

DATA RETENTION POLICY

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Data Retention Policy

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

1. Scope of the Policy

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

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

2. Responsibilities

The Trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The Chief Operating Officer has overall responsibility for this policy.

- The Business Manager in each academy will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and timely.
- Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines.

3. Relationship with Existing Policies

This policy has been drawn up within the context of:

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

4. Safe Disposal of Records

Where records have been identified for destruction they should be disposed of in an appropriate way and in accordance with this policy.

Confidential waste

Anything that contains personal information should be treated as confidential. Confidential waste should be disposed of via the confidential waste bins or sacks located around the academy. Alternatively, it can be shredded using a cross cut shredder.

Automatic deletion

Certain information will be automatically archived by the computer systems. Should you want to retrieve any information, or prevent this happening, please contact your Network Manager in the first instance.

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

Members of staff should record at least:

- File reference (or other unique identifier).
- File title (or brief description) and number of files.
- The name of the authorising officer and the date action taken.

This should be kept in an Excel spreadsheet or similar suitable format.

5. Transfer of Information

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

7. Retention Guidelines

The following retention guidelines have been issued by the Management Society of Great Britain 'Retention Guidelines for Schools'. Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the General Data Protection Regulation 2018, the Data Retention Regulations 2009 and the Freedom of Information Act 2000. Managing record series using these retention guidelines will be deemed to be 'normal processing' under the legislation mentioned above. If record series are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented.

Child Protection					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Child Protection files	Yes	Education Act 2002, related guidance "Safeguarding Children in Education", September 2016	Date of leaving + 25 years	Shred	Child Protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (the information does not need to be sent to a university) Where a child is removed from roll to be educated at home, the file should be copied to the Local Authority.
Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance) Education Act 2002 guidance "Dealing with Allegations of Abuse against Teachers and Other Staff" November 2005	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer	Shred	The following is an extract from "Safeguarding Children and Safer Recruitment in Education" p60: "Record Keeping 5.10 It is important that a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's confidential personnel file, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. It will provide clarification in cases where a future DBS Disclosure reveals information from the police about an allegation that did not result in a criminal conviction. And it will help to prevent unnecessary

					reinvestigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.”
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Board of Directors (OGAT/OGE/Members/OGSL)					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Principal set Minutes (signed)	No	Charities Act 2011 Companies Act 2006	Permanent	Retain for 6 years from date of meeting	Transfer to Archives
Inspection copies	No	Charities Act 2011 Companies Act 2006	Date of meeting + 3 years	SHRED	
Agendas	No	Charities Act 2011 Companies Act 2006	Date of meeting	SHRED	
Reports	No	Charities Act 2011 Companies Act 2006	Date of report + 6 years	Retain in school for 6 years from date of meeting	Transfer to Archives
Instruments of	No	Charities Act	Permanent	Retain in school	Transfer to Archives when the school

Government		2011 Companies Act 2006			has closed
Trusts and Endowments	No	Charities Act 2011 Companies Act 2006	Permanent	Retain in school whilst operationally required	Transfer to Archives
Action Plans	No	Charities Act 2011 Companies Act 2006	Date of action plan + 3 years	SHRED	It may be appropriate to offer to the Archives
Policy documents	No	Charities Act 2011 Companies Act 2006	Expiry of policy	Retain in school whilst policy is operational	Transfer to Archives
Complaints files	Yes			Date of resolution of complaint + 6 years	Retain in school for the first six years Review for further retention in the case of contentious disputes SHRED routine complaints
Annual Reports required by the Department for Education	No		Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI 2002 No 1171	Date of report + 10 years	Transfer to Archives
Proposals for schools to become, or be established as Academies	No			Current year + 3 years	Transfer to Archives

Academy Councils					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Principal set Minutes (signed)	No		Date of meeting + 6 years	SHRED	
Inspection copies	No		Date of meeting + 3 years	SHRED	
Agendas	No		Date of meeting	SHRED	
Reports	No		Date of report + 6 years	Retain in school for 6 years from date of meeting	Transfer to Archives
Complaints files	Yes			Date of resolution of complaint + 6 years	Retain in school for the first six years Review for further retention in the case of contentious disputes SHRED routine complaints
Proposals for schools to become, or be established as Academy	No			Current year + 3 years	Transfer to Archives

