Thinking Schools Academy Trust

"Transforming Life Chances"

Records Management, Retention and Disposal Policy

This policy was adopted on	June 2025
The policy is to be reviewed on	June 2029

1. **Policy Statement**

1.1. Records Management is the process by which the Trust and Academies manage all aspects of any type of 'record' whether internally or externally generated and in any format or media type, from their creation, throughout their lifecycle and to their eventual disposal.

1.2. This policy should be read and actioned in accordance with all the other School policies dealing with information governance.

2. **Definitions**

2.1. "*The Trust*" means Thinking Schools Academy Trust. This Policy applies to all Academies of The Thinking Schools Academy Trust and all Nurseries and Pre Schools of Little Thinkers Nursery & Pre School, a subsidiary of The Thinking Schools Academy Trust. When 'Academy' is used within this policy it applies to Nursery and Pre School settings. When 'Headteacher/Principal' is used with this policy it applies to Nursery Managers. When 'The Thinking Schools Academy Trust' is used within this policy is applies to Little Thinkers Nursery and Pre School.

2.2. *"Data"* means Personal Data and Special Category Personal Data.

2.3. *"Data Controller"* is the person who or the organisation which determine the purposes for which, and the manner in which, any personal data is processed. They are responsible for establishing practices and policies in line with Data Protection Legislation.

2.4. "*Data Subject*" means all living individuals about whom the Academy holds Data. A Data Subject need not be a UK national or resident. All Data Subjects have legal rights in respect of their Data and the information that the Academy holds about them.

2.5. *"Data Processor*" means any person who or organisation which processes Data on behalf of the Data Controller including contractors, and suppliers and any third party whose work involves accessing or otherwise using Data held by the Academy. Data Processors have a duty to protect the information they process for and on behalf of the Academy by following this and other Academy information governance policies at all times.

2.6. "*Data Protection Legislation*" means the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

2.7. "*Personal Data*" means any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

2.8. "*Processing*" means any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing also includes transferring personal data to third parties.

2.9. "*Special Category Personal Data*" means information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health or condition or sexual life, or genetic or biometric data

2.10. "*Social Media*" means websites and applications that enable users to create and share content or to participate in social networking including Facebook, LinkedIn, Twitter, Google+, and all other social networking sites, internet postings and blogs. It applies to use of Social Media for Academy purposes as well as personal use that may affect the Academy in any way.

2.11. "*Subject Access Request*" ("SAR") means a request by an individual to the Academy pursuant to Article 15 of the GDPR.

3. Relevant Data Protection Principles

3.1. The data protection principles[1] which directly relate to the management, retention and disposal of Personal Data are that the Personal Data must be:

i. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (Article 5(1)(c) of the GDPR)

ii. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (Article 5(1)(d) of the GDPR

iii. be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (Article 5(1)(e) of the GDPR)

iv. be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and

[1] Contained in Schedule 1 to DPA.

against accidental loss, destruction or damage, using appropriate technical or organisational measures (Article 5(1)(f) of the GDPR)

4. **Retention Periods**

4.1 In line with Article 5(1)(e) of the GDPR as set out at 3.1 (iii) above each Academy and the Trust will not retain Data in an identifiable form for any longer than necessary for the purpose for which it was obtained and in determining an appropriate retention period will take into account the following:

i. The current and future value of the Data.

ii. The costs, risks and liabilities associated with retaining the Data in an identifiable form.

iii. The ease or difficulty in ensuring the Data remains accurate and up-to-date. iv.

Any applicable statutory limitation periods.

v. Any relevant guidance documents.

4.2**Default Periods**

i. The default period is the minimum period for which the Academy or Trust will retain Data. At the conclusion of the default period, the Academy or Trust will review the Data being held and determine whether it can be destroyed in accordance with paragraph 6 below.

ii. The standard default period for retaining Data will be as set out in the Records Management Toolkit for Schools produced by the Records Management Society. This can be found in Appendix 2

iii. For Little Thinkers Nursery & Pre School Limited the standard default period for retaining data is set out in Appendix 1

iv. For Thinking Solutions for Education Limited the standard default period for retaining data is set out in Appendix 2

v. The Academy will take into account the matters set out in paragraph 4.3 below in determining whether Data will be retained beyond the default period.

