

Ormiston Academies Trust

## Sandymoor Ormiston Academy Records Retention policy

### Policy version control

|                        |   |
|------------------------|---|
| Policy type            | Statutory   |
| Author                 | Sonia Pressure, OAT DPO   |
| In consultation with   | Data Strategy and Information Governance Board  |
| Approved by            | James Miller, Director of Estates and Technology, August 2020   |
| Release date           | July 2020   |
| Next release date      | July 2022   |
| Description of changes | <p>Changes Made July 2020-07-20 – version 2</p> <ul style="list-style-type: none"> <li>■ Introduction- 1.1 hard and electronic added before record</li> <li>■ Corporate/Constitutional- Line 2, 'End of Life'; "At end of the life of the school offered to the Academy Trust. If not required." Amended to "Secure Disposal."</li> <li>■ Corporate/Constitutional- Line 3, 'End of Life'; "If these minutes contain any identifiable information they must be shredded." Amended to "Shredded."</li> <li>■ Corporate/Constitutional- Line 4, 'Reason for Retention'; "... at a later time", amended to "... later."</li> <li>■ Corporate/Constitutional-Line 6, 'Retention Period', "Locally stored documentation will be passed to OAT Head Office to review for further retention", been added and removed from 'End of Life' column, which now states "Secure disposal".</li> <li>■ Corporate/Constitutional- Line 7, 'Retention Period', "Three years after the duration plan", has been changed to "Until superseded or whilst relevant."</li> <li>■ Corporate/Constitutional- Line 8, 'Retention Period', "Three years after the duration plan", has been changed to "Until superseded or whilst relevant."</li> </ul> |

|  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>▪ 'Attendance Returns', 'Retention Period', "1 year after current year" has been amended to "Every entry is retained for a period of three years after the date of which the entry was made."</li> <li>▪ 'School copy of examination results', (not individual pupils examination results) has been added.</li> <li>▪ Health and Safety- 'Retention Periods'; "Health and Safety Risk assessments" amended, from 3 years to "Reviewed annually and if no longer required to be destroyed", "accident records for adults amended from 6 years to 3 years and children's accidents amended until age of 25 to 21 years.</li> <li>▪ Health and Safety- "Test and Trace (COVID-19)" added to table.</li> <li>▪ Property-row 2- 'Reason', "Legal document detailing tenure and/or ownership of property" replaces "Should follow property".</li> <li>▪ Property-row 3- 'Reason', "Part of the operating manuals for the building", has been added.</li> <li>▪ Property- row 6 'Retention Period', "completion of the works contracts signed under hand and 12 years from deed" and Building Contracts requirements added to 'Reason'.</li> <li>▪ Property-row 8 'Retention Period', "completion of the works contracts signed under hand and 12 years from deed" and Building Contracts requirements added to 'Reason'.</li> <li>▪ Academy Workforce- row 6- 'Retention Periods', "Once IDs have been verified for portable DBS checking, copies should not be kept", replaces "If is necessary to keep a copy, it will be places in the staff member's personnel file."</li> <li>▪ Academy Workforce-row 11-'Retention Periods' amended to "Until the persons normal retirement age or 10 years from the date of the allegation (whichever is the longer). Note: allegations that are found to be malicious/unfounded should be removed from personnel files after period of 4 months.</li> <li>▪ Academy Workforce- "Right to Work", "Management Instruction", "Unfounded disciplinary action" and Disciplinary Proceedings-oral and written warning level 1" rows added.</li> <li>▪ Section 4 "for more information please see Email Retention Policy" has been added.</li> <li>▪ 6. Retention Audit Guidance- added.</li> </ul> |
|--|---|

## Contents

|   |    |
|---|----|
| 1. Document retention.....  | 4  |
| Introduction.....   | 4  |
| 2. Document retention period.....   | 5  |
| Corporate/ Constitutional.....  | 5  |
| Insurance.....  | 11 |
| Health and safety.....  | 12 |
| Property.....   | 14 |
| Pension records.....  | 16 |
| Tax and finance.....  | 18 |
| Academy workforce.....  | 20 |
| Pupils.....   | 23 |
| Parents.....  | 28 |
| Alumni/ alumnae.....  | 29 |
| Freedom of information and Subject access request.....  | 29 |
| 3. Deletion and retention of documents.....   | 30 |
| 3.3. Other documentation (Standard Disposal).....   | 30 |
| 3.4. Automatic deletion.....  | 30 |
| 3.5. Individual responsibility.....   | 30 |
| 4. Deletion and retention of data stored as email for more information please see email retention policy..... | 30 |
| 5. Deletion and retention of user accounts, including email and other third-party services.....               | 31 |
| 6. Retention Audit Guidance.....  | 31 |

