



Record Retention Policy and Retention Schedule

This Policy has been adopted and approved by Oxlip Learning Partnership and is to be used by all members of the Trust.

History of Document

Version No.	Author/ Owner	Date Written / Reviewed	Date Ratified by Full Board	Comments	Next Review Date
V1	Data Protection Lead	July-2024	13-Sept-2024	Trust-wide schedule implemented with effect from 1-Sept-2024	In line with any changes to the Toolkit
V2	TDPL	June 2025	11-July-2025	Added in policy section and refined the schedule	Annual – Summer 2026
V3	Trust GDPR Lead	June 2026	30-June-2026	Review of schedule: minimal updates for clarity on pupil educational record retention.	Annual – Summer 2027

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Section One: Record Retention Policy

1. Introduction

In line with UK General Data Protection Regulations (UK GDPR), the Oxlip Learning Partnership (the Trust) has a responsibility to ensure that all records are only kept for as long as is necessary. This policy sets out the periods of retention for the information or records that we process and applies to all information, regardless of format.

2. Roles and Responsibilities

The Trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The Trust Data Protection Lead has overall responsibility for this policy.

The Data Protection Champions in each school will give guidance to staff in regard to good records management practice and will promote compliance with this policy.

All employees must ensure that records for which they are responsible are accurate and maintained. At the end of the retention period, it is the employee's responsibility to ensure that such records are disposed of in accordance with this policy.

3. How long should we keep our records

Records should be kept for as long as they are needed to meet the operational needs of the Trust, together with legal and regulatory requirements. We have assessed our records to:

- Determine their value as a source of information about the Trust, its operations, relationships and environment
- Assess their importance as evidence of business activities and decisions
- Establish whether there are any legal or regulatory retention requirements including: Public Records Act (1958), The Freedom of Information Act (2000), the Limitation Act (1980), the Data Protection Act (2018).

Where records are likely to have a historical value, or are worthy of permanent preservation, we may choose to archive them at the end of any retention period.

Where information is to be archived or destroyed, schools must carry out such processing by no later than the August after the expiration of the retention period.

4. Retention Schedule

The retention schedule (pages 4 onwards) has been produced in line with the advice and guidance provided by the Information Record Management Society (IRMS). This may not be an exhaustive list and where schools are unsure of particular retention periods, they should seek further guidance from the Trust's Data Protection Lead.

The schedule suggests a number of actions that can be taken to dispose of information once it has reached the end of its retention period:

- **Regular disposal** – Records can be placed in a normal rubbish bin or skip
- **Secure disposal** – for information to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed. Skips and regular waste disposal will not be considered secure
 - Paper record must be shredded using a cross-cutting shredder, pulped or burned
 - CDs/DVDs and other storage media should be destroyed to particles no larger than 6mm
 - Any electronic data should be deleted alongside any back-ups

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- **Secure disposal ‘must be shredded’** – Information is likely to be so sensitive it must be shredded on site, by a member of staff, and not left waiting for collection by an external company
- **Review** – At the end of the retention period, a review may be necessary to ascertain whether any further retention period is required to the one advised. If a further retention period isn’t necessary, the information must be securely disposed of
- **Transfer** – At the end of the retention period the information may be transferred to a different company or establishment. Where this is the case the information should be sent securely via encrypted email or other secure means; by recorded delivery; or delivered by hand.

5. Child Protection Records

Regardless of the suggested retention timescales set out in the Retention Schedule, the Trust may at its discretion extend the retention period to any information if, upon review, it is felt that a child’s safety may be at risk should the information be destroyed. Where such a decision is made, this will be documented and reviewed on a regular basis.

6. Using a third party

Schools may choose to use an external company to support them with their secure disposal. If doing so, academies must carry out checks to ensure that the company is reputable and will destroy the documents securely.

There should be a contract and a data processing agreement in place with the company to provide assurance that they will comply with the Data Protection Act and UK GDPR.

A record of disposal should also be maintained (see section 7. Record Keeping).

7. Record-Keeping

It is not necessary to document the disposal of records when that has been done in line with the records retention schedule on page 4 onwards, unless a third party provider has been used.

Where equipment and confidential waste has been sent for disposal or destruction by a third party, a log should be kept of the date the waste was collected, the company used, and a brief description of the files destroyed. The third party may provide you with a certificate of destruction which should also be recorded.

Documents disposed of outside the retention schedule, either by being disposed of earlier or kept for longer than listed, will also need to be recorded. A log should be kept of the date the decision was made, the authorising officer, a brief description of the files involved and the reason for the decisions made.

