

Data Retention Schedule

Responsibilities

| | |
|----------------------------|--|
| School Senior Staff | Implementation of policy at school level |
| Governors | Check school compliance with policy |
| Directors | Legal entity |

This is a live document and is continually reviewed and updated. Latest developments are identified in pink, and current focus area is identified with yellow highlighting.

Material Changes to Policy Since the Last Review

| Versions | Date | Description |
|----------|------------|---|
| 1 | | Retention policy for Trust |
| 2 | 06/01/2023 | Trainee teachers added |
| 3 | 14/09/2023 | Allegations of child abuse (Section 1 Child Protection) updated |
| 3.1 | 14/09/2023 | Human Resources updated |
| 3.2 | 14/09/2023 | Extracurricular Activities updated |
| | | |

Introduction

This retention schedule contains recommended retention periods for the different record series created and maintained by the Trust in the course of its business. The schedule refers to all information regardless of the media in which it is stored.

The schedule has been adapted from the West Berkshire Record Retention Policy for Schools and the Information and Records Management Society Toolkit for Academies (<https://irms.org.uk/page/AcademiesToolkit>).

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 current legislation.

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 than period laid out in this document, the reasons for this need to be documented.

This schedule should be reviewed on a regular basis.

Explanatory Notes & Glossary of Terms

The retention schedule will outline a description of records, followed by the action to be taken. This will be based on an event/action which will trigger that retention action. The disposal action will either be the destruction of the records, or their transfer to another destination.

Record Description: Details of the information which has been retained.

Retention Period: The length of time for which the record must be kept. Information may be included here about the method of disposal.

Trigger: An event or action which will prompt either the retention, disposal or transfer of the records to another location.

Notes: Further details regarding how or why the retention period or action has been decided upon.

Business decision: if there is no law or regulation to say how long a record should be kept, we may base this decision on the administrative needs of the organisation.

Closure: when a record ceases to be 'current'. This can be when a set of minutes are formally agreed or when a Help Desk incident is formally closed. Many retention periods are triggered after the 'closure' of a record.

Common practice: if there is no law or regulation to say how long a record should be kept, we may base this decision on what similar organisations do.

Evergreen: Records which will be retained with no requirement for disposal.

Secure disposal: Records must either be shredded if specified or disposed of via the confidential waste disposal facility.

These guidelines may include references to records which are no longer routinely created as part of school business (e.g. log books). These have been included to assist schools who have a large backlog of historical records which require reviewing.

Under the Freedom of Information Act 2000 LEA schools (including schools which are granted academy status) are regarded as public bodies and are subject to the Act. This requires that schools manage their records appropriately against agreed retention periods.

Using the Retention Schedule

The Retention Schedule is divided into 15 sections:

1. Child Protection
2. Children in Care
3. Governance of the Academy Trust
4. Board of Directors, Members Meetings and Governing Body
5. School Management
6. Pupil Management
7. Co-curricular Activities
8. Implementation of Curriculum
9. Human Resources
10. Health & Safety
11. Administration
12. Finance
13. Property
14. Local Authority
15. Central Government

1. Complaining to the Department for Education (DfE) Child Protection

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|---|--|---------------------------|---|------------------------------------|--|
| Child Protection files (Primary Schools) | Retain for the duration of the pupil's attendance at the school | Date pupil changes school | Keeping Children Safe in Education (Department for Education) | Office Manager | If any records relating to child protection issues are placed on the pupil file, they should be in a sealed envelope and then retained for the same period of time as the pupil file. |
| Child Protection files (Secondary Schools) | DOB of the child+25 years SECURE DISPOSAL (these records must be shredded) | Pupil's date of birth | 'Safeguarding Children in Education' 2004 Keeping Children Safe in Education (Department for Education) | Pastoral Administrator | If any records relating to child protection issues are placed on the pupil file, they should be in a sealed envelope and then retained for the same period of time as the pupil file. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record. |
| Child Protection files (Child Missing from Education, Traveller, Roma, Gypsy, and therefore removed from the roll). | DOB of the child+25 years SECURE DISPOSAL (these records must be shredded) | Pupil's date of birth | 'Safeguarding Children in Education' 2004 Keeping Children Safe in Education (Department for Education) | Pastoral Administrator | |
| Child Protection files (child is removed from the roll and is elective home educated) | DOB of the child+25 years SECURE DISPOSAL (these records must be shredded) | Pupil's date of birth | 'Safeguarding Children in Education' 2004 Keeping Children Safe in Education (Department for Education) | Pastoral Administrator | |
| Allegations of a child protection nature made against a member of staff (other than those found to be malicious or false) | Retain until the normal retirement age for the member of staff or for 10 years (whichever is longer) | Date of meeting | 'Keeping Children Safe in Education Statutory Guidance for Schools and Colleges 2023' | Head's PA | |