# 1. Document retention

## Introduction

- 1.1. The main aim of this policy is to enable Ormiston Academies Trust to manage hard and electronic records effectively and in compliance with the General Data Protection Regulations (GDPR). As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.
- 1.2. Ormiston Academies Trust is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.
- 1.3. The table below sets out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.
- 1.4. For information, the tables below set out the legal and other requirements for certain categories of document. Where we have decided to keep information longer than the statutory requirement, this has been explained in the tables in Section 2.
- 1.5. Section 2 of this policy sets out the destruction procedures for documents at the end of their retention period. The Data Protection Officer (DPO) team ([dpo@ormistonacademies.co.uk](mailto:dpo@ormistonacademies.co.uk)) and academy Data Protection Lead (DPL) shall be responsible for ensuring that this is carried out appropriately, and any questions regarding this policy should be referred to them.
- 1.6. If a document or piece of information is reaching the end of its stated retention period, but you are of the view that it should be kept longer, please refer to The Data Protection Officer (DPO) via the Data Protection Lead (DPL) who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.

## 2. Document retention period

| Corporate/ Constitutional  |   |   |                    |
|--|---|---|--------------------|
| Document Category  | Retention Period  | Reason for Retention  | End of life Action |
| Agendas for and minutes from Governing Body meetings   | See Principal Set below   | Meetings commonly refer to confidential issues relating to staff and may be required retrospectively.   | Secure disposal    |
| Principal Set of Governing Body meeting documentation (signed)   | For the duration of the life of the academy                                 | One copy should be retained with the master set of minutes. All other copies can be disposed of.  | Secure disposal.   |
| Inspection Copies  | Three years after the date of the meeting                                   | Retained for operational use only.  | Shredded.          |
| Reports presented to the Governing Body  | 25 years after the date of the meeting One copy retained with Principal Set | There may be data protection issues if the report deals with confidential issues relating to staff that may need to be referred to in the case of legal action later. | Secure disposal.   |
| Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002 | Six years after the date of the meeting.                                    | Education Act 2002 Section 33   | Secure disposal    |

|  |   |  |                  |
|--|---|--|------------------|
| Trusts and Endowments managed by the Governing body  | For the duration of the life of the academy. Locally stored documentation will be passed to OAT Head Office for review for further retention                  | Reference during the life of the school  | Secure disposal. |
| Action plans created and administered by the Trust   | Until superseded or whilst relevant.  | Retained for operational use and reference   | Secure disposal  |
| Policy documents administered by the Governing Body  | Until superseded or whilst relevant.  | Retained for operational use and reference   | Secure disposal  |
| Records relating to complaints dealt with by the Academy and not escalated to the Trust.   | Six years after the resolution of the complaint then review need to retain for a further six years  | Disputes may be reinitiated. Status of dispute must be reviewed before deletion                | Secure disposal  |
| Annual Report created under the requirements of the Education (Governor's Annual Reports) (England)(Amendment) Regulations 2002. | 10 years from the publication of the report   | Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171   | Secure disposal  |
| Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies               | Three years after date proposal accepted or declined  | Operational use then until context of plan has been superseded                                 | Secure disposal  |
| Logbooks of activity in the school maintained by the headteacher   | Log to be reviewed before disposal. If protection issues apply keep for 25 years. Otherwise keep for 6 years then review for remaining issues before disposal | There may be data protection issues if the log refers to confidential issues relating to staff | Secure disposal  |