These records will provide an audit trail for any inspections conducted by the Information Commissioner’s Office and will aid in addressing Freedom of Information requests, where we no longer hold the information.

8. Monitoring and Review

The Trust Data Protection Lead is responsible for the monitoring and review of this policy. The policy will be reviewed annually, or earlier in line with any changes in legislation, and approved by the Trust Board.

9. Links with other Policies and Documents

- Data Protection Policy
- Freedom of Information Policy and Publication Scheme

Section Two: Record Retention Schedule

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Records will be stored in the workplace in a way that does not cause a health and safety hazard. Records will not be stored in corridors or gangways and will 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 will be secured against intruders and have controlled access to the working space. Storage areas will be regularly monitored and checked for any damage or emerging risks, especially during holiday periods. On expiry of the retention period files will be destroyed in accordance with the following schedule.

Section Two: Record Retention Schedule

1. Governance, Funding and Financial Management

1.1	Governance of the Trust		
	Basic file description	Retention Period	Action at end of administrative life of the record
1.1.1	Articles of Association	Life of the Academy	
1.1.2	Memorandum of Association	This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL
1.1.3	Constitution	Life of the Academy	
1.1.4	Special Resolutions to amend the Constitution	Life of the Academy	
1.1.5	Written Scheme of Delegation	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
1.1.6	Annual Report – Trustees Report	Date of report + 10 years	SECURE DISPOSAL
1.1.7	Annual Report and Accounts	Date of report + 10 years	SECURE DISPOSAL
1.1.8	Annual Return	Date of report + 10 years	SECURE DISPOSAL
1.1.9	Appointment and removal or termination of Members, Trustees and Local Governors	Life of appointment + 6 years	SECURE DISPOSAL
1.1.10	Disqualification of Members, Trustees and Local Governors	Date of disqualification + 15 years	SECURE DISPOSAL
1.1.11	Strategic Plan	Life of plan + 6 years	SECURE DISPOSAL
1.1.12	Accessibility Plan	Life of plan + 6 years	SECURE DISPOSAL

1.2	Meetings and Statutory Registers		
	Basic file description	Retention Period	Action at end of administrative life of the record
	Meetings		
1.2.1	Agendas, Minutes of, and papers considered at, meetings of the Members, Trustees and Local Board and its committees	One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL
1.2.2	Board Decisions	Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.3	Annual Schedule of Business	Current year	SECURE DISPOSAL
1.2.4	Procedures for conduct of meeting	Date procedures superseded + 6 years	SECURE DISPOSAL

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1.2.5	Minutes relating to any committees set up by the Trustees	Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
Statutory Registers			
1.2.6	Register of Trustees, Members and Secretaries	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.7	Register of interests	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.8	Register of gifts, hospitality and entertainments	Life of the Academy + 6 years	SECURE DISPOSAL

1.3	Funding and Finance		
	Basic file description	Retention Period	Action at end of administrative life of the record
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 and on financial statements	Financial year report relates to + 6 years	SECURE DISPOSAL
Funding Agreements			
1.3.11	Funding Agreement with Secretary of State, supplemental funding agreements and termination	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.12	Funding Records – Capital Grant, Earmarked Annual Grant (EAG), General Annual Grant (GAG), Per pupil funding records	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.13	Exclusions agreement	Date of last payment of funding + 6 years	SECURE DISPOSAL

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1.3.14	Gift Aid and Tax Relief	Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.15	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			
1.3.16	Maternity pay records	Current year + 3 years	SECURE DISPOSAL
1.3.17	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL
1.3.18	Management of the Teachers' Pension Scheme and Records relating to pension registrations	Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.19	Payroll records	Date payroll run + 6 years	SECURE DISPOSAL
Risk Management and Insurance			
1.3.20	Insurance policies	Date the policy expires + 6 years	SECURE DISPOSAL
1.3.21	Records relating to the settlement of insurance claims	Date claim settled + 6 years	SECURE DISPOSAL
1.3.22	Employer's Liability Insurance Certificate	Closure of the school + 40 years	SECURE DISPOSAL
Endowment Funds and Investments			
1.3.23	Investment policies	Life of the investment + 6 years	SECURE DISPOSAL
1.3.24	Management of Endowment Funds	Life of the fund + 6 years	
Accounts and Statements			
1.3.25	Annual accounts	Current year + 6 years	STANDARD DISPOSAL
1.3.26	Loans and grants managed by the school	Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
1.3.27	Student Grant applications	Current year + 3 years	SECURE DISPOSAL
1.3.28	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
1.3.29	Invoices, receipts, order books and requisitions, delivery notices	Current financial year + 6 years	SECURE DISPOSAL
1.3.30	Records relating to the collection and banking of monies	Current financial year + 6 years	SECURE DISPOSAL
1.3.31	Records relating to the identification and collection of debt	Current financial year + 6 years	SECURE DISPOSAL
Contract Management			

