



Data Retention Schedule

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| Version: | 2.0 | |
| Written by: | ELAN executive team | |
| Reviewed by: | ELAN Board | Date: 05/07/2022 |
| Approved by: | Name: Rosemary Carr Signed by: Rosemary Carr Chair of the Board | Date: 05/07/2022 |
| Adopted by Academies: | Banwell Primary School Bournville Primary School Locking Primary School Mead Vale Primary School Mendip Green Primary School Milton Park Primary School Oldmixon Primary School Walliscote Primary School Windwhistle Primary School | |
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Document Control

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Version Control

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| 1.0 | 11/2019 | | Final Board approved |
| 1.1 | 18/06/2020 | HR Lead | Addition of DBS consent forms in section 1. |
| 2.0 | July 2022 | HR Lead | Annual review – no updates |
| | | | |
| | | | |

| 1. Child Protection | | | | |
|--|------------------------|--|--|---|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Safeguarding Policies and procedures | No | Permanent | ARCHIVE | Transfer to archive for retention when new policy implemented. |
| Child Protection files | Yes | DOB + 25 years but review sensitive case files every 5-6 years thereafter | SHRED | <p>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.</p> <p>Limitation periods can be dis-applied in criminal and civil abuse cases; to be weighed against rights under the GDPR and our insurers' requirements.</p> <p>Special category data MUST be shredded and disposed of securely at the end of its administrative life</p> |
| Allegations of a child protection nature against a member of staff | Yes | Until the person's normal retirement age, or 10 years from the date of the allegation if that's longer | SHRED | <p>ICO Employment Practices Code: Supplementary Guidance 2.13.1 (Discipline, grievance and dismissal)</p> <p>"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".</p> <p>Summary record to be retained on confidential personnel file, and a copy given to the person concerned.</p> |

1. Child Protection (continued)

| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
|-----------------------------|------------------------|--|--|--|
| DBS Disclosure Certificates | Yes | No longer than 6 months from decision on recruitment unless DBS specifically consulted | SHRED | Keep a record in the Single Central Record that checks were undertaken, with relevant reference details (Disclosure number, date, who checked it). . |
| DBS Consent Forms | Yes | No longer than 12 months from the application | SHRED | These will be retained centrally and a copy should not be retained within schools |

| 2. Governors | | | | |
|--|-------------------------------|--|---|---|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Minutes – principle set (signed) | Yes | Permanent | ARCHIVE | Transfer to archive for permanent retention after 6 years |
| Minutes – inspection copies | Yes | Date of Meeting + 3 years | SHRED | Minutes may contain personal information so default method of disposal is shredding |
| Agendas | No | Permanent - archive one copy with master of minutes, All other copies date of meeting | ARCHIVE one copy. All other copies SHRED | Transfer to archive for permanent retention after 6 years |
| Reports (including annual report) | Yes | Date of report + 6 years. If minutes refer directly to individual report, said report must be kept permanently | ARCHIVE | Dispose of after retention period |
| Annual Parent's Meeting papers held under section 33 of the Education Act 2002 | No | Date of meeting + 6 years | SHRED | Dispose of after retention period |
| Instruments of Government including Articles of Association | No | Permanent | Retain in school whilst school is open | Transfer to archive when the school has closed |
| Trusts and Endowments managed by the Governing Body | No | Permanent | Retain in school whilst operationally required | Transfer to archive |
| Action Plans | No | Date of action + 6 years | SHRED | These could be disposed of after 3 years but they are often linked to finances which have to be retained for a minimum of 6 years after the end of the financial year. (especially important if the school has been through a difficult period) |
| Policy Documents | No | Life of policy + 3 years | SHRED | Retained for inspection purposes – important if policy is linked to previous decision making process. Version control important. |