4.3**Exceptions to the Default Period**

i. In the majority of cases Data will be securely disposed of when it reaches the end of the retention period. When assessing whether Data should be retained beyond the retention period the Academy will consider whether:

(a)The Data is subject to a current request pursuant to the GDPR.
(b)The Academy is the subject of, or involved in ongoing legal action to which the Data is or may be relevant.

(c)The Data is or could be needed in connection with an ongoing investigation.

(d)The Data is processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, and the Academy has put in place appropriate technical and organisational measures.

(e)There are changes to the regulatory or statutory framework which require the Data to be retained for a longer period.

(f) The data subject has exercised their right to restrict the processing of the Data in accordance with Article 18 of the GDPR.

(g) The data is linked to a direct debit and would be required as evidence in a Direct Debit chargeback claim

(h) The data is retained by certain academies within the Trust for archiving and historical purposes, in order to maintain institutional records of significance in line with Article 89 of the UK GDPR

5. **Storage of Data**

Data will be stored in accordance with the Information Security Policy in place at the Academy from time to time.

6. **Disposal of Data**

6.1.When Data identified for disposal is destroyed, a register of the Data destroyed will be kept.

6.2.The destruction of Data is an irreversible act and must be clearly documented. All Data identified for disposal will be destroyed under confidential conditions by the Academy.

6.3.The Academy may sub-contract to another organisation its obligations to dispose of Data under confidential conditions.

6.4. Where the Academy sub-contracts its obligation to securely dispose of Data to a subcontractor or other third party, the Academy will satisfy itself of the subcontractor/third party's experience and competence to do so.

6.5. The decision for the destruction and disposal of Data must be made by nominated member of staff.

7. **Manual Records**

Where Data is held in paper or other manual form, the default period for retaining Data has expired and none of the exceptions for retaining Data beyond the default period at set out at paragraph 4.3 (i) (a) to (e) is satisfied, the Academy will ensure the Data is shredded or otherwise confidentially disposed of by the Academy or by a person duly authorised by the Academy to confidentially destroy the Data.

8. **Electronic Records**

8.1 Where Data is held in an electronic format the Academy or Trust will where feasible use its reasonable endeavours to:

i. Put the Data beyond use so that the Data is no longer on a live electronic system and cannot be accessed by a Data Processor.

ii. Permanently delete the Data from the Academy electronic systems when and where this becomes possible. The Academy will only engage Data Processors that are able to provide sufficient guarantees in relation to the secure disposal of Data.

8.2 Where the steps set out at paragraph 8.1 (a) to (d) are complied with, the Academy considers the Data to be 'put beyond use' and this Data will not be used in order to respond to a Subject Access Request.

9. **Monitoring and Review**

This policy will be reviewed by the nominated person responsible for data protection in the Academy every 4years or earlier if required and may be subject to change.

APPENDIX ONE

Little Thinkers Nursery & Pre School Limited Retention Schedule

Children's records	Retention period	Status	Authority
Children's records - including registers, medication record books and accident record books pertaining to the children	A reasonable period of time after children have left the provision - individual providers should determine how long to retain records relating to individual children.	Requirement	Statutory Framework for the Early Years Foundation Stage 2017 (given legal force by Childcare Act 2006)

	Until the child reaches the age of 21 - or until the child reaches the age of 24 for child protection, SEND records and health care plans. Records in relation to safeguarding concerns will also need to be kept in accordance with the Local Safeguarding Children Board's requirements	Recommendation from preschool learning alliance	Limitation Act 1980 Normal limitation rules (which mean that an individual can claim for negligently caused personal injury up to 3 years after, or deliberately caused personal injury up to 6 years after the event) are postponed until a child reaches 18 years of age
Records of any reportable death, injury, disease or dangerous occurrence	3 years after the date the record was made	Requirement	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (as amended)

