposal Method	Place of Disposal (onsite/of fsite)	Person(s) who undertook destruction

Appendix D: Schedule of Records Transferred by Staploe Education Trust for Permanent Preservation

Schedule of Records Transferred by Staploe Education Trust to {Name of Organisation/Local Record Office] for Permanent Preservation

Covering Dates	Unique Identifier	Title	Description	Quantity

On behalf of the Trust:	On behalf of the Organisation
Signed:	Signed:
Name (PRINT):	Name (PRINT):
Job Title:	Job Title:
School:	Organisation:
Date:	Date:
Discos return completed form to the Truct for r	ermenent retention

Please return completed form to the Trust for permanent retention.

Appendix E: List of Approved Contractors for Data Disposal

The list below is an exhaustive list of contractors approved by Staploe Education Trust is work with our confidential waste. These contractors meet the waste disposal criteria set out in this policy.

Confidential Waste (paper):

ICT Electronic Waste:

Appendix F: Scanning Documents

When scanning documents with a view to destroying the paper copy of the document the following must be adhered to.

Documents must be:

1. Scanned straight

All documents must be scanned straight and the whole content of the document needs to be viewable and nothing must be missing on the page of the scanned document.

2. All pages of a document must be scanned.

The whole page of the document must be scanned and nothing must be missing on the page of the scanned document.

- 3. Both sides of a page must be included within the scanned document Both sides of the document must be scanned even if the second side of document is blank. The blank pages of the documents must not be deleted.
- 4. All numbered pages to be scanned even if blank All pages that are numbered must be scanned even if they are blank.

5. Scanned using correct colours

All pages must be scanned in full colour

6. Is it legible?

The scanned document needs to be readable and all documents should be scanned using 200 dpi resolution to meet this requirement.

7. It shows the original page size

The scanned document should be scanned in and displayed in the same size as the original paper document.

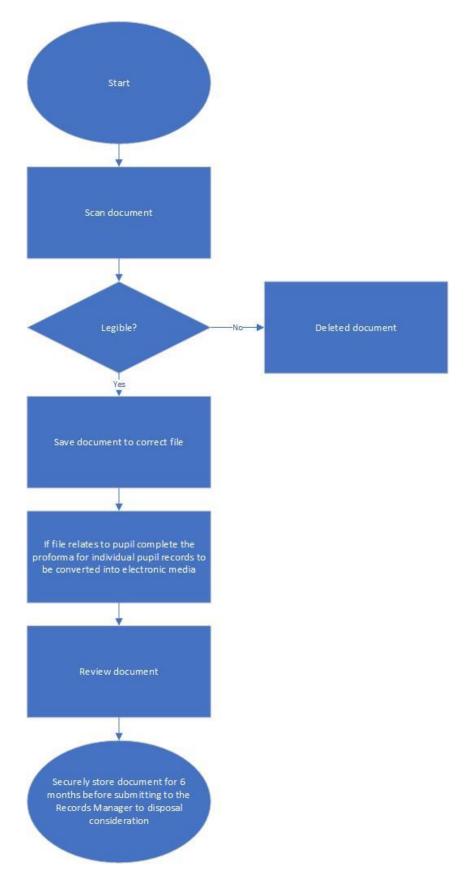
8. Scanned to a format that cannot be amended

All documents need to be scanned in PDF to ensure that they can't be edited or tampered with.

9. Audit trail should be maintained to show who scanned, when and what has happened with the document

All scanned documents must be able to be audited to show who scanned, when and who has viewed them. Dependent on the document, access to the scanned record will be restricted

Scanning Documents Flow Chart



Appendix G: Proforma for Individual Pupil Records to be Converted into Electronic Media.

Original Unique Identifier	Full Name of Pupil (SURNAME, Forename(s)	Date of Birth (DD/MM/YYYY)	Original Format of Record	New Format of Record	Date Digitised	New Unique Identifier
On behalf of the T	rust:	On t	behalf of the digitisi	ng organisation		
Signed:		Sign	ed:			
Name (PRINT):		Nam	ne (PRINT):			
Job Title:		Job	Title:			
School:		Orga	anisation:			
Date:		Date:				

Destruction of original records must be undertaken and recorded in accordance with normal destruction controls and procedures. Destruction of records must be authorised by []. Original records must be trained for a period of [inset timeframe of 3-6 months] before destruction. Please return completed form to the school for permanent retention

Appendix H: Records Retention Schedule

1. Go	1. Governance, Funding and Financial Management of the Academy Trust							
1.1	Governance of the Academy Trust							
	Basic file description	Data Protection Issues	Retention period guidance document used	Retention Period (Operational)	Action at end of administrative life of the record			
1.1.1	Governance Statement	No	IRMS Toolkit for Academies 2019	Life of governance statement + 6 years	SECURE DISPOSAL			
1.1.2	Articles of Association	No	IRMS Toolkit for Academies 2019	Life of the Academy				
1.1.3	Memorandum of Association	No	IRMS Toolkit for Academies 2019	This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL			
1.1.4	Memorandum of Understanding of Shared Governance among Schools	No	IRMS Toolkit for Academies 2019	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL			
1.1.5	Constitution	No	IRMS Toolkit for Academies 2019	Life of the Academy				
1.1.6	Special Resolutions to amend the Constitution	No	IRMS Toolkit for Academies 2019	Life of the Academy				
1.1.7	Written Scheme of Delegation	No	IRMS Toolkit for Academies 2019	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL			
1.1.8	Directors – Appointment	No	IRMS Toolkit for Academies 2019	Life of appointment + 6 years	SECURE DISPOSAL			