|   |  |   |                 |
|---|--|---|-----------------|
| Register of admissions  | All entries preserved for three years.   | School attendance Departmental advice for maintained schools, academies, independent schools and local authorities. October 2014  | Secure disposal |
| Casual admissions to secondary schools  | One year from date attendance ceases.  | Operational use and a period to cater for pupils in disrupted circumstances   | Secure disposal |
| Proofs of addresses supplied by parents as part of the admissions process   | One year from year of admission.   | Schools Admissions Code, Statutory guidance for admission authorities, governing bodies, local authorities, schools, adjudicators and admission appeals panels, December 2014 | Secure disposal |
| Supplementary information form including additional information such as religion, medical conditions etc. For successful admissions   | Until pupil reaches 25 years of age added to pupil file  | Added to pupil file   | Secure disposal |
| Supplementary information form including additional information such as religion, medical conditions etc. For unsuccessful admissions   | Retain only until the appeal process is completed  | Operational use only  | Secure disposal |
| General File Series. Files and records retained during the work of a school that do not contain personal data or fall into any other category with an associated retention period | Five years from current year then review to identify any operational needs or unforeseen protection issues and add to pupil file if there are. | Operational use. Review needed to identify need for retention before disposal   | Secure disposal |

|   |   |  |                   |
|---|---|--|-------------------|
| Records relating to the creation and publication of the school brochure or prospectus                       | Three years from year of operational use then review annually | Operational use. Review need to retain elements before disposal  | Standard Disposal |
| Records relating to the creation and distribution of circulars to staff, parents or pupils                  | One year after year of publication                            | Operational use. Review need to retain elements before disposal  | Standard Disposal |
| Register of admissions  | All entries preserved for three years.                        | School attendance Departmental advice for maintained schools, academies, independent schools and local authorities. October 2014 | Secure disposal   |
| Newsletters and other items with short operational use  | One year after year of publication                            | Operational use. Review need to retain elements before disposal  | Standard Disposal |
| Visitors books and signing in sheets  | Six years after current year then review annually             | Operational use and reference/evidence in claims, appeals or litigation. Review before disposal.                                 | Secure disposal   |
| Records relating to the creation of management or Old Students Associations and Parent/Teacher Associations | Six years after current year then review annually             | Operational and reference to cover duration of subjects' association with the school. Review before disposal                     | Secure disposal   |
| Records of contracts under signature  | Six years from last payment on contract                       | Limitations Act 1980   | Secure disposal   |
| Records of contract monitoring  | Two years from expiration of contract                         | Operational use and reference  | Secure disposal   |



|  |   |  |                   |
|--|---|--|-------------------|
| Curriculum returns to LEA or Trust   | Three years from year return submitted  | Operational use and reference once copies filed with LEA/Trust                                   | Secure disposal   |
| Curriculum returns to DfE including School Census Returns                      | Six years after current year  | Operational and reference once copies filed with DfE   | Secure disposal   |
| Attendance Returns   | Every entry is retained for a period of three years after the date of which the entry was made. | Operational  | Secure disposal   |
| School copy of examination results (not individual pupils examination results) | Six years from current year   | Operational and reference  | Secure disposal   |
| SATS Results   | Until pupil reaches 25 years of age on pupil file.  | Data protection Regulation   | Secure disposal   |
| Newsletters and other items with short operational use                         | One year after year of publication  | Operational use. Review need to retain elements before disposal                                  | Standard Disposal |
| Visitors books and signing in sheets   | Six years after current year then review annually   | Operational use and reference/evidence in claims, appeals or litigation. Review before disposal. | Secure disposal   |
| SATS Examination Papers  | Until appeals and validation process has completed  | Operational  | Secure disposal   |

|   |  |                               |                              |
|---|--|-------------------------------|------------------------------|
| Planned Admission Number reports (PAN)  | Six years from year of publication                               | Operational use and reference | Secure disposal              |
| Value Added and Contextual Data   | Six years from year of publication                               | Operational use and reference | Secure disposal              |
| Secondary Transfer Sheets - Primary   | Two years after year of publication                              | Operational use and reference | Secure disposal              |
| Circulars and information from LEA  | Remove when redundant  | Operational use and reference | Secure disposal              |
| Ofsted reports and papers   | Until superseded then review annually                            | Operational use and reference | Secure disposal              |
| Circulars and information from central Government   | Remove when redundant  | Operational use.              | Secure disposal              |
| Correspondence other than email (see below) created by any staff with administrative responsibilities including head teachers, deputy headteachers, heads of year, teachers, pastoral and support staff | Three years from the date of correspondence then review annually | Operational use and reference | Secure disposal after review |