2. Children in Care

Children in care may have a number of changes in school. When they move between schools, it is imperative that their school file is securely sent to the receiving school in a timely manner.

3. Governance of the Academy Trust

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|--|--|---------|---|------------------------------------|-------|
| Governance Statement | Life of governance statement + 6 years SECURE DISPOSAL | | | Bursar | |
| Articles of Association | Life of the Academy | | | Bursar | |
| Memorandum of Association | This can be disposed of once the Academy has been incorporated SECURE DISPOSAL | | | Bursar | |
| Memorandum of Understanding of Shared Governance among Schools | Life of Memorandum of Understanding + 6 years | | Companies Act 2006 section 355 | Bursar | |
| Constitution | Life of the Academy | | | Bursar | |
| Special Resolutions to amend the Constitution | Life of the Academy | | | Bursar | |
| Written Scheme of Delegation | Life of Written Scheme of Delegation + 10 years SECURE DISPOSAL | | Companies Act 2006 section 355 | Bursar | |
| Directors - Appointment | Life of appointment + 6 years SECURE DISPOSAL | | | Bursar | |
| Directors – Disqualification | Date of disqualification + 15 years SECURE DISPOSAL | | Company Directors Disqualification Act 1986 | Bursar | |
| Directors – Termination of Office | Date of termination + 6 years SECURE DISPOSAL | | | Bursar | |
| Annual Report and Trustees Report | Evergreen | | Companies Act 2006 section 355 | Bursar | |
| Annual Report and Accounts | Evergreen | | Companies Act 2006 section 355 | Bursar | |
| Annual Return | Evergreen | | Companies Act 2006 section 355 | Bursar | |

| | | | | | |
|---|--|--|---------------------------------|--------|--|
| Appointment of Trustees and Governors and Directors | Life of appointment + 6 years SECURE DISPOSAL | | | Bursar | |
| Statement of Trustees Responsibilities | Life of appointment + 6 years SECURE DISPOSAL | | | Bursar | |
| Appointment and removal of Members | Life of appointment + 6 years SECURE DISPOSAL | | | Bursar | |
| Strategic Review | Date of the review + 6 years SECURE DISPOSAL | | | Bursar | |
| Accessibility Plan | Life of plan + 6 years SECURE DISPOSAL | | Limitation Act 1980 (Section 2) | Bursar | First one was in 2013. Before this date it was known as the Access Initiative. |

4. Board of Directors, Members Meetings and Governing Body

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|---|--|----------------------------|---------------------------------|------------------------------------|----------------------------------|
| Board Meeting Minutes | Date of the meeting + a minimum of 10 years | Date of meeting | Companies Act 2006 section 248 | Bursar | |
| Board Decisions | Date of the meeting + a minimum of 10 years | Date of meeting | | Bursar | |
| Board Meeting: Annual Schedule of Business | Current year SECURE DISPOSAL | | | Bursar | |
| Board meeting: Procedures for conduct of meeting | Date procedures superseded + 6 years SECURE DISPOSAL | Date procedures superseded | Limitation Act 1980 (Section 2) | Bursar | |
| Minutes relating to any committees set up by the Board of Directors | Date of the meeting + a minimum of 10 years SECURE DISPOSAL | Date of meeting | | Bursar | |
| Records relating to the General Members' Meetings | Minutes must be kept for at least 10 years from the date of the meetings. SECURE DISPOSAL | Date of meeting | Companies Act 2006 section 248 | Bursar | |
| Records relating to the management of the Annual General Meeting | Minutes must be kept for at least 10 years from the date of the meeting. SECURE DISPOSAL | Date of meeting | Companies Act 2006 section 248 | Bursar | |
| Governors | | | | | |
| Principal set of signed minutes | Minutes must be kept for at least 10 years from the date of the meeting. SECURE DISPOSAL | Date of meeting | Common practice | Bursar | |
| Agendas | Current academic year only. | Conclusion of meeting | Common practice | Bursar | Records are held electronically. |
| Reports presented to the Governing Body | Reports should be kept for a minimum of 6 years. If the minutes refer directly to individual reports, then the reports | Date of report | Common Practice | Bursar | Records are held electronically. |

