

Attenborough Learning Trust

Data Retention Policy

Version: v0.1

Confidential

Version History

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Table of contents

1	Records Retention Policy _____	4
1.1	INTRODUCTION _____	4
1.2	SCOPE OF THE POLICY _____	4
1.3	RESPONSIBILITIES _____	4
1.4	RELATIONSHIPS WITH EXISTING POLICIES _____	4
1.5	MONITORING AND REVIEW _____	5
1.6	MANAGEMENT OF THE SCHOOL _____	6

1 Records Retention Policy

1.1 Introduction

The Trust recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the school. Records provide evidence for protecting the legal right and interests of the schools, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited. It covers:

- Scope
- Responsibilities
- Relationship with existing policies

1.2 Scope of the Policy

- This policy applies to all records created, received or maintained by staff of the Trust in the course of carrying out its functions.
- Records are defined as all those documents which facilitate the business carried out by the Trust and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.
- A small percentage of the Trust's records may be selected for permanent preservation as part of the institutions archives and for historical research. This should be done in liaison with the Leicester City Council's archives service.

1.3 Responsibilities

- The Trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with the overall responsibility is the Chief Executive Officer.
- This retention policy has been adapted from the Information Management Toolkit for Schools (IRMS) as comprehensive guidance for the retention of records. The Trust will also follow the best practice guidance contained within the toolkit.
- Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of securely and safely.

1.4 Relationships with existing policies

This policy has been drawn up within the context of:

- Information Management Toolkit for Schools (IRMS)

- Freedom of Information Publication Scheme
- Data Protection Policy
- E-safety Policy (covering unacceptable ICT use)
- And with other legislation or regulations (including audit, equal opportunities and ethics) affecting the Trust

1.5 Monitoring and Review

The day to day monitoring of this policy is the responsibility of the Headteachers of each school. This policy will be reviewed every three years or earlier if considered necessary.

1.6 Management of the Schools

This section contains retention periods connected to the general management of the schools within the Trust. This covers the work of the Trust, Local Governing Body, the Head Teacher and the Senior Leadership Team, the admissions process and operational administration.

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
1.1 Governing Body					
1.1.1	Agendas for Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with master set of minutes. All other copies can be disposed of.	SECURE DISPOSAL
1.1.2	Minutes of Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)			PERMANENT	If the school is unable to store these then they should be offered to the County Archives Service.
	Inspection Copies			Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded.
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the meeting is dealing 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 the signed set of minutes.
1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
1.1.5	Instruments of Government including Articles of Association	No		PERMANENT	These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
1.1.6	Trusts and Endowments managed by the Governing Body	No		PERMANENT	These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.
1.1.7	Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years	SECURE DISPOSAL
1.1.8	Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years	SECURE DISPOSAL
1.1.9	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL
1.1.11	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date proposal accepted or declined + 3 years	SECURE DISPOSAL
1.2 Head Teacher and Senior Leadership Team					
1.2.1	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		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.
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refer to individual pupils or members of staff		Date of the meeting + a minimum of 3 years then review	SECURE DISPOSAL
1.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to		Date of the report + a minimum of 3 years then review	SECURE DISPOSAL

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
		individual pupils or members of staff			
1.2.4	Records created by Head Teacher, 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		Current academic year + 6 years then review	SECURE DISPOSAL
1.2.5	Correspondence created by Head Teacher, 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		Date of correspondence + 3 years then review	SECURE DISPOSAL
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
1.2.7	School Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL
1.3 Admissions Process					
1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No	School Admissions Code, Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	Life of the policy + 3 years then review	SECURE DISPOSAL
1.3.2	Admissions – if the appeal is successful	Yes	School Admissions Code, Statutory guidance for admission authorities, governing bodies, local authorities, schools	Date of admission + 1 year	SECURE DISPOSAL
1.3.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code, Statutory guidance for admission authorities, governing bodies, local authorities, schools	Resolution of case + 1 year	SECURE DISPOSAL