1.1.9	Directors – Disqualification	No	IRMS Toolkit for Academies 2019	Life of disqualification + 15 years	SECURE DISPOSAL
1.1.10	Directors – Termination of Office	No	IRMS Toolkit for Academies 2019	Date of termination + 6 years	SECURE DISPOSAL
1.1.11	Annual Report – Trustees Report	No	IRMS Toolkit for Academies 2019	Date of termination + 10 years	SECURE DISPOSAL
1.1.12		No	IRMS Toolkit for Academies 2019	Date of report + 10 years	SECURE DISPOSAL
1.1.13	Annual Return	No	IRMS Toolkit for Academies 2019	Date of report + 10 years	SECURE DISPOSAL
1.1.14	Appointment of Trustees and Governors and Directors	Yes	IRMS Toolkit for Academies 2019	Life of appointment + 6 years	SECURE DISPOSAL
1.1.15	Statement of Trustees Responsibilities	No	IRMS Toolkit for Academies 2019	Life of appointment + 6 years	SECURE DISPOSAL
1.1.16		No	IRMS Toolkit for Academies 2019	Life of appointment + 6 years	SECURE DISPOSAL
1.1.17	Strategic Review	No	IRMS Toolkit for Academies 2019	Date of the review + 6 years	SECURE DISPOSAL
1.1.18	Strategic Plan (School Development Plans)	No	IRMS Toolkit for Academies 2019	Life of plan + 6 years	SECURE DISPOSAL
1.1.19	Accessibility Plan	There may be if the plan refers to specific pupils	IRMS Toolkit for Academies 2019	Life of plan + 6 years	SECURE DISPOSAL

1.2	Trust Board, Members Meetings and Advisory Body					
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at end of administrative life of the record	
	Trust Board					

1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	IRMS Toolkit for Academies 2019	Minutes must be kept for at least 10 years from the date of the	OFFER TO ARCHIVES
				meeting	
1.2.2	Board Decisions	Could be if the decisions refer to living individuals	IRMS Toolkit for Academies 2019	Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.3	Board Meeting: Annual Schedule of Business	No	IRMS Toolkit for Academies 2019	Current year	SECURE DISPOSAL
1.2.4	Board Meeting: Procedures for conduct of meeting	No	IRMS Toolkit for Academies 2019	Date procedures superseded + 6 years	SECURE DISPOSAL
	Committees				
1.2.5	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals	IRMS Toolkit for Academies 2019	Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
	General Members' Meeting				
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	IRMS Toolkit for Academies 2019	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.7	Records relating to the management of the Annual General Meeting	Could be if the minutes refer to living individuals	IRMS Toolkit for Academies 2019	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
	Governors				

1.2.8	Agendas for Governing Body meetings	May be data protection issues, if the meeting is dealing with confidential issues relating to staff	IRMS Toolkit for Academies 2019	One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL
1.2.9	Minutes of, and papers considered at, meetings of the Governing Body and its committees	May be data protection issues, if the meeting is dealing with confidential issues relating to staff	IRMS Toolkit for Academies 2019		
	 Principal Set (signed) 			Life of Academy	
	 Inspection copies 			Date of meeting + 3 years	SECURE DISPOSAL
1.2.10	Reports presented to the Governing Body	May be data protection issues, if the meeting is dealing with confidential issues relating to staff	IRMS Toolkit for Academies 2019	Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy	SECURE DISPOSAL or retain with the signed set of minutes
1.2.11	Trusts and Endowments managed by the Governing Body	No	IRMS Toolkit for Academies 2019	Permanent	
1.2.13	Records relating to complaints dealt with by the Governing Body	Yes	IRMS Toolkit for Academies 2019	Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL

1.2.14	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	IRMS Toolkit for Academies 2019	Date of report + 10 years	SECURE DISPOSAL
	Statutory Registers				
1.2.15	Register of Directors		IRMS Toolkit for Academies 2019	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.16	Register of Directors' interests [this is not a statutory register]		IRMS Toolkit for Academies 2019	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.17	Register of Directors' residential addresses		IRMS Toolkit for Academies 2019	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.18	Register of gifts, hospitality and entertainments		IRMS Toolkit for Academies 2019	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.19	Register of members		IRMS Toolkit for Academies 2019	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.20	Register of secretaries		IRMS Toolkit for Academies 2019	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.21	Register of Trustees interests		IRMS Toolkit for Academies 2019	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.22	Declaration of Interests Statements [Governors] [this is not a statutory register]		IRMS Toolkit for Academies 2019	Life of the Academy + 6 years	SECURE DISPOSAL