| Insurance                                   |                                      |  |                    |
|---|--------------------------------------|--|--------------------|
| Document Category                           | Retention Period                     | Reason for Retention   | End of life Action |
| Employers Liability Insurance documentation | 40 years after policy commencement   | Employers' Liability (Compulsory Insurance Regulations) 1998 | Secure disposal    |
| Policy Schedules and Documentation          | Three years after policy termination | Commercial requirement                                       | Secure disposal    |
| Correspondence relating to claims           | Three years after settlement         | Commercial requirement                                       | Secure disposal    |

| Health and safety                            |  |  |                    |
|--|--|--|--------------------|
| Document Category                            | Retention Period   | Reason for Retention   | End of life Action |
| Policy Statements                            | Three years from retirement of policy                                      | Limitations Act 1970   | Secure disposal    |
| Health and Safety Risk Assessments           | Reviewed annually and if no longer required to be destroyed                | Limitations Act 1970   | Secure disposal    |
| Records relating to accident/ injury at work | 12 years from date of incident with review to extend for serious accidents | Reporting of Injuries, Diseases and Dangerous Occurrences Regulation 1995  | Secure disposal    |
| Reporting of accidents to adults             | Three years from date of incident  | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 | Secure disposal    |
| Reporting of accidents to children           | 21 years from date of incident   | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 | Secure disposal    |
| COSHH  | 40 years after year of creation  | COSHH regulations 2002. Not applicable to records created under 1994-99 regulations.   | Secure disposal    |

|                                    |  |   |                 |
|------------------------------------|--|---|-----------------|
| Asbestos monitoring in used areas  | 40 years from last action - permanent                            | Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19 | Secure disposal |
| Radiation monitoring in used areas | Until person is aged 70 years but at least 50 years in any event | HSE Guide (Radiation)<br>The Ionising Radiations Regulations 1999         | Secure disposal |
| Fire regulations logs              | Six years from year of log entry                                 | Fire Safety Order 2005  | Secure disposal |
| Test and Trace (Covid-19)          | 21 days  | NHS Mandatory requirement   | Secure disposal |

| Property  |   |   |                    |
|---|---|---|--------------------|
| Document Category                               | Retention Period  | Reason for Retention  | End of life Action |
| Deeds of school properties                      | For the duration of the life of the academy   | Legal document detailing tenure and/or ownership of property.                 | Secure disposal    |
| Plans of school properties                      | For the duration of the life of the academy   | Part of the operating manuals for the building. To be passed on to new owners | Secure disposal    |
| School property leases                          | 12 years from expiration of lease   | Limitations Act 1980  | Secure disposal    |
| Letting records                                 | Six years from creation of record   | Limitations Act 1980  | Secure disposal    |
| Records of maintenance by contractors           | Six years from completion of the works contracts signed under hand and 12 years from deed | Limitations Act 1980<br>Building Contracts requirements                       | Secure disposal    |
| Records and logs of maintenance by school staff | Six years from creation of log/record   | Limitations Act 1980  | Secure disposal    |

|   |   |   |                 |
|---|---|---|-----------------|
| Building general records, certifications and warranties etc | Six years from completion of the works contracts signed under hand and 12 years from deed | Limitations Act 1980<br>Building Contracts requirements | Secure disposal |
| Inventories of furniture and equipment                      | Six years from creation of inventory  | Limitations Act 1980                                    | Secure disposal |
| Burglary, theft and vandalism report forms                  | Six years from creation of report   | Limitations Act 1980                                    | Secure disposal |

| Pension records                                       |   |  |                    |
|---|---|--|--------------------|
| Document Category                                     | Retention Period  | Reason for Retention   | End of life Action |
| Pension records about employees and workers           | Records kept by academy/OAT for six years after end of contract.                | Detailed Guidance for Employers: (April 2017) <a href="http://www.pensionsregulator.gov.uk">www.pensionsregulator.gov.uk</a> | Secure disposal    |
| Pension records re the Scheme                         | Records kept by academy/OAT for six years after end of contract.                | Detailed Guidance for Employers: (April 2017) <a href="http://www.pensionsregulator.gov.uk">www.pensionsregulator.gov.uk</a> | Secure disposal    |
| Pension records re active members and opt in/out      | Records kept by academy/OAT for six years after end of contract.                | Detailed Guidance for Employers: (April 2017) <a href="http://www.pensionsregulator.gov.uk">www.pensionsregulator.gov.uk</a> | Secure disposal    |
| Pension records Trust Deed / Rules and HMRC approvals | Records kept by academy/OAT for six years after end of operational use.         | Detailed Guidance for Employers: (April 2017) <a href="http://www.pensionsregulator.gov.uk">www.pensionsregulator.gov.uk</a> | Secure disposal    |
| Pension records Trustees' Minutes and annual accounts | Records kept by academy/OAT for six years after end of operational usefulness.  | Detailed Guidance for Employers: (April 2017) <a href="http://www.pensionsregulator.gov.uk">www.pensionsregulator.gov.uk</a> | Secure disposal    |
| Pension records Policy including investment policies  | Policies kept by academy/OAT for six years after end of operational usefulness. | Detailed Guidance for Employers: (April 2017) <a href="http://www.pensionsregulator.gov.uk">www.pensionsregulator.gov.uk</a> | Secure disposal    |



