



**Policy and Procedure:**

**Data Retention Policy and Schedule**

Version:

v 2.0

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Approved by:

Audit Committee

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## **1. Purpose, Scope and Users**

This policy sets the required retention periods for specified categories of personal data and sets out the minimum standards to be applied when destroying certain information within Eastern Multi-Academy Trust (“The Trust”)

This Policy applies to all business units, processes and systems in all countries in which The Trust conducts business and has dealings or other business relationships with third parties.

This Policy applies to all Company officers, directors, employees, agents, affiliates, contractors, consultants, advisors or service providers that may collect, process, or have access to data (including personal data and / or sensitive personal data). It is the responsibility of all of the above to familiarise themselves with this Policy and ensure adequate compliance with it.

This policy applies to all information used at The Trust. Examples of documents include:

- Emails
- Hard copy documents
- Soft copy documents
- Video and audio
- Data generated by physical access control systems

## **2. Reference Documents**

- EU GDPR 2016/679 (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC)
- General Personal Data Protection Policy

## **3. Retention Rules**

### **3.1. Retention General Principle**

In the event, for any category of document not specifically defined elsewhere in this policy and unless otherwise mandated differently by applicable law, the required retention period for such document will be deemed to be three years from the date of creation of the document.

### **3.2. Retention General Schedule**

Data Protection Officer defines the time period for which the documents and electronic records should to be retained through the Data Retention Schedule.

As an exemption, retention periods within Data Retention Schedule can be prolonged in cases such as:

- Ongoing investigations from authorities, if there is a chance records of personal data are needed by The Trust to prove compliance with any legal requirements; or
- When exercising legal rights in cases of lawsuits or similar court proceeding recognized under local law.

### **3.3. Safeguarding of Data during Retention Period**

The possibility that data media used for archiving will wear out shall be considered. If electronic storage media are chosen, any procedures and systems ensuring that the information can be accessed during the retention period (both with respect to the information carrier and the readability of formats) shall also be stored in order to safeguard the information against loss as a result of future technological changes. The responsibility for the storage falls to Deputy Chief Executive.

### **3.4. Destruction of Data**

The Trust and its employees will therefore, on a regular basis, review all data, whether held electronically on their device or on paper, to decide whether to destroy or delete any data once the purpose for which those documents were created is no longer relevant. See Appendix for the retention schedule. Overall responsibility for the destruction of data falls to the Deputy Chief Executive.

Once the decision is made to dispose according to the Retention Schedule, the data should be deleted, shredded or otherwise destroyed to a degree equivalent to their value to others and their level of confidentiality. The method of disposal varies and is dependent upon the nature of the document. For example, any documents that contain sensitive or confidential information (and particularly sensitive personal data) must be disposed of as confidential waste and be subject to secure electronic deletion; some expired or superseded contracts may only warrant in-house shredding. The Document Disposal Schedule section below defines the mode of disposal.

In this context, the employee shall perform the tasks and assume the responsibilities relevant for the information destruction in an appropriate way. The specific deletion or destruction process may be carried out either by an employee or by an internal or external service provider that the Deputy Chief Executive subcontracts for this purpose. Any applicable general provisions under relevant data protection laws and The Trust's General Personal Data Protection Policy shall be complied with.

Appropriate controls shall be in place that prevent the permanent loss of essential information of The Trust as a result of malicious or unintentional destruction of information.

The destruction process shall be fully documented and approved. The applicable statutory requirements for the destruction of information, particularly requirements under applicable data protection laws, shall be fully observed.

### **3.5. Breach, Enforcement and Compliance**

The person appointed with responsibility for Data Protection (DPO) has the responsibility to ensure that each of The Trust's offices complies with this Policy. It is also the responsibility of the DPO to assist any local office with enquiries from any local data protection or governmental authority.

Any suspicion of a breach of this Policy must be reported immediately to the DPO. All instances of suspected breaches of the Policy shall be investigated and action taken as appropriate.