2. Governors (continued)

| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
|---|------------------------|---|--|--|
| Complaints files | Yes | Date of resolution of complaint + 6 years | SHRED | Review for further retention before destruction in the case of contentious disputes. Destroy routine complaints. Complaints alleging possible harm to a pupil by a member of staff are covered in 1 above. |
| Annual reports required by the Department for Education | No | Date of report + 10 years | SHRED | Dispose of after retention period |
| Proposals for change of status of a maintained school including specialist status schools and academies | No | Date proposal accepted or declined + 3 years | SHRED | Dispose of after retention period |
| Governor personal details: name, address, date of birth | Yes | Whilst in post + 6 years | ARCHIVE | Keep a record in the Single Central Record. Dispose of after retention period |
| Trustees personal details: name, address, date of birth | Yes | Retained by Companies House on statutory register. Date of appointment + 20 years | ARCHIVE | Keep a record in the Single Central Record. Dispose of after retention period |

| 3. Management | | | | |
|--|-------------------------------|----------------------------------|---|--|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Log books | Yes | Date of last entry + 6 years | SHRED | May contain personal information |
| Minutes of the Senior Leadership Team and other internal administrative bodies | Yes | Date of meeting + 3 years | SHRED | May contain personal information |
| Records created by Head Teacher or management team (except child protection records which are dealt with in section 1 above) | Yes | Current academic year + 6 years | SHRED | May contain personal information |
| Correspondence created by Head, Deputy Heads, Heads of Year and other members of staff with administrative responsibilities | Yes | Date of correspondence + 3 years | SHRED | May contain personal information |
| Professional Development Plans | Yes | Life of the Plan + 6 years | SHRED | May contain personal information |
| School Development Plans | No | Life of the Plan + 3 years | SHRED | Review before destroying for relevance to any current actions or decisions |
| All records relating to the creation and implementation of School Admissions Policy | No | Life of the policy + 3 years | SHRED | Review before destroying for relevance to any current actions or decisions |
| Admissions if successful | Yes | Admission + 1 year | SHRED | May contain personal information |

| 3. Management (continued) | | | | |
|---|-------------------------------|--|---|-----------------------------------|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Admissions if the appeal is unsuccessful | Yes | Resolution of case + 1 year | SHRED | May contain personal information |
| Proof of address provided by parents as part of the admissions process | Yes | Current + 1 year | SHRED | May contain personal information |
| Supplementary information form including additional information such as medical conditions, religion etc. | Yes | Successful admission – add to the pupil file Unsuccessful admission – until the appeals process is complete | SHRED | May contain personal information |
| Records relating to the creation and implementation of the School Admission's Policy | Yes | Life of the policy + 3 years | SHRED | Dispose of after retention period |

| 4. Pupils | | | | |
|--|------------------------|--|--|--|
| Data Description | Data Protection Issues | 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 | SHRED | Review before destroying. Schools may wish to consider keeping admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school |
| Attendance registers | Yes | Date of entry + 3 years | SHRED AND/OR DISPOSAL | If these record are retained electronically any back up copies should be destroyed at the same time |
| Correspondence relating to authorised absence | Yes | Current academic year + 2 years | SHRED | May contain personal information |
| Correspondence relating to unauthorised absence and issues | Yes | Date of absence + 2 years | SHRED | May contain personal information |
| Pupil files retained in school | Yes | Retain for the time the pupil remains at the school | TRANSFER | Transfer to secondary school or other primary school when the child leaves the school. In the case of exclusions it may be appropriate to transfer the record to the Pupil Referral Unit |
| Special Educational Needs files, reviews and IEP's | Yes | DOB of the pupil + 25 years minimum. Recommendation is from date of leaving the school/academy, files should be retained for 70 years | SHRED | Review before destroying. Note: this retention period is the minimum and some authorities elect to keep SEN files for a longer period Special category data MUST be shredded and disposed of securely at the end of its administrative life |
| Any other records created in the course of contact with pupils | Yes | Current academic year + 3 years | SHRED | Review at the end of 3 years and either allocate a further retention period or dispose or shred |
| Child protection information held on pupil file | Yes | If any records relating to child protection are placed on the pupil file, they should be in a sealed envelope and retained for the same period of time as the pupil file | See pupil files above | See pupil files above |

| 4. Pupils (continued) | | | | |
|--|------------------------|--|--|--|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Child protection information held in separate files | Yes | DOB of the child + 25 years, then review sensitive case files every 5-6 years thereafter | TRANSFER | <p>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).</p> <p>In the case of pupil exclusions it may be appropriate to transfer the record to the Local Education Authority or Pupil Referral Unit.</p> <p>Where a child is removed from roll to be educated at home, the file should be copied to the Local Education Authority.</p> <p>Limitation periods can be dis-applied in criminal and civil abuse cases; to be weighed against rights under the GDPR and our insurers' requirements.</p> <p>Special category data MUST be shredded and disposed of securely at the end of its administrative life (DOB of the child + 25 years).</p> |
| Statement maintained under the Education Act 1996-Section 234 and any amendments made to the statement | Yes | DOB + 25 years. (This would normally be retained on the pupil file) | SHRED | <p>Shred unless legal action is pending.</p> <p>Special category data MUST be shredded and disposed of securely at the end of its administrative life.</p> |
| Advice and information to parents regarding educational needs | Yes | DOB of pupil + 25 years. (This would normally be retained on the pupil file) | SHRED | <p>Shred unless legal action is pending.</p> <p>Special category data MUST be shredded and disposed of securely at the end of its administrative life.</p> |
| Accessibility Strategy | Yes | DOB + 25 years. (This would normally be retained on the pupil file) | SHRED | <p>Special category data MUST be shredded and disposed of securely at the end of its administrative life.</p> |
| Parental consent forms for school trips – where there has been no major incident | Yes | Conclusion of the trip | SHRED | <p>May contain personal information</p> |

| 4. Pupils (continued) | | | | |
|---|------------------------|---|--|--|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Parental consent forms for school trips – where there has been a major incident | Yes | DOB 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 | SHRED | May contain personal information |
| Pupil medical records | Yes | DOB + 25 years | SHRED | Special category data MUST be shredded and disposed of securely at the end of its administrative life. |
| Published Admission Number (PAN) reports | Yes | Current year + 6 years | SHRED | May contain personal information |
| Self-evaluation forms | Yes | Current year + 6 years | SHRED | May contain personal information |

| 5. Curriculum | | | | |
|------------------------|------------------------|---------------------------------|--|---|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Curriculum development | No | Current academic year + 6 years | DESTROY | If personal data is recorded in the records, they must be shredded. |
| Curriculum returns | No | Current year + 3 years | DESTROY | If personal data is recorded in the records, they must be shredded |
| SAT's records | Yes | Current academic year + 6 years | SHRED | May contain personal information |
| Trip records | Yes | Date of trip + 2 years | SHRED | See also H & S with regard to risk assessments. Records should be retained for longer if an incident occurs |
| Pupil's work | No | Current academic year + 1 year | DESTROY | Review these records at the end of each academic year and allocate a new retention period or destroy |
| Class record books | No | Current academic year + 1 year | DESTROY | Review these records at the end of each academic year and allocate a new retention period or destroy. If additional personal data is recorded in the books, they must be shredded. |
| Schemes of work | No | Current academic year + 1 year | DESTROY | Review these records at the end of each academic year and allocate a new retention period or destroy |

| 6. Staff Records | | | | |
|---|------------------------|--|--|--|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Contracts of employment | Yes | End of contract + 6 years | SHRED | May contain personal information |
| Timesheets | Yes | End of contract + 6 years | SHRED | May contain personal information |
| Personnel files (including leave and training records) | Yes | End of contract + 6 years | SHRED | May contain personal information |
| Interview notes and recruitment records | Yes | Date of interview + 3 years (if successful). | SHRED | See also separate note on retention of DBS certificates. Notes from unsuccessful candidates can be destroyed after 6 months |
| Pre-employment vetting information (including unsuccessful DBS checks) | Yes | Date of check + 6 months (if unsuccessful) | SHRED | If successful , this information must be placed on the personnel file and managed in line with this policy |
| Pension or other benefit schedule | Yes | Permanent | ARCHIVE | Transfer to archive after employee has left employment |
| Disciplinary proceedings for all matters except those relating to child protection issues (for these circumstances see section 1) (Including investigation notes and witness statements) | Yes | Informal warning: date of warning + 6 months Written warning: date of warning + 12 months Final Warning: date + 18 months | SHRED | If these are placed on personnel files they need to be removed at the end of the retention period If, following investigation there is found to be no case to answer (except child protection allegations – see section 1), documents should be shredded upon conclusion of the case |
| Records relating to accident/injury at work | Yes | Date of incident + 5 years | SHRED | Review at the end of this period. In the case of serious accident, a further retention period will need to be applied |

