We are an ambitious and inclusive Trust of Trusts
strengthening communities through excellent education.

Data Retention Policy

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1.0 Policy Statement

1.1 We are an ambitious and inclusive Trust of schools strengthening our communities through excellent education. We are committed to providing excellent education for every child, every day, and aim to strengthen and work with our communities to ensure confident compliance.

2.0 Scope and Purpose

2.1 The Trust and our schools have a responsibility to maintain its records and record keeping systems. When doing this, they will take account of the following factors:

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Accessibility of records and record keeping systems.

2.2 This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the Trust's current practice, the requirements of current legislation, best practice and guidance. All staff must be familiar with this policy and comply with it. It may be amended by the Trust from time to time and any changes will be communicated to staff.

3.0 Definition

3.1 For the purpose of this document, Ted Wragg Multi Academy Trust is referred to as Ted Wragg Trust, TWT or the Trust. This policy applies to the Trust's central functions and all schools within the Trust.

4.0 Legal Framework

4.1 This Policy will be published on our website and will be included in the Trust's Policy Monitoring Schedule.

5.0 Data Protection

5.1 This policy sets out how long employment-related and pupil data will normally be held by the Trust and when that information will be confidentially destroyed in compliance with the terms of the UK General Data Protection Regulation (UK GDPR) and the Freedom of Information Act 2000.

5.2 Data will be stored and processed to allow for the efficient operation of the Trust. The Trust's Data Protection Policy outlines its duties and obligations under the UK GDPR.

6.0 Retention Schedule

6.1 Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the Trust will adhere to the standard retention times listed within that schedule.

6.2 The retention schedule applies to all records regardless of the medium in which they are stored. The Trust Lead for Complaints and Compliance will coordinate periodic review of retention arrangements. Schools and central teams remain responsible for applying the schedule to paper and electronic records, including any automated retention or deletion rules used by their systems.

7.0 Destruction of Records

7.1 The schedule is a relatively lengthy document listing the many types of records used by the Trust and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

7.2 Where records have been identified for destruction, they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

7.3 All paper records containing personal information or sensitive policy information should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate wastepaper merchant. All electronic information will be deleted.

7.4 The Trust maintains a log of records which have been destroyed and who authorised their destruction, using the template at Appendix 1. When destroying documents, whether paper or electronic, the appropriate staff member should record the following:

- File reference (or other unique identifier);
- File title/description;
- Number of files;
- Name of the authorising officer;
- Date destroyed or deleted from system; and
- Person(s) who undertook destruction.

8.0 Retention of Safeguarding Records

8.1 Any allegations made that are found to be malicious must not be part of the personnel records.

8.2 For any other allegations, the Trust must keep a comprehensive summary of the allegation, details of how it was investigated and resolved, and any decisions reached. This should be retained on the personnel file of the person concerned. Records relating to child sexual abuse will be retained until further guidance is issued following the conclusion of the Independent Inquiry into Child Sexual Abuse.

8.3 The Trust will keep the retention of safeguarding records under review and will update this policy when further guidance is issued by the ICO or Department for Education.

9.0 Archiving

9.1 Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. A database of the records sent to the archives is maintained by Compliance Lead. The appropriate staff member, when archiving documents should record in this list the following information: -

- File reference (or other unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising officer.

9.2 Files in our archive will be filed away with the destruction date as appropriate.

10.0 Transferring Information to Other Media

10.1 Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

11.0 Transferring Information to Another School

11.1 We retain the pupil's educational record whilst the child remains at the school. Once a pupil leaves the school, the file should be sent to their next school. The responsibility for retention then shifts onto the next school. We retain the file for a year following transfer in case any issues arise as a result of the transfer.

11.2 We may delay destruction for a further period where there are special factors such as potential litigation.

12.0 Record Storage Through Third Parties

12.1 Where third-party platforms are used to record or store information, the Trust will ensure that the platform's retention policies and settings align with this policy and the retention schedule. This must be considered during onboarding and reviewed periodically to reduce the risk of records being retained for too long or deleted prematurely.

13.0 Responsibility and Monitoring

13.1 The Compliance Lead has primary and day-to-day responsibility for implementing this policy. The Data Protection Officer, in conjunction with the Trust is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The Data Protection Officer will consider the suitability and adequacy of this policy and report improvements directly to management.