Failure to comply with this Policy may result in adverse consequences, including, but not limited to, loss of customer confidence, litigation and loss of competitive advantage, financial loss and damage to The Trust's reputation, personal injury, harm or loss. Non-compliance with this policy by permanent, temporary or contract employees, or any third parties, who have been granted access to Trust premises or information, may therefore result in disciplinary proceedings or termination of their employment or contract. Such non-compliance may also lead to legal action against the parties involved in such activities.

## **4. Document Disposal**

### **4.1. Routine Disposal Schedule**

Records which may be routinely destroyed unless subject to an on-going legal or regulatory inquiry are as follows:

- Announcements and notices of day-to-day meetings and other events including acceptances and apologies;
- Requests for ordinary information such as travel directions;
- Reservations for internal meetings without charges / external costs;
- Transmission documents such as letters, fax cover sheets, e-mail messages, routing slips, compliments slips and similar items that accompany documents but do not add any value;
- Message slips;
- Superseded address list, distribution lists etc.;
- Duplicate documents such as CC and FYI copies, unaltered drafts, snapshot printouts or extracts from databases and day files;
- Stock in-house publications which are obsolete or superseded; and
- Trade magazines, vendor catalogues, flyers and newsletters from vendors or other external organizations.

In all cases, disposal is subject to any disclosure requirements which may exist in the context of litigation.

## **4.2. Destruction Method**

Level I documents are those that contain information that is of the highest security and confidentiality and those that include any personal data. These documents shall be disposed of as confidential waste (cross-cut shredded and incinerated) and shall be subject to secure electronic deletion. Disposal of the documents should include proof of destruction.

Level II documents are proprietary documents that contain confidential information such as parties' names, signatures and addresses, or which could be used by third parties to commit fraud, but which do not contain any personal data. The documents should be cross-cut shredded and then placed into locked rubbish bins for collection by an approved disposal firm, and electronic documents will be subject to secure electronic deletion.

Level III documents are those that do not contain any confidential information or personal data and are published Company documents. These should be strip-shredded or disposed of through a recycling company and include, among other things, advertisements, catalogues, flyers, and newsletters. These may be disposed of without an audit trail.

## Data Retention Schedule

### 1. General 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 Principal and the senior management team, the admissions process and operational administration.*

<b>1.1 Trust Board and Academy Councils (collectively the Governing Body)</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (✓)</b>
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 the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL <sup>1</sup>	
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 Academy is unable to store these then they should be offered to the County Archives Service	
	Inspection Copies <sup>2</sup>		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 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 the signed set of the minutes	
1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL	

<sup>1</sup> In this context SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the Academy has the facility, shredding using a cross cut shredder.

<sup>2</sup> These are the copies which the clerk to the Governor may wish to retain so that requestors can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

<b>1.1 Governing Body (continued...)</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (v)</b>
1.1.5	Instruments of Government including Articles of Association	No	PERMANENT	These should be retained in the Academy whilst the Academy is open and then offered to County Archives Service when the Academy closes.	
1.1.6	Trusts and Endowments managed by the Governing Body	No	PERMANENT	These should be retained in the Academy whilst the Academy is open and then offered to County Archives Service when the Academy 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	
1.1.10	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Date of report + 10 years	SECURE DISPOSAL	
1.1.11	Proposals concerning the change of status of a maintained Academy including Specialist Status Academies and Academies	No	Date proposal accepted or declined + 3 years	SECURE DISPOSAL	

<b>1.2 Head Teacher / Principal and Senior Management Team</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (v)</b>
1.2.1	Log books of activity in the Academy maintained by the Head Teacher	There may be data protection issues if the log book refers to individual Students 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 refers to individual Students or members of staff	Date of the meeting + 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 individual Students or members of staff	Date of the report + a minimum of 3 years then review	SECURE DISPOSAL	
1.2.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual Students or members of staff	Current academic year + 6 years then review	SECURE DISPOSAL	
1.2.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual Students 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	Academy Development Plans	No	Life of the plan + 3 years	SECURE DISPOSAL	