Personnel records	**Retention period**	**Status**	**Authority**

Application forms and interview notes for unsuccessful candidates	6 months to a year	Recommendation from preschool learning alliance	Chartered Institute of Personnel and Development (CIPD)
Personnel files and training records (including disciplinary records and working time records)	6 years after employment ceases	Recommendation from preschool learning alliance	CIPD
	Records of unfounded allegations of a child protection nature must be kept until the person's normal retirement age or 10 years after the date of the allegation; allegations found to be malicious must be removed from personnel files.	Requirement	Keeping Children Safe in Education, DfE 2018

DBS check information	Original DBS disclosures: a maximum of 6 months Providers must be able to show Ofsted they have kept a record of DBS disclosures and the DBS Code of Practice permits them to retain the following details: the date of issue of the certificate; the name of the subject; the type of certificate requested; the position for which the certificate was requested; the unique reference	Recommendation from preschool learning alliance	Disclosure and Barring Service/Ofsted

	number; details of the recruitment decision taken.		
Pay			

Wage/salary records (including overtime, bonuses and expenses)	6 years	Requirement	Taxes Management Act 1970

Statutory Maternity Pay (SMP) records	3 years after the end of the tax year to which they relate	Requirement	The Statutory Maternity Pay (General) Regulations 1986
Parental leave records	5 years from the birth/adoption of the child or 18 years if the child receives a disability allowance	Recommendation from preschool learning alliance	CIPD
Statutory Sick Pay (SSP) records	6 years after employment ends	Recommendation from preschool learning alliance	CIPD
Income tax and National Insurance returns/records	At least 3 years after the end of the tax year to which they relate	Requirement	The Income Tax (Employments) Regulations 1993 (as amended)
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	6 years after employment ends	Recommendation from preschool learning alliance	CIPD
National Minimum Wage Records	3 years after the end of the pay reference period following the one that the records cover	Requirement	National Minimum Wage Act 1998
Pensions scheme and member records	6 years from the automatic enrolment staging date	Requirement	The Pensions Regulator

	12 years from the ending of any benefit payable under the policy	Recommendation from preschool learning alliance	CIPD

Personnel records (cont'd)	Retention period	Status	Authority
Health and Safety			
Staff accident records (for organisations with 10 or more employees)	3 years after the date of the last entry in the book (separate rules govern the recording of accidents involving hazardous substances)	Requirement	Social Security (Claims and Payments) Regulations 1979
Records of any reportable death, injury, disease or dangerous occurrence	3 years after the date the record was made	Requirement	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (as amended)

Accident/medical records as specified by the Control of Substances Hazardous to Health Regulations (COSHH)	40 years from the date of the last entry	Requirement	The Control of Substances Hazardous to Health Regulations 2002 (COSHH)
Assessments under Health and Safety Regulations and records of consultations with safety representatives and committees	Permanently	Recommendation from preschool learning alliance	CIPD
	For the life of the assessment plus 3 years	Recommendation from preschool learning alliance	Information and Records Management Society (IRMS)
Financial records	**Retention period**	**Status**	**Authority**
Accounting records (e.g. cash books, invoices, receipts)	3 years from the end of the financial year for private and charitable companies, 6 years for	Requirement	Companies Act 2006

	public limited companies		
	6 years for charities	Requirement	Charities Act 2011

Administration records	Retention period	Status	Authority
Employers' liability insurance records	For as long as possible	Recommendation from preschool learning alliance	Health and Safety Executive
Visitors books/signing in sheets	The current year plus 6 years	Recommendation from preschool learning alliance	IRMS
Policy documents	For the life of the policy/setting plus 3 years	Recommendation from preschool learning alliance	IRMS
Complaints	At least 6 years after the date of resolution of the complaint	Recommendation from preschool learning alliance	IRMS
Minutes/minute books	At least 10 years from the date of the meeting for companies	Requirement	Companies Act 2006

