



Policy Document for: Data Retention Schedule

Approved by Directors: June 2018

Due for Review: May 2023

Manor Multi Academy Retention Guidelines

This retention schedule contains recommended retention periods for the different record series created and maintained by schools in the course of their business.

The schedule refers to all information regardless of the media in which it is stored. The schedule will be reviewed on a regular basis by the Records Manager.

Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the Data Protection Act 1998, GDPR 2018 and the Freedom of Information Act 2000.

Managing record series using these retention guidelines will be deemed to be 'normal processing' under the legislation mentioned above.

If record series are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented.

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1. Acknowledgements

This retention schedule for schools is based on the guidelines issued by the Local Government Group of the Records Management Society of Great Britain.

2. The purpose of the school retention schedule

The purpose of the retention schedule 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.

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.

The retention schedule refers to all information, regardless of the media in which they are stored.

3. Benefits of a school retention schedule

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

- Managing records against the retention schedule is deemed to be 'normal processing' under the Data Protection Act 1998, GDPR 2018 and the Freedom of Information Act 2000.
- Providing 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.
- Staff can be confident about destroying information at the appropriate time.
- Information which is subject to Freedom of Information and Data Protection legislation will be available when required.
- The school is not maintaining records and storing information unnecessarily.

4. Maintaining and amending the school retention schedule

Where appropriate this retention schedule will be reviewed by Manor Multi Academy Trust board of Directors and amended to include any new record series created. It will also remove any obsolete record series.

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

5.1 Destruction of records

Records that 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.

The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction.

Staff should record at least:

- File reference (or other unique identifier)
- File title (or brief description)
- Number of files
- The name of the authorising officer. This could be kept in an Excel spreadsheet or other database format.

5.2 Transfer of records to Local Authority Archives

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

5.3 Transfer of information to other media

Where lengthy retention periods have been allocated to records, 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.

6. Useful Contacts

Name	Contact Email	Contact No.
Manor Primary School	info@manorprimary.com	01902 556460
Hill Avenue Academy	info@hillavenueacademy.com	01902 558750
East Park Academy	info@eastparkacademy.com	01902 558899
St Thomas' CofE Primary	info@stthomasceacademy.com	01902 558963
St Albans CofE Primary	info@stalbansceacademy.com	01902 558825
Foley Infant Academy	info@foleyacademy.com	01384 872382
Brindley Heath Junior Academy	info@brindleyacademy.com	01384 872343
Foxyards Academy	info@foxyardsacademy.com	01902 553230

7.1 Child Protection: The retention and use of records relating to child protection matters concerning pupils, and child protection allegations against staff requires specific guidance in this schedule. This will be subject to update following implementation of the recommendations by Sir Michael Bichard.

Basic file description	Data Protection issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
Child protection files	Yes	Education Act 2002, s175, related guidance 'Safeguarding Children in Education', September 2004	DOB + 25 years [Amended in consultation with Safeguarding Children Group]	Shred - Child Protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (i.e. the information does not need to be sent to a university for example) Where a child is removed from roll to be educated at home, the file should be copied to the Local Education Authority.
Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance) Education Act 2002 guidance "Dealing with Allegations of Abuse against Teachers and Other Staff" November 2005	Until the person's normal retirement age, or 10 years from the date of the allegation if that's longer	(Records of Disciplinary and Grievance): Records of allegations about workers who have been investigated and found to be without substance should not normally be retained once an investigation has been completed. There are some exceptions to this where for its own protection the employer has to keep a limited record that an allegation was received and investigated, for example, where the allegation relates to abuse and the worker is employed to work with children or other vulnerable individuals summary record to be retained on confidential personnel file and a copy given to the person concerned.

7.2 Governors

Basic file description	Data Protection issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
Minutes				
Principal set (signed)	No		Permanent	Retain in school for 6 years from date of meeting and then offer to Archives
Inspection copies	No		3 years from date of meeting	Destroy – If these Minutes contain any sensitive information, they should be shredded
Agendas	No		Date of meeting	Destroy
Reports			Date of meeting + 6 years	Retain in school for 6 years from date of meeting and then offer to Archives
Annual parents' meetings	No		Date of meeting + 6 years	Retain in school for 6 years from date of meeting and then offer to Archives
Instruments of government	No		Permanent	Retain in school whilst school is open and then offer to Archives
Trusts and endowments	No		Permanent	Retain in school whilst operationally required and then offer to Archives
Action plans	No		Date of plan + 3 years	Destroy under normal circumstances, but consider offering to 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 operationally required. This includes if the expired policy is part of a past decision making process – offer to Archives
Complaints files	Yes		Date of resolution of complaint + 6 years	Retain in school for the first 6 years and review for further retention in the case of contentious disputes. Destroy routine complaints