|  |                                     |   |                 |
|--|-------------------------------------|---|-----------------|
| Maternity Pay Records  | Three years from creation of record | Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567) | Secure disposal |
| Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Six years from creation of record   | Retirement Benefits Schemes (Information Powers) Regulations 1995                             | Secure disposal |

| Tax and finance  |   |  |                    |
|--|---|--|--------------------|
| Document Category  | Retention Period  | Reason for Retention   | End of life Action |
| Annual accounts including payroll                          | Six years from year of accounts                                       | Requirement of HMRC and the DfE academies financial handbook | Secure disposal    |
| Loans and grants   | 12 years from last payment of loan then review annually               | Requirement of HMRC and the DfE academies financial handbook | Secure disposal    |
| Pupil grant applications                                   | Three years from and of year of application year then review annually | Requirement of HMRC and the DfE academies financial handbook | Secure disposal    |
| Budget management records and associated paperwork         | Three years from life of budget                                       | Requirement of HMRC and the DfE academies financial handbook | Secure disposal    |
| Invoices, receipts, orders, requisitions, delivery notices | Six years from financial year of transaction                          | Requirement of HMRC and the DfE academies financial handbook | Secure disposal    |
| Banking records and associated paperwork                   | Six years from financial year in which record or document created     | Requirement of HMRC and the DfE academies financial handbook | Secure disposal    |

|  |  |  |                 |
|--|--|--|-----------------|
| Records of identification and collection of debt   | Six years from financial year of record creation | Requirement of HMRC and the DfE academies financial handbook | Secure disposal |
| School fund cheque books, paying in books, ledgers, invoices, receipts, bank statements, journey books | Six years from year item created                 | Requirement of HMRC and the DfE academies financial handbook | Secure disposal |

| Academy workforce  |  |   |                    |
|--|--|---|--------------------|
| Document Category  | Retention Period   | Reason for Retention  | End of life Action |
| All application records associated with the unsuccessful staff candidates                                | Six months after the date of appointment   | Various discrimination Acts, minimum retention periods for records relating to advertising of vacancies and job applications. | Secure disposal    |
| All records associated with the successful application of staff candidates                               | Details required to create a personal file retained until six years after termination of employment. All other information retained for six months | Limitation Act 1980 (Section 2)   | Secure disposal    |
| All records concerning the appointment of other workers e.g. contractors, consultants, temporary workers | One year after termination of arrangement. Review before disposal  | Operational use. Review to identify claims, appeals and any other ongoing process   | Secure disposal    |
| Pre-employment DBS checks  | Record only satisfactory/unsatisfactory. If copy kept no longer than six months  | Part 4 of the Schedule to the (Independent School Standards) Regulations 2007   | Secure disposal    |
| Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure       | If it is necessary to keep a copy, it will be placed in the staff member's personnel file.   | DfE Statutory Guidance "Working together to safeguard children."  | Secure disposal    |
| Right to Work  | Evidence of RTW should be kept during employment and retain for the period as the personnel file post leaving for six years                        | An employer's guide to Right To Work check (Home Office January 2019)   | Secure disposal    |