<b>1.3 Admissions Process</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (v)</b>
1.3.1	All records relating to the creation and implementation of the Academy Admissions' Policy	No	Life of the policy + 3 years then review	SECURE DISPOSAL	
1.3.2	Admissions – if the admission is successful	Yes	Date of admission + 1 year	SECURE DISPOSAL	
1.3.3	Admissions – if the appeal is unsuccessful	Yes	Resolution of case + 1 year	SECURE DISPOSAL	
1.3.4	Register of Admissions	Yes	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. <sup>3</sup>	REVIEW Academy may wish to consider keeping the admission register permanently as often Academies receive enquiries from past Students to confirm the dates they attended the Academy.	
1.3.5	Admissions – Secondary Academies – Casual	Yes	Current year + 1 year	SECURE DISPOSAL	
1.3.6	Proofs of address supplied by parents as part of the admissions process	Yes	Current year + 1 year	SECURE DISPOSAL	
1.3.7	Supplementary Information form including additional information such as religion, medical conditions etc	Yes			
	For successful admissions		This information should be added to the Student file	SECURE DISPOSAL	
	For unsuccessful admissions		Until appeals process completed	SECURE DISPOSAL	

<b>1.4 Operational Administration</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (✓)</b>
1.4.1	General file series	No	Current year + 5 years then REVIEW	SECURE DISPOSAL	
1.4.2	Records relating to the creation and publication of the Academy 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 Students	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 Parent Teacher Associations and/or Old Students Associations	No	Current year + 6 years then REVIEW	SECURE DISPOSAL	

## 2. Human Resources

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

<b>2.1 Recruitment</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (✓)</b>
2.1.1	All records leading up to the appointment of a new Principal	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 personal file (see below) and all other information retained for 6 months	SECURE DISPOSAL	
2.1.4	Pre-employment vetting information – DBS Checks	No	The Academy does not have to keep copies of DBS certificates. If the Academy does so the copy must NOT be retained for more than 6 months		
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes	Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file		
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom <sup>4</sup>	Yes	Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years		

<b>2.2 Operational Staff Management</b>					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
2.2.1	Staff Personal File	Yes	Termination of Employment + 6 years	SECURE DISPOSAL	
2.2.2	Timesheets	Yes	Current year + 6 years	SECURE DISPOSAL	
2.2.3	Annual appraisal/ assessment records	Yes	Current year + 5 years	SECURE DISPOSAL	

<b>2.3 Management of Disciplinary and Grievance Processes</b>					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded <sup>5</sup>	Yes	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned	SECURE DISPOSAL These records must be shredded	
2.3.2	Disciplinary Proceedings	Yes			
	oral warning		Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal 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 child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL	

<b>2.4 Health and Safety</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (✓)</b>
2.4.1	Health and Safety Policy Statements	No	Life of policy + 3 years	SECURE DISPOSAL	
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			
	Adults		Date of the 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	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	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	

<b>2.5 Payroll and Pensions</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (✓)</b>
2.5.1	Maternity pay records	Yes	Current year + 3 years	SECURE DISPOSAL	
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 Academy

*This section deals with all aspects of the financial management of the Academy including the administration of Academy meals*

#### 3.1 Risk Management and Insurance

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
3.1.1	Employer's Liability Insurance Certificate	No	Closure of the Academy + 40 years	SECURE DISPOSAL	

#### 3.2 Asset Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
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

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
3.3.1	Annual Accounts	No	Current year + 6 years	STANDARD DISPOSAL	
3.3.2	Loans and grants managed by the Academy	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