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
1.3.4	Register of Admissions	Yes	School attendance; departmental advice for maintained schools, academies, independent schools and local authorities	Every entry in the admission register must be preserved for a period three years after the date on which the entry was made.	REVIEW Schools may wish to consider keeping the admissions register permanently as often schools receive enquiries from past pupils to confirm the dates they attended school.
1.3.5	Proofs of address supplied by parents as part of the admissions process (proofs taken by LA)	Yes	School Admissions Code, Statutory guidance for admission authorities, governing bodies, local authorities, schools	Current year + 1 year	SECURE DISPOSAL
1.3.6	Supplementary information form including additional information such as religion, medical conditions etc.	Yes			
1.3.7	For successful admissions			This information should be added to the pupil file	SECURE DISPOSAL
1.3.8	For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL
1.4 Operational Administration					
1.4.1	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
1.4.2	Records relating to the creation and distribution of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
1.4.4	Newsletters and other items with a short operational use	No		Current year +1 year	STANDARD DISPOSAL
1.4.5	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
1.4.6	Records relating to the creation and management of	No		Current year + 6 years then REVIEW	SECURE DISPOSAL

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
	Parent Teacher Associations and/ or Old Pupils Associations				
2. Human Resources					
2.1 Recruitment					
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes		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		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		All the relevant information should be added to the staff personnel file and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS checks	No	DBS Update Service, Keeping Children Safe in Education	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months.	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process checking “portable” enhanced DBS disclosure	Yes		Where possible these should be checked and note kept of what was seen and checked. If it is felt necessary to keep copy documentation then this should be placed on member of staff’s personnel file.	
2.1.6	Pre-employment vetting information – evidence proving the right to work in the United Kingdom	Yes	An employer’s guide to right to work checks	Date of termination + 6 years	SECURE DISPOSAL
2.2 Operational Staff Management					
2.2.1	Staff Personnel File	Yes	Limitation Act 198 (S2)	Termination of Employment + 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
2.2.3	Annual appraisal/assessment records	Yes		Current year + 2 years	SECURE DISPOSAL
2.2.4	Volunteer records	Yes		Current year + 2 years	SECURE DISPOSAL
2.2.5	Work experience & teaching student records	Yes		Current year + 2 years	SECURE DISPOSAL
2.3 Management of Disciplinary and Grievance Process					
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	Keeping children safe in education guidance	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note that allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on file a copy a provided to the person concerned.	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	Oral warning			Date of warning + 6 months (remaining live) and then retained on file	SECURE DISPOSAL After the active period, the warning will remain permanently on the personnel file but will be disregarded in deciding the outcome of future disciplinary proceedings save for exceptional circumstances where the law permits from time to time.
	Written warning – level 1			Date of warning + 6 months (remaining live) and then retained on file	
	Written warning – level 2			Date of warning + 12 months (remaining live) and then retained on file	
	Final Warning			Date of warning + 18 months (remaining live) and then retained on file	
	Case not found			If the incident is child protection related then see above otherwise dispose of at conclusion of the case	
2.4 Health and Safety					
2.4.1	Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL

Data Retention Policy
v0.1

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
2.4.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/ injury at work	Yes		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	Social Security (Claims and Payments) Regulations 1979 Regulation 25, Social Security Administration Act 1992 S8, Limitation Act 1980		
	Adults			Date of incident + 6 years	SECURE DISPOSAL
	Children			DOB of the child + 25 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	COSHH Regulations 2002. SI 2002 No 2677 Regulation 11.	Current year + 40 years	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire Precautions log books	No		Current year + 6 years	SECURE DISPOSAL
2.5 Payroll and Pensions					
2.5.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SECURE DISPOSAL
3. Financial Management of the School					
3.1 Risk Management and Insurance					
3.1.1	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
3.2 Asset Management					
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL
3.3 Accounts and Statements including Budget Management					
3.3.1	Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
3.3.2	Loan and grants managed by the School	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
3.3.3	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.6	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.7	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL
3.4 Contract Management					