|   |  |  |                 |
|---|--|--|-----------------|
| Staff appraisal/assessment  | Six years after year they apply to.  | Limitation Act 1970  | Secure disposal |
| Staff Personal File   | Six years from termination of employment   | Limitation Act 1980 (Section 2)  | Secure disposal |
| Timesheets  | Two years after year they apply to.  | Working Time Regulations 1998 as amended   | Secure disposal |
| Allegation of a child protection nature against a member of staff including where the allegation is unfounded | Until the persons normal retirement age or 10 years from the date of the allegation (whichever is longer). | Keeping children safe in education<br>Statutory guidance for schools and colleges March 2015 | Secure disposal |
| Management Instruction  | 12 months  | OAT Disciplinary policy  | Secure disposal |
| Unfounded disciplinary action   | Four months unless related to safeguarding. See section above  | OAT Disciplinary Policy<br>OAT Safeguarding Policy   | Secure disposal |
| Disciplinary Proceedings – oral and written warning level 1   | Six months from date of warning  | ICO Guidance, Employment Practices Code and supplementary guidance.                          | Secure Disposal |
| Disciplinary Proceedings – written warning level 2  | One year from date of warning  | CO Guidance, Employment Practices Code and supplementary guidance.                           | Secure Disposal |

|  |   |   |                 |
|--|---|---|-----------------|
| Disciplinary Proceedings –final warning                    | 18 months from date of warning  | CO Guidance, Employment Practices Code and supplementary guidance.                                  | Secure Disposal |
| Disciplinary Proceedings –case not found                   | Dispose at conclusion. If child protection related see above              | CO Guidance, Employment Practices Code and supplementary guidance.                                  | Secure Disposal |
| Sick Pay / Calculations / Certificates / Self-certificates | Three years after tax year end in which period ends Sick Pay Guide (HMRC) | The Statutory Maternity Pay (General) and Statutory Sick Pay (General) (Amendment) Regulations 2005 | Secure disposal |

| Pupils  |   |   |  |
|---|---|---|--|
| Document Category                             | Retention Period                                  | Reason for Retention  | End of life Action   |
| FSM registers                                 | Six years from year of register                   | Operational. Cover duration of Ever6 status.                                  | Secure disposal  |
| Registers for school meals and summary sheets | Three years from year of register                 | Operational and reference   | Secure disposal  |
| Pupil Educational Record -<br>Primary         | Duration of pupil's attendance at primary school. | The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 | <p>The file must follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> <li>to another primary school</li> <li>to a secondary school</li> <li>to a pupil referral unit</li> <li>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</li> </ul> <p>Secure disposal</p> |

|  |   |  |                               |
|--|---|--|-------------------------------|
| Pupil Educational Record -<br>Secondary                    | Until pupil reaches 25 years of age   | Data protection Regulation<br>Pupil Information Regulations 2005   | Secure disposal               |
| Pupil copies of public and internal examination results    | Until pupil reaches 25 years of age (on pupil file)   | Uncollected certificates should be returned to the examination board   | Returned to examination board |
| Child protection information held on pupil file            | In sealed envelope on pupil file until pupil reaches 25 years of age  | Keeping children safe in education<br>Statutory guidance for schools and colleges March 2015; Working together to safeguard children. A guide to inter-agency                              | Secure disposal               |
| Child protection information stored outside of pupil file. | Until pupil reaches 25 years of age. Principal copy with the appropriate local authority.   | Keeping children safe in education<br>Statutory guidance for schools and colleges March 2015; Working together to safeguard children. A guide to inter-agency                              | Secure disposal               |
| Attendance Registers                                       | Paper Registers: Three years after recording attendance<br><br>Electronic Register:<br>Three years after the end of the school year | Pupil Registration Regulations 2006. Regulation 14<br><br>School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014 | Secure Disposal               |
| Authorised absence confirmation communications             | Two years after current year  | Education Act 1996 Section 7   | Secure disposal               |



|  |  |  |                  |
|--|--|--|------------------|
| SEN reviews, files and IEPs  | Until pupil reaches 25 years of age on pupil file  | Limitation Act 1980 (Section 2)  | Secure disposal  |
| Statement of SEN made under section 234 of the Education Act 1990 including subsequent amendments                                      | Until pupil reaches 25 years of age on pupil file.<br><br>In the case of documentation subject to a legal hold review annually after the initial 25-year period. | Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1 | Secure disposal. |
| Educational needs advice and information to parents  | Until pupil reaches 25 years of age on pupil file.<br><br>In the case of documentation subject to a legal hold   | Education Act 1996 Special Educational Needs and Disability Act 2001 Section 2 | Secure disposal. |
| Accessibility Strategy   | Until pupil reaches 25 years of age on pupil file.<br><br>In the case of documentation subject to a legal hold review annually after the initial 25-year period. | Education Act 1996 Special Educational Needs and Disability Act 2001 Section 2 | Secure disposal. |
| Schemes of Work, timetables, class records, mark books, homework records and images produced in association with curriculum activities | One year after current year then review need for retention on a case-by-case basis   | Operational and reference  | Secure disposal  |

