RECORDS MANAGEMENT POLICY (Retention Policy)

This is a Category 1 Policy (Full Delegation)

This policy is in force until further notice from:	October 2023
This policy must be reviewed by:	Autumn 2024
Policy Author(s):	Shamita Kumar
Date policy reviewed by Compliance & Governance Officer:	October 2023
Date compliance with GDPR assured:	October 2023
Location of publication of policy:	The Trust Website/ Governor Hub/ Internal Records & Intranet
Under the Trust's Scheme of Delegation this policy must be approved by People, Compliance & Governance Committee Such approval was given on:	Audit & Risk Committee November 2023

INTRODUCTION

1. Avanti Schools Trust ("the Trust") processes a significant amount of personal information about its pupils, parents, staff, volunteers and other individuals that we come into contact with. This can include sensitive information ("Special Category Data").

2. The UK General Data Protection Regulation (the retained EU law version of the General Data Protection Regulation (EU) 2016/679) ("GDPR") requires that we keep personal information for no longer than it is necessary for the purposes that it was processed. This is known as the principle of 'Storage Limitation'. This Policy has been implemented to ensure that we meet this important requirement.

3. This procedure applies to all Trust staff, trustees, volunteers and contractors.

THE IMPORTANCE OF STORAGE LIMITATION

4. For those tasked with meeting the requirements of this Policy, it is important to understand why we must not keep personal information for longer than is necessary.

5. Where the Trust holds personal information, it will always do so for a purpose that is necessary for it to function effectively. Once it becomes unnecessary to hold personal information, it creates risks that the data will become irrelevant, excessive or in inaccurate. This can create risks to individuals because using their data could have negative consequences for them. A further problem that arises when information is held longer than necessary, is that it creates operational inefficiencies for the Trust. For example, it can lead to unnecessary costs associated with storage and security of data, or increased time spent responding to subject access requests due to the time spent reviewing records unnecessarily.

6. With the above context being understood, those tasked with undertaking the requirements of this Policy are not only supporting the Trust to meet its legal obligations under the UK GDPR, but also supporting us to operate efficiently.

THE PROCEDURE

7. Our Procedure is designed to be user friendly and easy to follow. There are 3 specific stages which are as follows:

    (1) Review
    (2) Destruction
    (3) Certification

8. Each step is set out below.

A. REVIEW

Retention Periods

9. The purpose of this task is to review both manual and electronic records, and to determine whether they have met the date for destruction set out in the **Retention Schedule at Appendix A.**

10. The GDPR does not set out how long the Trust is required to hold personal information. It is up to the Trust to assess the personal information that it processes and determine the date by which it will no longer be necessary. Because the personal information processed by the Trust is so wide reaching, how long is necessary will depend on the type of data that we are concerned with and why we need it. In some instances, there is a legal requirement to keep personal information for a specific period of time. Ultimately, the Trust must be able to justify why it is necessary to hold personal information for a given period of time.

11. To meet this requirement, the Data Protection Officer ("DPO") for the Trust has developed a Records Retention Schedule ("Retention Schedule"). This schedule is informed by various sources, most notably the IRMS Academies Toolkit. The purpose of the Retention Schedule is to set out how long we will hold different categories of personal information for before it can be destroyed. A copy of the Retention Schedule is contained within **Appendix A**. The Retention Schedule creates a consistent, uniformed approach across the Trust to data retention.

12. There is little use in having a Retention Schedule if no steps are taken to review these data sets, and to destroy those that have reached or surpassed the stated retention date. Our Policy is that we will carry out a review of records annually. We have determined this review period based on our available resources and taking into account privacy risks to individuals. The Trust may however undertake more frequent reviews where there is justification for doing so.

13. Accordingly, on an annual basis, we will require the Trust, and each school, to review the records that it holds against the Retention Schedule. The person responsible for leading on this will be the Data Protection Lead (DPL) for each school and the Trust. However, the review should be undertaken collaboratively, and the responsibility for review shared. In this regard, the DPL may delegate different parts of the Retention Schedule to the most appropriate individual(s) for review e.g. the SENCo may be best placed to review SEN records, the DSL may be best placed to review safeguarding records.

B. DESTRUCTION

14. Where the person responsible for reviewing the Retention Schedule determines that a particular data set is "no longer necessary", then it must be deleted or destroyed in accordance with the guidelines below:

(a) **Hard copy records** - Hard copy records must be destroyed by means of shredding, or by putting into approved confidential waste bins. No other form of destruction should be used without first obtaining approval from the Compliance Officer.

(b) **Electronic records** – The starting point is to irretrievably delete records from systems where it is possible to do so. However, the ICO recognises that for technical reasons associated with a particular system, it may not always be possible to irretrievably delete records. For example, this may be because deleting a particular set of personal information that is no longer required will result in other personal information that remains necessary also being deleted; the ICO takes a realistic approach to issues such as

these. In these circumstances, personal information that is deemed to be no longer necessary must be 'put beyond use'. This means that the Trust:

(a) will be unable, or will not attempt, to use the personal data to inform any decision in respect of any individual or in a manner that affects the individual in any way;
(b) does not give any other organisation access to the personal data;
(c) surrounds the personal data with appropriate technical and organisational security; and
(d) commits to permanent deletion of the information if, or when, this becomes possible.