7.3 School 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 [Books where the Head of School or another member of staff keeps of record of what happens in the school, this may include details of events, photographs and other information.]	Yes	Activities of individual pupils and staff are subject to data protection	Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry - Offer to Archives
Minutes [Senior Management Team and other internal administrative bodies]	Yes	Amended in consultation with Safe-guarding Children Group	Date of meeting + 5 years	Retain in school for 5 years from meeting and offer to Archives. The appropriate archivist will then take a sample for permanent preservation
Head teacher reports [Made by the Head Teacher or the Management Team]	Yes	Amended in consultation with Safe-guarding Children Group	Date of report + 3 years	Retain in school for 3 years from completion of report/meeting and offer to Archives. The appropriate archivist will then take a sample for permanent preservation
School correspondence created by all staff with administrative responsibilities (except child protection records which are dealt with in section 7.1 above).	Yes	Amended in consultation with Safe-guarding Children Group	Closure of file + 6 years	Destroy - If these records contain sensitive information they should be shredded
Annual reports required by the Department for Education and Skills	No	Education regs 2002.SI2002 No 1171	Date of report + 10 years	Transfer to Archives

7.3 School management				
Basic file description	Data Protection issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record

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 Archives
Successful Admissions (Primary schools)	Yes		Admission + 7 years	Destroy
Successful Admissions (Secondary schools)	Yes		Admission + 5 years	Destroy
Unsuccessful Admissions (Primary and Secondary)	Yes		Resolution of case + 3 years	Destroy
Successful Casual Admissions (Secondary schools)	Yes		Admission + 5 years	Destroy
Proof of address – supplied by Parents as part of the admissions process	Yes		Retain for the period the child is at the school	Destroy
Employer's liability	Yes		Permanent	Offer to Archives
Performance reviews	Yes		Permanent	Offer to Archives
Proposals for schools to become, or be established as Specialist Status schools	No		Current year + 3 years	Transfer to Archives for assessment for preservation or destruction.

7.4 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 - Offer to Archives

Attendance registers	Yes		Date of register + 3 years	Destroy - If these records are retained electronically, any back-up copies should also be Destroyed at the same time
Pupil record cards				
Primary	Yes		Retain for the time which the pupil remains at the 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
Secondary	Yes		DOB of the pupil + 25 years	Shred - In the case of exclusion, it may be appropriate to transfer the record to the Behaviour Service
Pupil files				
Primary	Yes		Retain for the time which the pupil remains at the school	Transfer to the secondary school (or other primary school) when the child leaves the school. In the case of exclusion, consider transfer the record to the Behaviour Service

7.4 Pupils				
Basic file description	Data Protection issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
Pupil files				
Secondary	Yes		DOB of the pupil + 25 years	Shred - In the case of exclusion, it may be appropriate to transfer the record to the Behaviour Service

Deceased pupil files (Primary and Secondary)	Yes		7 years after the Pupil has died	Destroy. (Death occurs outside of education environment)
Special educational needs files, reviews and Individual education plans	Yes		DOB of the pupil +25 years	Shred – In the case of exclusion, it may be appropriate to transfer the record to the Behaviour Service
Letters authorising absence	No		Date of absence + 2 years	Shred
Absence books	No		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 examination board.
<i>Internal examination results</i>	Yes		Current year +5 years	Destroy – If records are retained on the pupil file (or National Records of Achievement), kept for as long as operationally necessary.
Outside Educational Visits – records created by schools	No	H&S of pupils on Educational visits	Date of visit + 10 years	Destroy or delete securely

7.4 Pupils				
Basic file description	Data Protection issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
Pupil correspondence	Yes		Current year + 3 years	Review – Consider allocating a further retention period or Destroy
Statement maintained under Education Act 1996 - Section 324	Yes	Special Educational Needs and Disability Act 2001 - Section 1	DOB + 30 years	Destroy – Unless legal action is pending

Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 - Section 1	DOB + 30 years	Destroy – Unless legal action is pending
Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 - Section 2	Closure + 12 years	Destroy – Unless legal action is pending
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		Closure + 35 years	Destroy – Unless legal action is pending
Parental permission slips for school trips – where there has been no major incident	Yes		At the conclusion of the trip	Destroy
Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980	DOB of the pupil involved + 25 years	Destroy – The permission slips of all the children on the trip need to be retained to show the rules had been followed for all.