1.3	Funding and Finance
	Strategic Finance

1.3.1	Statement of financial	No	IRMS Toolkit for	Current financial year +	SECURE DISPOSAL
1.3.1		INU	Academies 2019		SECORE DISPOSAL
4.0.0	activities for the year	Na		6 years	
1.3.2	Financial planning	No	IRMS Toolkit for	Current financial year +	SECURE DISPOSAL
			Academies 2019	6 years	
1.3.3	Value for money statement	No	IRMS Toolkit for	Current financial year +	SECURE DISPOSAL
			Academies 2019	6 years	
1.3.4	Records relating to the	No	IRMS Toolkit for	Current financial year +	SECURE DISPOSAL
	management of VAT		Academies 2019	6 years	
1.3.5	Whole of government	No	IRMS Toolkit for	Current financial year +	SECURE DISPOSAL
	accounts returns		Academies 2019	6 years	
1.3.6	Borrowing powers	No	IRMS Toolkit for	Current financial year +	SECURE DISPOSAL
			Academies 2019	6 years	
1.3.7	Budget plan	No	IRMS Toolkit for	Current financial year +	SECURE DISPOSAL
			Academies 2019	6 years	
1.3.8	Charging and remissions	No	IRMS Toolkit for	Date policy	SECURE DISPOSAL
	policy		Academies 2019	superseded + 3 years	
	Audit Arrangements				
1.3.9	Audit Committee and	No	IRMS Toolkit for	Life of the Academy	SECURE DISPOSAL
	appointment of responsible		Academies 2019	, ,	
	officers				
1.3.10	Independent Auditor's	No	IRMS Toolkit for	Financial year report	SECURE DISPOSAL
	report on regularity		Academies 2019	relates to + 6 years	
1.3.11	Independent Auditor's	No	IRMS Toolkit for	Financial year report	SECURE DISPOSAL
	report on financial		Academies 2019	relates to + 6 years	
	statements			· · · · · · · · · · · · · · · · · · ·	
	Funding Agreements				
1.3.12	Funding Agreement with	No	IRMS Toolkit for	Date of last payment of	SECURE DISPOSAL
	Secretary of State and	-	Academies 2019	funding + 6 years	
	supplemental funding				
	agreements				
	~g. 50110110				

1.3.13	Termination of the funding		IRMS Toolkit for Academies 2019	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.14	agreement ¹ Funding Records – Capital Grant	No	IRMS Toolkit for Academies 2019	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.15	Funding Records – Earmarked Annual Grant (EAG)	No	IRMS Toolkit for Academies 2019	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.16	Funding Records – General Annual Grant (GAG)	No	IRMS Toolkit for Academies 2019	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.17	Per pupil funding records	No	IRMS Toolkit for Academies 2019	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.18	Exclusions agreement ²	No	IRMS Toolkit for Academies 2019	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.19	Funding records	No	IRMS Toolkit for Academies 2019	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.20	Gift Aid and Tax Relief	No	IRMS Toolkit for Academies 2019	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.21	Records relating to loans	No	IRMS Toolkit for Academies 2019	Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	SECURE DISPOSAL

¹ Either party may give not less than 7 financial years' written notice to terminate the Agreement, such notice to expire on 31 August. Or, where the Academy has significant financial issues or is insolvent, the Agreement can be terminated by the Secretary of State to take effect on the date of the notice. ² The Academy can enter into an arrangement with a Local Authority (LA), so that payment will flow between the Academy and the LA, in the same way as it would do were the Academy a maintained school.

	Payroll and Pensions							
1.3.22	Maternity pay records	Yes	IRMS Toolkit for Academies 2019	Current year + 3 years	SECURE DISPOSAL			
1.3.23	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	IRMS Toolkit for Academies 2019	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL			
1.3.24	Management of the Teachers' Pension Scheme	Yes	IRMS Toolkit for Academies 2019	Date of last payment on the pension + 6 years	SECURE DISPOSAL			
1.3.25	Records relating to pension registrations	Yes	IRMS Toolkit for Academies 2019	Date of last payment on the pension + 6 years	SECURE DISPOSAL			
1.3.26	Payroll records	Yes	IRMS Toolkit for Academies 2019	Date payroll run + 6 years	SECURE DISPOSAL			
	Risk Management and Insurance							
1.3.27	Insurance policies	No	IRMS Toolkit for Academies 2019	Date the policy expires + 6 years	SECURE DISPOSAL			
1.3.28	Records relating to the settlement of insurance claims	No	IRMS Toolkit for Academies 2019	Date claim settled + 6 years	SECURE DISPOSAL			
1.3.29	Employer's Liability Insurance Certificate	No	IRMS Toolkit for Academies 2019	Closure of the school + 40 years	SECURE DISPOSAL			
	Endowment Funds and Inv	estments						
1.3.30	Investment policies	No	IRMS Toolkit for Academies 2019	Life of the investment + 6 years	SECURE DISPOSAL			
1.3.31	Management of Endowment Funds	No	IRMS Toolkit for Academies 2019	Life of the fund + 6 years				

	Accounts and Statements				
1.3.32	Annual accounts	No	IRMS Toolkit for Academies 2019	Current year + 6 years	STANDARD DISPOSAL
1.3.33	Loans and grants managed by the school	No	IRMS Toolkit for Academies 2019	Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
1.3.34	Student Grant applications	Yes	IRMS Toolkit for Academies 2019	Current year + 3 years	SECURE DISPOSAL
1.3.35	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No	IRMS Toolkit for Academies 2019	Life of the budget + 3 years	SECURE DISPOSAL
1.3.36	Invoices, receipts, order books and requisitions, delivery notices	No	IRMS Toolkit for Academies 2019	Current financial year + 6 years	SECURE DISPOSAL
1.3.37	Records relating to the collection and banking of monies	No	IRMS Toolkit for Academies 2019	Current financial year + 6 years	SECURE DISPOSAL
1.3.38	Records relating to the identification and collection of debt	No	IRMS Toolkit for Academies 2019	Current financial year + 6 years	SECURE DISPOSAL
	Contract Management				
1.3.39	All records relating to the management of contracts under seal	No	IRMS Toolkit for Academies 2019	Last payment on the contract + 12 years	SECURE DISPOSAL
1.3.40	All records relating to the management of contracts under signature	No	IRMS Toolkit for Academies 2019	Last payment on the contract + 6 years	SECURE DISPOSAL

1.3.41	Records relating to the monitoring of contracts	No	IRMS Toolkit for Academies 2019	Current year + 2 years	SECURE DISPOSAL
	Asset Management				
1.3.42	Inventories of furniture and equipment	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL
1.3.43	Burglary, theft and vandalism report forms	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL
1.3.44	Records relating to the leasing of shared facilities, such as sports centres	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL
1.3.45	Land and building valuations	No	IRMS Toolkit for Academies 2019 IRMS Toolkit for Academies 2019	Date valuation superseded + 6 years	SECURE DISPOSAL
1.3.46	Disposal of assets	No	IRMS Toolkit for Academies 2019	Date asset disposed of + 6 years	SECURE DISPOSAL
1.3.47	Community School leases for land	No	IRMS Toolkit for Academies 2019 IRMS Toolkit for Academies 2019	Date lease expires + 6 years	SECURE DISPOSAL
1.3.48	Commercial transfer arrangements	No	IRMS Toolkit for Academies 2019	Date of transfer + 6 years	SECURE DISPOSAL
1.3.49	Transfer of land to the Academy Trust	No	IRMS Toolkit for Academies 2019	Life of land ownership then transfer to new owner	SECURE DISPOSAL
1.3.50	Transfers of freehold land	No	IRMS Toolkit for Academies 2019	Life of land ownership then transfer to new owner	SECURE DISPOSAL

	School Fund						
1.3.51	School Fund – Cheque books	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL		
1.3.52	School Fund – Paying in books	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL		
1.3.53	School Fund – Ledger	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL		
1.3.54	School Fund – Invoices	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL		
1.3.55	School Fund – Receipts	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL		
1.3.56	School Fund – Bank statements	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL		
1.3.57	School Fund – Journey books	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL		
	School Meals						
1.3.58	Free school meals registers	Yes	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL		
1.3.59	School meals registers	Yes	IRMS Toolkit for Academies 2019	Current year + 3 years	SECURE DISPOSAL		
1.3.60	School meals summary sheets	No	IRMS Toolkit for Academies 2019	Current year + 3 years	SECURE DISPOSAL		

1.4	Policies, Frameworks and Overarching Requirements					
1.4.1	Data Protection Policy, including data protection notification	No	IRMS Toolkit for Academies 2019	Date policy superseded + 6 years	SECURE DISPOSAL	

1.4.2	Freedom of Information	No	IRMS Toolkit for	Date policy	SECURE DISPOSAL
	Policy		Academies 2019	superseded + 6 years	
1.4.3	Information Security Breach	No	IRMS Toolkit for	Date policy	SECURE DISPOSAL
	Policy		Academies 2019	superseded + 6 years	
1.4.4	Special Educational Needs	No	IRMS Toolkit for	Date policy	SECURE DISPOSAL
	Policy		Academies 2019	superseded + 6 years	
1.4.5	Complaints Policy	No	IRMS Toolkit for	Date policy	SECURE DISPOSAL
			Academies 2019	superseded + 6 years	
1.4.6	Risk and Control	No	IRMS Toolkit for	Life of framework + 6	SECURE DISPOSAL
	Framework		Academies 2019	years	
1.4.7	Rules and Bylaws	No	IRMS Toolkit for	Date rules or bylaws	SECURE DISPOSAL
			Academies 2019	superseded + 6 years	
1.4.8	Home School Agreements	No	IRMS Toolkit for	Date agreement	SECURE DISPOSAL
			Academies 2019	revised + 6 years	
1.4.9	Equality Information and	No	IRMS Toolkit for	Date of statement + 6	SECURE DISPOSAL
	Objectives (public sector		Academies 2019	years	
	equality duty) Statement for				
	publication				
1.4.10	Breach Report- No action		ICO	Case Closed + 2 Years	
	taken				
1.4.11	Breach Report – where		ICO	Case Closed + 6 Years	
	action was taken				
1.4.12	Documents relating to IT		ICO	End of System Life + 3	
	system integral to their			Years	
	running and long term use				
1.4.13	IT Infrastructure		ICO	Last Action + 3 Years	
1.4.14	Information Security		ICO	Last Action + 6 Years	
1.4.15	IT Back ups		ICO	Last Action + 3 Months	
1.4.16	Building Reports, Risk		ICO	Last Action + 3 Years	
	Assets, Helpdesk and				
	Security Reports				