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
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3.4.1	All records relating to the management of contracts under seal	No	Last payment on the contract + 12 years	SECURE DISPOSAL	
3.4.2	All records relating to the management of contracts under signature	No	Last payment on the contract + 6 years	SECURE DISPOSAL	
3.4.3	Records relating to the monitoring of contracts	No	Current year + 2 years	SECURE DISPOSAL	

### 3.5 Academy Fund

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.5.1	Academy Fund - Cheque books	No	Current year + 6 years	SECURE DISPOSAL	
3.5.2	Academy Fund - Paying in books	No	Current year + 6 years	SECURE DISPOSAL	
3.5.3	Academy Fund – Ledger	No	Current year + 6 years	SECURE DISPOSAL	
3.5.4	Academy Fund – Invoices	No	Current year + 6 years	SECURE DISPOSAL	
3.5.5	Academy Fund – Receipts	No	Current year + 6 years	SECURE DISPOSAL	
3.5.6	Academy Fund - Bank statements	No	Current year + 6 years	SECURE DISPOSAL	
3.5.7	Academy Fund – Journey Books	No	Current year + 6 years	SECURE DISPOSAL	

### 3.6 Academy Meals

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.6.1	Free Academy Meals Registers	Yes	Current year + 6 years	SECURE DISPOSAL	
3.6.2	Academy Meals Registers	Yes	Current year + 3 years	SECURE DISPOSAL	
3.6.3	Academy Meals Summary Sheets	No	Current year + 3 years	SECURE DISPOSAL	

## 4. Property Management

*This section covers the management of buildings and property.*

<b>4.1 Property Management</b>					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
4.1.1	Title deeds of properties belonging to the Academy	No	PERMANENT  These should follow the property unless the property has been registered with the Land Registry		
4.1.2	Plans of property belong to the Academy	No	These should be retained whilst the building belongs to the Academy and should be passed onto any new owners if the building is leased or sold.		
4.1.3	Leases of property leased by or to the Academy	No	Expiry of lease + 6 years	SECURE DISPOSAL	
4.1.4	Records relating to the letting of Academy premises	No	Current financial year + 6 years	SECURE DISPOSAL	

<b>4.2 Maintenance</b>					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
4.2.1	All records relating to the maintenance of the Academy carried out by contractors	No	Current year + 6 years	SECURE DISPOSAL	
4.2.2	All records relating to the maintenance of the Academy carried out by Academy employees including maintenance logbooks	No	Current year + 6 years	SECURE DISPOSAL	

## 5. Student Management

*This section includes all records which are created during the time a Student spends at the Academy. For information about accident reporting see under Health and Safety above*

<b>5.1 Student's Educational Record</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (v)</b>
5.1.1	Student's Educational Record required by The Education (Student Information) (England) Regulations 2005	Yes			
	Primary		Retain whilst the child remains at the primary Academy	The file should follow the Student when he/she leaves the primary Academy. <sup>3</sup>	
	Secondary		Date of Birth of the Student + 25 years	SECURE DISPOSAL	
5.1.2	Examination Results – Student Copies	Yes			
	Public		This information should be added to the Student file	All uncollected certificates should be returned to the examination board.	
	Internal		This information should be added to the Student file		
5.1.3	Child Protection information held on Student file		If any records relating to child protection issues are placed on the Student file, it should be in a sealed envelope and then retained for the same period of time as the Student file.	SECURE DISPOSAL – these records MUST be shredded	
5.1.4	Child protection information held in separate files		DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	SECURE DISPOSAL – these records MUST be shredded	

<sup>3</sup> This will include: (i) to another primary Academy (ii) to a secondary Academy (iii) to a Student referral unit (iv) If the Student dies whilst at primary Academy the file should be returned to the Local Authority to be retained for the statutory retention period. If the Student transfers to an independent Academy, transfers to home Academying or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Academies do not ordinarily have sufficient storage space to store records for Students who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the Student will request the record from the Local Authority

