



Data Retention Policy

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Review Frequency	Every 3 years
Policy First Issued	2018
Last Reviewed	July 2021
Date policy considered by External HR Consultant	N/A
Date policy considered by External Solicitor	July 2021 by Judicium
Agreed by LT on	13 th July 2021
Does this policy need to be agreed by Governors? If yes, which committee?	No
Agreed by Governors on	N/A
This policy is communicated by the following means:	
Governors	n/a
Staff	On staff SharePoint, via Data Protection/GDPR staff training
Parents	On academy website
Students	On academy website

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1. Rationale

The retention policy lays down the length of time which records are retained by the academy and the action which is taken when they no longer needs to be retained.

Members of staff are expected to manage their record keeping systems using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems.

The retention schedule refers to all information, regardless of the media in which it is stored, and is informed by the irms Information Management Toolkit for Schools (February 2016, updated 2019). This schedule will be updated in line with any future irms updates. This policy supports the General Data Protection Regulation (GDPR) for data that relates to identifiable individuals.

2. Destruction of Records

Where records have been identified for destruction, they will be disposed of in an appropriate way. All records containing personal information, or sensitive policy information, are shredded.

3. Transfer of information to other media

Where lengthy retention periods are allocated to records, the academy may convert paper records to other media such as digital media if it is cost effective to do so. Digital media records are destroyed/deleted in line with the retention schedule.

4. Transfer of Records to the Academy Archives

Where records have been identified as being worthy of permanent preservation, arrangements are made to transfer the records to the archives.

Appendix 1 – Retention Schedule: Management of the Academy

This section contains retention periods connected to the general management of the academy. This covers the work of the Governing Body, the Headteacher and the Leadership Team, the admissions process and operational administration.

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Governing Body					
Agendas for Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff.		One copy retained with the master set of minutes. All other copies can be disposed of.	Secure Disposal	Headteacher - support from Head's PA
Minutes of Governing Body meetings (signed set)	There may be data protection issues if the meeting is dealing with confidential issues relating to staff.		Permanent		Headteacher - support from Head's PA
Reports presented to the Governing Body	There may be data protection issues if the report deals with confidential issues relating to staff.		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently.	Secure Disposal or retain with minutes if appropriate	Headteacher
Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002 (AGM)	No	Education Action 2002, Section 33	Date of the meeting + 6 years.	Secure Disposal	School Business Leader

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Governing Body					
Instruments of Government including Articles of Association	No		Permanent	These should be retained in the academy. If the academy were to close, they should be offered to the LEA.	School Business Leader
Trusts & Endowments managed by the Governing Body	No		Permanent	These should be retained in the academy. If the academy were to close, they should be offered to the LEA.	School Business Leader
Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years	Secure Disposal	Headteacher
Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years	Secure Disposal	Headteacher - support from Head's PA
Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + 6 years then review for further retention in case of contentious disputes.	Secure Disposal	Headteacher
Annual Reports created under the requirements of the Education Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	Date of report + 10 years	Secure Disposal	School Business Leader
Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date of proposal accepted or declined + 3 years	Secure disposal	School Business Leader

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Headteacher & Leadership Team					
Log books of activity in the academy maintained by the Headteacher	There may be data protection issues if the log book refers to individual students or staff.		Date of last entry in book + 6 years.	These could be of permanent historical value and may be considered for archives.	Headteacher
Minutes of Leadership Team meetings and the meetings of other internal admin bodies.	There may be data protection issues if minutes refer to individual students of staff.		Date of meeting + 3 years.	Secure disposal	Headteacher – support from Head's PA
Reports created by the Headteacher or Leadership Team	There may be data protection issues if reports refer to individual students of staff.		Date of report + 3 years.	Secure disposal	Headteacher – support from Head's PA
Records created by Leadership Team, HOYs/HOPs and other staff with admin responsibilities	There may be data protection issues if records refer to individual students of staff.		Current academic year + 6 years	Secure disposal	All staff who create records
Correspondence created by Leadership Team, HOYs/HOPs and other staff with admin responsibilities	There may be data protection issues if correspondence refers to individual students of staff.		Date of correspondence + 3 years	Secure disposal	All staff who create correspondence – should be filed on student/HR files
Professional Development Plans	Yes		Life of the plan + 6 years	Secure disposal	LT responsible for CPD
Academy Improvement Plans	No		Life of the plan + 3 years	Secure disposal	Headteacher