1.4.17	System Audit Logs	ICO	Last Action + 1 Year	
1.4.18	CCTV (not relating to disciplinary matter)	ICO	Last Action + 1 Month	
1.4.19		ICO	Last Action + 6 Years	
1.4.20		ICO	Last Action + 3 Years	
1.4.21	Communications with Journalists	ICO	Creation + 2 Years	
1.4.22	Policy Legal and Legal Advice	ICO	Last Action + 6 Years	
1.4.23	Enforcement Legal Cases	ICO	Case Closed + 6 Years	
1.4.24	Contracts	ICO	End of Contract + 6 Years	
1.4.25	Unsuccessful Tenders	ICO	Last Action + 400 days	
1.4.26	Building Contracts and Leases	ICO	End of Contract + 12 Years	
1.4.27	Significant Draft Versions: The draft versions of policies, advice and guidelines for significant areas of work	ICO	Last Action + 3 Years	
1.4.28	Internal Audits	ICO	Creation + 3 Years	
1.4.29	Templates, Procedures, Team Information and Team Meetings	ICO	Last Action + 3 Years	
1.4.30		ICO	End of Financial Year + 3 Years	

1.4.31	Mobile device information for visitor Wi-Fi use		ICO	Creation + 90 days
1.4.32	Subject Access Request	Yes	CIPD	1 year following completion of the request
1.4.33	Whistleblowing	Yes	CIPD	6 months following the outcome (if a substantiated investigation). If unsubstantiated, personal data should be removed immediately.

2. Hu	2. Human Resources					
	Basic file description	Data Protection Issue	Statutory Provisions	Retention Period [Operational]	Action at the end of administrative life of the record	
2.1	Recruitment					
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes	IRMS Toolkit for Academies 2019	Date of appointment + 6 years	SECURE DISPOSAL	
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes	IRMS Toolkit for Academies 2019	Date of appointment of successful candidate + 6 months	SECURE DISPOSAL	
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes	IRMS Toolkit for Academies 2019	All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL	
2.1.4	Original job application form for successful candidate		EPM	Termination + 6 years	SECURE DISPOSAL	
2.1.5	Copies of qualifications certificates relevant to employment		EPM	Termination + 6 years	SECURE DISPOSAL	
2.1.6	ECT – Satisfactory completion of skills tests.		EPM	Termination + 6 years	SECURE DISPOSAL	
2.1.7	Two original references		EPM	Termination + 6 years	SECURE DISPOSAL	
2.1.8	Successful Recruitment Candidate Information (including third party referee		EPM		SECURE DISPOSAL	

	details provided by the applicant)		504	T	
2.1.9	Original contract acceptance All records leading up to the appointment of a new member of staff but no one appointed – thus all unsuccessful candidates		EPM EPM	Termination + 6 years date of interviews + 6 months	SECURE DISPOSAL SECURE DISPOSAL
2.1.11	Pre-employment vetting information – DBS Checks	No	IRMS Toolkit for Academies 2019	The organisation should take a copy of the DBS certificate when it is shown to them by the individual and should be added to the Staff Personal File	SECURE DISPOSAL
2.1.12			EPM	Six months Recommended If, in very exceptional circumstances, it is considered necessary to retain a copy of the original certificate for longer than six months, consent should be sought from the applicant and retained on file.	SECURE DISPOSAL
2.1.13	Confirmation of DBS outcome and any associated docs (e.g. risk assessment		EPM	Termination + 25 years Recommended within the DFE guidance, 'Data Protection: a	SECURE DISPOSAL

	or certificate of good conduct)		toolkit for schools', April 2018	
2.1.14	Pre-employment vetting information – Medical Check Clearance	EPM	Termination + 6 years {STAFF FILE}	
2.1.15	Barred list clearance	EPM	Termination + 25 years	
2.1.16	Prohibition check	EPM	Termination + 25 years	
2.1.17	Third party emergency contact details provided by the staff member	EPM	End of Employment - Immediate	
2.1.18	Copies of documents used for identity authentication for DBS and Asylum and Immigration Act purposes	EPM	Termination + 2 years	
2.1.19	UK Border Agency Documentation (Work permit)	EPM	Termination + 2 years	
2.1.20	Records relating to employees from outside of the UK e.g. visa, work permits, etc.	EPM	Termination + 2 years	

2.1.21	Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	Yes	IRMS Toolkit for Academies 2019	Where possible, these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File	SECURE DISPOSAL
2.1.22	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	IRMS Toolkit for Academies 2019]	Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.23	Records relating to the employment of overseas teachers	Yes	IRMS Toolkit for Academies 2019	Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL

2.1.24	Copies of qualifications certificates relevant to employment		EPM	Termination + 6 years	
2.1.25	Records relating to the TUPE process	Yes	IRMS Toolkit for Academies 2019	Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

