



**Waterton**  
Academy Trust

# Data Retention Policy

2024 - 2025



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Waterton Academy Trust recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of each academy. This document provides the policy framework through which this effective management can be achieved and audited.

## Scope of the Policy

This policy applies to all records created, received or maintained by staff across the Trust in the course of carrying out its functions.

- Records are defined as all those documents which facilitate the business carried out by the Trust and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.
- A small percentage of the Trust's records will be selected for permanent preservation as part of the institution's archives and for historical research.

## Responsibilities

- The Trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The CEO has delegated responsibility for this policy to the Headteacher of each academy.
- The role and responsibility of the appointed DPO is to assist the CEO and Board of Directors to monitor internal compliance, inform and advise on the Trusts data protection obligations, provide advice regarding Data Protection Impact Assessments (DPIAs) and act as a contact point for data subjects and the Information Commissioner's Office (ICO).
- The person responsible for records management in the academy will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and timely.
- Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the Trust's records management guidelines.

## Relationship with Existing Policies

This policy has been drawn up within the context of:

- Freedom of Information Policy;
- Data Protection Policy; and
- with other legislation or regulations (including audit, equal opportunities and ethics) affecting the Trust.

## Storage of records

Records must be stored in such a way that they are accessible and safeguarded against environmental damage. All files in current use must be stored appropriately:

- Closed, Personal/sensitive records are kept securely in a locked, fire proof filing cabinets and access to the files is restricted to authorised personnel. This should be considered the minimum standard.
- All pupil records should be kept securely at all times. Paper records should be kept in locked filing cabinets/storage areas and the contents should be secure within the file. Equally, electronic records should have appropriate security. Records will be maintained according to any model protocol for record keeping on children and young people.
- Access arrangements for pupil records should ensure that confidentiality is maintained whilst equally enabling information to be shared lawfully and appropriately, and to be accessible for those authorised to see it.
- Staff records are stored in locked filing cabinet and accessed only by persons authorised by the Headteacher.
- Financial records are stored appropriately by relevant staff and published online in accordance with the requirements of Companies House and the Academy Trust Handbook.
- Management Information Systems – use restricted to relevant staff members and password protected. Passwords should not be divulged to other persons.
- All records to be archived as per the Document Retention Schedule will be stored in appropriate storage. Document Boxes will indicate contents and date of disposal. Where applicable boxes will contain a contents list. Where files are converted to digital format, the Trust will ensure a long term fully Government compliant solution is employed which will meet the Trusts operation needs and rights of the data subjects.

## Safe Disposal of Records

Where records have been identified for destruction they will be disposed of in an appropriate manner.

For example, paper-based records will be shred or incinerated, electronic files overwritten or deleted. Third parties may be used to safely dispose of records on the Trust's behalf, but sufficient guarantees must be provided to ensure that it complies with data protection law.

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.

Section 46 of the Code of Practice on the Management of Records issued under section 46 of the Freedom of Information Act 2000 recommends that all schools maintain a list of records which have been destroyed and who authorised their destruction.

Members of staff should record at least:

- File reference (or another unique identifier);
- File title (or brief description);

- Number of files; and
- The name of authorising office.

## Transfer of Information

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

## School Closures

Should any school close, there will be records that need to be stored until the statutory retention periods is reached. In these circumstances, Waterton Academy Trust will inform its data subjects on the following;

- A) An overview of data categories that the Trust holds on you as an individual.
- B) Inform you, the data subject on how the data is stored
- C) Inform you, the data subject whereby statutory requirements dictate, where the Trust will transfer ownership of the data. For example, Waterton Trust ceases as a legal entity and another Trust assumes legal responsibility.
- D) Inform you, the data subject, how you can exercise your right to correction and or erasure.
- E) Inform you, the data subject how and who you can contact in relation to points A-D.

It is the responsibility of Waterton Academy Trust to manage these records until they have reached the end of their administrative life and to arrange for their disposal when appropriate, or in the event of Waterton Multi Academy Trust becoming dissolved, to take legal and best practice measures to inform its data subject of points A-E and ensure secure transfer of data.