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|---|--|-------------------------|--|--------------------|----------------------------------|
| | should be kept for the life of the Academy. SECURE DISPOSAL | | | | |
| Incorporation Certificate | Retain at school for the duration of its operation | Closure of school | Common Practice | Bursar | |
| Action plans | Evergreen | | Common Practice | Bursar | |
| Policy documents | Evergreen | | Common Practice | Bursar | To support retrospective claims. |
| Records relating to complaints made to and investigated by the Governing Body or Head Teacher | Current year + 6 years. If negligence involved then: current year + 15 years If child protection or safeguarding issues are involved then: current year + 40 years SECURE DISPOSAL | Resolution of complaint | Common Practice | Clerk to Governors | |
| Annual reports required by central government | Evergreen | | Education (Governors' annual Report) (Amendment regulations 2002) | Bursar | |
| Statutory Registers | | | | | |
| Register of Directors | Life of the Academy+6 years SECURE DISPOSAL | Closure of the Academy | Companies Act 2006 | Bursar | |
| Register of Directors' interest (this is not a statutory register) | Life of the Academy+6 years SECURE DISPOSAL | Closure of the Academy | Companies Act 2006 | Bursar | |
| Register of the Directors' residential addresses | Life of the Academy+6 years SECURE DISPOSAL | Closure of the Academy | Companies Act 2006 | Bursar | |
| Register of gifts, hospitality and entertainments | Life of the Academy+6 years SECURE DISPOSAL | Closure of the Academy | Companies Act 2006 | Bursar | |

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|--|---|------------------------|--------------------|--------|--|
| Register of members | Life of the Academy+6 years SECURE DISPOSAL | Closure of the Academy | Companies Act 2006 | Bursar | |
| Register of secretaries | Life of the Academy+6 years | Closure of the Academy | Companies Act 2006 | Bursar | |
| Register of Trustees' interests | Life of the Academy+6 years SECURE DISPOSAL | Closure of the Academy | | Bursar | |
| Declaration of Interests Statements (Governors) (this is not a statutory register) | Life of Academy+6 years SECURE DISPOSAL | | | Bursar | |

5. School Management

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|---|---|---|---------------------------------------|------------------------------------|--|
| Minutes of Senior Management Team | Evergreen | | Common Practice | Head's PA | |
| Records and correspondence created by Head Teachers, Deputy Head Teachers and other members of staff with administrative responsibilities | Recommendation varies between either 3 or 6 years from date of creation then review SECURE DISPOSAL | | Common Practice | ALL STAFF | This will encompass a huge amount of data stored on the shared area, for which we do not have a policy in place. Further discussion required. |
| School Development Plans | Evergreen | Expiry of plan | Common Practice | Headteacher | |
| Successful school admissions applications (data provided by LEA) | Retain for up to 7 years from date of admission SECURE DISPOSAL | Date of cohort leaving school at end of Year 13 | School Admission Code September 2021 | SIMS Manager | Records held electronically. |
| Unsuccessful school admission applications (where an appeal is made). May include proofs of address supplied by parents as part of the admissions process to LEA. | Retain for up to 7 years from date of admission SECURE DISPOSAL | Date of cohort leaving school at end of Year 13 | School Admissions Code September 2021 | SIMS Manager | Records held electronically. |

