



ARCHIVE AND RECORDS MANAGEMENT POLICY

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Review Date: When new legislation/guidance is published affecting retention times.
Otherwise, every 3 years.

Appendix 1 Record of changes
Appendix 2 Record of Employee having read the policy.

Introduction

This retention policy is designed for the following purposes:

- Support compliance with data legislation such as the Data Protection Act 2018, and the General Data Protection Regulations (GDPR) 2018, as well as being adaptable to any future legislation.
- Ensure good management of our data and records for the appointed lifespan and prevent premature destruction of said data and records.
- Make provisions for data which may need to be transferred to other organisations or be retained for national inquiries (such as the Independent Investigation into Child Sexual Abuse)
- Provide clear guidance on the destruction of records no longer required to minimise storage costs, protect privacy, and prevent issues associated with data breaches.
- Identify any records which may be of historical value and offer those to local archives if appropriate.

As a publicly funded, accountable body, APTCOO must maintain records of potential interest to staff, stakeholders, and members of the public. Records of activities and achievements contain accumulated experience, expertise, and knowledge. They also offer evidence of processes and best practice in action.

Legislation and Guidance

This document refers to the following legislation and guidance:

- Health & Safety at Work Act 1974
- Limitation Act 1980
- Data Protection Act 2018
- General Data Protection Regulations 2018
- Guidance from The National Cyber Security Centre

This document references the following APTCOO policies:

- Acceptable Use Policy
- Data Protection and GDPR Policy
- Safeguarding and Child Protection Policy

1. Information that has ongoing business value

This is information that is of value to APTCOO, which is needed for both day-to-day activities and longer-term strategic planning.

2. Information that is of archival or historical value

This is information which reflects the 'what, why and how' of government and should be selected for permanent preservation at The National Archives. This will include significant policy documents, records of significant decisions, documents about notable events, persons or public issues broadly encompassing:

- a) the principal policies and actions of the UK central government
- b) the decision-making process in government
- c) the state's interaction with its citizens and the physical environment

We need to keep some information permanently to meet this need. For other types of information, we can safely destroy it after a certain period.

Most information is scheduled to be retained for 6 or 7 years. This is because of a concept known as the liability period and is particularly relevant where we hold a contract with either a grant holder, supplier or where we have provided a service to another organisation.

There is the actual cost of storing information that is no longer needed either in offsite archives or within our IT infrastructure, as well as the cost to the organisation of not being able to use our information resources effectively to support us in our work. This policy applies to all records at APTCOO, including electronic records.

Data protection

This policy will ensure that APTCOO is complying with the fundamental ethos of the Data Protection Act which requires that we do not store material about our service users, staff or other people who could be identified which has no business use.

To comply with the principles of the Data Protection Act 1998, an organisation must:

- only keep information for as long as there is a business need
- keep records secure, whether electronic or paper
- allow a person access to information held about them, should they request it

It follows that APTCOO employees must:

- a) destroy papers and electronic data for which there is no continuing business need and send papers that cannot be destroyed to archive for as short a time as possible
- b) keep data secure while it remains in any office
- c) keep track of where information is stored
- d) continue to apply these good practices to avoid stockpiling papers in the future

Storage and Security

Physical records must be safeguarded to ensure that they cannot be damaged, destroyed or lost. Records must be stored in the organisation in a way that does not cause health and safety obstructions or hazards. The area assigned for record storage should be secured against potential intruders and have limited and controlled access in the workplace.

Areas marked for record storage should be entirely weatherproof. Additionally, records are not to be stored directly on the floor, to minimise the risk of flood damage.

Email

Emails straddle a fine line between ephemeral correspondence and long-term valuable data depending on their context. Email applications are not a viable long-term storage facility for keeping email as a record.

Emails that have information should be identified by content, for example:

- Does it form part of a learner record?
- Is it part of a contract?
- Does it relate to an employee?
- Does it hold other long-term contextual value?

The retention period for keeping these types of emails will correspond with the record types found in the retention schedule below. APTCOO will save these emails into the appropriate, long-term file type or paper document for storage on our systems and in archives where appropriate. Information contained within these emails should be recorded in the appropriate place (e.g. CPOMS). Once this is done and verified, the original email can be deleted.