## Retention Guidelines

The following retention guidelines have been issued by the Information and Records Management Society of Great Britain 'Retention Guidelines for Schools' "add in version here". 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 in line with the statutory bodies, Academy Trust handbook, Education funding Agency and reflect the requirements of the Data Protection Act 2018 and the Freedom of Information Act 2000 as set out by the ICO.

Waterton Academy Trust acknowledges that this policy shall be updated from time to time in line with any reasonable request of Barnsley Metropolitan Borough Council to the extent any such data relates to schools within Barnsley.

## Policy Review

This policy shall be reviewed and updated (as required) by Waterton Academy Trust on an annual basis and otherwise in accordance with any applicable Law.

For further information on what the ICO requires from organisations, please either visit <https://ico.org.uk/> or write to;

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

To discuss any matters within this policy please contact the Trust's Internal DPO (Michael Berry) on the following methods;

**Email:** [dataprotection@watertonacademytrust.org](mailto:dataprotection@watertonacademytrust.org)

**By post:** Data Protection  
Waterton Academy Trust  
The Business Village Cudworth,  
Snydale Road,  
Cudworth Barnsley,  
South Yorkshire,  
S72 8RP

The Chief Executive Officer, Mr David Dickinson can be contacted by the following methods;

**Email:** [admin@watertonacademytrust.org](mailto:admin@watertonacademytrust.org)

**By post:** CEO  
Waterton Academy Trust  
Centre for Excellence  
Walton Primary Academy  
The Grove  
Walton  
Wakefield  
WF2 6LD

## Child Protection

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Child Protection files	Yes	Education Act 2002, related guidance "Safeguarding Children in Education", 2015	Retain whilst the child remains at the primary school	PASS SECURELY TO NEW SCHOOL	Child Protection information must be sent under separate cover to new school and proof of transfer obtained. Where a child is removed from roll to be educated at home, the file should be copied to the Local Authority. A copy of any chronology may be kept until the child reaches the age of 25.
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 whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned	DESTROY	<p>The following is an extract from "Safeguarding Children and Safer Recruitment in Education" p60:</p> <p>"Record Keeping 5.10 It is important that a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's confidential personnel file, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. It will provide clarification in cases where a future DBS Disclosure reveals information from the police about an allegation that did not result in a criminal conviction. And it will help to prevent unnecessary reinvestigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer."</p>

## Governors

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Principal set Minutes (signed)	No		Permanent	Retain in school for 6 years from date of meeting  <i>Any working papers leading up to the set of papers signed by the Chair at the AGM with the final reports and final budget can be disposed after 6 years</i>	Transfer to Archives  Shred/Delete
Inspection copies	No		Date of meeting + 3 years	DESTROY	
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
Annual Parents' meeting papers	No		Date of meeting + 6 years	Retain in school for 6 years from date of meeting	Transfer to Archives
Instruments of Government	No		Permanent	Retain in school	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
Policy documents	No		Expiry of policy	Retain in school whilst policy is Operational	Transfer to Archives for period of 6 years
Complaints files	Yes		Date of resolution of complaint + 6 years	Retain in school for the first six years Review for further retention in the case of contentious disputes	



				Complaints alleging possible harm to a young person by a member of staff are covered in the CP section  DESTROY routine complaints	
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	DESTROY	
Proposals for schools to become, or be established as Specialist Status schools	No		Current year + 3 years		Destroy

## Management

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Log books of activity in the school maintained by the Head Teacher [Books where the Headteacher or another member of staff keeps a record of what happens in the school. This may include details of events, photographs and other information]	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 + 6 years	Retain in the school for 6 years from meeting	Transfer to the Archives
Reports made by the Head Teacher or the management team	Yes		Date of report + 6 years	Retain in the school for 6 years from meeting	Transfer to the Archives
Records created by Head Teachers, Deputy Head Teachers and other members of staff with administrative responsibilities	Yes		Closure of file + 6 years then review	DESTROY	
Correspondence created by Head Teachers, Deputy Head Teachers and other members of staff with administrative responsibilities	Yes		Date of correspondence + 6 years	DESTROY	
Professional development plans	Yes		Life of the plan + 6 years	DESTROY	
School development plans	No		Life of the plan + 6 years	Review and if appropriate Destroy	
Complaints	Yes		Current + 6 years	Destroy	
Service Level Agreements	No		Expiry of agreement + 6 years		

