

Document Retention Policy

Date: January 2021

Review date: January 2024

Introduction

The Trust and its academies have a responsibility to maintain their records and record keeping systems. When doing this, the Trust will take into account the following factors:

- a) The most efficient and effective way of storing records and information;
- b) The confidential nature of the records and information stored;
- c) The security of the record systems used;
- d) Privacy and disclosure; and
- e) Their accessibility.

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, and best practice and guidance. It may be amended by the Trust from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect. The Trust may also vary any parts of this procedure, including any time limits, as appropriate in any case.

Data Protection

This policy sets out how long employment-related and pupil data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of Data Protection and Freedom of Information legislation.

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

Retention Schedule

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

Paper and electronic records will be regularly monitored by School Business Managers at academy level and Lisa Collison Head of HR/Laura Fisher Head of Business Support at Trust level.

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

Destruction of Records

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.

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 waste paper merchant. All electronic information will be deleted.

The Trust and its academies maintain a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in this list at least:

- a) File reference (or another unique identifier);
- b) File title/description;
- c) Number of files; and
- d) Name of the authorising officer.

Archiving

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 the School Business Managers or nominated Administrators at our academies and Lisa Collison

Head of HR/Laura Fisher Head of Business Support at Trust level. The appropriate staff member, when archiving documents should record in this list the following information:

- a) File reference (or another unique identifier);
- b) File title/description;
- c) Number of files; and
- d) Name of the authorising officer.

Transferring Information to other Media

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.

Reasonability & Monitoring

Our Headteachers have a primary and day-to-day responsibility for implementing this policy.

The Trust Data Protection Officer, in conjunction with the Trust and its academies are 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 the policy and report any necessary improvements directly to management.

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

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.

RETENTION SCHEDULE

FILE DESCRIPTION	RETENTION PERIOD
Employment Records	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates, unless the Trust/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	6 years after employment ceases.
Written particulars of employment, contracts of employment and changes to terms and conditions	6 years after employment ceases.
Right to work documentation, (including identification documents immigration checks)	2 years after employment ceases.
DBS checks and disclosures of criminal records forms	The Trust uses an on-line system, therefore no hard copies are kept. The Trust destroys any ID copied for the DBS check on receipt of confirmation that the check has been completed. The Trust does keep a form with details of the ID that was seen during this check for audit purposes. This remains on file until 6 years after employment ceases.
Change of personal details notifications	The Trust keeps a completed form with confirmation of ID seen that is kept on file until 6 months after employment ceases.
Emergency contact details	Destroyed on termination.
Personnel and training records	While employment continues and up to six years after employment ceases.
Annual leave records	2 years on paper personnel file, while electronic files are kept for 6 years after employment ceases.
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: <ul style="list-style-type: none"> • Opt out forms • Records of compliance with WTR 	<ul style="list-style-type: none"> • 2 years from the date on which they were entered into. • 2 years after the relevant period.
Disciplinary and training records	6 years after employment ceases.
Allegations of a child protection nature against a member of staff, including where the allegation is unfounded?	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 and Payroll Records	

All financial paperwork relating to the accounts	7 years after the end of the accounting period they relate to.
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 the end of the tax year they relate to.
Maternity/Adoption/Paternity Leave records	3 years after the end of the tax year they relate to.
Statutory Sick Pay	3 years after the end of the tax year they relate to.
Current bank details	No longer than necessary.
Agreements and Administration Paperwork	
Collective workforce agreements and past agreements that could affect present employees	Permanently.
Trade union agreements	10 years after ceasing to be effective.
School Development Plans	3 years from the life of the plan.
Professional Development Plans	6 years from the life of the plan.
Visitors' Book and Signing in Sheets	6 years.
Visitors' Forms	1 term only (precluding the current term)
Newsletters and circulars to staff, parents and pupils	1 year.
Health and Safety Records	
Health and Safety consultations	Permanently.
Health and Safety Risk Assessments	3 years from the life of the risk assessment.
Any reportable accident, death or injury in connection with work	For at least 12 years from the date the report was made.
Accident reporting	Adults – 6 years from the date of the incident Children – when the child attains 25 years of age.
Fire precaution log books	6 years.
Medical records and details of: <ul style="list-style-type: none"> • 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.
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.
Pupil Records	
Admissions records	1 year from the date of admission.
School Meals Registers	7 years.
Free School Meals Registers	7 years.
Pupil Record	Passed to the next school at point of transfer. If pupils are to be home educated, records will be kept for a period of 6 years.
Attendance Registers	Paper registers are kept for 3 years from the date of entry.
Child protection pupil documentation	Until the child turns 25.
Special Educational Needs files, reviews and individual education plans (this includes any statement and all advice and information shared regarding educational needs)	Until the child turns 25.
Other records	
Emails	7 years.