7.5 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	Yes		Current year + 6 years	Destroy
Curriculum returns	No		Current year + 3 years	Destroy
School syllabus	No		Current year + 1 year	Destroy – Consider reviewing at the end of each year and allocate a new retention period

Schemes of work	No		Current year + 1 year	Destroy – Consider reviewing at the end of each year and allocate a new retention period
Timetable	No		Current year + 1 year	Destroy – Consider reviewing at the end of each year and allocate a new retention period
Class record books	No		Current year + 1 year	Destroy – Consider reviewing at the end of each year and allocate a new retention period
Mark books	No		Current year + 1 year	Destroy – Consider reviewing at the end of each year and allocate a new retention period
Records of homework set	No		Current year + 1 year	Destroy – Consider reviewing at the end of each year and allocate a new retention period
Pupil's work	No		Current year + 1 year	Destroy – Consider reviewing at the end of each year and allocate a new retention period

7.5 Curriculum				
Basic file description	Data Protection issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
SATS results	Yes		Current year + 6 years	Destroy – These records should be shredded
PANDA reports	Yes		Current year + 6 years	Destroy – These records should be shredded
Examination results	Yes		Current year + 6 years	Destroy
Value added records	Yes		Current year + 6 years	Destroy

7.6 School personnel				
Basic file description	Data Protection issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
Time sheets, sick pay	Yes	Financial Regulations	Current year + 6 years	Shred
Staff personal files	Yes		Termination + 15 years	Shred
Interview notes and recruitment records	Yes		Date of interview + 1 year	Shred
Pre-employment vetting information – including unsuccessful CRB checks	No	CRB guidelines	Date of check + 1 year	Shred – This information should be placed on the personnel file if the applicant is successful
Disciplinary files (not child protection – see 7.1)	Yes			
<i>Oral warning</i>	Yes		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>	Yes		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>	Yes		Date of warning + 1 year	Shred – If this is placed on a personal file, it must be weeded from the file
<i>Final warning</i>	Yes		Date of Warning + 2 years	Shred – If this is placed on a personal file, it must be weeded from the file
<i>Case not found</i>	Yes		Destroy	Immediately at the conclusion of the case. except Child Protection allegations (see 7.1)
Annual appraisal and assessment records	No		Current year + 6 years	Shred

7.6 School personnel

Basic file description	Data Protection issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
Time sheets, sick pay	Yes	Financial Regulations	Current year + 6 years	Shred
Salary cards	Yes		Last date of employment + 6 years	Shred – The information should be transferred to the superannuation department at the appropriate time who will maintain the master record
Maternity pay records	Yes	Statutory maternity pay	Current year + 3 years	Shred
Records held under retirement benefits schemes	Yes	Information Powers Regulations 1995	Last payment + 6 years	Shred
Proofs of identity collected as part of the process of checking 'portable' enhanced CRB disclosure	Yes		Termination + 15 years	Where possible, these should be checked and a note kept of what has been checked. If it is felt necessary to keep a copy, documentation should be placed on the member of staff's personal file

7.7 School 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	No	DDA	Current year + 6 years	Destroy
Accident reporting				
<i>Adults – Accident book</i>	Yes		Last entry in book + 6 years	Shred
<i>Adults – Internal reports</i>	Yes		Current year + 6 years	Shred

<i>Children</i>	Yes		DOB + 25 years	Shred – A child may make a claim for negligence 7 years from their 18 th birthday. All records are kept until the pupil reaches the age of 25 years.
Records relating to serious injury at work	Yes		Date of incident + 12 years.	Review - In the case of serious accidents, a further retention period will need to be applied
COSHH	Yes		Current year +10 years	Review
Incident reports	Yes		Current year + 20 years	Shred
Risk assessments	Yes		Date assessment superseded+ 3 years	Destroy
Asbestos monitoring	Yes		Last action + 40 years	Destroy – where employees and persons are likely to have come in contact with asbestos
Radiation monitoring	Yes		Last action + 50 years	Destroy – where employees and persons are likely to have contact with radiation
Fire Precaution Log Books			Current year + 6 years	Destroy

7.8 School administration				
Basic file description	Data Protection issues	Statutory Provision	Retention period [operational]	Action at the end of the administrative life of the record
Employer's liability certificate	Yes		Permanent whilst the school is open	Retain for 40 years after the school has closed
School brochure/prospectus	Yes		Current year + 3 years	Offer to Archives - The appropriate archivist will then take a sample for permanent reservation
Circulars (staff/parents/pupils)	No		Current year + 1 year	Destroy

Newsletters	No		Current year + 1 year	Review to see whether any further retention is required - Offer to Archives [The appropriate archivist will then take a sample for permanent reservation]
Visitor's book	No		Current year + 2 years	Review to see whether any further retention is required - Offer to Archives [The appropriate archivist will then take a sample for permanent reservation]
PTA/old pupils' associations	Yes		Current year + 6 years	Offer to Archives - The appropriate archivist will then take a sample for permanent reservation
Cooks day book	No		Current year + 3 years	Destroy
Dinner register	No		Current year + 3 years	Destroy
Leaflets and publications	No		When superseded	Destroy
Inventories of equipment and furniture			Current year + 6 years	Destroy