2.2	Operational Staff Manageme	ent			
2.2.1	Staff Personal File, including employment contract and any variation letters or side letters, and staff training records	Yes	IRMS Toolkit for Academies 2019	Termination of employment + 6 years	SECURE DISPOSAL
2.2.2	Time sheets	Yes	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal/assessment records	Yes	IRMS Toolkit for Academies 2019	Current year + 5 years	SECURE DISPOSAL
2.2.4	Records relating to the agreement of pay and conditions	No	IRMS Toolkit for Academies 2019	Date pay and conditions superseded + 6 years	SECURE DISPOSAL
2.2.5	Training needs analysis	No	IRMS Toolkit for Academies 2019	Current year + 1 year	SECURE DISPOSAL
2.2.6	Inland Revenue/HMRC correspondence		EPM	Termination + 6 years	
2.2.7	National minimum wage records		EPM	Three years after the end of the pay reference period	

			following the one that the records cover.	
2.2.8	Wage/salary records (also overtime, bonuses, expenses)	EPM	6 years from the end of the tax year to which they relate	
2.2.9	Medical certificates/ Occupational Health reports and sickness absence record	EPM	Current year + 6 years	
2.2.10	SMP, SAP, SSPP records, calculations, certificates (Mat B1s) or other medical evidence, notifications, declarations and notices	EPM	Three years after the end of the tax year in which the leave period ends	
2.2.11	Statutory Sick Pay records, calculations, certificates, self-certificates	EPM	Termination of employment + 6 years	
2.2.12	Parental leave records	EPM	Eighteen from birth/adoption of the child or if the child receives a disability living allowance Recommended	
2.2.13	Other special leave of absence including parental leave, maternity leave	EPM	Current year + 6 years	
2.2.14		EPM	Termination + 7 years	
2.2.15		EPM	Termination + 7 years	

2.2.16	Redundancy details, calculations of payments, refunds, notification to the Secretary of State	EPM	Six years from the date of redundancy
2.2.17	Retirement Benefits Schemes – records of notifiable events, for example, relating to incapacity	EPM	Six years from the end of the scheme year in which the event took place
2.2.18	Salary assessment forms – teachers	EPM	Current year + 6 years
2.2.19	Staff induction including ECTs Induction	EPM	Completion + 6 years Recommended within DFE statutory guidance 'Induction for newly qualified teachers (England)', April 2018
2.2.20	Working time records including overtime, annual holiday, jury service, time off for dependants, etc	EPM	Two years from date on which they were made Statutory
2.2.21	General Annual Leave	ICO	End of Financial Year + 3 Years
2.2.22	Flexible Working Requests	CIPD	18 months following any appeal
2.2.23	Driving offences	CIPD	Must be removed once the conviction is spent under the Rehabilitation of Offenders Act 1974.

2.2.24	Settlement agreement and agreed reference	EPM	Termination + 7 years	Kept in marked envelope on personnel file for
				senior personnel only to review

2.3	Management of Disciplinary	and Grievance	e Processes		
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded	Yes	IRMS Toolkit for Academies 2019	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	SECURE DISPOSAL These records must be shredded
2.3.2	Allegation which is child protection in nature against a member of staff, including where the allegation proven to be malicious or false		IRMS Toolkit for Academies 2019	Not retained on personnel records, unless the individual give their consent for retention of the information	
2.3.3	Disciplinary Proceedings	Yes	IRMS Toolkit for Academies 2019		
2.3.4	Oral warning			Date of warning + 12 months	SECURE DISPOSAL
2.3.5	Written warning – level 1			Date of warning + 12 months	SECURE DISPOSAL
2.3.6	Written warning – level 2			Date of warning + 12 months	SECURE DISPOSAL
2.3.7	Final warning			Date of warning + 18 months	SECURE DISPOSAL

2.3.8	Case not found		If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL
2.3.9	Formal disciplinary warnings – child protection related	EPM	Termination + 25 years Recommended within the DFE guidance, 'Data Protection: a toolkit for schools', April 2018	
2.3.10	Formal disciplinary warnings – not child protection related	EPM	Termination + 6 years	
2.3.11	CCTV relating to a disciplinary matter or unfair dismissal claim	ICO	6 months following the outcome of any formal decision or appeals	

2.4	Health and Safety				
2.4.1	Health and Safety policy statements	No	IRMS Toolkit for Academies 2019	Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety risk assessments	No	IRMS Toolkit for Academies 2019	Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/injury at work	Yes	IRMS Toolkit for Academies 2019	Date of incident + 12 years. In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL

2.4.4	Accident reporting	Yes	IRMS Toolkit for Academies 2019	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format. The incident reporting form may be retained as below	SECURE DISPOSAL
2.4.5	Adults			Date of incident + 6 years	SECURE DISPOSAL
2.4.6	Children			Date of birth of the child + 25 years	SECURE DISPOSAL
2.4.7	Control of Substances Hazardous to Health (COSHH)	No	IRMS Toolkit for Academies 2019	Current year + 10 years then REVIEW	SECURE DISPOSAL
2.4.8	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No	IRMS Toolkit for Academies 2019	Last action + 40 years	SECURE DISPOSAL
2.4.9	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No	IRMS Toolkit for Academies 2019	Last action + 50 years	SECURE DISPOSAL
2.4.10	Fire precautions log books	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL
2.4.11	Fire risk assessments	No	IRMS Toolkit for Academies 2019	Life of the risk assessment + 6 years	SECURE DISPOSAL