<b>5.2 Attendance</b>					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.2.1	Attendance Registers	Yes	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL	
5.2.2	Correspondence relating to authorized absence		Current academic year + 2 years	SECURE DISPOSAL	

<b>5.3 Special Educational Needs</b>					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Date of Birth of the Student + 25 years	REVIEW  NOTE: This retention period is the minimum retention period that any Student file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.	
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Date of birth of the Student + 25 years [This would normally be retained on the Student file]	SECURE DISPOSAL unless the document is subject to a legal hold	
			Date of birth of the Student + 25 years [This would normally be retained on the Student file]	SECURE DISPOSAL unless the document is subject to a legal hold	
			Date of birth of the Student + 25 years [This would normally be retained on the Student file]	SECURE DISPOSAL unless the document is subject to a legal hold	

## 6. Curriculum Management

<b>6.1 Statistics and Management Information</b>					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
6.1.1	Curriculum returns	No	Current year + 3 years	SECURE DISPOSAL	
6.1.2	Examination Results (Academy's Copy)	Yes	Current year + 6 years	SECURE DISPOSAL	
	SATS records –	Yes			
	Results		<p>The SATS results should be recorded on the Student's educational file and will therefore be retained until the Student reaches the age of 25 years.</p> <p>The Academy may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison</p>	SECURE DISPOSAL	
	Examination Papers		The examination papers should be kept until any appeals/validation process is complete	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	

<b>6.2 Implementation of Curriculum</b>					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
6.2.1	Schemes of Work	No	Current year + 1 year	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 homework set	No	Current year + 1 year		

6.2.6	Students' Work	No	Where possible Students' work should be returned to the Student at the end of the academic year if this is not the Academy's policy then current year + 1 year	SECURE DISPOSAL	
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## 7. Extra Curriculum Management

7.1 Educational Visits outside the Classroom					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
7.1.1	Records created by Academics to obtain approval to run an Educational Visit outside the Classroom – Primary Academics	No	Date of visit + 14 years	SECURE DISPOSAL	
7.1.2	Records created by Academics to obtain approval to run an Educational Visit outside the Classroom – Secondary Academics	No	Date of visit + 10 years	SECURE DISPOSAL	
7.1.3	Parental consent forms for Academy trips where there has been no major incident	Yes	Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most Academics do not have the storage capacity to retain every single consent form issued by the Academy for this period of time.	
7.1.4	Parental permission slips for Academy trips – where there has been a major incident	Yes	DOB of the Student involved in the incident + 25 years  The permission slips for all the Students on the trip need to be retained to show that the rules had been followed for all Students		

7.2 Walking Bus					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
7.2.1	Walking Bus Registers	Yes	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  [If these records are retained electronically any back up copies should be destroyed at the same time]	

<b>7.3 Family Liaison Officers and Home Academy Liaison Assistants</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (v)</b>
7.3.1	Day Books	Yes	Current year + 2 years then review		
7.3.2	Reports for outside agencies- where the report has been included on the case file created by the outside agency	Yes	Whilst child is attending Academy and then destroy		
7.3.3	Referral forms	Yes	While the referral is current		
7.3.4	Contact data sheets	Yes	Current year then review, if contact is no longer active then destroy		
7.3.5	Contact database entries	Yes	Current year then review, if contact is no longer active then destroy		
7.3.6	Group Registers	Yes	Current year + 2 years		

## 8. Central Government and Local Authority

<b>8.1 Local Authority</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (v)</b>
8.1.1	Secondary Transfer Sheets (Primary)	Yes	Current year + 2 years	SECURE DISPOSAL	
8.1.2	Attendance Returns	Yes	Current year + 1 year	SECURE DISPOSAL	
8.1.3	Academy Census Returns	No	Current year + 5 years	SECURE DISPOSAL	
8.1.4	Circulars and other information sent from the Local Authority	No	Operational use	SECURE DISPOSAL	

<b>8.2 Central Government</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (v)</b>
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	