6. Pupil Management

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|--|--|------------------------------|---|--|--|
| Attendance register | See notes SECURE DISPOSAL | Last entry in register | School attendance: Departmental advice October 2014 | SIMS Manager | Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made. Attendance data in SIMS will be retained according to the pupil files retention period below. |
| Pupil Signing In/Out book | See notes | | | SIMS Manager | Data is recorded on SIMS and will be retained in accordance with attendance data above. |
| Letter authorising absence | Current academic year+2 years SECURE DISPOSAL | Date of absence | Education Act 1996 section 7 | | Retained in pupil file |
| Pupil files (primary school) | Retain for duration of pupil's attendance at school | Date pupil changes school | Common practice | Office Manager | Paper files are transferred to the new school. What about primary school SIMS data? |
| Pupil files (secondary school) | DOB of pupil+25 years SECURE DISPOSAL | Pupil's date of birth | The Limitation Act 1980 | Pastoral Administrator SIMS Manager Head's PA | Paper records are retained until DOB+23 years, when they are moved to electronic storage. |
| Special educational needs records relating to individual support provided by the schools (Primary) | Retain for duration of attendance at school | Transfer to secondary school | Common practice | | Files are transferred to the new school |
| Special educational needs records relating to individual support provided by the schools (Secondary) | Retain for DOB of pupil +35 years SECURE DISPOSAL unless subject to legal hold | Pupil's date of birth | Special Educational Needs and Disability Act 2001 | SENDCo/ SEND Administrator Pastoral Administrator Head's PA | REVIEW. The minimum retention period for these records is DOB of the pupil+25 years; however, schools and LEAs may choose to keep SEN files for longer to defend themselves in a 'failure to provide a sufficient education' -case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period – this should be documented. |

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|--|---|-----------------------|---|--|---|
| SEND files, reviews and EHCPs including advice and information issued by the school to parents regarding educational needs for individual pupils | Retain for 35 years. EHCP is valid until age 25. SECURE DISPOSAL unless subject to legal hold | Pupil's date of birth | Special educational needs and disability act 2001 | SENDCo/ SEND Administrator Pastoral Administrator Head's PA | Retention period extended from recommended DOB+25 years plus 6 years retention period to DOB+35 years to keep it in line with other SEND records above. |
| Records relating to the management of exclusions | DOB of the pupil involved+25 years SECURE DISPOSAL | Pupil's date of birth | | Pastoral Administrator | |
| Public examination results | DOB of pupil+25 years SECURE DISPOSAL | | | Exams Officer | Records held electronically on SIMS. Uncollected certificates are shredded 5 years from issue. |
| Internal school examination results | DOB of the pupil+25 or 35 years (SEN) SECURE DISPOSAL | Pupil's date of birth | Common practice | SIMS Manager | Forms part of the pupil record on SIMS. |
| Photographs (not on pupil record) | Evergreen | | | E-Learning & Development Manager | Photographs on SIMS form part of the pupil record and will be deleted at the same time as that record. |

7. Co-curricular Activities

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|---|---|-----------------------|---|------------------------------------|---|
| Parental permission slips for school trips where there has not been a major incident | No retention required SECURE DISPOSAL | Conclusion of trip | Common practice | Office Manager | Data collected electronically via ParentPay. ParentPay records will be deleted one month after trip completion. |
| Parental permission slip for school trips where there has been a major incident | Retain for 25 years from DOB of youngest pupil on the trip. SECURE DISPOSAL | Pupil's date of birth | The Limitation Act 1980 | Education Visits Co-ordinator | Data collected electronically via ParentPay. ParentPay records will be downloaded and retained with the trip pack. |
| Records created by school in order to obtain approval to run an educational visit outside the classroom – primary school | Date of visit+14 years SECURE DISPOSAL | Date of visit | Outdoor Education Advisors' Panel National Guidance website: http://oeapng.info , specifically section 3 'Legal Framework and Employer Systems' and section 4 'good practice' | Education Visits Co-ordinator | |
| Records created by schools in order to obtain approval to run an educational visit outside the classroom – secondary school (excluding residential trips, adventurous activities or overseas trips) | Date of visit+10 years SECURE DISPOSAL | Date of visit | Outdoor Education Advisors' Panel National Guidance website: http://oeapng.info , specifically section 3 'Legal Framework and Employer Systems' and section 4 'good practice' | Education Visits Co-ordinator | Retention of these records started in 2019. Since June 2022, Kennet has used Evolve to manage trips. This retention period applies to both paper documentation and the Evolve record. In the event that Kennet ends its contract with Evolve, we have 30 days to download the information stored from the system, before Evolve hard deletes it. |
| Records created by school to obtain approval to run an Educational Visit outside the classroom where there has been a major incident | Retain for 25 years from DOB of youngest pupil on the trip. SECURE DISPOSAL | Pupil's date of birth | The Limitation Act 1980 | Education Visits Co-ordinator | Since June 2022, Kennet has used Evolve to manage trips. This retention period applies to both paper documentation and the Evolve record. In the event that Kennet ends its contract with Evolve, we have 30 days to download the information stored from the system, before Evolve hard deletes it. |