|   |  |  |                 |
|---|--|--|-----------------|
| Pupil's work  | Returned to pupil at the end of the current year otherwise one year after current year | Classed with curriculum items above but you can justify retaining for purposes such as moderation samples, display or analysis. In all cases consider offering the original to the pupil/parent and retaining copies | Secure disposal |
| Records of approvals for educational visits - Primary       | 14 years after date of visit   | Outdoor Education Advisers' Panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice"      | Secure disposal |
| Records of approvals for educational visits - Secondary     | 10 years after date of visit   | Outdoor Education Advisers' Panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice"      | Secure disposal |
| Consent forms for educational visits with no major incident | Conclusion of trip   | Of no further use and retention unnecessary  | Secure disposal |
| Consent forms for educational visits with a major incident  | Until pupil reaches 25 years of age  | Limitation Act 1980 (Section 2)  | Secure disposal |
| Registers for walking buses                                 | Three years after the date of the register   | 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 |

|  |  |                 |                 |
|--|--|-----------------|-----------------|
| School/Home Liaison Day Books  | Two years after current date then review annually    | Operational use | Secure disposal |
| School/Home Liaison reports from other agencies if included in their own case file | Until child leaves the school                        | Operational use | Secure disposal |
| School/Home Liaison referral forms   | While referral is current                            | Operational use | Secure disposal |
| School/Home Liaison contact data sheets  | Current year then review. Remove if no longer active | Operational use | Secure disposal |
| School/Home Liaison contact database entries                                       | Current year then review. Remove if no longer active | Operational use | Secure disposal |
| School/Home Liaison Registers  | Two years after year register created                | Operational use | Secure disposal |

| Parents                                 |   |   |                              |
|---|---|---|------------------------------|
| Document Category                       | Retention Period  | Reason for Retention  | End of life Action           |
| Parent details as a pupil contact       | One year from current year then review annually   | Schools Admissions Code, Statutory guidance for admission authorities, governing bodies, local authorities, schools, adjudicators and admission | Secure disposal              |
| Messaging services                      | Operational use and review to delete after six months then dispose. Review content to produce hard-copy and retain as detailed in | Operational   | Deletion                     |
| Consents                                | Operational. Disposal once recorded   | Operational   | Secure disposal              |
| Photographs of parents                  | Operational, dispose when no longer in use  | Subject to consent  | Secure disposal              |
| Cashless Catering records               | For information extracted from cashless catering processors one year after year containing transactions                           | Operational   | Secure disposal              |
| Other documents produced by the academy | Three years from the date of issue then review  | Operational use and reference   | Secure disposal after review |

| Alumni/ alumnae                                      |  |                      |                    |
|--|--|----------------------|--------------------|
| Document Category                                    | Retention Period   | Reason for Retention | End of life Action |
| Records of former pupils kept by Alumni associations | One year after subject is no longer engaged in the association | Operational          | Secure disposal    |

| Freedom of information and Subject access request                                    |  |                      |                    |
|--|--|----------------------|--------------------|
| Document Category  | Retention Period   | Reason for Retention | End of life Action |
| Freedom of Information   | Seven years or for pupil related files when pupil reaches 25 years of age. | Operational          | Secure disposal    |
| Data Breach Records (e.g. actual or record of assessment of risk impact assessments) | Seven years or for pupil related files when pupil reaches 25 years of age. | Operational          | Secure Disposal    |
| Subject Access Requests  | Seven years or for pupil related files when pupil reaches 25 years of age. | Operational          | Secure Disposal    |
| Complaints   | Seven years or for pupil related files when pupil reaches 25 years of age. | Operational          | Secure Disposal    |

## 3. Deletion and retention of documents

3.1. When a document is at the end of its retention period, it should be dealt with in accordance with this policy

3.2. Confidential waste (Secure Disposal)

3.2.1. This should be made available for collection in the confidential waste bins or sacks or shredded through OAT assessed compliant data disposal organisations

3.2.2. Anything that contains personal information should be treated as confidential.

### 3.3. Other documentation (Standard Disposal)

3.3.1. Other documentation can be deleted or placed in recycling bins where appropriate.

### 3.4. Automatic deletion

3.4.1. Certain information will be automatically archived by the computer systems. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact the ICT lead in your academy or The Web Services Manager for Head Office.