2.4.12	Incident reports	Yes	IRMS Toolkit for Academies 2019	Current year + 20 years	SECURE DISPOSAL
2.4.13	Health and Safety Inspections, Property Management and Asset Records		EPM	Last Action + 6 Years	SECURE DISPOSAL
2.4.14	First Aid training	Yes	CIPD	6 years after employment	SECURE DISPOSAL
2.4.15	Health & Safety representatives and employees' training	Yes	CIPD	5 years after employment	SECURE DISPOSAL

3. Ma	3. Management of the Academy							
3.1	Recruitment							
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at end of administrative life of the record			
3.1.1	All records relating to the creation and implementation of the School Admissions' Policy	No	IRMS Toolkit for Academies 2019	Life of the policy + 3 years then REVIEW	SECURE DISPOSAL			
3.1.2	Admissions – if the admission is successful	Yes	IRMS Toolkit for Academies 2019	Date of admission + 1 year	SECURE DISPOSAL			
3.1.3	Admissions – if the appeal is unsuccessful	Yes	IRMS Toolkit for Academies 2019	Resolution of case + 1 year	SECURE DISPOSAL			
3.1.4	Register of admissions	Yes	IRMS Toolkit for Academies 2019	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	REVIEW Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates they attended the school			
3.1.5	Admissions – Secondary Schools – Casual	Yes	IRMS Toolkit for Academies 2019	Current year + 1 year	SECURE DISPOSAL			

3.1.6	Proofs of address supplied by parents as part of the admissions process	Yes	IRMS Toolkit for Academies 2019	Current year + 1 year	SECURE DISPOSAL
3.1.7	Supplementary information form, including additional information such as religion and medical conditions	Yes	IRMS Toolkit for Academies 2019		
3.1.8	 For successful admissions 			This information should be added to the pupil file	SECURE DISPOSAL
3.1.9	 For unsuccessful admissions 			Until appeals process completed	SECURE DISPOSAL

3.2	Head Teacher and Senior Management Team						
3.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff	IRMS Toolkit for Academies 2019	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		
3.2.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff	IRMS Toolkit for Academies 2019	Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL		

3.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff	IRMS Toolkit for Academies 2019	Date of the report + a minimum of 3 years then review	SECURE DISPOSAL
3.2.4	Records created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff	IRMS Toolkit for Academies 2019	Current academic year + 6 years then review	SECURE DISPOSAL
3.2.5	Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff	IRMS Toolkit for Academies 2019	Date of correspondence + 3 years then review	SECURE DISPOSAL
3.2.6	Professional Development Plans	Yes	IRMS Toolkit for Academies 2019	Life of the plan + 6 years	SECURE DISPOSAL

3.3	Operational Administration				
3.3.1	Management of complaints	Yes	IRMS Toolkit for Academies 2019	Date complaint resolved + 3 years	SECURE DISPOSAL
3.3.2	Data Protection and FOI Complaints		EPM	Case Closed + 2 years	SECURE DISPOSAL
3.3.3	Records relating to the management of contracts with external providers	No	IRMS Toolkit for Academies 2019	Date of last payment on contract + 6 years	SECURE DISPOSAL

3.3.4	Records relating to the management of software licences	No	IRMS Toolkit for Academies 2019	Date licence expires + 6 years	SECURE DISPOSAL
3.3.5	General file series	No	IRMS Toolkit for Academies 2019	Current year + 5 years then REVIEW	SECURE DISPOSAL
3.3.6	Records relating to the creation and publication of the school brochure or prospectus	No	IRMS Toolkit for Academies 2019	Current year + 3 years	STANDARD DISPOSAL
3.3.7	Records relating to the creation and distribution of circulars to staff, parents or pupils	No	IRMS Toolkit for Academies 2019	Current year + 1 year	STANDARD DISPOSAL
3.3.8	Newsletters and other items with a short operational use	No	IRMS Toolkit for Academies 2019	Current year + 1 year	STANDARD DISPOSAL
3.3.9	Visitors' books and signing in sheets	Yes	IRMS Toolkit for Academies 2019	Current year + 6 years then REVIEW	SECURE DISPOSAL
3.3.10	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No	IRMS Toolkit for Academies 2019	Current year + 6 years then REVIEW	SECURE DISPOSAL

4. P	4. Property Management							
4.1	1 Property Management							
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at end of administrative life of the record			

4.1.1	Title deeds of properties belonging to the school	No	IRMS Toolkit for Academies 2019	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	No	IRMS Toolkit for Academies 2019	These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold	
4.1.3	Leases of property leased by or to the school	No	IRMS Toolkit for Academies 2019	Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No	IRMS Toolkit for Academies 2019	Current financial year + 6 years	SECURE DISPOSAL
4.1.5	Business continuity and disaster recovery plans	No	IRMS Toolkit for Academies 2019	Date the plan superseded + 3 years	SECURE DISPOSAL

4.2	Maintenance				
4.2.1	All records relating to the maintenance of the school carried out by contractors	No	IRMS Toolkit for Academies 2019	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	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL

4.3	Fleet Management				
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	No	IRMS Toolkit for Academies 2019	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.2		No	IRMS Toolkit for Academies 2019	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.3		No	IRMS Toolkit for Academies 2019	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	No	IRMS Toolkit for Academies 2019	Date of journey + 6 years	SECURE DISPOSAL