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Admissions Process					
All records relating to the creation & implementation of the Academy's Admissions Policy	No	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admissions appeals panels Dec 2014	Life of the policy + 3 years	Secure disposal	LT responsible for admissions
Admissions – if the admission is successful	Yes	As above	Date of admission + 1 year	Secure disposal	Head of Student Reception
Admissions – if the appeal is unsuccessful	Yes	As above	Resolution of case + 1 year	Secure disposal	LT responsible for admissions
Register of admissions	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools & local authorities Oct 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.	As we can receive enquiries from past students to confirm dates of attendance we aim to retain all registers of admissions to support this.	Head of Student Reception
Admissions form	Yes		This information is added to the student file.	Secure disposal	Head of Student Reception
Admissions information (SIMs via CTF)	Yes		This information is imported onto SIMs. For students who are admitted, this information becomes the electronic student file. For students who are not admitted, this information is deleted after the appeals process is completed.	Secure disposal	Head of Student Reception

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Operational Administration					
Records relating to the creation & publication of the academy prospectus	No		Current year + 3 years	Standard disposal	Marketing & Comms Manager
Records relating to the creation & distribution of circulars to staff, parents or students	Yes – for student & staff notices where individuals are named.		Current year + 1 year	Secure disposal for staff & student notices. Standard disposal for full school drops.	Marketing & Comms Manager and Head's PA
Newsletters & other items with a short operational use	No		Current year + 1 year	Standard disposal	Marketing & Comms Manager and Head's PA
Visitors' book/signing in sheets	Yes		Current year + 6 years	Secure disposal	Head of HR
Records relating to the creation & management of Parent Associations	No		Current year + 6 years	Secure disposal	Headteacher – support from Head's PA

Appendix 2 – Retention Schedule: Human Resources

This section deals with all matters of Human Resources management within the academy.

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Recruitment					
All records leading up to the appointment of a new Headteacher	Yes		Date of appointments + 6 years	Secure disposal	HR Manager
All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appoint of successful candidate + 6 months	Secure disposal	HR Manager
All records leading up to the appointment of a new member of staff – successful candidate	Yes		All the relevant information is added to the personnel file and all other information is retained for 6 months	Secure disposal	HR Manager
Pre-employment vetting information – DBS checks	No	DBS Update Service Employer Guide June 2014: Keep Children Safe in Education June 2015	The academy does not keep copies. The academy records DBS information on the SCR and associated databases.		HR Manager
Proofs of identity	Yes		These are checked and copy documentation is placed on personnel files.	Personnel file – secure disposal	HR Manager
Pre-employment vetting – right to work in the UK	Yes	An employer's guide to right to work check (Home Office May 2015)	These are checked and copy documentation is placed on personnel files.	Personnel file – secure disposal	HR Manager

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Operational Staff Management					
Staff Personnel File	Yes	Limitation Act 1980 (section 2)	Termination of employment + 6 years	Secure disposal	HR Manager
Timesheets (on payroll files) & salary records	Yes		Current year + 6 years	Secure disposal	School Business Leader
Annual appraisal/ assessment records (eg LOs)	Yes		Current year + 5 years	Secure disposal	HR Manager

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Management of Disciplinary & Grievance Processes					
Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	Keeping Children Safe in Education 2015	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer.	Secure disposal	Headteacher
Disciplinary Proceedings	Yes				HR Manager
Verbal warning			Date of warning + 6 months	Secure disposal (if warnings are placed on personnel files then they must be weeded from the file).	
Written warning – level 1			Date of warning + 6 months		
Written warning – level 2			Date of warning + 12 months		
Final warning			Date of warning + 18 months		
Case not found			If the incident is CP related see above, otherwise dispose of at conclusion of case.	Secure disposal	

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Health & Safety					
Health & Safety policy statements	No		Life of policy + 3 years	Secure disposal	School Business Leader
Health & Safety risk assessments	No		Life of risk assessment + 3 years	Secure disposal	Headteacher (Covid), School Business Leader (FM Contract), Premises Manager (FM), LT responsible for trips (trips), HOFs (faculty RAs)
Records relating to accident/ injury at work	Yes		Date of incident + 12 years. For serious incidents a longer retention period may need to be applied.	Secure disposal	School Business Leader
Accident reporting	Yes	Social Security Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Adults – date of the incident + 6 years	Secure disposal	School Business Leader
			Children – DOB + 25 years	Secure disposal	
Control of Substances Hazardous to Health (COSHH)	No	COSHH Regulations 2002.	Current year + 40 years	Secure disposal	Premises Manager (FM/cleaning), Head of Science (Science), Head of ADT (ADT)
Process of monitoring areas where site users are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012	Last action + 40 years	Secure disposal	Premises Manager
Process of monitoring areas where site users are likely to have become in contact with radiation.	No		Last action + 50 years	Secure disposal	Head of Science (Science)
Fire precautions log books	No		Current year + 6 years	Secure disposal	Premises Manager

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Payroll & Pensions					
Maternity pay records	Yes	Statutory maternity pay Regulations 1986	Current year + 3 years	Secure disposal	HR Manager (HR file), School Business Leader (payroll records)
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	Secure disposal	HR Manager (HR file)

Appendix 3 – Retention Schedule: Financial Management of the academy

This section deals with all aspects of the financial management of the academy including the administration of school meals.