### 3.5. Individual responsibility

3.5.1. This should be made available for collection in the confidential waste bins or sacks or shredded through OAT assessed compliant data disposal organisations

3.5.1.1. Has the information come to the end of its useful life?

3.5.1.2. Is there a legal requirement to keep this information or document for a set period?

3.5.1.3. Would the information be likely to be needed in the case of any legal proceedings? In particular, is it potentially relevant to an historic child abuse enquiry? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)

3.5.1.4. Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?

3.5.1.5. Is the document of historic or statistical significance?

3.5.1.6. If the decision is made to keep the document, this must be referred to the Data Protection Officer via the Data Protection Lead of an individual academy and reasons given.

## 4. Deletion and retention of data stored as email for more information please see email retention policy

4.1. Email must only be retained for as long as stipulated in the OAT Email Policy.

Record retention policy

- 4.2. Email services have an operational function and are not provided for the storage or filing of documents and as such emails must be reviewed and dealt with promptly.
- 4.3. Emails that contain information that exists elsewhere on the academy's systems must be deleted within the period stated in the OAT Email Policy.
- 4.4. Information that is attached to or contained within emails is subject to a retention period as detailed within section 2 of this document.

## 5. Deletion and retention of user accounts, including email and other third-party services

### 5.1. Network accounts

- 5.1.1. will be locked as soon as the user leaves the employment of the Trust or its academies.
- 5.1.2. a decision on the retention of data should be decided within 90 days. The files and emails should be moved to the required appropriate storage during this time

### 5.2. Third party services

- 5.2.1. A list of the users third party access should already be known for each user or should be able to be ascertained quickly
- 5.2.2. All third-party access should be removed immediately upon the user leaving the Trust.

## 6. Retention Audit Guidance

- 6.1. It is the responsibility of the Data Protection Lead (DPL) and local IT to ensure retention audits are conducted at regular intervals. This can be done on a termly basis, half termly or any other interval the academy deems appropriate.
- 6.2. The Retention Audit findings need to be documented and sent to OAT Data Protection Officer:  
[dpo@ormistonacademies.co.uk](mailto:dpo@ormistonacademies.co.uk)
- 6.3. It is recommended that all staff at your academy have reviewed the Record Retention Policy and Email Retention Policy, so that any questions about these policies can be raised and addressed before conducting a retention audit.
- 6.4. The retention audit should be conducted on a random sample of staff and data types if possible, avoid staff doing the same job role. For example, if you conducted your audit on 10 members of staff, and they were all teaching staff, this would not include a variety of job roles. Data types can be picked from the sections of the Record Retention Policy E.g. Health and Safety Documents.
- 6.5. The below questionnaire should be completed by the staff member included in the audit and where possible, the information provided verified by the DPL and/local IT member. For example, if the staff

member states they delete emails within the required retention period then a check of the staff email account should show this is the case

#### 6.6. Sample Record Retention Audit Questionnaire for Staff:

Staff job title: \_\_\_\_\_  
Date of Audit: \_\_\_\_\_  
Name of Auditor: \_\_\_\_\_  
Auditor's job title: \_\_\_\_\_

Please ensure you answer all the questions below independently.

1. I can locate policies relating to data retention and know who in my academy can assist with questions?
2. Routine emails not relating to pupils, safeguarding or another legitimate reason should be retained for no longer than?
- 2a. Do you have emails older than this period? If yes, approximately how many emails?
3. Do you know your academies policy/procedure on deleting confidential data?
- 3b. Can you please outline what the process is?
4. How often do you review the documents you manage?
5. **[Insert a question regarding retention that is specific to the staff members role.]** *For example, a teaching staff member could be asked, 'how long we are required to keep Pupil's work?'*

Any questions about this policy should be directed to you Data Protection Lead or OAT Data Protection Officer: [dpo@ormistonacademies.co.uk](mailto:dpo@ormistonacademies.co.uk)