5. Pupil Management							
5.1	Pupil's Educational Record						
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at end of administrative life of the record		
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	IRMS Toolkit for Academies 2019				
	• Primary			Retain whilst the child remains at the primary school	The file should follow the pupil when they leave the primary school. This will include: • To another primary school • To a secondary school • To a secondary school • To a pupil referral unit If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period. If the pupil transfers to an independent school,		

	e Socondary			Date of birth of the	transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA SECURE DISPOSAL
	Secondary			pupil + 25 years	
5.1.2	Records relating to the management of exclusions	Yes	IRMS Toolkit for Academies 2019	Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
5.1.3	Management of examination registrations	Yes	IRMS Toolkit for Academies 2019	The examination board will usually mandate how long these records need to be retained	

5.1.4	Examination results – pupil copies	Yes	IRMS Toolkit for Academies 2019		
	Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	 Internal 			This information should be added to the pupil file	
5.1.5	Child protection information held on pupil file	Yes	IRMS Toolkit for Academies 2019	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file	SECURE DISPOSAL – these records MUST be shredded
5.1.6	Child protection information held in separate files	Yes	IRMS Toolkit for Academies 2019	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	SECURE DISPOSAL – these records MUST be shredded

5.2	Attendance							
5.2.1	Attendance registers	Yes	IRMS Toolkit for Academies 2019	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	SECURE DISPOSAL			
5.2.2	Correspondence relating to authorised absence	Yes	IRMS Toolkit for Academies 2019	Current academic year + 2 years	SECURE DISPOSAL			

5.3	Special Educational Needs				
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	IRMS Toolkit for Academies 2019	Date of birth of the pupil + 25 years	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time 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
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	IRMS Toolkit for Academies 2019	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	IRMS Toolkit for Academies 2019	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.4	Accessibility strategy	Yes	IRMS Toolkit for Academies 2019	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold

6. Cu	6. Curriculum Management							
6.1.	Statistics and Management Information							
	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at end of administrative life of the record			
6.1.1.	Curriculum returns	No	IRMS Toolkit for Academies 2019	Current year + 3 years	SECURE DISPOSAL			
6.1.2	Examination results (schools copy)	Yes	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL			
6.1.3	SATs record-	Yes	IRMS Toolkit for Academies 2019	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			
	Examination papers			The examination papers should be kept until any	SECURE DISPOSAL			

				appeals/validation process is complete	
6.1.4	Published Admission Number (PAN) reports	Yes	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL
6.1.5	Value added and contextual data	Yes	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL
6.1.6	Self-evaluation forms	Yes	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL

6.2	Implementation of Curr	iculum			
6.2.1	Schemes of work	No	IRMS Toolkit for Academies 2019	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.2	Timetable	No	IRMS Toolkit for Academies 2019	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL

6.2.3	Class record books	No	IRMS Toolkit for Academies 2019	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.4	Mark Books	No	IRMS Toolkit for Academies 2019	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.5	Record of homework set	No	IRMS Toolkit for Academies 2019	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.6	Pupils' work	No	IRMS Toolkit for Academies 2019	Where possible, work should be returned to the pupil at the ned 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						
7.1.1	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Primary schools	No	IRMS Toolkit for Academies 2019	Date of visit + 14 years	SECURE DISPOSAL		
7.1.2	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Secondary schools	No	IRMS Toolkit for Academies 2019	Date of visit + 10 years	SECURE DISPOSAL		
7.1.3	Parent consent forms for school trips where there has been no major incident	Yes	IRMS Toolkit for Academies 2019	Conclusion of the trip	Although the consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most school do not have the storage capacity to retain every single consent form issued by the school for this period of time		
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	IRMS Toolkit for Academies 2019	Date of birth of the pupil involved in the incident + 25 years.			

				The permission slips for all the pupils on the trip need to be retained to show that the rule had been followed for all pupils	
7.1.5	Records relating to residential trips	Yes	IRMS Toolkit for Academies 2019	Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL

7.2	Walking Bus				
7.2.1	Walking bus registers	Yes	IRMS Toolkit for Academies 2019	Date of register + 3 years. This take into account the fact that, if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [if these records are retained electronically any back up copies should be destroyed at the same time]

8. Cei	8. Central Government and Local Authority (LA)			
8.1	Local Authority			

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at end of administrative life of the record
8.1.1	Secondary transfer sheets (Primary)	Yes	IRMS Toolkit for Academies 2019	Current year + 2 years	SECURE DISPOSAL
8.1.2	Attendance returns	Yes	IRMS Toolkit for Academies 2019	Current year + 1 year	SECURE DISPOSAL
8.1.3	School census returns	No	IRMS Toolkit for Academies 2019	Current year + 5 years	SECURE DISPOSAL

8.2	Central Government						
8.2.1	OFSTED reports and papers	No	IRMS Toolkit for Academies 2019	Life of the report then REVIEW	SECURE DISPOSAL		
8.2.2	Returns made to central government	No	IRMS Toolkit for Academies 2019	Current year + 6 years	SECURE DISPOSAL		
8.2.3	Circulars and other information sent from central government	No	IRMS Toolkit for Academies 2019	Operational use	SECURE DISPOSAL		