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Risk Management and Insurance					
Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	Secure disposal	School Business Leader

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Asset Management					
Inventories of furniture & equipment	No		Current year + 6 years	Secure disposal	Deputy School Business Manager (ICT equipment/other)
Burglary, theft & vandalism report forms	No		Current year + 6 years	Secure disposal	Premises Manager

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Accounts and Statements including Budget Management					
Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Annual Accounts	No		Current year + 6 years	Standard Disposal	School Business Leader
Loans and grants managed by the academy	No		Date of last payment on the loan + 12 years	Secure disposal	School Business Leader
Student Grant applications	Yes		Current year + 3 years	Secure disposal	School Business Leader

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
All records relating to the creation and management of budgets including the annual budget statement & background papers	No		Life of the budget + 3 years	Secure disposal	School Business Leader
Invoices, receipts, order books and requisitions, delivery notes	No		Current financial year + 6 years	Secure disposal	Deputy School Business Manager
Records relating to the collections and banking of monies	No		Current financial year + 6 years	Secure disposal	Deputy School Business Manager
Records relating to the identification and collection of debt.	No		Current financial year + 6 years	Secure disposal	Deputy School Business Manager

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Contract Management					
All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	Secure disposal	School Business Leader
All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	Secure disposal	School Business Leader
Records relating to the monitoring of contracts	No		Current year + 2 years	Secure disposal	School Business Leader

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
School Fund					
Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
School Fund – Cheque books	No		Current year + 6 years	Secure disposal	Deputy School Business Manager
School Fund – Paying in books			Current year + 6 years	Secure disposal	Deputy School Business Manager
School Fund – Ledger			Current year + 6 years	Secure disposal	Deputy School Business Manager
School Fund – Invoices			Current year + 6 years	Secure disposal	Deputy School Business Manager
School Fund – Receipts (includes ParentPay)			Current year + 6 years	Secure disposal	Deputy School Business Manager
School Fund – Bank Statements			Current year + 6 years	Secure disposal	Deputy School Business Manager
School Fund – Journey books (includes ParentPay)			Current year + 6 years	Secure disposal	Deputy School Business Manager

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
School Meals Management					
Free School Meals Registers	Yes		Current year + 6 years	Secure disposal	Head of Student Reception (HLT notifications) and Deputy School Business Manager (cashless catering)
School Meals Registers	Yes		Current year + 3 years	Secure disposal	Deputy School Business Manager (cashless catering)
School Meals Summary Sheets	No		Current year + 3 years		Deputy School Business Manager (cashless catering)

Appendix 4 – Retention Schedule: Property Management

This section covers the management of buildings and property

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Property Management					
Title deeds of properties belonging to the school	No		Permanent		N/A
Plans of property belonging to the school	No		Whilst the building belongs to the school		N/A
Leases of property leased by or to the academy	No		Expiry of lease + 6 years	Secure disposal	School Business Leader
Records relating to the letting of academy premises	No		Current financial year + 6 years	Secure disposal	Deputy School Business Manager

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Maintenance					
All records relating to the maintenance of the academy carried out by contractors	No		Current year + 6 years	Secure disposal	Premises Manager (some related to FM contract & LBH Lifecycle)
All records relating to the maintenance of the school carried out by FM contractors including maintenance log books	No		Current year + 6 years	Secure disposal	Premises Manager

Appendix 5 – Retention Schedule: Student Management

This section includes all records which are created during the time a student spends at the academy. For information about accident reports see H&S section

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Student's Educational Record					
Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 Limitation Act 1980 (Section 2)	Date of birth of the student + 25 years	Secure disposal	Head of Student Reception and Data Leader
Examination Results (public) – student copies	Yes		This information should be added to the student file	All uncollected certificates should be returned to the examination board	Exams Officer
Examination Results (internal) – student copies	Yes		This information should be added to the student file		Exams Officer
Teacher Assessment Grades evidence	Yes		6 years from the date of the exam award	Secure disposal	Exams Officer