Admissions Appeals - 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	DESTROY	
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	DESTROY	
Proof of address supplied by a parent as part of the admissions process	Yes		Current year + 1 year	Destroy	

## Pupils

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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
Attendance registers	Yes		Date of register + 6 years	DESTROY - if these records are retained electronically any backup copies should be destroyed at the same time	
Biometric Information	Yes	Protection of Freedoms Act 2012	Destroy immediately the child leaves school OR permission is withdrawn from the child or their parent(s)		
Pupil's Educational Record required by The Education (Pupil Information (England) Regulations 2005  PRIMARY	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school. This will include: to another primary school to a secondary school or to a pupil referral unit. If the pupil dies whilst at primary school the file should be returned to the Local Authority 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 Local Authority 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 Local Authority as it is more likely that the pupil will request the record from the Local Authority	

Pupil's Educational Record required by The Education (Pupil Information England) Regulations 2005  SECONDARY	Yes	Limitations Act 1980	DoB of the Pupil + 30 years		Destroy
Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil + 30 years  Record should be transferred to secondary school on transition	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 to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.	
Letters authorising absence	No		Date of absence + 2 years		Destroy
Absence books	Yes		Current year + 6 years	DESTROY	
Public examination results	No		Year of examinations + 6 years	DESTROY	
Internal examination results	Yes		Current year + 6 years (if these records are retained on the pupil file or in their National Record of Achievement they need only be kept		Destroy

			for as long as operationally necessary		
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<b>Pupils</b>				
<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at the end of the administrative life of the record</b>
Any other records created in the course of contact with pupils	Yes		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  Including proposed statement or amended statement	Yes	SEN and Disability Act 2001 Section 1	DOB of the pupil + 30 years (This would normally be retained in the pupil file)	DESTROY unless legal action is pending
Advice and information to parents regarding educational needs	Yes	SEN and Disability Act 2001 Section 2	DOB of the pupil + 30 years (This would normally be retained in the pupil file)	DESTROY unless legal action is pending
Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14		DESTROY unless legal action is pending
Children's SEN Files	Yes	SEN and Disability Act 2001 Section 1	Any information that does not transfer to secondary as part of the pupil file should be destroyed when the pupil leaves primary  Secondary pupil information should be retained DoB of pupil + 30 years	DESTROY unless legal action is pending
Parental permission slips for school trips - where there has been no major incident	Yes		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 in the incident + 30 years The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils	DESTROY
Records created by schools to obtain approval to run an Educational Visit outside the Classroom. - PRIMARY	No	Outdoor Education Advisers' Panel National Guidance specifically Section 3 "Legal Framework and Employer Systems" and Section 4 - "Good Practice". 3 part supplement to the H&S of Pupils on Educational Visits (HASPEV) (1998)	Date of visit + 14 years	DESTROY
Records created by schools to obtain approval to run an Educational Visit outside the Classroom. - SECONDARY	No	Outdoor Education Advisers' Panel National Guidance specifically Section 3 "Legal Framework and Employer Systems" and Section 4 - "Good Practice".  3 part supplement to the H&S of Pupils on Educational Visits (HASPEV) (1998)	Date of visit + 10 years	DESTROY
Walking Bus Register	Yes		Date of register + 3 years	Destroy (if records are retained electronically any back up copies should also be destroyed)



## Curriculum

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	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
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		Where possible pupils' work should be returned to the pupil at the end of the academic year if	It may be appropriate to review these records at the end of each year and allocate a new retention period or

			this is not the school's policy then current year + 1 year	DESTROY
SATS records	Yes		The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison.	DESTROY
PAN reports	Yes		Current year + 6 years	DESTROY
Value added records	Yes		Current year + 6 years	DESTROY
Self Evaluation Forms	Yes		Current year + 6 years	DESTROY
Early Years Foundation Analysis	No		Current year + 13 years	DESTROY
Key Stage 1 Analysis			Current year + 11 years	DESTROY
Key Stage 2 Analysis			Current year + 9 years	DESTROY

## Early Years

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Early Years Provision - name, home address and DoB of each child who is looked after on the premises	Yes		Closure of setting + 50 years (These could be required to show whether or not an individual child attended the setting in a child protection investigation)	DESTROY
Name, home address and telephone number of a parent of each child who is looked after on the premises	Yes		If this information is kept on the same form as the previous then the same retention period should be used. If stored separately then destroy once the child has left the setting (unless it has been collected for anything other than emergency contact)	DESTROY
Name, address and telephone number of any person who will be looking after children on the premises	Yes		See entry immediately below	DESTROY
Daily record of the names of children looked after on the premises, their hours of attendance and the names of the persons who looked after them	Yes	The Day Care and Child Minding (National Standards) *England) Regulations 2003	Current year + 2 (if records are likely to be needed in a CP setting then should be retained for closure of setting + 50 years	DESTROY
A record of accidents occurring on the premises and incident books relating to other incidents	Yes	The Day Care and Child Minding (National Standards) *England) Regulations 2003	DOB of child + 25 years. If an adult is injured then the accident book must be kept for 7 years from date of incident	DESTROY
Record of any medicinal product administered to any child on the premises including date and circumstances of administration.		The Day Care and Child Minding (National Standards) *England) Regulations 2003	DOB of child + 25 years	DESTROY

by whom, what etc plus parent consent				
Record of transfer	Yes			1 copy to parent, 1 copy to Primary School
Portfolio of work	Yes			To be sent home with child

## Staff records

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	DESTROY
Flexitime records	Yes		Current year + 2 years	DESTROY
Staff Personnel files	Yes		Termination + 6 years	DESTROY
Interview notes and recruitment records	Yes		Date of interview + 6 months	DESTROY
Disciplinary proceedings:	Yes	<p>Where the warning relates to child protection issues then retain until the person's normal retirement age, or 10 years from the date of the allegation, whichever is the longer. If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice.</p> <p>All other disciplinary proceedings must be placed in a sealed envelope on the personnel file and retained for a period of 6 years from date of termination after which point records should be destroyed</p>		
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	DESTROY
Annual appraisal/assessment records	No		Current year + 5 years	DESTROY
Salary cards	Yes		Last date of employment + 85 years	DESTROY
Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999	Current year, + 3yrs	DESTROY
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	DESTROY
Proofs of identity collected as	Yes		Where possible these should be checked and	

part of the process of checking "portable" enhanced DBS disclosure			a note kept of what was seen and checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's personal file.	
Pensions personal records	Yes	Financial regulations	6 years after first pension payment  (currently outsourced to BMBC)	DESTROY
Payroll - Records	Yes	Financial regulations	Currently outsourced to BMBC Payroll and retained under the BMBC policy	
Personal Files - records relating to an individual's employment history	Yes**	Limitation Act 1980 (Section 2)	Termination + 6 years then review	DESTROY
Pre-employment vetting information (including DBS checks)	No	DBS guidelines	Date of check + 6 months	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months
Staff training records - general	Yes		Current year + 35 years	DESTROY
Training (proof of completion such as certificates, awards, exam results)	Yes		Last action + 7 years	DESTROY
Risk Assessments (e.g. maternity, temporary adjustments due to illness etc)	Yes		Current year + 3 years	DESTROY
Training records - Health & Safety	Yes		Current year + 40 years	DESTROY
Union documents			Current year + 2 years	DESTROY

Termination of Employment	Yes		6 years after first pension payment	DESTROY
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## Recruitment

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
All records leading up to the appointment of a new member of staff - unsuccessful candidates	Yes		Date of appointment of successful candidate + 1 year	DESTROY	
All records leading up to the appointment of a new member of staff - successful candidate	Yes		All the relevant information should be added to the staff personal file (see above) and all other information retained for 6 months	DESTROY	
Pre-employment vetting information - DBS Checks	No	DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months		
Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	Yes		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's personal file (see above)		
Pre-employment vetting	Yes	An employer's guide	Where possible these documents		



information - Evidence proving the right to work in the United Kingdom <sup>4</sup>		to right to work checks (Home Office May 2015)	should be added to the Staff Personal File (see above), but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years		
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### Health and Safety

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Accessibility Plans	Yes	Disability Discrimination Act	Current year + 6 years	DESTROY
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	DESTROY
Accident Reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
Adults	Yes		Date of incident + 7 years	DESTROY

Children	Yes		DOB of child + 25 years	DESTROY
COSHH	No		Current year + 10 years (where appropriate an additional retention period may be allocated)	DESTROY
Incident reports	Yes		Current year + 20 years	DESTROY
Policy Statements	No		Date of expiry + 6 years	DESTROY
Risk Assessments	Yes		Current year + 6 years	DESTROY
Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No		Last action + 40 years	DESTROY
Process of monitoring areas where employees and persons are likely to have come into contact with radiation			Last action + 50 years	DESTROY
Fire Precautions log books	No		Current year + 7 years	DESTROY
Training records (H&S)	Yes		Current year + 40 years	Destroy

## Administrative

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Employer's Liability certificate	No		Closure of the school + 40 years	DESTROY	
Inventories of equipment and furniture	No		Current year + 6 years	DESTROY	
School brochure or prospectus	Yes		Current year + 3 years		DESTROY
Newsletters/school circulars	Yes		Current year + 1 year	Review to see whether a further retention period is required	DESTROY
Visitors' book	Yes		Current year + 6 years	Review to see whether a further retention period is required	DESTROY
PTA/Old Pupils Associations	Yes		Current year + 6 years	Review to see whether a further retention period is required	DESTROY
Minor matters of theft, Fraud misappropriation (internal action taken)	Yes		6 years after action/investigation complete		DESTROY
Serious matters of theft, Fraud misappropriation (internal action taken)	Yes		10 years after action/investigation complete		DESTROY

## School Meals

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Free School Meals Registers	Yes		Current year + 6 years	DESTROY	
School Meals Summary Sheets	Yes		Current year + 3 years	DESTROY	

## Finance

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Annual Accounts	No	Financial Regulations	Current year + 6 years	DESTROY	
VAT Accounts/Claims		Financial Regulations	Current year + 6 years	DESTROY	
Investment Records			Current year + 2 years	Review then DESTROY or retain for further period of appropriate	
Loans and grants	No	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)
Contracts under seal	No		Contract completion date + 12 years	DESTROY	
Contracts under signature	No		Contract completion date + 6 years	DESTROY	
Contracts Forms of Tender			Current year + 6 years	DESTROY	
Contracts - expressions of interest, tender received forms and/or post tender negotiations/clarification			2 years after contract let or not proceeded with	DESTROY	

documents/minuted					
Copy orders	No		Current year + 2 years	DESTROY	
Budget reports, budget monitoring etc.	No		Current year + 3 years	DESTROY	
Invoice, receipts and other records covered by the Financial Regulations	No	Financial Regulations	Current year + 6 years	DESTROY	
Annual Budget and background papers	No		Current year + 6 years	DESTROY	
Order books and requisitions	No		Current year + 6 years	DESTROY	
Delivery Documentation	No		Current year + 6 years	DESTROY	
Quotations - successful		Financial regulations	Current year + 6 years	DESTROY	
Quotations - unsuccessful			Current year + 1 year	DESTROY	
Debtors' Records	Yes	Limitation Act 1980	Current year + 6 years	DESTROY	
School Fund - Cheque books	No		Current year + 6 years	DESTROY	
School Fund - Paying in books	No		Current year + 6 years then review	DESTROY	
School Fund - Ledger	No		Current year + 6 years then review	DESTROY	
School Fund - Invoices	No		Current year + 6 years then review	DESTROY	
School Fund - Receipts	No		Current year + 6 years	DESTROY	
School Fund - Bank statements	No		Current year + 6 years then review	DESTROY	
School Fund - School Journey books	No		Current year + 6 years then review	DESTROY	
Applications for free school meals, travel, uniforms etc	Yes		Whilst child at school	DESTROY	

Student grant applications	Yes		Current year + 3 years	DESTROY	
Free school meals registers	Yes	Financial Regulations	Current year + 6 years	DESTROY	
Petty cash books	No	Financial Regulations	Current year + 6 years	DESTROY	
Contracts monitoring records	No		Current year + 2 years	DESTROY	
Correspondence (income)			Current year + 2 years	DESTROY	
Correspondence on unpaid accounts			Current year + 6 years	DESTROY	
Credit Notes			Current year + 6 years	DESTROY	

<b>Property</b>					
<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at the end of the administrative life of the record</b>	
Title Deeds	No		Permanent	Permanent unless the property has been registered at the Land Registry	Offer to Archives if the deeds are no longer needed
Plans	No		Permanent	Retain in school whilst Operational	Offer to Archives
Maintenance and contractors	No	Financial Regulations	Current year + 6 years	DESTROY	
Leases	No		Expiry of lease + 6 years	DESTROY	
Lettings	No		Current year + 3 years	DESTROY	
Burglary, theft and vandalism report forms	No		Current year + 6 years	DESTROY	
Maintenance log books	No		Last entry + 10 years	DESTROY	
Contractors' Reports	No		Current year + 6 years	DESTROY	

<b>Department for Education</b>					
<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at the end of the administrative life of the record</b>	
OFSTED reports and papers	No		Replace former report with any new inspection report	Review to see whether a further retention period is Required	Transfer to Archives
Returns	No		Current year + 6 years	DESTROY	

Circulars from Department for Education	No		Whilst operationally required	Review to see whether a further retention period is Required	Transfer to Archives
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### Local Authority

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Secondary transfer sheets (Primary)	Yes		Current year + 2 years	DESTROY	
Attendance returns	Yes		Current year + 1 year	DESTROY	
Circulars from LA	No		Whilst required operationally	Review to see whether a further retention period is required	Transfer to Archive

### Other Records - Administration

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
<b>Financial Records</b>				
Financial records - accounts, statements, invoices, petty cash etc	No		Current year + 6 years	DESTROY
Stock taking records	No		Current year + 1 year	Destroy
Internal requisitions	Yes		Current year + 5 years	Destroy
Approved supplier list	Yes		Current year + 10 years	Destroy
<b>Insurance</b>				
Insurance policies - Employers Liability	No	Employers Liability Financial Regulations	The policies are kept for a minimum of 7 years and a maximum of 40 years depending on the type of	DESTROY



			policy	
Insurance renewal information			5 years after renewal	DESTROY
Claims made against insurance policies - damage to property	Yes		Case concluded + 3 years	DESTROY
Claims made against insurance policies - personal injury	Yes		Case concluded + 6 years	DESTROY
<b>Human Resources</b>				
Premises and Health and Safety				
Premises files (relating to maintenance)	No		Cessation of use of building + 7 years then review	DESTROY

**\*\*For Data Protection purposes the following information should be kept on the file for the following periods:**

All documentation on the personal file                      Duration of employment

Pre-employment and vetting information                      Start date + 6 months


Records relating to accident or injury at work                      Minimum of 12 years

Annual appraisal/assessment records                      Minimum of 5 years

**Records relating to disciplinary matters (kept on personal files)**

- oral warning                      6 months
- first level warning                      6 months
- second level warning                      12 months
- final warning                      18 months

## Document Detail

<b>Document Name:</b>	Data Retention Policy
<b>Version:</b>	6
<b>Chief Officer Signature:</b>	
<b>Effective From:</b>	01/04/2025
<b>Approved by:</b>	D Dickinson
<b>Approval Meeting Reference:</b>	ELT 3/3/25
<b>Next Review Date:</b>	01/01/2027

## Version Control

Version	Date	Author	Change/Reference
1	2018	V Collins	New policy
2	2020	V Collins	Checked for compliance.
3	June 2022	V Collins / I Burns	Addition of section on storage of records Additional detail on how records will be managed in the event of school closure. Additional contact methods provided
4	July 2024	M Bretherton	No change. Checked for compliance.
5	October 24	D Dickinson	Insertion of an additional provision that states the Retention Schedule needs to be kept in line with the Council's time periods. • Insertion of an annual review clause. • Insertion of a named contact for the custodians of the data and records.
6	January 25	M Bretherton	Minor changes in wording. Removal of SAR section (duplicated in FOI Policy) Change from 30 years to 25 for Child Protection File Retention. Change from 3 years to 6 for Attendance Registers.