6. Staff Records (continued)

| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
|---|------------------------|--|--|---|
| Appraisal documentation and assessment records or action plans | Yes | Duration of employment + 6 years | SHRED | May contain personal information |
| Health records | Yes | Duration of employment + 6 years | SHRED | May contain personal information |
| Pension records | Yes | Last payment + 6 years | SHRED | May contain personal information |
| Salary records | Yes | End of employment + 6 years | SHRED | May contain personal information |
| Maternity pay records | Yes | Current year +3 years | SHRED | May contain personal information |
| Allegation of a child protection nature against a member of staff including where the allegation is unfounded | Yes | Until the person's normal retirement age or 10 years from the date of the allegation, whichever is the longer then REVIEW. | SHRED | <p>Allegations that are found to be malicious should be removed from the files. If founded, they are to be kept on file and a copy provided to the person concerned</p> <p>May contain personal information</p> |

| 7. Health and Safety | | | | |
|---|------------------------|---|--|---|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Accessibility plans | Yes | Current year + 6 years | DESTROY | May contain personal information |
| Accident reporting records | Yes | Adults: last entry in the book/file + 6 years Children: DOB + 25 years | SHRED | Latent injuries can take years to manifest and the limitation period for claims reflects this. Notes should be kept of all procedures as they were, along with a record that they were followed. Review each case before destruction, especially if a case is live. Child may make a claim for negligence for 7 years from their 18 th birthday. To ensure that all records are kept until the pupil reaches the age of 25, this retention period has been applied. |
| COSHH | No | Current year + 40 years | DESTROY | Review and where appropriate an additional retention period may be allocated |
| Policy Statements | No | Date of expiry + 3 years | DESTROY | Version control is important |
| Risk Assessments, including personal RA's | Yes (if personal) | Completion of project, event, incident or activity + 7 years | SHRED | Retain if risk assessment relates to a visit or trip during which an incident occurred and a claim is ongoing. Review if an incident occurred but no claim was made. Risk assessments for trips can be destroyed 3 years after the trip if no incident occurred |
| Records relating to accidents/injury at work | Yes | Date of incident + 12 years. For serious accidents this will have to be increased | DESTROY | Review and where appropriate an additional retention period may be allocated |
| Process of monitoring areas where employees are likely to have come into contact with asbestos | No | Last action + 40 years | DESTROY | Records maintained by Estates Manager |
| Process of monitoring areas where employees are likely to have come into contact with radiation | No | Last action + 50 years | DESTROY | Records maintained by Estates Manager |
| Fire Log Books | No | Current year + 6 years | DESTROY | Records maintained by Estates Manager |

| 8. Administration | | | | |
|--|------------------------|---------------------------------|--|--|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Employers Liability Certificate | No | Permanent | ACHIVE | Retain for 40 years after the school has closed |
| Inventory of furniture and equipment | No | Current year + 6 years | DESTROY | |
| School prospectus | No | Current academic year + 3 years | ARCHIVE | Transfer to archive |
| Circulars (staff/parents/pupils) | No | Current academic year + 1 year | DESTROY/ARCHIVE | Review for any items which may be usefully archived |
| Newsletters etc. | Yes | Current academic year + 1 year | SHRED/ARCHIVE | Review for any items which may be usefully archived |
| Visitors' book | Yes | Current academic year + 2 years | SHRED/ARCHIVE | Review for any items which may be usefully archived |
| Insurance Policy | No | End of cover + 1 year | SHRED | May contain confidential Company information |
| Insurance records (renewals, claims, notifications etc.) | No | End of cover + 7 years | SHRED | Review before destruction. Retain records for claims which may be ongoing for a further period |

