ODST Data Retention Schedule

Governance		
Document	**Legislation/Reasons for Retention**	**Retention Period**
Articles of Association	Companies Act 2006 Charities Act 2011	Permanent
Memorandum of Association		
Constitution		
Special Resolutions		
Written Scheme of Delegation		
Rules and Bylaws	Companies Act 2006 Charities Act 2011	Date superseded + 6 years
Statutory registers (including directors/trustees, members, secretaries, register of interests, registers of gifts and hospitality)	Companies Act 2006 Compliance guidance in the academy trust governance guide. Academy trust handbook.	Life of appointment + 6 years
Appointment and removal of members and trustees		
Director/trustee disqualification	The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England) Regulations 2004.	Date of disqualification + 15 years
Trustees Annual Report and Financial Statements	The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.	Date of report + 6 years
Annual return/confirmation statement	Retain as detailed in section 2 of the Limitation Act 1980.	

Strategic plans and reviews		Life of plan + 6 years
Agendas, Minutes and meeting papers	Companies Act 2006 Charities Act 2011	Permanent
Annual schedule of business/agenda planner		Current year
Procedures for the conduct of meetings (governance document)		Date superseded + 6 years
School management		
Minutes of meetings		For governance meetings see governance retention periods. Other meetings - date of meeting + 3 years
Reports created by the academy or the Trust		Date of report + 3 years
Records created by the academy trust		Current academic year + 6 years
Correspondence created by the academy trust		Date of correspondence + 3 years
Professional Development Plans		Life of the plan + 6 years
Self-evaluation forms		Current year + 6 years
Management of complaints		Stage 1 and 2 Date complaint resolved + 3 years. Stage 3 Date complaint resolved + 6 years
Records relating to the creating and publication of academy and Trust brochure or prospectus		Current year + 3 years
Records relating to the creation and distribution of circulars and newsletters		Current year + 1 year
Records relating to the creation and management of Parent Teacher Association and other parent forums		Current year + 6 years
Ofsted reports and papers		Life of the report

Returns made to central government		Current year + 6 years
Policies		
Accessibility Plan	Retain as detailed in section 2 of the Limitation Act 1980	Life of plan + 6 years
Charging and Remissions; Data Protection Policies and associated appendices; Freedom of Information; Special Educational Needs; Complaints and Home School Agreement		Date policy superseded + 6 years
Equality Information and Objectives (PSED) Statement for Publication		Date of statement + 6 years
Health and Safety Policy and Admissions Policy		Life of policy + 3 years
All other policies		Destroy when policy superseded
Finance		
All records relating to the creation and management of budgets		Life of the budget + 3 years
Trustees Annual Report and Financial Statements	Companies Act 2006 Charities Act 2011	Date of report + 6 years
Independent auditors report on regularity and report on financial statements	Companies Act 2006 Charities Act 2011	Financial year report relates to + 6 years
Funding agreements	Charities Act 2011	Date of last payment of funding + 6 years
Funding records (capital grants, EAG, GAG etc)	Charities Act 2011	Date of last payment of funding + 6 years
Gift aid and tax relief	Finance Act 1998 Taxes Management Act 1970	Date of last payment + 6 years
Loans and Grants		Date of last payment on loans + 12 years
Student loan/grant/bursary applications		Current year + 3 years

School fund records		Current financial year + 6 years
School meal registers, including evidence of successful FSM eligibility checks		FSM - current year + 6 years; Other - current year + 3 years
Debtor's records	Section 2 of the Limitation Act 1980.	End of financial year + 6 years
VAT records	Record keeping (VAT Notice 700/21).	End of financial year + 6 years
All other financial records and documents	Companies Act 2006 Charities Act 2011	End of financial year + 6 years
Property and Asset Management		
Title deeds	Section 2 of the Limitation Act 1980.	Life of deed + 12 years
Land and building valuations		Date valuation superseded + 6 years
Leases for land and other property.		Date lease expires + 6 years
Transfer of land		Life of land ownership
Property plans		Life of land ownership
Records relating to the letting of school premises		Current year + 6 years
Inventories of furniture and equipment		Current year + 6 years
Disposal of assets		Date asset disposed of + 6 years
Burglary, theft and vandalism reports forms		Current year + 6 years
Property maintenance records	Record keeping (VAT Notice 700/21).	Current year + 6 years
Acquiring, disposing of and maintenance of vehicles	Section 2 of the Limitation Act 1980.	Disposal of the vehicle + 6 years