	At least 6 years from the date of the meeting for Charitable Incorporated Organisations	Requirement	The Charitable Incorporated Organisations (General) Regulations 2012
	Permanently	Recommendation from preschool learning alliance	CIPD

APPENDIX TWO

Thinking Solutions for Education Retention Schedule

Customer Records	Retention Period
Thinking Fitness	Retention Period

Prospective Customers	6 months from initial contact/last visit
Customer membership records, including Name, address, contact details and DOB	Membership plus 3years
Customer fitness record, including BMI, Weight & Height	Membership plus 3 months
Medical records	Membership plus 3 months
Thinking Solutions for Education: Thinking Creative, Thinking Personnel & Thinking Financial	Retention Period
Client contact details	

All Personnel, Financial including payment details, CCTV, Administration and Health & Safety records are held in line with the IRMS toolkit for schools and can be found in Appendix 2

APPENDIX 2 – IRMS SCHOOLS TOOLKIT RETENTION SCHEDULE

Appendix x – Retention Schedule (for Academies)

1. Governance, Funding and Financial Management of the Academy Trust

Academies are governed by the Academy Trust, which will usually be a company limited by guarantee. The Academy Trust may also be a charitable Trust.

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.1 Governance of the Academy Trust					

1.1.1	Governance Statement	No		Life of governance statement + 6 years	SECURE DISPOSAL
1.1.2	Articles of Association	No		Life of the Academy	
1.1.3	Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	SECURE DISPOSAL
1.1.4	Memorandum of Understanding of Shared Governance among Schools	No	Companies Act 2006 section 355	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL
1.1.5	Constitution	No		Life of the Academy	
1.1.6	Special Resolutions to amend the Constitution	No		Life of the Academy	
1.1.7	Written Scheme of Delegation	No	Companies Act 2006 section 355	Life of Written Scheme of Delegation + 10 years	SECURE DISPOSAL
1.1.8	Directors – Appointment	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.9	Directors – Disqualification	No	Company Directors Disqualification Act 1986	Date of disqualification + 15 years	SECURE DISPOSAL
1.1.10	Directors – Termination of Office	No		Date of termination + 6 years	SECURE DISPOSAL

1.1.11	Annual Report – Trustees Report	No	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL
1.1.12	Annual Report and Accounts	No	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL
1.1.13	Annual Return	No	Companies Act 2006 section 355	Date of report + 10 years	SECURE DISPOSAL
1.1.14	Appointment of Trustees and Governors and Directors	Yes		Life of appointment + 6 years	SECURE DISPOSAL
1.1.15	Statement of Trustees Responsibilities	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.16	Appointment and removal of Members	No		Life of appointment + 6 years	SECURE DISPOSAL
1.1.17	Strategic Review	No		Date of the review + 6 years	SECURE DISPOSAL
1.1.18	Strategic Plan [also known as School Development Plans]	No		Life of plan + 6 years	SECURE DISPOSAL
1.1.19	Accessibility Plan	There may be if the plan refers to specific pupils	Limitation Act 1980 (Section 2)	Life of plan + 6 years	SECURE DISPOSAL
1.2 Board of Directors, Members Meetings and Governing Body					

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.2	Board Decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.3	Board Meeting: Annual Schedule of Business	No		Current year	SECURE DISPOSAL
1.2.4	Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	SECURE DISPOSAL
1.2.5	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES

1.2.7		Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.8	Agendas for Governing Body meetings	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

	Minutes of, and papers considered at, meetings of the Governing Body and its committees	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		Principal Set (Signed) – Life of Academy Inspection Copies – Date of meeting + 3 years	SECURE DISPOSAL
1.2.10	Reports presented to the Governing Body	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy	SECURE DISPOSAL or retain with signed set of minutes

1.2.11	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
1.2.12	Trusts and Endowments managed by the Governing Body	No		PERMANENT	

1.2.13	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
1.2.14	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
1.2.15	Register of Directors		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.16	Register of Directors' interests [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL

1.2.17	Register of Directors' residential addresses		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.18	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.19	Register of members		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.20	Register of secretaries		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.21	Register of Trustees interests			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.22	Declaration of Interests Statements [Governors] [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL
1.3 Funding and Finance					
1.3.1	Statement of financial activities for the year	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.2	Financial planning	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.3	Value for money statement	No		Current financial year + 6 years	SECURE DISPOSAL

1.3.4	Records relating to the management of VAT	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.5	Whole of government accounts returns	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.6	Borrowing powers	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.7	Budget plan	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.8	Charging and remissions policy	No		Date policy superseded + 3 years	SECURE DISPOSAL
1.3.9	Audit Committee and appointment of responsible officers	No		Life of the Academy	SECURE DISPOSAL
1.3.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	SECURE DISPOSAL
1.3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	SECURE DISPOSAL

1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.13	Funding Agreement – Termination of the funding agreement			Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.15	Funding Records – Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.17	Per pupil funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.18	Exclusions agreement	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.19	Funding records	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	SECURE DISPOSAL

1.3.21	Records relating to loans	No		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	SECURE DISPOSAL

1.3.22	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
1.3.23	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL
1.3.24	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.25	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.26	Payroll records	Yes		Date payroll run + 6 years	SECURE DISPOSAL

1.3.27	Insurance policies	No		Date the policy expires + 6 years	SECURE DISPOSAL
1.3.28	Records relating to the settlement of insurance claims	No		Date claim settled + 6 years	SECURE DISPOSAL
1.3.29	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
1.3.30	Investment policies	No		Life of the investment + 6 years	SECURE DISPOSAL
1.3.31	Management of Endowment Funds	No		Life of the fund + 6 years	

1.3.32	Annual accounts	No		Current year + 6 years	STANDARD DISPOSAL
1.3.33	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
1.3.34	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL

1.3.35	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL
1.3.36	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.37	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.38	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL
1.3.39	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
1.3.40	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL

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

1.3.51	School Fund – Cheque books	No		Current year + 6 years	SECURE DISPOSAL
1.3.52	School Fund – Paying in books	No		Current year + 6 years	SECURE DISPOSAL
1.3.53	School Fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
1.3.54	School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
1.3.55	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
1.3.56	School Fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
1.3.57	School Fund – Journey books	No		Current year + 6 years	SECURE DISPOSAL
1.3.58	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.59	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.60	School meals summary sheets	No		Current year + 3 years	SECURE DISPOSAL
1.4 Policies, Frameworks and Overarching Requirements					

1.4.1	Data Protection Policy, including data protection notification	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.2	Freedom of Information Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.3	Information Security Breach Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.4	Special Educational Needs Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.5	Complaints Policy	No		Date policy superseded + 6 years	SECURE DISPOSAL
1.4.6	Risk and Control Framework	No		Life of framework + 6 years	SECURE DISPOSAL
1.4.7	Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	SECURE DISPOSAL
1.4.8	Home School Agreements	No		Date agreement revised + 6 years	SECURE DISPOSAL
1.4.9	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	SECURE DISPOSAL

2. Human Resources

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
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		6 months	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 12 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks	Yes	DBS Update Service Employer Guide June 2014	The organisation should take a copy of the DBS certificate when it is shown to them by the individual and should be added to the Staff Personal File	SECURE DISPOSAL

2.1.5	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 added to the Staff Personal File	SECURE DISPOSAL
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 [Home Office May 2015]	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	Yes		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	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

2.2 Operational Staff Management					
2.2.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980 (Section 2)	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
2.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	SECURE DISPOSAL
2.2.5	Training needs analysis	No		Current year + 1 year	SECURE DISPOSAL

Ref.	**Basic file description**	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**
2.3 Management of Disciplinary and Grievance Processes					

2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	● Oral warning			Date of warning + 6 months	SECURE DISPOSAL
	● Written warning – level 1			Date of warning + 6 months	SECURE DISPOSAL
	● Written warning – level 2			Date of warning + 12 months	SECURE DISPOSAL
	● Final warning			Date of warning + 18 months	SECURE DISPOSAL
	● Case not found			If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
2.4 Health and Safety					
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	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	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
2.4.5	Control of Substances Hazardous to Health (COSHH)	No		Current year + 10 years then REVIEW	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have come into 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 come into contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire precautions logbooks	No		Current year + 6 years	SECURE DISPOSAL
2.4.9	Fire risk assessments	No	Fire Service Order 2005	Life of the risk assessment + 6 years	SECURE DISPOSAL
2.4.10	Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL

3. Management of the Academy

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
3.1 Admissions					
3.1.1	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 December 2014	Life of the policy + 3 years then REVIEW	SECURE DISPOSAL
3.1.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL

3.1.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
3.1.4	Register of admissions	Yes	School Attendance (Pupil Registration) (England) Regulations 2024.	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
3.1.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL

3.1.6	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL
3.1.7	Supplementary information form, including additional information such as religion and medical conditions	Yes			
	For successful admissions			This information should be added to the pupil file	SECURE DISPOSAL
	For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL
3.2 Headteacher and Senior Management Team					
3.2.1	Logbooks of activity in the school maintained by the Head Teacher	There may be data protection issues if the logbook 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

3.2.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL
3.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL
3.2.4	Records created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then REVIEW	SECURE DISPOSAL
3.2.5	Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL

3.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
3.3 Operational Administration					
3.3.1	Management of complaints	Yes		Date complaint resolved + 3 years	SECURE DISPOSAL
3.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL
3.3.3	Records relating to the management of software licences	No		Date licence expires + 6 years	SECURE DISPOSAL
3.3.4	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
3.3.5	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
3.3.6	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
3.3.7	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL

3.3.8	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
3.3.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL

4. Property Management

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
4.1 Property Management					
4.1.1	Title deeds of properties belonging to the school	No		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	

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
4.1.5	Business continuity and disaster recovery plans	No		Date the plan superseded + 3 years	SECURE DISPOSAL
4.2 Maintenance					
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		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 logbooks	No		Current year + 6 years	SECURE DISPOSAL
4.3 Fleet Management					
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	N	Limitation Act 1980 (Section 2)	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	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	SECURE DISPOSAL
	driving the vehicles and when, maintenance				
4.3.3	Service logs and vehicle logs	N	Limitation Act 1980 (Section 2)	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	N	Limitation Act 1980 (Section 2)	Date of journey + 6 years	SECURE DISPOSAL

5. Pupil Management

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
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 primary school	The file should follow the pupil when they leave the primary school. This will include: ● To another

					primary school • To a secondary school • To a pupil referral unit If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily

					have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA
	• Secondary		Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
5.1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
5.1.4	Examination results – pupil copies	Yes			

	• Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board

	• Internal			This information should be added to the pupil file	
5.1.5	Child protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2024"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children December 2023"	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file	SECURE DISPOSAL – these records MUST be shredded

5.1.6	Child protection information held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2024"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children December 2023"	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	SECURE DISPOSAL – these records MUST be shredded
5.2 Att endance					

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
5.2.1	Attendance registers	Yes	Working together to improve school attendance – statutory guidance for maintained schools, academies, independent schools and local authorities – August 2024	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, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time in order to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period – this should be documented

5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.4	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold

6. Curriculum Management

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
6.1 Statistics and Management Information					

6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination results (schools' copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	SATs records –	Yes			
	• 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
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	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL

6.2.3	Class record books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL

6.2.4	Mark books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL
6.2.5	Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL

6.2.6	Pupils' work	No		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

7. Extracurricular Activities

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record
7.1 Educational Visits outside the Classroom					
7.1.1	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Primary schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice".	Date of visit + 14 years	SECURE DISPOSAL

7.1.2	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Secondary schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice".	Date of visit + 10 years	SECURE DISPOSAL

7.1.3	Parental consent forms for school trips where there has been no major incident	Yes		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 every single consent form issued by the school for this period of time

7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	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	
7.1.5	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL
7.2 Walking Bus					
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]

8. Central Government and Local Authority

Ref.	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record

8.1 Local Authority					
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	School census returns	No		Current year + 5 years	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