APTCOO is in the process of creating electronic rules whereby emails in inboxes are automatically deleted after a period of time, subject to them being filed away. By doing so, we aim to minimise the amount of data subject to theoretical breaches and reduce the pressure on our storage capacity.

Disposal procedure

APTCOO cannot and must not retain all corporate data indefinitely. This is due to the financial cost of data storage, the need for well-structured records to aid information retrieval and legal challenges in retaining personal data about our customers for longer than there is a clear need to do so.

At the end of their useful life, records should be confidentially destroyed. In general, records will not be retained beyond the lifespan indicated in the retention schedule unless the DPO indicates otherwise.

APTCOO will maintain a list of records which have been destroyed and who authorised their destruction. A link to a digital copy of this list can be found in the Key Documents section at the bottom of this policy.

Members of staff should record the following:

- File reference (or another unique identifier);
- File title (or brief description);
- Number of files and date range
- The name of the authorising officer
- Date the action was taken

There are two types of disposal; standard and secure.

STANDARD DISPOSAL/DELETION: If the document contains no personal or sensitive information, it may be disposed of without shredding. For electronic documents, it may be deleted via the recycle bin of the system being used.

SECURE DISPOSAL/DELETION: is defined as being destroyed by confidential and secure means. All data which could be construed as personal must be disposed of in a secure way.

For paper records, this will be destruction via (at a minimum standard) a cross-cut shredder, though APTCOO will prioritise destruction via micro-cut shredding.

In the case of electronic records, it will involve deletion and overwriting using secure software or PowerShell commands to ensure full irretrievability. At the end of the storage hardware's life cycle, it will be wiped using secure digital methods before being collected and destroyed by an appropriately qualified third-party organisation.

Methods of wiping and destruction for documentation

Methods of wiping and destruction employed by APTCOO will meet the necessary security thresholds outlined by ISO 9001: BS EN 15713.

We will contract with an external company qualified to the above standards for the purpose of destroying old hard drives and other electronic storage systems.

Roles and Responsibilities

In practice, everyone is responsible for the timely submission and safeguarding of data.

However, the oversight and maintenance of data protection on a day-to-day basis will be the Data Protection Officer. It is their responsibility to ensure that complete and accurate records are retained in line with legislative requirements and good practice.

Staff will create, use, manage and preserve the records in accordance with all statutory requirements including the Freedom of Information Act 2000.

Responsibility for records created by or for Board members lies with the Board of Trustees/Governing Board.

Retention schedule

NOTES: All information which is disposed of must have a written explanation as to why said information is no longer held. This will constitute a reference to its record of destruction. All data must be manually reviewed before being destroyed – due to the nuances of the data we hold, automated destruction is not a safe option.

Section 77 of the FoI has provisions for authorities to be charged with destroying records to prevent disclosure. The DPA contains further provisions on the transparency of retention. It is therefore critical that any decision to dispose of data is properly documented.

Document	Retention period	Reason for retention	Action at end of administrative life	Notes (AND VERIFIED)
Governing Body				
Instruments of Governance, including Articles of Association / Memorandums	PERMANENT	To be retained in the school for as long as said school is active. If Mems and Arts are replaced, old ones possibly of historical interest, review	To be offered to the County Archives Service if the school closes. Otherwise, SECURE DISPOSAL	

		before disposal.		
Trusts and endowments managed by Board	PERMANENT	To reference during the entire lifetime of the school	To be offered to the County Archives Service if the school closes. Otherwise, SECURE DISPOSAL	
Records relating to the elections of governors (including appointments and resignations)	Term of office + 6 YEARS	In case of allegations concerning children, keep records for 25 YEARS following conclusion of term.	SECURE DISPOSAL	
Records relating to the election/appointment of the Chair	Term of office + 6 YEARS	In case of allegations concerning children, keep for 25 YEARS following conclusion of term	SECURE DISPOSAL	
Meetings schedule	End of SAME YEAR (financial/ AGM)	Common practice	STANDARD DISPOSAL	
Annual review	PERMANENT (?)		SECURE DISPOSAL	
Agendas for Board meetings	One copy to be retained with master set of minutes (PERMANENT) All other copies to be disposed of.	Meetings may refer to confidential issues relating to staff and may be required in retrospect.	SECURE DISPOSAL	Data protection issues if involving confidential issues relating to staff
Principal set of signed Board minutes	IICSA recommends PERMANENT retention, but 10 YEARS minimum in law. Exception listed directly below, in which case should be PERMANENT (reports referenced in meeting minutes)	Companies Act 2006 for 10-year retention. IICSA for permanent retention	If school IS unable to store these, they should be offered to the County Archives Service. Otherwise, SECURE DISPOSAL	