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1.3.32	All records relating to the management of contracts under seal	Last payment on the contract + 12 years	SECURE DISPOSAL
1.3.33	All records relating to the management of contracts under signature	Last payment on the contract + 6 years	SECURE DISPOSAL
1.3.34	Records relating to the monitoring of contracts	Current year + 2 years	SECURE DISPOSAL
Asset Management			
1.3.35	Inventories of furniture and equipment	Current year + 6 years	SECURE DISPOSAL
1.3.36	Burglary, theft and vandalism report forms	Current year + 6 years	SECURE DISPOSAL
1.3.37	Records relating to the leasing of shared facilities, such as sports centres	Current year + 6 years	SECURE DISPOSAL
1.3.38	Land and building valuations	Date valuation superseded + 6 years	SECURE DISPOSAL
1.3.39	Disposal of assets	Date asset disposed of + 6 years	SECURE DISPOSAL
1.3.40	Community School leases for land	Date lease expires + 6 years	SECURE DISPOSAL
1.3.41	Commercial transfer arrangements	Date of transfer + 6 years	SECURE DISPOSAL
1.3.42	Transfer of land to the Academy Trust	Life of land ownership then transfer to new owner	SECURE DISPOSAL
1.3.43	Transfers of freehold land	Life of land ownership then transfer to new owner	SECURE DISPOSAL
School Fund			
1.3.44	School Fund – Cheque books, Paying in books, Ledger, Invoices, Receipts, Bank statements, Journey books	Current year + 6 years	SECURE DISPOSAL
School Meals			
1.3.45	Free school meals registers	Current year + 6 years	SECURE DISPOSAL
1.3.46	School meals registers and summary sheets	Current year + 3 years	SECURE DISPOSAL

1.4	Policies, Frameworks and Overarching Requirements		
	Basic file description	Retention Period	Action at end of administrative life of the record
1.4.1	Data Protection and related Policies	Date policy superseded + 6 years	SECURE DISPOSAL
1.4.2	Freedom of Information Policy	Date policy superseded + 6 years	SECURE DISPOSAL
1.4.3	Special Educational Needs Policy	Date policy superseded + 6 years	SECURE DISPOSAL

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1.4.4	Complaints Policy	Date policy superseded + 6 years	SECURE DISPOSAL
1.4.5	Risk and Control Framework	Life of framework + 6 years	SECURE DISPOSAL
1.4.6	Rules and Bylaws	Date rules or bylaws superseded + 6 years	SECURE DISPOSAL
1.4.7	Home School Agreements	Date agreement revised + 6 years	SECURE DISPOSAL
1.4.8	Equality Information and Objectives (public sector equality duty) Statement for publication	Date of statement + 6 years	SECURE DISPOSAL
1.4.9	Health and Safety Policy	Date policy superseded + 3 years	SECURE DISPOSAL
1.4.10	Admissions Policy and all records relating to the creation and implementation	Date policy superseded + 3 years	SECURE DISPOSAL
1.4.11	All other policies	Destroy when policy superseded	SECURE DISPOSAL

2. Human Resources

2.1	Recruitment		
	Basic file description	Retention Period	Action at end of administrative life of the record
2.1.1	All records leading up to the appointment of a new Head Teacher	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	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	All relevant information should be added to the Staff Personal File and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks	It isn't usual practice to keep a copy of the DBS certificate. However, it is sometimes kept for a period of time. A copy of the DBS certificate should only be kept in the following circumstances: - If there is a formal risk assessment in place. DBS is kept for the duration of the risk assessment or until such time that the convictions would be filtered by DBS (whichever is sooner). - If we are waiting for a new starter's DBS to arrive, we may keep a copy of a DBS from a previous employer (if one has been provided), until the new DBS has been received.	SECURE DISPOSAL
2.1.5	Proof of identity collected as part of the process of checking enhanced DBS disclosure	Checked, and a note kept of what was seen. Copy documents should be added to the Staff Personal File	SECURE DISPOSAL

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2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.7	Records relating to the employment of overseas teachers	Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.8	Records relating to the TUPE process	Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