Accordingly, short of deletion, the personal information must be put beyond use.

15. A record of the records deleted should be entered into the destruction log a copy of which can be found at **Appendix B.**

C. CERTIFICATION

16. Once the review is completed, the DPL will be responsible for signing the certification at **Appendix C.** The certification acts as confirmation that the Trust, or the school, has completed the Review and destroyed records that are no longer necessary.

17. The certificate will be held centrally by the Trust and should be sent to the Compliance Officer (DPO@avanti.org.uk), clearly titled.

APPENDIX A

RECORDS RETENTION SCHEDULE

1. Governance

1.1 Governance of the Academy Trust					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
1.1.1	Appointment of Trustees, Governors and Directors	Yes		Life of appointment + 6 years	SECURE DISPOSAL
1.1.2	Accessibility Plan	There may be if the plan refers to specific pupils	Limitation Act 1980 (section 2)	Life of plan + 6 years	SECURE DISPOSAL

1.2 Board of Directors, Members Meetings and Governing Body					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
	Board of Directors				
1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Companies Act 2006 (section 248)	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
1.2.2	Board Decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
	Committees				
1.2.3	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
	General Members' Meeting				
1.2.4	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 (section 248)	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES

1.2.5	Records relating to the management of the Annual General Meeting	Could be if the minutes refer to living individuals	Companies Act 2006 (section 248)	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
	Governors				
1.2.6	Agenda for Governing Body meetings	May be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL
1.2.7	Minutes of, and papers considered at, meetings of the Governing Body and its committees	May be data protection issues if the meeting is dealing with confidential issues relating to staff			
	Principal set (signed)			Life of Academy	
	Inspection copies			Date of meeting + 3 years	SECURE DISPOSAL
1.2.8	Reports presented to the Governing Body	May be data protection issues if the meeting is dealing with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy	SECURE DISPOSAL or retain with the signed set of minutes
1.2.9	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL

	Statutory Registers[1]				
1.2.10	Register of Directors		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.11	Register of Directors' interests [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.12	Register of Directors' residential addresses		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.13	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.14	Register of members		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.15	Register of secretaries		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.16	Register of Trustees' interests			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.17	Declaration of Interests Statements [Governors] [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL

1.3	**Funding and Finance**				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
	Payroll and Pensions				
1.3.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL

[1] Academies are required by law to keep specific records, collectively known as statutory registers or the statutory books. The registers record information relating to the Academy's operations and structure, such as the current directors. Records should be kept up-to-date to reflect any changes that take place.

1.3.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL
1.3.3	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.4	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.5	Payroll records	Yes		Date of payroll run + 6 years	SECURE DISPOSAL
1.3.6	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.7	School Fund - Invoices	No		Current year + 6 years	SECURE DISPOSAL
1.3.8	School Fund - Receipts	No		Current year + 6 years	SECURE DISPOSAL
1.3.9	School Fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
	School Meals[2]				
1.3.10	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.11	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL

[2] Unless it would be unreasonable to do so, school lunches should be provided when they are requested by, or on behalf of, any pupil. A school lunch must be provided free of charge to any pupil entitled to free school lunches. From September 2014, free school lunches must be provided to all KS1 pupils.

2. Human Resources

2.1 Recruitment[3]					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	Yes		Where possible, these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File	SECURE DISPOSAL
2.1.5	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom[4]	Yes	An employer's guide to right to work checks [Home Office May 2015]	Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are	SECURE DISPOSAL

[3] Academies do not necessarily have to employ people with qualified teacher status; only the SEN and designated LAC teacher must be qualified.
[4] Employers are required to take a "clear copy" of the documents which they are shown as part of this process.

				kept for termination of employment plus not less than 2 years	
2.1.6	Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.7	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

2.2	**Operational Staff Management**				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
2.2.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980 (section 2)	Termination of employment + 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal / assessment records	Yes		Current year + 5 years	SECURE DISPOSAL

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

2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded[5]	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	SECURE DISPOSAL These records must be shredded
	Disciplinary proceedings	Yes			
2.3.2	Oral warning			Date of warning + 6 months[6]	SECURE DISPOSAL[7]
2.3.3	Written warning – level 1			Date of warning + 6 months	SECURE DISPOSAL
2.3.4	Written warning – level 2			Date of warning + 12 months	SECURE DISPOSAL
2.3.5	Final warning			Date of warning + 18 months	SECURE DISPOSAL
2.3.6	Case not found			If the incident is child protection related then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL

2.4 Health and Safety					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
2.4.1	Records relating to	Yes		Date of incident + 12 years	SECURE DISPOSAL

[5] This review took place when the Independent Inquiry on Child Sexual Abuse was beginning. In light of this it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention.
[6] Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice.
[7] If warnings are placed in personal files, then they must be weeded from the file.