13.2 Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

13.3 Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

14.0 Emails

14.1 Emails accounts are not a case management tool in itself. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost.

15.0 Pupil Records

15.1 All schools, with the exception of independent schools, are under a duty to maintain a pupil record for each pupil. Early years settings have separate record-keeping requirements. Where a pupil transfers to another school before completing compulsory education, the pupil record should be transferred to the next school. A primary school may retain a copy for a limited period where necessary. A secondary school that is the pupil's final school of compulsory education will retain the record until the pupil reaches the age of 25.

16.0 Retention Schedule

FILE DESCRIPTION	RETENTION PERIOD
Employment Records	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference. In this case, application forms will give applicants the opportunity to object to their details being retained
Job applications and interview records of successful candidates	Added to the staff personnel file and retained in line with that record (6 years after employment ceases)
Written particulars of employment, contracts of employment and changes to terms and conditions	Added to the staff personnel file and retained in line with that record (6 years after employment ceases
Right to work documentation including identification documents and immigration checks	Kept separately from personnel file and retained for 2 years after employment ceases. **Employer's guide to right to work checks: 21 June 2024**
DBS checks and disclosures of criminal records forms	DBS certificates should be destroyed as soon as practicable after the check has been completed and the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months
Change of personal details notifications	No longer than 6 months after receiving this notification
Emergency contact details	Destroyed on termination
Personnel records	While employment continues and up to six years after employment ceases (Limitation Act 1980)

FILE DESCRIPTION	RETENTION PERIOD
Annual leave records	Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards
Working Time Regulations records, including: • Working time compliance records • Records demonstrating compliance with relevant working time and night-work limits • Working time opt-out agreements	Two years from the date the record was made.
Disciplinary records	6 years after employment ceases. (Limitation Act 1980)
Grievance records	6 years after employment ceases (Limitation Act 1980)
Training	6 years after employment ceases or length of time required by the professional body
Staff training where it relates to safeguarding or other child related training	Date of the training plus 40 years (This retention period reflects that the IICSA may wish to see training records as part of an investigation)
Annual appraisal/assessment records	Current year plus 3 years
Professional Development Plans	6 years from the life of the plan
Allegations of a child protection nature against a member of staff including where the allegation is founded	10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed.
Financial Management	
Employer's Liability Insurance Certificate	Closure of the School + 40 years. Pass to the Local Authority if the school closes (These Regulations amend the Employers' Liability (Compulsory Insurance) Regulations 1998 (the 1998 Regulations). Regulation 2(1) omits

FILE DESCRIPTION	RETENTION PERIOD
	paragraphs (4) and (5) from regulation 4 of the 1998 Regulations. Paragraph (4) required an employer to retain a copy of its employer liability insurance certificate for 40 years. Paragraph (5) was a consequential provision to paragraph (4), providing for the retention of certificates, and is therefore also being omitted. Paragraph (3) substitutes paragraphs (1) and (2) of regulation 5 of the 1998 Regulations. Under the new provisions, the requirements for the display of the certificate will be satisfied if the certificate is made available in electronic form and is reasonably accessible to the relevant employees. Paragraph (4) makes a consequential amendment to regulation 6(b) of the 1998 Regulations).
Pension records	12 years
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	6 years from the end of the scheme year in which the event took place
Payroll and wage records	6 years after end of tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Maternity/Adoption/Paternity Leave records	3 years after end of tax year they relate to (Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567))
Statutory Sick Pay	3 years after the end of the tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Current bank details	Until updated plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Bonus Sheets	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)

FILE DESCRIPTION	RETENTION PERIOD
Time sheets/clock cards/flexitime	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Pupil Premium Fund records	Date pupil leaves the provision plus 6 years
National Insurance (schedule of payments)	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Insurance	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Overtime	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Annual accounts	Current year plus 6 years
Loans and grants managed by the School	Date of last payment on loan + 6 years if the loan is under 10,000 or date of last payment on loan + 12 years if the loan is over 10,000
All records relating to the creation and management of budgets	Life of the budget plus 3 years
Invoices, receipts, order books and requisitions, delivery notices	Current financial year plus 6 years
Student Grant applications	Current year plus 3 years
School fund documentation (including but not limited to invoices, cheque books, receipts, bank statements etc).	Current year plus 6 years
Free school meals registers (where the register is used as a basis for funding)	Current year plus 6 years
School meal registers and summary sheets	Current year plus 3 years
Agreements and Administration Paperwork	
All records relating to the creation and implementation of the School Admissions' Policy	Life of the Policy + 7 years then review. 15(2) of the regulation refers to the 7 preceding years (School Admissions Code Statutory guidance

FILE DESCRIPTION	RETENTION PERIOD
	for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels)
Collective workforce agreements and past agreements that could affect present employees	Permanently
Trade union agreements	10 years after ceasing to be effective
Strategic Plan or School Development Plans	Life of plan or until plan superseded + 3 years. If major changes are made to the plan then an archive copy of previous plans should be retained
Visitors Signing In Records	6 years
Newsletters and circulars to staff, parents and pupils	1 year (and the School may decide to archive one copy)
Minutes of Senior Management Team meetings	Date of the meeting plus 3 years or as required
Reports created by the Head Teacher or the Senior Management Team.	Date of the report plus a minimum of 3 years or as required
Records relating to the creation and publication of the school prospectus	Current academic year plus 3 years
Burglary, theft and vandalism report forms	Current year + 6 years
Walking Bus Registers	Date of register + 3 years.
Records created by schools to obtain approval to run an educational visit outside of the classroom – Primary schools	Date of visit + 15 years (Limitation Act 1980)
Records created by schools to obtain approval to run an educational visit outside of the classroom – Secondary schools	Date of visit + 15 years. (Limitation Act 1980)

FILE DESCRIPTION	RETENTION PERIOD
Health and Safety Records	
Health and Safety consultations	Permanently
Health and Safety Risk Assessments	Life of the risk assessment plus 6 years
Health and Safety Policy Statements	Life of policy plus 3 years
Any records relating to any reportable death, injury, disease or dangerous occurrence	Date of incident plus 3 years provided that all records relating to the incident are held on personnel file
Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	Until the child reaches the age of 21. Limitation Act 1980.
Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	Date of last entry in the Accident book should be + 3 years but if there is a possibility of negligence allegation then date of incident +15 years or date of settlement +6 years. (Social Security (Claims and Payments) Regulations 1979; Social Security Administration Act 1992; Limitation Act 1980)
Fire precaution log books	Current year plus 6 years
Medical records and details of: - • control of lead at work • employees exposed to asbestos dust • records specified by the Control of Substances Hazardous to Health Regulations (COSHH)	40 years from the date of the last entry made in the record (Control of Substances Hazardous to Health Regulations (COSHH); Control of Asbestos at Work Regulations)
Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made
Temporary and Casual Workers	
Records relating to hours worked and payments made to workers	3 years
Trust Board and Local Governance	

FILE DESCRIPTION	RETENTION PERIOD
Articles of Association	For the life of the School (Not Statutory)
Trusts and Endowments managed by the Governing Body	Life of the Trust or Endowment + 6 years (NS)
Proposals concerning the change of status of a maintained school or single academy trust including specialist status schools and academies	For the life of the organisation (Companies Act 2006 Section 355)
Instruments of government	For the lifetime of the School. Consult local archives before disposal.
Meetings schedule	Current year
Minutes - Principal set marked as signed on Governor HUB	Date of meeting + 10 years
Agendas – principal copy	Where possible the agenda should be stored with the principal set of minutes
Agendas – Additional copies	Until replaced
Policy documents created and administered by the governing body	Until replaced.
Register of attendance at full governing board meetings	Date of last meeting in the book plus 6 years
Annual reports Annual Reports created under the requirements of the Education (Governors Annual Reports) (England) (Amendment) Regulations 2002	Date of report plus 10 years
Records relating to complaints made to and investigated by the governing body or head teacher.	Major complaints: current year plus 6 years. If negligence involved: current year plus 15 years. If child protection or safeguarding issues are involved then: current year plus 40 years.
Correspondence sent and received by the governing body or head teacher	General correspondence should be retained for current year plus 3 years

FILE DESCRIPTION	RETENTION PERIOD
Records relating to the terms of office of serving governors, including evidence of appointment and personnel files.	Date appointment ceases plus 6 years except where there have been allegations concerning children. In this case retain for 25 years.
Register of business interests	Date appointment ceases plus 10 years. (Companies Act 2006)
Records relating to the training required and received by governors	Date appointment ceases plus 10 years (Companies Act 2006)
Records relating to the appointment of a clerk to the governing body	Date on which clerk appointment ceases plus 6 years
Governor personnel files	Date appointment ceases plus 6 years
Pupil Records	
Details of whether admission is successful/unsuccessful	1 year from the date of admission/non-admission (School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels)
Proof of address supplied by parents as part of the admissions process	Current year plus 1 year (School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels)
Admissions register	Entries to be preserved for six years from date of entry (Working together to improve school attendance, Section, 36, 2024 Statutory guidance)
Pupil Record, including non-child protection safeguarding records.	Primary – Whilst the child attends the School Secondary – until the child reaches the age of 25 (Limitation Act 1980)

FILE DESCRIPTION	RETENTION PERIOD
Attendance Registers	6 years from the date of entry. (Working together to improve school attendance, Section 36, 2024 Statutory guidance)
Correspondence relating to any absence (authorised or unauthorised)	Current academic year plus 2 years (Education Act 1996)
Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Date of birth of the pupil plus 31 years (Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan). (Children and Family's Act 2014; Special Educational Needs and Disability Act 2001).
Child protection information (to be held in a separate file).	DOB of the child plus 25 years then review. If aspects of the record relate to child sexual abuse, then these records should be retained indefinitely. (Based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)
Exam results (pupil copy)	This information should be added to the pupil file and retained in line with that record
Examination results (school's copy)	Current year plus 6 years
Allegations of sexual abuse	If the complaint relates to child sexual abuse, then indefinitely. (Based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)
Records relating to any allegation of a child protection nature against a member of staff	Until the accused normal retirement age or 10 years from the date of the allegation (whichever is the longer) Retention period informed by the guidance of KCSIE)
Consents relating to school activities as part of UK GDPR compliance (for example, consent to be sent circulars or mailings)	Evidence of consent will be retained whilst the pupil attends the school, or until withdrawn, whichever the shorter.

FILE DESCRIPTION	RETENTION PERIOD
Pupil's work	Where possible, returned to pupil at the end of the academic year (provided the School have their own internal policy to this effect). Otherwise, the work should be retained for the current year plus 1 year
Mark books	Current year plus 1 year
Schemes of work	Current year plus 1 year
Timetable	Current year plus 1 year
Class record books	Current year plus 1 year
Record of homework set	Current year plus 1 year
Photographs of pupils	For the time the child is at the School and for a short while after. Please note select images may also be kept for longer (for example to illustrate history of the school)
Parental consent forms for school trips where there has been no major incident	End of the trip or end of the academic year (subject to a risk assessment carried out by the School)
Parental permission slips for school trips where there has been a major incident	Date of birth of the pupil involved in the incident plus 25 years. Permission slips for all the pupils on the trip should be retained to demonstrate the rules had been followed for all pupils
Contract Management	
All records relating to the management of contracts under seal	Last payment on the contract + 12 years of end of contract +12 years, whichever is longer (Limitation Act 1980)

FILE DESCRIPTION	RETENTION PERIOD
All records relating to the management of contracts under signature	Last payment on the contract + 12 years or end of contract +12 years, whichever is longer (Limitation Act 1980)
Records relating to the monitoring of contracts	Current year + 2 years. End of the contract or until the final payment has been made whichever is the longer (NS)
Estate Management	
Title Deeds of properties belonging to the School	Permanent. These should follow the property unless the property has been registered with the Land Registry. These should follow the property, unless the property has been registered with the Land Registry. Transfer to the new owner (NS)
Plans of property belonging to the school	These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold
Leases of property leaved by or to the school	Expiry of lease +6 years
Records relating to the letting of school premises	Current financial year + 6 years
Other Records	
Emails	2 years
CCTV	1 Calendar month
FOI Requests and Responses	3 years
Privacy notices	Until replaced plus 6 years
Inventories of furniture and equipment	Current year plus 6 years
All records relating to the maintenance of the School carried out by contractors or employees of the school	Whilst the building belongs to the school

FILE DESCRIPTION	RETENTION PERIOD
Records relating to the letting of school premises	Current financial year plus 6 years
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	Current year plus 6 years then review
Referral forms	While the referral is current
Contact data sheets	Current year then review if contact is no longer active then destroy