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Child Protection					
Child Protection information held on student's file	Yes	Keeping Children Safe in Education March 2015 Working Together to Safeguard Children March 2015	Date of birth of the student + 25 years	Secure disposal – must be shredded	Designated Safeguarding Lead
Child Protection information held in separate files (this is the academy's approach to CP record keeping)	Yes	Keeping Children Safe in Education March 2015 Working Together to Safeguard Children March 2015	Date of birth of the student + 25 years	Secure disposal – must be shredded	Designated Safeguarding Lead

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Attendance					
Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities Oct 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. At CGA, data is recorded on SIMs and will be deleted when student record is.	Secure disposal	Head of Student Reception
Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	Secure disposal	Head of Student Reception

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Special Educational Needs (SEND)					
SEND files, annual reviews & EHCPs	Yes	Limitation Action 1980 (section 2)	Date of birth of the student + 25 years	Secure Disposal	SENDCo
Statement maintained under section 234 of the Education Act 1990 and any amendments made	Yes	Education Action 1996 Special Educational Needs & Disability Act 2001 Section 1	Date of birth of the student + 25 years	Secure Disposal	SENDCo
Advice & information provided to parents regarding SEND	Yes	Special Educational Needs & Disability Act 2001 Section 2	Date of birth of the student + 25 years	Secure Disposal	SENDCo
Accessibility strategy	Yes	Special Educational Needs & Disability Act 2001 Section 14	Date of birth of the student + 25 years	Secure Disposal	SENDCo
Access arrangements	Yes		Date of leaving + 6 years	Secure Disposal	SENDCo
External agency referrals	Yes		Whilst referral is current	Secure Disposal	SENDCo
EHCP & medical needs register	Yes		Whilst student is on roll	Secure Disposal	SENDCo & staff

Appendix 6 – Retention Schedule: Curriculum Management

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Statistics & Management Information					
Curriculum returns (PLASC)	No		Current year + 3 years	Secure disposal	Data Leader
Examination results (academy's copy)	Yes		Current year + 6 years	Secure disposal	Exams Officer
Examination papers	Yes		Kept until any appeals/ validation process is complete	Secure disposal	Exams Officer
Published Admission Number (PAN) Reports	Yes		Current year + 6 years	Secure disposal	Headteacher
Value Added and Contextual Data	Yes		Current year + 6 years	Secure disposal	Data Leader
Self Evaluation Forms	Yes		Current year + 6 years	Secure disposal	Headteacher

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Implementation of Curriculum					
Schemes of learning	No		Current year + 1 year	Secure disposal	Heads of Faculty & Heads of Subject
Timetable	No		Current year + 1 year	Secure disposal	Data Leader
Mark Books/ Assessment Data	No		Current year + 1 year	Secure disposal	Individual teachers/ Data Leader
Record of Homework Set	No		Current year + 1 year	Secure disposal	LT responsible for homework (using Satchel:One)
Students' work	No		Wherever possible this should be returned to the student. If this is not possible then current year + 1 year	Secure disposal	Individual teachers

Appendix 7 – Retention Schedule: Extra Curricular Activities

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Educational Visits outside the classroom					
Records created to obtain approval to run an education visit outside the classroom	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically section 3 and section 4.	Data of visit + 10 years	Secure disposal	LT responsible for trips & visits
Parental consent forms for trips where there has been no major incident	Yes		Conclusion of the trip	Secure disposal	Individual teachers
Parental consent forms for trips where there has been a major incident	Yes	Limitation Act 1980 (section 2)	DOB of the student involved in the incident + 25 years. Permission slips for all students on the trip must be retained to show that the rules had been followed for all students.	Secure disposal	Headteacher

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Home School Liaison					
Day books	Yes		Current year + 2 years	Secure disposal	Home School Liaison Line Manager
Reports for outside agencies where report has been included on case file created by outside agency	Yes		Whilst the student is attending school	Secure disposal	Home School Liaison Line Manager
Referral forms	Yes		Whilst the referral is current	Secure disposal	Home School Liaison Line Manager
Contact database entries	Yes		Current year then review.	If contact is no longer active destroy.	Home School Liaison Line Manager

Appendix 8 – Retention Schedule: Central Government and Local Authority

This section covers records created in the course of interaction between the academy and the DfE/LA

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Local Authority					
Attendance Returns	Yes		Current year + 1 year	Secure disposal	Head of Student Reception/ Data Leader
Circulars and other information sent from the LA	No		Operational use	Secure disposal	Headteacher

Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the retention period	Post holder responsible
Central Government					
OFSTED reports and papers	No		Life of the report then review	Secure disposal	Headteacher
Returns made to central government	No		Current year + 6 years	Secure disposal	Headteacher
Circulars and other information sent from central government	No		Operational use	Secure disposal	Headteacher
School Census Returns	Yes		Current year + 5 years	Secure disposal	Data Leader