	accident/injury at work			In the case of serious accidents, a further retention period will need to be applied	
2.4.2	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 (regulation 25). Social Security Administration Act 1992 (section 8). Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format. The incident reporting form may be retained as below.	
	• Adults			Date of incident + 6 years	SECURE DISPOSAL
	• Children			Date of birth of the child + 25 years	SECURE DISPOSAL
2.4.3	Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL

3. Management of the Academy

3.1 Admissions					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
3.1.1	Admissions – if the admission is successful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL
3.1.2	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
3.1.3	Register of admissions	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014 (page 6)	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	REVIEW Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates they attended the school
3.1.4	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
3.1.5	Proofs of address supplied	Yes	School Admissions Code	Current year + 1 year	SECURE DISPOSAL

	by parents as part of the admissions process		Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014		
3.1.6	Supplementary information form, including additional information such as religion and medical conditions	Yes			
	• Successful admissions			This information should be added to the pupil file	SECURE DISPOSAL
	• Unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL

3.2	Head Teacher and Senior Management Team				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
3.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the County Archives Service, if appropriate
3.2.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or		Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL

		members of staff			
3.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL
3.2.4	Records created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then REVIEW	SECURE DISPOSAL
3.2.5	Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL
3.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL

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

3.3.1	Management of complaints	Yes		Date of complaint resolved + 3 years	SECURE DISPOSAL
3.3.2	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL

4. Pupil Management

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

4.1 Pupil's Educational Record					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
4.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 (SI 2005 No. 1437)		
	• Primary			Retain whilst the child remains at the primary school	The file should follow the pupil when they leave the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the

					country, the file should be returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA.
	• Secondary		Limitation Act 1980 (section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL
4.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
4.1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
4.1.4	Examination results – pupil copies	Yes			
	• Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	• Internal			This information should be added to the pupil file	
4.1.5	Child protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file	SECURE DISPOSAL – these records MUST be shredded

			2015"		
4.1.6	Child protection information held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	SECURE DISPOSAL – these records MUST be shredded

Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule

4.2	**Attendance**				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
4.2.1	Attendance registers	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	SECURE DISPOSAL
4.2.2	Correspondence relating to authorised absence		Education Act 1996 (section 7)	Current academic year + 2 years	SECURE DISPOSAL

4.3	**Special Educational Needs**				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
4.3.1	Special Educational Needs files, reviews and Individual	Yes	Limitation Act 1980 (section 2)	Date of birth of the pupil + 25 years	REVIEW Note: This retention period is the

	Education Plans				minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time in order to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period – this should be documented
4.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 (section 1)	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
4.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 (section 2)	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
4.3.4	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 (section 14)	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold

5. Curriculum Management

5.1 Statistics and Management Information					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
5.1.1	Examination results (schools copy)	Yes		Current year + 6 years	SECURE DISPOSAL
5.1.2	SATs records	Yes			
	• Results			The SATs results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL
	• Examination papers			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
5.1.3	Published Admission Number (PAN) reports	Yes		Current year + 6 years	SECURE DISPOSAL
5.1.4	Value added and contextual data	Yes		Current year + 6 years	SECURE DISPOSAL
5.1.5	Self-evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL

6. Extracurricular Activities

6.1 Educational Visits outside the Classroom					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
6.1.1	Parental consent forms for school trips where there has been no major incident[8]	Yes		Conclusion of the trip	Although the consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time
6.1.2	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (section 2)	Date of birth of the pupil involved in the incident + 25 years. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	
6.1.3	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL

6.2 Walking Bus					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**

[8] One-off or blanket consent: The Department for Education (DfE) has prepared a one-off consent form to be signed by the parent on enrolment of their child in a school. this form is intended to cover all types of visits and activities where parental consent is required. The form is available on the DfE website for establishments to adopt and adapt, as appropriate, at www.gov.uk/government/publications/consent-for-school-trips-and-other-off-site-activities. A similar form could be used or other establishments, such as Early Years Foundation Stage (EYFS) providers and youth groups, or at the start of programme for young people.

6.2.1	Walking bus registers	Yes		Date of register + 3 years. This takes into account the fact that, if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]

7. Central Government and Local Authority (LA)

This section covers records created in the course of interaction between the school and the LA

7.1 Local Authority					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
7.1.1	Secondary transfer sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
7.1.2	Attendance returns	Yes		Current year +1 year	SECURE DISPOSAL

APPENDIX B

RECORD OF DESTRUCTION

RECORDS MANAGEMENT POLICY

Item reference (or other unique identifier)	Description of Item	No. of files/records destroyed	Person authorising destruction	Method	Date

APPENDIX C

CERTIFICATE

RECORDS MANAGEMENT POLICY

I, [insert name] [insert position] can confirm as follows:

(a) I have read and understood the Records Management Policy

(b) I can confirm that the [insert name of school or Trust] has completed a review of the records held in accordance with the Records Management Policy and the Retention Schedule at Appendix A.

(c) I can confirm that records that have met their date for destruction have been destroyed and a record of the same has been made in the Record of Destruction at Appendix B.

Name: …….

Position: …….

Date: ……