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
3.4.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
3.4.3	All records relating to the management of contracts	No		Current year + 2 years	SECURE DISPOSAL
3.5 School Fund					
3.5.1	School Fund – Cheque books	No		Current year + 6 years	SECURE DISPOSAL
3.5.2	School Fund – Paying in books	No		Current year + 6 years	SECURE DISPOSAL
3.5.3	School Fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
3.5.4	School Fund - Invoices	No		Current year + 6 years	SECURE DISPOSAL
3.5.5	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
3.5.6	School Fund – Bank Statements	No		Current year + 6 years	SECURE DISPOSAL
3.5.7	School Fund – Journey Books	No		Current year + 6 years	SECURE DISPOSAL
3.6 School Meals Management					
3.6.1	Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.6.2	School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
3.6.3	School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL
1. Property Management					
4.1 Property Management					
4.1.1	Title deeds of properties belonging to the school	No		PERMANENT 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		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	

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.2 Maintenance					
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		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		Current year + 6 years	SECURE DISPOSAL
2. Pupil Management					
5.1 Pupil's Educational Record					
5.1.1	Pupil's Educational Record required by the Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	Primary			Retain whilst the child remains at the school	The file should follow the pupil when she/ he leaves the school. This will include to another primary school, to a pupil referral unit, if the pupil dies whilst at the school the file should be returned to the Local Authority to be retained for the statutory retention period. If the pupil transfer to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
					be retained for the statutory retention period.
	Secondary		Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2.	Child Protection information held on pupil file	Yes	Keeping children safe in education guidance	If any records relating to child protection issues are place 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
5.1.3	Child Protection information held in separate files	Yes	Keep children safe in education guidance	DOB of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understand that the principal copy of this information will be found on the Local Authority Social Services record.	SECURE DISPOSAL – these records MUST be shredded
5.2 Attendance					
5.2.1	Attendance Registers	Yes	School attendance; departmental advice for maintained schools, academies, independent schools and local authorities	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		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL
5.3 Special Educational Needs					
5.3.1	Special Educational Needs files, review and EHCP's.	Yes	Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	REVIEW
5.3.2	EHCP maintained under section 234 of the Education Act 1990 and any amendments made to EHCP	Yes	Education Act 1996 Special Educational Needs and Disability Act	Date of birth of pupil + 25 years	SECURE DISPOSAL unless the document is subject a legal hold

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act	Date of birth of pupil + 25 years	SECURE DISPOSAL unless the document is subject a legal hold
5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act	Date of birth of pupil + 25 years	SECURE DISPOSAL unless the document is subject a legal hold
3. Curriculum Management					
6.1 Statistics and Management Information					
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	SATS records	Yes		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 the current year + 6 years to allow suitable comparison.	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL
6.2 Implementation of Curriculum					
6.2.1	Schemes of Work	No		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		Current year + 1 year	
6.2.3	Class Record Books	No		Current year + 1 year	
6.2.4	Mark Books	No		Current year + 1 year	
6.2.5	Record of Homework Set	No		Current year + 1 year	
6.2.6	Pupil's Work	No		Where possible this should be returned to the pupil at the end of the academic year.	

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
4. Extra-Curricular Activities					
7.1 Educational Visits outside the Classroom					
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom	No	Outdoor Education Advisers' Panel National Guidance website	Date of visit + 14 years	SECURE DISPOSAL
7.1.3	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	SECURE DISPOSAL
7.1.4	Parental consent forms for schools – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years. Consent forms for all pupils on the trip need to be retained to show that the rules had been followed for all pupils.	SECURE DISPOSAL
7.2 Walking Bus					
7.2.1	Walking Bus Registers	Yes		Date of register + 3 years	SECURE DISPOSAL
7.3 Family Liaison Officers and Home School Liaison Assistants					
7.3.1	Day Books	Yes		Current year + 2 years then review	SECURE DISPOSAL
7.3.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency	Yes		Whilst the child is attending school and then destroy	SECURE DISPOSAL
7.3.3	Referral forms	Yes		While the referral is current	SECURE DISPOSAL
7.3.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
7.3.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
7.3.6	Group Registers	Yes		Current year + 2 years	SECURE DISPOSAL
5. Central Government and Local Authority					
8.1 Local Authority					
8.1.1	Attendance Returns	Yes		Current year + 2 years	SECURE DISPOSAL
8.1.2	School Census Returns	No		Current year + 5 years	SECURE DISPOSAL

	Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
8.1.3	Circulars and other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL
8.2 Central Government					
8.2.1	OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
8.2.2	Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL
8.2.3	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL