



Records Retention Policy

Document Control Information

Records Retention Policy, Issue 2 – August 2017

Review Period

Every 2 years

Review Committee

Trustees

Revision History

Author	Summary of changes	Issue	Date Authorised
R Righini	New policy extracted section from data protection policy	1	31 st August 2017

Authorisation

Approved By: This policy was approved by the Trustees

Date Approved: 31st August 2017

Date of Next review: 31st August 2019

Document Owner & Reviewer: The senior manager responsible for this policy is the Operations Director

Equality Impact

Statement We welcome feedback on this document and the way it operates. We are interested to know of any possible or actual adverse impact that may affect any groups in respect of any of the Equality Act 2010 protected characteristics.

The person responsible for equality impact assessment for this document is the Director of Equality and Diversity.

Screening This document has been screened by the Equality Team and the impact has been assessed as:

- Not applicable
- Low
- Medium
- High

1. Purpose

- 1.1. Under the Freedom of Information Act 2000, schools are required to maintain a retention schedule listing the record series which the school creates in the course of its business. The retention schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use.
- 1.2. Members of staff are expected to manage their current record keeping systems using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems.
- 1.3. The retention schedule refers to all information, regardless of the media in which it is stored.

2. Scope of Policy

- 2.1. This policy applies to all staff, particularly those who are involved in records storage.

3. Reason for Review

- 3.1. This policy was reviewed as part of a Multi Academy Trust (MAT) policy audit. The review also acknowledges the significant changes that will take place in May 2018 for all schools.

4. Aim(s)

- 4.1. We aim for all staff to have an informed knowledge of the record keeping policy and procedure that the MAT uses.

5. Procedures and practice

5.1. Benefits of a retention schedule

5.1.1. There are a number of benefits which arise from the use of a complete retention schedule:

- 5.1.1.1. Managing records against the retention schedule is deemed to be “normal processing” under the Data Protection Act 1998 and the Freedom of Information Act 2000. Provided members of staff are managing record series using the retention schedule they cannot be found guilty of unauthorised tampering with files once a freedom of information request or a data subject access request has been made.
- 5.1.1.2. Members of staff can be confident about destroying information at the appropriate time.
- 5.1.1.3. Information which is subject to Freedom of Information and Data Protection legislation will be available when required.
- 5.1.1.4. The MAT is not maintaining and storing information unnecessarily.

5.2. Maintaining and amending the retention schedule

5.2.1. Where appropriate the retention schedule (Appendix 2) should be reviewed and amended to include any new record series created and remove any obsolete record series.

5.3. **What to do with records once they have reached the end of their administrative life**

5.3.1. **Destruction of records**

5.3.1.1. Where records have been identified for destruction they should be disposed of in an appropriate way. All records containing personal information or sensitive policy information should be shredded before disposal (if possible). Any other records should be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways.

5.3.1.2. The Freedom of Information Act 2000 requires the MAT to maintain a list of records which have been destroyed and who authorised their destruction. Members of staff should record at least:

5.3.1.2.1. File reference (or other unique identifier);

5.3.1.2.2. File title (or brief description);

5.3.1.2.3. Number of files;

5.3.1.2.4. The name of the authorising officer

5.3.1.3. This could be kept in an Excel spreadsheet or other database format.

5.3.2. **Transfer of records to the Archives**

5.3.2.1. Where records have been identified as being worthy of permanent preservation, arrangements should be made to transfer the records to the Archives.

5.3.3. **Transfer of information to other media**

5.3.3.1. Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as microform or digital media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

5.3.4. **Useful Contacts**

CEO

New Bridge MAT

Roman Road

Hollinwood

Oldham

OL8 3PH

Tel : 0044 (0)161 883 2401

Email : info@newbridgegroup.org

6. **Sources and references**

6.1. Data Protection Act 1998

6.2. Equality Act 2010

7. Other useful documents

- 7.1. Subject Access Request Policy
- 7.2. Freedom of Information Policy
- 7.3. Equality Impact Scheme
- 7.4. Publication Scheme
- 7.5. Complaints Policy

8. Monitoring

- 8.1. This policy will be monitored through the MAT's accountability framework.

Retention Schedule

1. Governors					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Minutes					
<i>Principal set (signed)</i>	No		Permanent	Retain in school for 6 years from date of meeting	Transfer to Archives
<i>Inspection copies</i>	No		Date of meeting + 3 years	DESTROY (If these minutes contain any sensitive personal information they should be shredded)	
Agendas	No		Date of meeting	DESTROY	
Reports	No		Date of report + 6 years	Retain in school for 6 years from date of meeting	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)
Annual Parents' meeting papers	No		Date of meeting + 6 years	Retain in school for 6 years from date of meeting	Transfer to Archives (the appropriate archivist will then take a sample for

1. Governors

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
					permanent preservation)
Instruments of Government	No		Permanent	Retain in school whilst school is open	Transfer to Archives when the school has closed
Trusts and Endowments	No		Permanent	Retain in school whilst operationally required	Transfer to Archives
Action Plans	No		Date of action plan + 3 years	DESTROY	It may be appropriate to offer to the Archives for a sample to be taken if the school has been through a difficult period
Policy documents	No		Expiry of policy	Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)
Complaints files	Yes		Date of resolution of complaint + 6 years	Retain in school for the first 6 years Review for further retention in the case of contentious disputes Destroy routine complaints	

1. Governors

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Annual Reports required by the Department for Education and Skills	No	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI 2002 No 1171	Date of report + 10 years		Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)
Proposals for schools to become, or be established as Specialist Status schools	No		Current year + 3 years		Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)

2. Management

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Log Books	Yes		Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry.	Transfer to the Archives
Minutes of the Senior Management Team and other internal administrative bodies	Yes		Date of meeting + 5 years	Retain in the school for 5 years from meeting	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)

2. Management

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Reports made by the head teacher or the management team	Yes		Date of report + 3 years	Retain in the school for 3 years from meeting	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)
Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Closure of file + 6 years	DESTROY If these records contain sensitive information they should be shredded	
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	No		Date of correspondence + 3 years	DESTROY If these records contain sensitive information they should be shredded	
Professional development plans	Yes		Closure + 6 years	SHRED	
School development plans	No		Closure + 6 years	Review	Offer to the Archives

3. Pupils

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Admission Registers	Yes		Date of last entry in the book (or file) + 6 years	Retain in the school for 6 years from the date of the last entry.	Transfer to the Archives

3. Pupils

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Attendance Registers	Yes		Date of register + 3 years	DESTROY (If these records are retained electronically any back-up copies should be destroyed at the same time)	
Pupil record cards	Yes				
<i>Primary</i>			Retain for the time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school. In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service	
<i>Secondary</i>			Until the student reaches the age of 30	SHRED	
Pupil files	Yes				
<i>Primary</i>			Retain for the time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school. In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service	
<i>Secondary</i>			Until the student reaches the age of 30	SHRED	
Special Educational Needs files, reviews and Individual Education Plans	Yes		Until the student reaches the age of 30	SHRED	

3. Pupils					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Letters authorising absence	No		Date of absence + 2 years	SHRED	
Absence books	Yes		Current year + 6 years	SHRED	
Examination results					
<i>Public</i>	No		Year of examinations + 6 years	DESTROY	Any certificates left unclaimed should be returned to the appropriate Examination Board
<i>Internal examination results</i>	Yes		Current year + 5 years	DESTROY	
Any other records created in the course of contact with pupils	Yes/No		Current year + 3 years	Review at the end of 3 years and either allocate a further retention period or DESTROY	
Statement maintained under The Education Act 1996 - Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	Until the student reaches the age of 30	DESTROY unless legal action is pending	
Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	Until the student reaches the age of 30	DESTROY unless legal action is pending	
Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Until the student reaches the age of 30	DESTROY unless legal action is pending	

3. Pupils					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years	DESTROY unless legal action is pending	
Children SEN Files	Yes		Until the student reaches the age of 30	DESTROY unless legal action is pending	

4. Curriculum					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Curriculum development	No		Current year + 6 years	DESTROY	
Curriculum returns	No		Current year + 3 years	DESTROY	
School syllabus	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or DESTROY	
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 new retention period or DESTROY	
Timetable	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or DESTROY	
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 new retention period or DESTROY	
Mark books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or DESTROY	

4. Curriculum					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
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 new retention period or DESTROY	
Pupils' work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or DESTROY	
Examination results	Yes		Current year + 6 years	DESTROY [These records should be shredded]	
SATS records	Yes		Current year + 6 years	DESTROY [These records should be shredded]	
PANDA reports	Yes		Current year + 6 years	DESTROY [These records should be shredded]	
Value added records	Yes		Current year + 6 years	DESTROY [These records should be shredded]	

5. Personnel					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	SHRED	
Payroll records	Yes	DPA Regulations	Current year + 6 years	SHRED	
Travel records	Yes	DPA Regulations	Current year + 6 years	SHRED	
Staff Personal files	Yes		Termination + 7 years	SHRED	
Interview notes and recruitment records	Yes		Date of interview + 6 months	SHRED	
Pre-employment vetting information (including CRB checks)	No	CRB guidelines	Date of check + 6 months	SHRED [by the designated member of staff]	

5. Personnel

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Disciplinary proceedings:	Yes		Please note that all these retention periods where the warning relates to child protection issues may change in light of any recommendations made by the Bichard Inquiry.		
<i>oral warning</i>			Date of warning + 6 months	SHRED If this is placed on a personal file, it must be weeded from the file.	
<i>written warning – level one</i>			Date of warning + 6 months	SHRED If this is placed on a personal file, it must be weeded from the file.	
<i>written warning – level two</i>			Date of warning + 12 months	SHRED If this is placed on a personal file, it must be weeded from the file.	
<i>final warning</i>			Date of warning + 18 months	SHRED If this is placed on a personal file, it must be weeded from the file.	
<i>case not found</i>			DESTROY immediately at the conclusion of the case		

5. Personnel					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Records relating to accident/injury at work	Yes		Date of incident + 12 years	Review at the end of this period. In the case of serious accidents a further retention period will need to be applied	
Annual appraisal/assessment records	No		Current year + 5 years	SHRED	
Salary cards	Yes		Last date of employment + 85 years	SHRED	
Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year, +3yrs	SHRED	
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SHRED	

6 Health and Safety					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Accessibility Plans		Disability Discrimination Act	Current year + 6 years	DESTROY	

6 Health and Safety

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
<i>Adults</i>	Yes		Current year + 3 years	SHRED
<i>Children</i>	Yes		DOB + 25 years	SHRED
COSHH			Current year + 10 years	Review [where appropriate an additional retention period may be allocated]
Incident reports	Yes		Current year + 20 years	SHRED
Policy Statements			Date of expiry + 1 year	DESTROY
Risk Assessments			Current year + 3 years	DESTROY
Process of monitoring of areas where employees and persons are likely to have come in contact with asbestos			Last action + 40 years	DESTROY

6 Health and Safety					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Process of monitoring of areas where employees and persons are likely to have come in contact with radiation			Last action + 50 years	DESTROY	
Fire Precautions log books			Current year + 6 years	DESTROY	

7. Administrative					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Employer's Liability certificate			Permanent whilst the school is open	DESTROY once the school has closed	
Inventories of equipment and furniture			Current year + 6 years	DESTROY	
General file series			Current year + 5 years	Review to see whether a further retention period is required	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)

7. Administrative

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
School brochure/prospectus			Current year + 3 years		Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)
Circulars (staff/parents/pupils)			Current year + 1 year	DESTROY	
Newsletters, ephemera			Current year + 1 year	Review to see whether a further retention period is required	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)
Visitors' book			Current year + 2 years	Review to see whether a further retention period is required	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)
PTA/Old Pupils' Associations			Current year + 6 years	Review to see whether a further retention period is required	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)

8 Finance

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Annual Accounts		Financial Regulations	Current year + 6 years		Offer to the Archives

8 Finance					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Loans and grants		Financial Regulations	Date of last payment on loan + 12 years	Review to see whether a further retention period is required	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)
Supply cover insurance		Financial Regulations	Current year + 6 years		
Contracts					
under seal			Contract completion date + 12 years	SHRED	
under signature			Contract completion date + 6 years	SHRED	
monitoring records			Current year + 2 years	SHRED	
Copy orders			Current year + 2 years	SHRED	
Budget reports, budget monitoring etc.			Current year + 3 years	SHRED	
Invoices, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	SHRED	
Annual Budget and background papers			Current year + 6 years	SHRED	
Order books and requisitions			Current year + 6 years	SHRED	
Delivery Documentation			Current year + 6 years	SHRED	
Debtors' Records		Limitation Act 1980	Current year + 6 years	SHRED	
School Fund – Cheque books			Current year + 3 years	SHRED	
School Fund – Paying in books			Current year + 6 years	SHRED	
School Fund – Ledger			Current year + 6 years	SHRED	
School Fund – Invoices			Current year + 6 years	SHRED	

8 Finance					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
School Fund – Receipts			Current year + 6 years	SHRED	
School Fund – Bank statements			Current year + 6 years	SHRED	
School Fund – School Journey books			Current year + 6 years	SHRED	
Applications for free school meals, travel, uniforms etc.			Whilst child at school	SHRED	
Student grant applications			Current year + 3 years	SHRED	
Free school meals registers	Yes	Financial Regulations	Current year + 6 years	SHRED	
Petty cash books		Financial Regulations	Current year + 6 years	SHRED	

9 Property					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Title Deeds			Permanent	These should follow the property	Offer to Archives
Plans			Permanent	Retain in school whilst operational	Offer to Archives
Maintenance and contractors		Financial Regulations	Current year + 6 years	DESTROY	
Leases			Expiry of lease + 6 years	DESTROY	
Lettings			Current year + 3 years	DESTROY	
Burglary, theft and vandalism report forms			Current year + 6 years	SHRED	
Maintenance log books			Last entry + 10 years	DESTROY	
Contractors' Reports			Current year + 6 years	DESTROY	

10 LEA					
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Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Secondary transfer sheets (Primary)	Yes		Current year + 2 years	SHRED	
Attendance returns	Yes		Current year + 1 year	DESTROY	
Circulars from LEA			Whilst operationally required	Review to see whether a further retention period is required	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)

11. DfE

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
HMI reports			These do not need to be kept any longer		Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)
OFSTED reports and papers			Replace former report with any new inspection report	Review to see whether a further retention period is required	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)
Returns			Current year + 6 years	DESTROY	
Circulars from DfES			Whilst operationally required	Review to see whether a further retention period is required	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)

12. Positive Steps

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
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12. Positive Steps

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Service level agreements			Until superseded	SHRED	
Work Experience agreement			DOB of child + 18 years	SHRED	

13. School Meals

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record	
Dinner Register			Current year + 3 years	SHRED	
School Meals Summary Sheets			Current year + 3 years	SHRED	