| 9. Finance | | | | |
|---|------------------------|---------------------------------|--|--|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Annual accounts | No | Current year + 6 years | SHRED | May contain confidential Company financial information |
| Loans and grants | No | Date of last payment + 12 years | SHRED | May contain confidential Company financial information |
| Contracts | No | Contract completion + 6 years | SHRED | May contain confidential Company financial information |
| Copy orders | No | Current year + 2 years | SHRED | May contain confidential Company financial information |
| Budget reports/monitoring documents | No | Life of the budget + 3 years | SHRED | May contain confidential Company financial information |
| Invoices, receipts and other records covered by the Financial Regulations | No | Current year + 6 years | SHRED | May contain confidential Company financial information |
| Annual budget and background papers | No | Current year + 6 years | SHRED | May contain confidential Company financial information |
| Delivery documentation | No | Current year + 6 years | SHRED | May contain confidential Company financial information |
| Debtor's records | No | Current year + 6 years | SHRED | May contain confidential Company financial information |
| School Fund cheque books | No | Current year + 6 years | SHRED | May contain confidential Company financial information |
| School Fund paying in books | No | Current year + 6 years | SHRED | May contain confidential Company financial information |

| 9. Finance (continued) | | | | |
|--|------------------------|------------------------|--|--|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| School Fund bank statements | No | Current year + 6 years | SHRED | May contain confidential Company financial information |
| School fund ledger, invoices and receipts | No | Current year + 6 years | SHRED | May contain confidential Company financial information |
| Free School Meals registers | Yes | Current year + 6 years | SHRED | May contain personal information. Special category data MUST be shredded and disposed of securely at the end of its administrative life |
| Petty cash books | No | Current year + 3 years | SHRED | May contain confidential Company financial information |
| School Meal registers, summaries and records | No | Current year + 3 years | SHRED | May contain confidential Company financial information |
| Bursary/grant applications | No | Current year + 3 years | SHRED | May contain confidential Company financial information |

| 10. Property | | | | |
|---|------------------------|---------------------------|--|--|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Title deeds | No | Permanent | ARCHIVE | May contain confidential Company information |
| Plans | No | Permanent | ARCHIVE | Retain in school whilst operational |
| Maintenance and contractors records and reports | Yes | Current year + 6 years | SHRED | May contain confidential Company information. If personal details about individual contractors are included these must be shredded at the end of their life |
| Service Level Agreements | Yes | Until superseded | SHRED | May contain confidential Company information. If personal details about individual contractors are included these must be shredded at the end of their life |
| Leases | No | Expiry of lease + 6 years | SHRED | May contain confidential Company information |
| Lettings | Yes | Current year + 6 years | SHRED | May contain confidential Company information. If this documentation contains personal detail about individuals these must be shredded at the end of their life |
| Burglary, theft and vandalism reports | Yes | Current year + 6 years | SHRED | May contain confidential Company information. If this documentation contains personal detail about individuals these must be shredded at the end of their life |
| Maintenance log books | No | Current year + 6 years | SHRED | May contain confidential Company information. If this documentation contains personal detail about individuals these must be shredded at the end of their life |
| Contractors' reports | No | Current year + 6 years | SHRED | May contain confidential Company information. If this documentation contains personal detail about individuals these must be shredded at the end of their life |

| 11. Local Authority | | | | |
|---------------------------|------------------------|-------------------------------|--|--|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Secondary transfer sheets | Yes | Current year + 2 years | SHRED | May contain personal information |
| Attendance returns | Yes | Current year + 1 year | SHRED | May contain personal information |
| School census returns | No | Current year + 5 years | SHRED/DISPOSE | Dispose of after retention period |
| Circulars from LA | No | Whilst operationally required | DISPOSE | Review to see whether a further retention period is required before disposal |

12. Department for Children, Schools and Families

| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
|------------------|------------------------|--|--|--|
| HMI reports | No | No longer need to be retained | SHRED | |
| Ofsted reports | No | Replace former report with any new inspection report | SHRED | Review to see whether a further retention period is required |
| Returns | No | Current year + 6 years | DISPOSE | Review to see whether a further retention period is required before disposal |
| Circulars | No | Whilst operationally required | SHRED | Review to see whether a further retention period is required |

| 13. Work Experience | | | | |
|--------------------------------------|------------------------|-------------------------|--|--|
| Data Description | Data Protection Issues | Retention Period | Action at the end of the administrative life of the record | |
| Work experience and risk assessments | Yes | DOB of child + 18 years | SHRED | |