Management					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Minutes of the Senior	Yes		Date of	Retain in the school for 5 years	Transfer to the Archives

Management Team and other internal administrative bodies			meeting + 5 years	from meeting	
Reports made by the head teacher or the management team	Yes		Date of report + 3 years	Retain in the school for 3 years from meeting	Transfer to the Archives
Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Closure of file + 6 years	SHRED	
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Date of correspondence + 3 years	SHRED	
Professional development plans	Yes		Closure + 6 years	SHRED	
School development plans	No		Closure + 6 years	Review	Offer to the Archives
Admissions – if the admission is successful	Yes		DOB of the pupil + 25 years	SHRED	
Admissions – if the appeal is unsuccessful	Yes		Resolution of case + 1 year	SHRED	

Students					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Admission Registers	Yes	Pupil Information Regulations 2005	Date of last entry in the book (or file) + 6 years	Retain in the school for 6 years from the date of the last entry.	Transfer to the Archives
Attendance registers	Yes	Pupil Information Regulations 2005	Date of register + 3 years	SHRED	
Student's academic records and reports		Limitation Act 1980	DOB of the pupil + 25 years	SHRED	
Special Educational Needs files, reviews and Individual Education Plans	Yes	SEN & Disability Regulations 2014 Children & Families Act 2014	DOB of the pupil + 25 years	SHRED	
Public examination results	No		Year of examinations + 6 years	SHRED	Unclaimed certificates returned to Exam Board
Internal examination results	Yes		Current year + 5 years	SHRED	
Any other records created in the course of contact with pupils	Yes/No	Pupil Information Regulations 2005	Current year + 3 years	Review at the end of 3 years and either allocate a further retention period or SHRED	
Statement maintained under The Education Act	Yes	SEN and Disability	DOB + 30 years	SHRED unless legal action is pending	

1996 - Section 324		Regulations 2014		
Proposed statement or amended statement	Yes	SEN and Disability Regulations 2014	DOB + 30 years	SHRED unless legal action is pending
Advice and information to parents regarding educational needs	Yes	SEN and Disability Regulations 2014	Closure + 12 years	SHRED unless legal action is pending
Accessibility Strategy	Yes	SEN and Disability Regulations 2014	Closure + 12 years	SHRED unless legal action is pending
Children's SEN Files	Yes	SEN and Disability Regulations 2014	DOB of pupil + 25 years then review – it may be appropriate to add an additional retention period in certain cases	SHRED unless legal action is pending
Parental permission slips for school trips – where there has been no major incident	Yes		Conclusion of the trip	SHRED
Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years The permission slips for all pupils on the trip need to be	SHRED

			retained to show that the rules had been followed for all pupils	
Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Secondary Schools	No	3 part supplement to the H&S of Pupils on Educational Visits (HASPEV) (1998).	Date of visit + 10 years	SHRED

Curriculum				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Curriculum development	No		Current year + 6 years	SHRED
Curriculum returns	No		Current year + 3 years	SHRED
School syllabus	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
Timetable	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
Class record books	No		Current year + 1 year	It may be appropriate to review

				these records at the end of each year and allocate a new retention period or SHRED
Mark Books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
Students' work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
Examination results	Yes		Current year + 6 years	SHRED
SATS records	Yes		Current year + 6 years	SHRED
PAN reports	Yes		Current year + 6 years	SHRED
Value added records	Yes		Current year + 6 years	SHRED

Staff records				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	SHRED
Staff Personal files	Yes		Termination + 7 years	SHRED
Interview notes and recruitment records	Yes		Date of interview + 6 months	SHRED
Pre-employment vetting	No	DBS guidelines	Date of check + 6 months	SHRED

information (including DBS checks)				
Disciplinary proceedings:	Yes	Where the warning relates to child protection issues then retain until the person's normal retirement age, or 10 years from the date of the allegation, whichever is the longer If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice.		
• oral warning			Date of warning + 6 months	SHRED
• written warning – level one			Date of warning + 6 months	SHRED
• written warning – level two			Date of warning + 12 months	SHRED
• final warning			Date of warning + 18 months	SHRED
• case not found			If child protection related then retain until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer. Otherwise shred immediately at the conclusion of the case	SHRED
Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SHRED
Annual appraisal/performance management records	No		Current year + 5 years	SHRED
Salary cards	Yes		Last date of employment + 85 years	SHRED

Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year, + 3yrs	SHRED
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SHRED
Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file.	
Recruitment documentation, including unsuccessful applications	Yes		7 months from the date the job advert closes	SHRED Delete records from recruitment site

Health and Safety				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Accessibility Plans	Disability Discrimination		Current year + 6 years	SHRED

	Act			
Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
<ul style="list-style-type: none"> Adults 	Yes		Date of incident + 7 years	SHRED
<ul style="list-style-type: none"> Children 	Yes		DOB of child + 25 years	SHRED
COSHH			Current year + 10 years [where appropriate an additional retention period may be allocated]	SHRED
Incident reports	Yes		Current year + 20 years	SHRED
Policy Statements			Date of expiry + 1 year	SHRED
Risk Assessments			Current year + 3 years	SHRED
Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos			Last action + 40 years	SHRED
Process of monitoring of areas where employees and persons are likely to have come in contact			Last action + 50 years	SHRED

with radiation				
Fire Precautions log books			Current year + 6 years	SHRED

Administrative				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Employer's Liability certificate			Closure of the school + 40 years	SHRED
Inventories of equipment and furniture			Current year + 6 years	SHRED
General file series			Current year + 5 years	Review to see whether a further retention period is required Transfer to Archives
Academy brochure or prospectus			Current year + 3 years	Transfer to Archives
Newsletters, ephemera			Current year + 1 year	Review to see whether a further retention period is required Transfer to Archives
Visitors' book			Current year + 2 years	Review to see whether a further retention period is required Transfer to Archives
PTA/Old Pupils Associations			Current year + 6 years	Review to see whether a further retention period is required Transfer to Archives

Finance				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Annual Accounts		Financial Regulations	Current year + 6 years	Transfer to Archives
Loans and grants		Financial Regulations	Date of last payment on loan + 12 years	Transfer to Archives
Contracts under seal			Contract completion date + 12 years	SHRED
Contracts under signature			Contract completion date + 6 years	SHRED
Contracts monitoring records			Current year + 2 years	SHRED

Finance				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Copy orders	Current year + 2 years			SHRED
Budget reports, budget monitoring etc.	Current year + 3 years			SHRED
Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	SHRED
Annual Budget and background papers			Current year + 6 years	SHRED
Order books and requisitions			Current year + 6 years	SHRED

Delivery Documentation			Current year + 6 years	SHRED
Debtors' Records		Limitation Act 1980	Current year + 6 years	SHRED
School Fund – Cheque books			Current year + 3 years	SHRED
School Fund – Paying in books			Current year + 6 years then review	SHRED
School Fund – Ledger			Current year + 6 years then review	SHRED
School Fund – Invoices			Current year + 6 years then review	SHRED
School Fund – Receipts			Current year + 6 years	SHRED
School Fund – Bank statements			Current year + 6 years then review	SHRED
School Fund – School Journey books			Current year + 6 years then review	SHRED
Applications for free school meals, travel, uniforms etc			Whilst child at school	SHRED
Student grant applications			Current year + 3 years	SHRED
Free school meals registers	Yes	Financial Regulations	Current year + 6 years	SHRED
Petty cash books	Financial Regulations		Current year + 6 years	SHRED

Property				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Title Deeds			Permanent these should follow the property unless the property has been registered at the	Archive if the deeds are no longer needed

			Land Registry	
Plans			Permanent	Retain in school whilst operational Archive
Maintenance and contractors		Financial Regulations	Current year + 6 years	SHRED
Leases			Expiry of lease + 6 years	SHRED
Lettings			Current year + 3 years	SHRED
Burglary, theft and vandalism report forms			Current year + 6 years	SHRED
Maintenance log books			Last entry + 10 years	SHRED
Contractors' Reports			Current year + 6 years	SHRED

School Meals				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Dinner Register			Current year + 3 years	SHRED
Evidence of qualification for Free School Meals	Yes	Financial Regulations	Current year + 6 years	SHRED