2.2	Operational Staff Management		
	Basic file description	Retention Period	Action at end of administrative life of the record
2.2.1	Staff Personal File, including employment contract and staff training records	Termination of employment + 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal/assessment records	Current year + 5 years	SECURE DISPOSAL
2.2.4	Records relating to the agreement of pay and conditions	Date pay and conditions superseded + 6 years	SECURE DISPOSAL
2.2.5	Training needs analysis	Current year + 1 year	SECURE DISPOSAL

2.3	Management of Disciplinary and Grievance Processes		
In line with recommendations from ACAS Code of Practice, the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. While the warning may not remain active and the final outcome documents removed from the personal file, a record of what has occurred will be retained by the Trust.			
	Basic file description	Retention Period	Action at end of administrative life of the record
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded	Until the person’s normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW Note: allegations that are found to be malicious should be removed from personnel files.	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings: a. Oral warning b. Written warning – level 1 c. Written warning – level 2 d. Final warning	a. Date of warning + 6 months b. Date of warning + 6 months c. Date of warning + 12 months d. Date of warning + 18 months	SECURE DISPOSAL

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	e. Case not found	e. If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	
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3. Management of Schools

3.1	Admissions		
	Basic file description	Retention Period	Action at end of administrative life of the record
3.1.1	Admissions – if the admission is successful	Date of admission + 1 year	SECURE DISPOSAL
3.1.2	Admissions – if the appeal is unsuccessful	Resolution of case + 1 year	SECURE DISPOSAL
3.1.3	Register of admissions	Every entry in the admission register must be preserved for a period of 6 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
3.1.4	Proofs of address supplied by parents as part of the admissions process	Current year + 1 year	SECURE DISPOSAL
3.1.5	Supplementary information form, including additional information such as religion and medical conditions: a. For successful admissions b. For unsuccessful admissions	a. This information should be added to the pupil file b. Until appeals process completed	SECURE DISPOSAL

3.2	Central Team and Senior Leaders		
	Basic file description	Retention Period	Action at end of administrative life of the record
3.2.1	Log books of activity in the school maintained by the Head Teacher	Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the County Archives Service, if appropriate
3.2.2	Minutes of Exec/Senior Management Team meetings and meetings of other internal administrative bodies	Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL
3.2.3	Reports created by the CEO / Head Teacher or the Management Team	Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL
3.2.4	Records created by CEO, Senior Leaders, 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

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3.2.5	Correspondence created by CEO, 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
3.2.6	Professional Development Plans	Life of the plan + 6 years	SECURE DISPOSAL

3.3	Operational Administration		
	Basic file description	Retention Period	Action at end of administrative life of the record
3.3.1	Management of complaints	- Stage 1 and 2 complaints: Date complaint resolved + 3 years - Stage 3 complaint: Date complaint resolved + 6 years	SECURE DISPOSAL
3.3.2	Records relating to the management of contracts with external providers	Date of last payment on contract + 6 years	SECURE DISPOSAL
3.3.3	Records relating to the management of software licences	Date licence expires + 6 years	SECURE DISPOSAL
3.3.4	Records relating to the creation and publication of the school brochure or prospectus	Current year + 3 years	STANDARD DISPOSAL
3.3.5	Records relating to the creation and distribution of circulars to staff, parents or pupils	Current year + 1 year	STANDARD DISPOSAL
3.3.6	Newsletters and other items with a short operational use	Current year + 1 year	STANDARD DISPOSAL
3.3.7	Visitors' books and signing in sheets	Current year + 6 years then REVIEW	SECURE DISPOSAL
3.3.8	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	Current year + 6 years then REVIEW	SECURE DISPOSAL

4. Property Management

This section covers the management of buildings and property.

4.1	Property Management		
	Basic file description	Retention Period	Action at end of administrative life of the record
4.1.1	Title deeds of properties belonging to the school	These should follow the property, unless the property has been registered with the Land Registry	
4.1.2	Plans of property belonging to the school	These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold	

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4.1.3	Leases of property leased by or to the school	Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	Current financial year + 6 years	SECURE DISPOSAL
4.1.5	Business continuity and disaster recovery plans	Date the plan superseded + 3 years	SECURE DISPOSAL

4.2	Maintenance		
	Basic file description	Retention Period	Action at end of administrative life of the record
4.2.1	All records relating to the maintenance of the school carried out by contractors	Current year + 6 years	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school employees, including maintenance log books	Current year + 6 years	SECURE DISPOSAL