7.9 School 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 and background papers	Yes	Financial Regulations	Current year + 6 years	Offer to Archives
Loans and grants	Yes	Financial Regulations	Date of last payment on loan + 12 years	Review to see whether any further retention is required - Offer to Archives [The appropriate archivist will then take a sample for permanent reservation]

Contracts

<i>Under seal</i>	Yes		Contract completion date + 12 years	Review to see whether any further retention is required - Offer to Archives [The appropriate archivist will then take a sample for permanent reservation]
<i>Under signature</i>	Yes		Contract completion date + 6 years	Shred
Budget monitoring reports	Yes		Current year + 3 years	Shred
Invoices and receipts covered by financial regulations	Yes		Current year + 6 years	Shred
Order books and requisitions	No		Current year + 6 years	Shred
Delivery notes	No		Current year + 1 year	Destroy
Debtors' records	Yes		Current year + 6 years	Shred
School fund records covered by financial regulations	Yes		Current year + 6 years	Shred

7.9 School finance				
Basic file description	Data Protection issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
Applications for free school meals, travel, uniforms	Yes		Whilst child is at school	Shred
Student grant applications	Yes		Current year + 3 years	Shred
Free school meals registers	Yes	Financial Regulations	Current year + 6 years	Shred
Petty cash books	No	Financial Regulations	Current year + 6 years	Shred
LMS returns			Current year + 2 years	Destroy

School fund – cheque and paying in books		Financial Regulations	Current year + 2 years	Destroy
School fund – ledgers, invoices, receipts and Bank statements		Financial Regulations	Current year + 6 years	Destroy
Unofficial funds – uniforms, trips etc			Current year + 6 years	Destroy
Income from school premises bookings			Current year + 3 years	Destroy

7.10 School 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	Yes		Permanent	These should follow the property – Offer to Archives
Plans	Yes		Permanent	Retain until superseded and offer to Archives
Maintenance and contracts	Yes	Financial Regulations	Current year + 6 years	Destroy
Leases	Yes		Expiry of lease + 6 years	Destroy
Lettings	Yes		Current year + 3 years	Destroy
Burglary, theft and vandalism reports	No		Current year + 6 years	Shred
Maintenance log books	Yes		Last entry + 10 years	Destroy
Contractors' reports	Yes		Current year + 6 years	Destroy
Inventory	No		Current year + 6 years	Destroy

7.11 LA				
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 LA	No		Whilst operationally required	Review to see whether a further retention period is required – Offer to Archives
Admissions data	Yes		Current year + 5 years	Destroy/DELETE
Student enrolment	Yes		Current year = 2 years	Shred

7.12 DCSF				
Basic file description	Data Protection issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
HMI reports	No		These do not need to be kept any longer	If any are retained – Offer to Archives
OFSTED reports and papers	Yes		Replace former report with any new inspection report	Review to see whether a further retention period is required – offer to Archives
Returns	No		Current year + 6 years	Destroy
Circulars from DCSF	No		Whilst operationally required	Review to see whether a further retention period is required – offer to Archives

7.13 Partnership working				
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	Yes		Until superseded	Shred
Work experience agreement	Yes		DOB of child + 18 years	Shred

7.14 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	No		Current year + 3 years	Shred
School meals summary sheet	No		Current year + 3 years	Shred
Free school meals register	Yes		Current year + 6 years	Destroy
Free school meals vouchers	Yes		Current year + 5 years	Destroy
School meals vouchers	No		Current year + 5 years	Destroy

7.15 Schools and colleges				
Basic file description	Data Protection issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
Tutor folders	Yes		Termination + 6 years	Shred
Potential tutors	Yes		Current year + 2 years	Shred
Ex tutor folders	Yes		Termination + 15 years	Shred
Student enquiry files	Yes		Current year + 2 years	Shred

<i>Student support files and finance</i>	<i>Yes</i>		<i>Current year + 6 years</i>	<i>Shred</i>
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8. European funded records

Where any record relates to a project that is funded by a European Union (EU) programme, it is essential that all the records are retained together.

All EU funded records (including finance) can only be disposed of **after** the EU funded programme has been nationally signed off. Therefore, records associated with an EU funded programme have a different life cycle to other similar records listed within the Retention Schedule.

9. Finding the School retention schedule

This School Data Retention Schedule can be found via the Manor Multi Academy Trust Website <http://www.manormat.com/governance/gdpr>

10. Authorisation

This school retention schedule is authorised by:

Directors
Manor Multi Academy Trust