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|--|---|------------------------|-----------------|-------------------------------|--|
| Records relating to residential trips, adventurous activities or overseas trips | Retain for 25 years from DOB of youngest pupil on the trip. SECURE DISPOSAL | | | Education Visits Co-ordinator | |
| Walking Bus register (Primarys?) | Retain for three years SECURE DISPOSAL | Last entry in register | Common practice | | 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. |

8. Implementation of Curriculum

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|-------------------------|--|---|---------------------|------------------------------------|-------|
| Curriculum development | Retain for 6 years | End of calendar year that the record was created in | Common Practice | Curriculum Lead | |
| Curriculum maps | Retain for 6 years | Discontinuation of use | Common Practice | Curriculum Lead | |
| Schemes of work | Retain for 3 years | End of the calendar year that the record was created in | Common practice | Curriculum Lead | |
| Timetable development | Retain for 2 years SECURE DISPOSAL | End of the calendar year that the record was created in | Common practice | Curriculum Lead | |
| Record of marks awarded | Retain for 1 year SECURE DISPOSAL | End of the calendar year that the record was created in | Common Practice | Curriculum Lead | |
| Records of homework set | Retain for 1 year not on Virtual Learning Environment (VLE) Retain for current year + 1 year on VLE SECURE DISPOSAL | End of the calendar year that the record was created in | Common Practice | Curriculum Lead | |

9. Human Resources

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|--|--|---|----------------------------------|------------------------------------|---|
| All records leading up to the appointment of a new member of staff – unsuccessful candidates | Retain for 6 months SECURE DISPOSAL | Date of appointment of successful candidate | Business decision | Head's PA | |
| Staff personal files including employment contract & staff training records | Retain for 7 years SECURE DISPOSAL | End of employment | Limitations Act 1980 (section 2) | Head's PA | October 2023: Network files will be brought into line with paper file retention. Record will be kept of date of disposal/deletion. The staff leavers record on MIS cannot be deleted as it is linked to too many other records in the system. It may be possible to remove some leavers with very limited data and this is being investigated. |
| Staff personal record for trainee teachers (Placement B : duration 6 weeks) | Retain until end of the academic year of placement SECURE DISPOSAL | End of academic year | Common Practice | Head's PA | |
| Staff personal record for trainee teachers (main placement : duration 1 year) | Retain for academic year of placement plus 1 year SECURE DISPOSAL | End of placement | Common Practice | Head's PA | |
| Recruitment record for successful candidates including interview notes and copy evidence of entitlement to work in the UK | Retain and add to personal file SECURE DISPOSAL | Date successful candidate is in post | Common Practice | Head's PA | |
| Pre-employment vetting of successful candidates for the purpose of preventing unsuitable people from working with children (DBS checks). | Retain for duration of processing until sight of original DBS certificate SECURE DISPOSAL | Date information was checked | DBS guidelines | Head's PA | |
| Pre-employment vetting of successful candidates for the purpose of preventing unsuitable people from working with children | Add copies of evidence to the personal file SECURE DISPOSAL | Date successful candidate is in post | DBS guidelines | Head's PA | |

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|---|---|---------------------------------|--|------------------|---|
| (social media checks and reference). | | | | | |
| Pre-employment vetting of successful candidates, for the purposes of ensuring school staff are adequately qualified | Add copies of evidence to the personal file SECURE DISPOSAL | | Common practice | Head's PA | |
| Pre-employment vetting of successful candidates, for the purposes of ensuring school staff are legally entitled to work in the UK | Add copies of evidence to the personal file SECURE DISPOSAL | | Immigration, Asylum & Nationality Act 2006 | Head's PA | |
| Informal warning | Retain in personal file SECURE DISPOSAL | Date of warning | | Head's PA | |
| Formal warning | Retain in personal file SECURE DISPOSAL | Date of warning | | Head's PA | |
| Final warning | Retain in personal file SECURE DISPOSAL | Date of warning | | Head's PA | |
| Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings) | Retain in personal file SECURE DISPOSAL | Date case to be found unfounded | | Head's PA | |
| Staff appraisal records | Retain in personal file SECURE DISPOSAL | | Common practice | Head's PA | |
| Single Central Record | Evergreen | | | Head's PA | Leavers will be archived to evidence compliance with safer recruitment checks. |

10. Health & Safety

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|--|---|--|--|------------------------------------|---|
| Accessibility Plans | Retain for 6 years | End of the calendar year in which the record was created | Disability and Equality Act 2010 | | |
| Accident reporting | Retain for 3 years after the last entry in the Accident Book The incident reporting form may be retained as below. SECURE DISPOSAL | 3 years after the last entry in the Accident Book | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act Section 8. Limitation Act 1980 | Matron | The book may be paper or electronic format. |
| <ul style="list-style-type: none"> Adults | Date of incident + 6 years SECURE DISPOSAL | | | Matron | |
| <ul style="list-style-type: none"> Children | DOB of the pupil+25 or 35 years (SEN) SECURE DISPOSAL | | | Pastoral Administrator | Retain in pupil file. |
| Records of monitoring areas where employees/pupils are likely to come into contact with asbestos | Evergreen | | The Control of Substances Hazardous to Health Regulations | Estates Manager | Records started 2012. |
| Records of monitoring areas where employee/pupils are likely to come into contact with radiation | Evergreen | | The Ionising Radiations regulations 1985 | Head of Science | |
| Control of Substances Hazardous to Health (COSHH) | Current year+7 years then REVIEW SECURE DISPOSAL | | Business decision | Estates Manager | Records started 2020. |
| Fire log books | Retain for 3 years SECURE DISPOSAL | End of calendar year | Common practice | Estates Manager | |
| Incident reports | Current year+20 years | | | Estates Manager | Mr Keen looking into this 31/03/2022 |

| SECURE DISPOSAL | | | | | |
|---|--|-----------------------|-----------------|--------|-----------------------|
| Records of the administration of non-prescription medicines and remedies including painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers | Retain for 1 year SECURE DISPOSAL | End of calendar year | Common practice | Matron | |
| Records of the administration of any other medication, including: peg feeding; injections; treatments for serious conditions such as diabetes, ADHD or depression; records of reported incidents, or problems arising from administering medication | DOB of the pupil+25 or 35 years (SEN) SECURE DISPOSAL | Pupil's date of birth | Common Practice | Matron | Retain in pupil file. |

11. Administration

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|--|---|---|---------------------|------------------------------------|--|
| Employer's Liability Certificate | Retain for 40 years (may be kept electronically) SECURE DISPOSAL | Closure of school. Pass LA if school closes | Common practice | Estates Manager | Records start 2011 |
| Inventories of equipment/furniture (assets worth £1000+) | Evergreen | | Business decision | Estates Manager | Records start 2011 |
| Circulars to parents/staff/pupils | Retain for 1 year STANDARD DISPOSAL | End of calendar year | Common practice | Office Manager | |
| Newsletters produced by the school | Evergreen | | Business decision | E-Learning & Development Manager | Newsletters are retained for 2 years on the public website. They are then archived for historic reasons. |
| Visitor books | Retain for 3 years (in case of claims by parents or pupils about various actions) SECURE DISPOSAL | Last entry in visitor book | Common practice | Office Manager | Kennet & Francis Baily use electronic system. Whitelands Park is a paper-based system. |
| Staff signing in/out book | Retain for 1 year (rolling 3 terms) | | Business decision | Office Manager | |
| Kennet School Virtual Learning Environment (FROG) | Current year + 1 year | | Business decision | E-Learning & Development Manager | |
| Website | 1 year after removal then deleted | | Business decision | E-Learning & Development Manager | All webpages are reviewed annually and out-of-date information is removed. |