4.3	Fleet Management		
	Basic file description	Retention Period	Action at end of administrative life of the record
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.2	The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, maintenance	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.3	Service logs and vehicle logs	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	Date of journey + 6 years	SECURE DISPOSAL

5. Health and Safety

5.1	Health and Safety		
	Basic file description	Retention Period	Action at end of administrative life of the record
5.1.1	Health and Safety risk assessments	Life of risk assessment + 3 years	SECURE DISPOSAL
5.1.2	Records relating to accident/injury at work	Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL

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5.1.3	Accident reporting	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	
	Adults	Date of incident + 6 years	SECURE DISPOSAL
	Children	Date of birth of the child + 25 years	SECURE DISPOSAL
5.1.4	Control of Substances Hazardous to Health (COSHH)	Current year + 10 years then REVIEW	SECURE DISPOSAL
5.1.5	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	Last action + 40 years	SECURE DISPOSAL
5.1.6	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	Last action + 50 years	SECURE DISPOSAL
5.1.7	Fire precautions log books	Current year + 6 years	SECURE DISPOSAL
5.1.8	Fire risk assessments	Life of the risk assessment + 6 years	SECURE DISPOSAL
5.1.9	Incident reports	Current year + 20 years	SECURE DISPOSAL

6. Pupil Management

This section includes all records which are created during the time a pupil spends at the school. For information about accident reporting, see Health and Safety (section 5).

6.1	Pupil's Educational Record		
	Basic file description	Retention Period	Action at end of administrative life of the record
6.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005		FOR ALL SCHOOLS If the pupil dies whilst at school, the file should be returned to the LA to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period. However, if the LA does not agree to holding the file, the school should retain the file as below: Date of birth of the pupil + 25 years
	Primary	Retain whilst the child remains at the primary school. The pupil's data should remain on the MIS for 2 terms after the pupil leaves.	The file should follow the pupil when they leave the primary school. This will include: - To another primary school - To a secondary school - To a pupil referral unit

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	Secondary	Date of birth of the pupil + 25 years	The file should follow the pupil if they leave the secondary school. This will include: - To another secondary school - To a pupil referral unit - To Post 16 provision Otherwise, SECURE DISPOSAL
6.1.2	Records relating to the management of exclusions	Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
6.1.3	Management of examination registrations	The examination board will usually mandate how long these records need to be retained	
6.1.4	Examination results – pupil copies		
	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	

6.2	Safeguarding	Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule (section 2.3).	
	Basic file description	Retention Period	Action at end of administrative life of the record
6.2.1	Safeguarding records where a child is not looked after and does not transfer to another school	Where concerns were at a low level / threshold for referral to social care not met / no inter-agency involvement - date of birth + 25 years. Where a file relates to child sexual abuse - date of birth + 75 years.	SECURE DISPOSAL – these records MUST be shredded
6.2.2	Safeguarding records where a child who is not looked after moves to another school, or where a child is under 18 and leaves to attend college	Chronology of events should be retained as above. Where the new school has CPOMS no action required, other than to retain a chronology, as the new school can access records once the child is on roll. Where the new school does not have CPOMS, or where we hold other safeguarding records, these should be hand delivered to the DSL of the new school. If it is necessary to post the file, this should be by recorded delivery and a copy of the entire file should be kept until the new setting confirms safe receipt.	SECURE DISPOSAL – these records MUST be shredded SECURE TRANSFER SECURE TRANSFER
6.2.3	Safeguarding records for a child who is looked after or previously looked after	Date of birth + 75 years	SECURE DISPOSAL – these records MUST be shredded

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6.3	Attendance		
	Basic file description	Retention Period	Action at end of administrative life of the record
6.3.1	Attendance registers	Every entry in the attendance register must be preserved for a period of 6 years after the date on which the entry was made	SECURE DISPOSAL
6.3.2	Correspondence relating to authorised absence	Current academic year + 2 years	SECURE DISPOSAL

6.4	Special Educational Needs		
	Basic file description	Retention Period	Action at end of administrative life of the record
6.4.1	Special Educational Needs files, reviews and Individual Education Plans	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.
6.4.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement. Advice and information provided to parents regarding educational needs. Accessibility strategy	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

7. Curriculum Management

7.1	Statistics and Management Information		
	Basic file description	Retention Period	Action at end of administrative life of the record
7.1.1	Curriculum returns	Current year + 3 years	SECURE DISPOSAL
7.1.2	Examination results (schools copy)	Current year + 6 years	SECURE DISPOSAL
	SATs records –		
	Results	The SATs results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL
	Examination papers	The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL

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7.1.3	Published Admission Number (PAN) reports	Current year + 6 years	SECURE DISPOSAL
7.1.4	Value added and contextual data	Current year + 6 years	SECURE DISPOSAL
7.1.5	Self-evaluation forms	Current year + 6 years	SECURE DISPOSAL

7.2	Implementation of Curriculum		
	Basic file description	Retention Period	Action at end of administrative life of the record
7.2.1	Schemes of work	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
7.2.2	Timetable	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
7.2.3	Class record books	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
7.2.4	Mark books	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
7.2.5	Record of homework set	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
7.2.6	Pupils' work	Where possible, work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	SECURE DISPOSAL

8. Extracurricular Activities

8.1	Educational Visits outside the Classroom		
	Basic file description	Retention Period	Action at end of administrative life of the record
8.1.1	Records created by schools in order to obtain approval to run an educational visit outside the classroom: Primary schools Secondary schools	Date of visit + 14 years Date of visit + 10 years	SECURE DISPOSAL
8.1.2	Parental consent forms for school trips where there has been no major incident	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 schools do not have the storage capacity to retain

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			every single consent form issued by the school for this period of time
8.1.3	Parental permission slips for school trips – where there has been a major incident	Date of birth of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	
8.1.4	Records relating to residential trips	Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL

8.2	Walking Bus		
	Basic file description	Retention Period	Action at end of administrative life of the record
8.2.1	Walking bus registers	Date of register + 3 years. This takes into account the fact that, if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL

9. Data Processing

This section covers records created for the purpose of processing data.

9.1	Records of Subject Access Requests, Freedom of Information Requests and Data Breach		
	Basic file description	Retention Period	Action at end of administrative life of the record
9.1.1	Data retrieved as part of a subject access request or freedom of information request	A skeleton log will be kept of all information requests. Date of entry + 5 years. A copy of any outcome letter will be placed on the relevant staff or student file. The data retrieved as part of the request will be kept in a secure folder for 2 years following the date of the outcome letter.	n/a Follow retention rules for staff or student files. Review and then SECURE DISPOSAL
9.1.2	Record of breaches and any data collected as part of an investigation	A skeleton log will be kept of all breaches. Any notes, correspondence or data collated as a result of the investigation will be held for 2 years following the date the breach was realised.	n/a Review then SECURE DISPOSAL

9.2	Data Processing Agreements		
	Basic file description	Retention Period	Action at end of administrative life of the record
9.2.1	Data Processing Agreements, Data Sharing Agreements	Last payment on contract/date processing or sharing terminated (whichever is later) + 6 years	SECURE DISPOSAL

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9.2.2	Data Protection Impact Assessments	Life of the DPIA + 6 years	SECURE DISPOSAL
9.2.3	Biometric Data (e.g. fingerprints)	To be destroyed once the data subject has left the school or when consent has been withdrawn	SECURE DISPOSAL
9.2.4	Photography	The date the data subject has left the school + 3 years (unless the photograph is deemed worthy of permanent preservation due to their historical or social value (i.e. a significant event in the life of the school; class or yearbook photographs)	SECURE DISPOSAL

10. Central Government and Local Authority (LA)

10.1	Local Authority		
	Basic file description	Retention Period	Action at end of administrative life of the record
10.1.1	Secondary transfer sheets (Primary)	Current year + 2 years	SECURE DISPOSAL
10.1.2	Attendance returns	Current year + 1 year	SECURE DISPOSAL
10.1.3	School census returns	Current year + 5 years	SECURE DISPOSAL

10.2	Central Government		
	Basic file description	Retention Period	Action at end of administrative life of the record
10.2.1	OFSTED reports and papers	Life of the report then REVIEW	SECURE DISPOSAL
10.2.2	Returns made to central government	Current year + 6 years	SECURE DISPOSAL
10.2.3	Circulars and other information sent from central government	Operational use	SECURE DISPOSAL

11. Email

The Trust has applied a 16-month rolling auto-retention period to our email system. This means that any email older than 16 months will be deleted from staff accounts. Where the email has content that forms part of a record, information must be transferred to the appropriate record (e.g. HR file, pupil file, relevant Management Information System etc. as soon as possible).

11.1	Email Retention		
	Basic file description	Retention Period	Action at end of administrative life of the record
11.1.1	Emails	Rolling auto-retention period of 16 months, after which emails will be deleted from staff email accounts.	SECURE DISPOSAL