Service logs for vehicles	Section 2 of the Limitation Act 1980.	Leased vehicle - return to lease company with vehicle Owned vehicle - Life of vehicle + 6 years
GPS tracking data		Date of journey + 6 years
Contracts and Licences		
All records relating to the management of contracts under seal (executed as a deed, signed and witnessed)	Section 2 of the Limitation Act 1980.	Last payment on contract + 6 years
All records relating to the management of any other contract		
Records relating to the monitoring of contracts		Current year + 2 years
Records relating to software licences		Date licence expires + 6 years
Risk management and Insurance		
Visitors books and signing in records		Current year + 6 years
Insurance policies		Date policy expires + 6 years
Records relating to the settlement of insurance claims		Date claim settled + 6 years
Employers liability insurance certificate	Employers' Liability (Compulsory Insurance Regulation) 1998	Closure of the Trust + 40 years
Risk and control framework/Risk Register		Life of framework + 6 years
H&S risk assessments (not fire - see below)		Life of risk assessment + 3 years
Accident books	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995	3 years after last entry
Records of accidents to child where action is taken (child collected, child taken to hospital etc)	Accidents involving pupils should be retained in the pupil record. Regulation 25 of the Social Security (Claims and Payments) Regulations 1979.	Date of birth + 25 years

Accident Reporting Forms for adults (for Injuries where action is needed)		Date of incident + 7 years and review. If injury was serious enough for a RIDDOR report to be filed, follow the retention period below for records relating to an accident/injury at work.
Records relating to accident/injury at work		Date of incident + 12 years
Other incident reports		Current year + 20 years
Control of substances hazardous to health	The Control of Substances Hazardous to Health Regulations 2002.	Current year + 5 years
Health surveillance records	The Control of Substances Hazardous to Health Regulations 2002 and Health surveillance – Record keeping.	40 years.
Other health records of staff	The Control of Substances Hazardous to Health Regulations 2002 and Health surveillance – Record keeping.	While the worker is employed in your school.
Asbestos monitoring/management	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years
Radiation monitoring/management		Last action + 50 years
Fire precaution log books		Current year + 6 years
Fire risk assessments	Retain as detailed in section 2 of the Limitation Act 1980.	Life of the risk assessment + 6 years
Business Continuity Plans		Date the plan was superseded + 3 years
Admissions		
All records relating to creation and implementation of the Admissions Policy		Life of the policy + 3 years
Paperwork relating to successful admissions		Add to pupil file
Paperwork relating to unsuccessful admissions		Resolution of case

Register of admissions	Regulation 7 of the School Attendance (Pupil Registration) (England) Regulations 2024.	Admission date + 6 years
Attendance		
Attendance registers	Regulation 7 of the School Attendance (Pupil Registration) (England) Regulations 2024.	Date of entry + 6 years
Attendance returns to the local authority		Current year + 1 years
School census returns		Current year + 5 years (BromCom)
Primary Pupil Records		
Pupil File (Primary)	The Education (Pupil Information) (England) Regulations 2005 for details of what to keep in the pupil record and guidance on how to transfer information to another school.	File passed to new school – no retention of any data unless: • The pupil left for elective home education • Missing from education • Left the UK Then data should be stored for 25 years from the pupil's date of birth.
Secondary Pupil Records		
Pupil Education Record (Secondary) or last known school) Records regarding suspensions and exclusions	The Education (Pupil Information) (England) Regulations 2005 for details of what to keep in the education record. Retain as detailed in section 2 of the Limitation Act 1980. See guidance on what to do if your school will close before the end of the retention period.	Date of birth of pupil + 25 years Dispose of records securely. If the pupil leaves to go to another school, transfer the records to that school.
Secondary transfer sheets		Current year + 2 years

SEND		
SEND files	SEND code of practice: 0 to 25 years. Retain as detailed in section 2 of the Limitation Act 1980. Transfer as detailed in Regulation 15 of The Special Educational Needs and Disability Regulations 2014.	Retain for duration of attendance at the school and then transfer to new setting The final setting retain for 6 years. Dispose of records securely, unless the document is subject to a legal hold.
SEND files for EHCP children		Duration of attendance at the school. Final setting from date of birth + 25 years.
Curriculum		
Management of exam registrations		Each exam board will have their own retention period that should be followed
Public examination results (pupil copy)		Certificates given to pupils and outcomes recorded on their pupil file
Internal examination results (pupil copy)		Added to pupil file
Examination results (schools copy)		Current year + 6 years
SATs exam papers		Retain until any appeal/validation process is complete
Timetable	The Education (School Records) Regulations 1989 and Regulation 3 of the Education (Pupil Information) (England) Regulations 2005.	Current year + 1 year
Class lists		Current year + 1 year
Pupils work		Where possible all work should be returned to pupil at the end of the academic year. If not possible, retain for current year + 1 year
Records created in order to obtain approval for educational trips	Health and safety on educational visits. Retain as detailed in section 2 of the Limitation Act 1980.	Primary - Date of visit + 14 years Secondary - Date of visit + 10 years
Parental consent forms for non-residential trips where no major incident		Conclusion of the trip

Parental consent forms for non-residential trips where major incident occurred		Retain the permission slips for all pupils and the incident report in the pupil record, or until the pupil reaches the age of 25.
Parental consent for residential trips		Date of birth of youngest pupil involved + 25 years
Child Protection		
Child protection information	Store in a separate child protection file. Keeping Children Safe in Education sections 66, 67, 121 and 122. The Report of the Independent Inquiry into Child Sexual Abuse (IICSA), recommendation on access to records.	Retain for duration of attendance at the school and then transfer to new setting The final setting retain until the child's 25th birthday. If the file relates to child sexual abuse, retain until the child's 75th birthday. Dispose of records securely.
Allegations of child protection against a member of staff, including unfounded allegations	Keeping Children Safe in Education and Working together to safeguard children.	Until the staff member's normal retirement age, or 10 years from the date of the allegation, whichever is later.
Safeguarding records where child is not looked after, and leaves and doesn't transfer to another school		Retain for duration of attendance at the school and then transfer to new setting The final setting retain: Concerns were at low level / threshold for referral to social care not met / no inter-agency involvement – Date of birth + 25 years A referral was made / social care involved / other agencies involved – Date child left school + 35 years

Safeguarding records where child who is not looked after, leaves school and moves to another school; or where the child is under 18 and leaves to attend college		Chronology of events should be retained as above. Where new school has CPOMS - no action required (other than to retain chronology) as new school can access this once child on roll Where the new school doesn't have CPOMS, or where we hold other safeguarding records, these should be hand delivered to the DSL of the new school. If it is necessary to post the file, this should be by recorded delivery and a copy of the entire file should be kept until the new setting confirms safe receipt.
Safeguarding records for child who is looked after		Retain for duration of attendance at the school and then transfer to new setting The final setting retain until date child leaves school + 75 years
Hard copy cause for concern forms (completed by colleagues/visitors who don't have access to CPOMs)		Scanned to CPOMs and secure disposal of hard copy
Workforce		
All records leading up to the appointment of a new Headteacher		All relevant information added to the personnel file (see below) All other information retained from date of appointment + 6 years
All records leading up to the appointment of a new member of staff - successful candidate		All relevant information added to the personnel file (see below) All other information retained for 6 months
All records leading up to the appointment of a new member of staff - unsuccessful candidates	ICO Employment Practices Code (Recruitment & Selection) Disability Discrimination Act 1995 & Race Relations Act 1976	Date of appointment of successful candidate + 6 months

Pre-employment vetting information - DBS checks	Keeping Children Safe in Education.	A copy of the DBS certificate should only be kept in the following circumstances: a) if there is a formal risk assessment (positive disclosure form) in place. DBS is kept for the duration of the risk assessment or until such time that the convictions would be filtered by DBS (whichever is sooner) b) If we are waiting for a new starter's DBS to arrive, we may keep a copy of a DBS from a previous employer (if one has been provided), until the new DBS has been received.
Proof of ID collected for DBS check		Checked and a note made of what was seen. Copy documents can be added to personnel file.
Evidence of right to work in the UK		These documents should be added to the personnel file. Home Office requires that they are kept for 2 years from termination of employment.
Records relating to TUPE		Date last member of staff transfers or leaves the organisation + 6 years
Staff personnel files, including contract and training records	Section 2 of the Limitation Act 1980.	Termination of employment + 6 years
Time sheets		Current year + 6 years
Records relating to the agreement of pay and conditions		Date pay and conditions superseded + 6 years
Allegation which is child protection in nature against a member of staff		Until the person's normal retirement age or 10 years from the date of the allegation (whichever is longer)
Allegation which is child protection in nature against a member of staff where the allegation is unfounded		Remain on personnel file
Other disciplinary records where case not found		If the incident is child protection related see above; otherwise dispose of at conclusion of the case
Disciplinary sanctions		Remain on personnel file

Payroll		
Maternity pay records	The Statutory Maternity Pay (General) Regulations 1986.	Current year + 3 years
Records held under Retirement Benefits Schemes	Regulation 15 of the Retirement Benefits Schemes (Information Powers) Regulations 1995	From the end of the year in which the accounts were signed + 6 years
Records relating to pensions		Date of last payment on the pension + 6 years
Payroll records	PAYE and payroll for employers: keeping records.	Date of payroll run + 6 years
Other Information		
Data retrieved as part of a subject access request or a freedom of information request		A skeleton log will be kept of all information requests. A copy of any outcome letter will be placed on the relevant staff or student file. The data retrieved as part of the request will be kept in a secure folder in Google Drive for 2 years following the date of the outcome letter.
Record of breaches and any data collected as part of the investigation.		A skeleton log will be kept of all breaches. Any notes, correspondence or data collated as a result of the investigation will be held for 2 years following the date the breach was realised.
Data Processing Agreements, Data Sharing Agreements.		Last payment on contract/date processing or sharing terminated (whichever is later) + 6 years
Data Protection Impact Assessments.		Life of the DPIA + 6 years
Biometric Data (e.g. fingerprints)		To be destroyed once the data subject has left the academy or when consent has been withdrawn.
Photography		The date the data subject has left the academy + 3 years (unless the photograph is deemed worthy of permanent preservation due to their historical or social value (i.e. a significant event in the life of the school; class or yearbook photographs).

Emails	Emails must be managed like any other record, and in keeping with relevant information legislation including the Data Protection Act 2018 and Freedom of Information Act 2000	Students - accounts disabled within 3 months Accounts and emails are deleted within a year of leaving Staff – accounts disabled when they are notified by HR Deleted within a year of leaving.
CCTV		Retain until hard drive is full and then they overwrite most will not fill for longer than 30 days
Contact data sheets		Current year then review, if contact is no longer active then destroy
Parent Portal accounts		Disabled one term after the last child leaves the school

Useful links:

Data protection in schools - Record keeping and management - Guidance - GOV.UK
Record keeping and retention information for academies and academy trusts - GOV.UK