12. Finance

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|--|---|-----------------|--------------------------------|------------------------------------|-------|
| Annual accounts | Retain at school for 6 years STANDARD DISPOSAL | | Common practice | Bursar | |
| Payroll records | Evergreen | | Business decision | Bursar | |
| Invoices, receipts, and other financial records covered by financial regulations | Retain at school for 6 years SECURE DISPOSAL | | Standard financial regulations | Bursar | |
| Annual budget and supporting papers | Retain at school for 6 years SECURE DISPOSAL | | Common practice | Bursar | |
| Ordinary contracts | Retain at school for 6 years SECURE DISPOSAL | | The Limitations Act 1980 | Bursar/Estates Manager | |
| Contracts under seal | Retain at school for 12 years SECURE DISPOSAL | End of contract | The Limitations Act 1980 | Bursar | |

13. Property

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|--|---|------------------------|---------------------|------------------------------------|-------|
| Building plans | Retain whilst operational | End of operational use | Common practice | Estates Manager | |
| Records relating to the letting of school premises | Retain at school for 6 years SECURE DISPOSAL | | Common practice | Bursar | |
| All records relating to the maintenance of the school carried out by contractors | These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. | | Common practice | Estates Manager | |

14. Local Authority

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|-----------------------------|---|------------------|---------------------|------------------------------------|---|
| Secondary transfer document | Retain for up to 7 years from date of admission SECURE DISPOSAL | Year of transfer | Common practice | SIMS Manager | Spreadsheet completed by primary schools with KS2 data, friendship groups, SEND and any pertinent information |

15. Central Government

| Record Description | Retention Period | Trigger | Basis for Retention | Job Role Responsible for Retention | Notes |
|-------------------------------|--|------------------------|---------------------|------------------------------------|-------|
| Ofsted reports and papers | Life of the report then REVIEW SECURE DISPOSAL | Date new report issued | Common practice | Headteacher | |
| Returns to central government | Retain for 6 years SECURE DISPOSAL | | Common practice | SIMS Manager | |

Transferring of School Records Between Educational Provision

When a pupil ceases to be registered at a maintained school in England, the school is legally required to send a common transfer file (CTF) and educational record to the pupil's new school if it is in the UK. In addition, the Designated Safeguarding Lead (DSL) should make sure the pupil's child protection file and/or notes of concern are transferred to the new school or college.

Information relating to child protection should be transferred separately from the main pupil file. This means that these files should be stored separately, such as in separate envelopes, but can still be transferred at the same time providing they are clearly identified and addressed to the relevant person.

Parents cannot prevent child protection records relating to their child being transferred to a new school.

Prior to transferring records, contact should be made between schools/college to confirm the pupil is accepted and the date they will be on roll. A named contact should be identified so that, in particular, child protection records are sent from DSL to DSL.

Transferring Records Electronically:

Providing records are suitably encrypted it is preferable to transfer electronic records.

- If the CTF is transferred through the DfE's school-to-school (S2S) system. The system is encrypted to help ensure that pupils' personal data is transferred securely.
- Child Protection databases such as CPOMS and MyConcern allow secure electronic transfer of files between schools who both use the same systems.

Transferring Paper Records

The school sending the records needs to ensure an audit trail is kept evidencing the transfer of documents which may include:

- How the records have been transferred
- What measures were taken to protect pupils' personal data during transfer.
- Who delivered the files, on what date and at what time
- Who received the files (including a signature)

In cases where records are sent by post a receipt of delivery from the receiving school/courier company should be obtained.

Biometric Information

Kennet School collects biometric information about pupils and staff for use in its automated biometric recognition system for cashless catering and signing in/out of Sixth Form pupils. The system takes measurements of the person's fingerprint and converts these measurements into a template. **An image of the fingerprint is not stored.** The data is only retained for as long as the person wants to use the system or is a pupil or member of staff at Kennet School. Upon leaving, the biometrics information will be securely deleted.