Reports made to the meeting which are referenced in the minutes	PERMANENT	Good practice for context	SECURE DISPOSAL	
Minutes of general meetings and members' resolutions passed other than at a general meeting	Minimum 10 YEARS after date of meeting/resolution/decision	Check	SECURE DISPOSAL	
Inspection copies	Date of meeting + THREE YEARS	Operational use only		
Register of attendance at full Board meetings	Date of last meeting in the book + 6 YEARS	Personal information	SECURE DISPOSAL	
Action plans created and administered by the governing body	Until superseded or whilst relevant for reference	Retained for operational use and reference	SECURE DISPOSAL	
Policy documents created and administered by the organisation	Until superseded or whilst relevant for reference + 6 YEARS	Consider keeping all historical policies relating to safeguarding, child protection, or other learner-related issues such as exclusion. Useful for IICSA.	SECURE DISPOSAL	
Fixed assets register	PERMANENT	Best practice	SECURE DISPOSAL	
Records relating to complaints made to and investigated by the Board or Head Teacher	Major complaints: Current year + 6 YEARS If negligence: current year + 15 YEARS If child protection / safeguarding concerns: current year + 40 YEARS	Disputes may be reinitiated. Status of dispute must be reviewed before deletion. Limitation Act 1980 (Section 2)	SECURE DISPOSAL	
SLT AND ADMIN RECORDS				
Minutes and reports of Senior Management Team meetings	Date of meeting + 3 YEARS, then review	Information and Record Management Society (IRMS)	SECURE DISPOSAL	May be data protection issues if minutes refer to individual learners or staff

and other internal administrators.		School Toolkit - guidance		
Reports created by Head Teacher or management team	Date of report + 3 YEARS, then review		SECURE DISPOSAL	
Records created by Head Teacher (or deputy), and other members of staff with admin responsibilities	Current academic year + 6 YEARS, then review	Limitation Act 1980 (Section 2)	SECURE DISPOSAL	May be data protection issues if records refer to individual learners or staff
Correspondence created by Head Teacher (or deputy), and other members of staff with admin responsibilities	Date of correspondence + 3 YEARS, then review	Common practice	SECURE DISPOSAL	May be data protection issues if correspondence refers to individual learners or staff
Professional development plans	Should be held on personnel file, otherwise: Life of the plan/ termination + 6 YEARS	Limitation Act 1980 (Section 2)	SECURE DISPOSAL	
School development plans	Life of the plan + 3 YEARS	Common practice	SECURE DISPOSAL	Possibly retain development strategy for historical purposes(?)
All records relating to creation and implementation of the school's Admissions Policy	3 YEARS after date policy is no longer followed. Amended policies are to be treated as new policy.	School attendance guide May 2022	SECURE DISPOSAL	
Admissions – if successful	3 YEARS after date of submission	School attendance guide May 2022	SECURE DISPOSAL	
Admissions – if unsuccessful	1 YEAR after resolution of case		SECURE DISPOSAL	
Admissions register	All entries preserved for 3 YEARS	School attendance guide May 2022	SECURE DISPOSAL	

Proof of addresses supplied by parents as part of admissions process	3 YEARS from year of admission	Part of “all entries to admissions register” School attendance guide May 2022	SECURE DISPOSAL	
Supplementary information form including religion, medical conditions, etc (for successful admissions)	Learner DOB + 31 YEARS (for EHCP holders)	For learner file	SECURE DISPOSAL	
(for unsuccessful admissions)	Until appeal process is completed	Operational use only	SECURE DISPOSAL	
Files and records retained during the work of a school which do not contain personal data or fall into any other category with an associated retention period.	Current year + 5 YEARS, then review to identify any operational needs or unforeseen protection issues. If any, add to the learner file and adopt that retention period.	Operational use. Review required to identify need for retention before disposal	SECURE DISPOSAL	
Records relating to creation or publication of school brochure or prospectus	3 YEARS after operational usage ceases, then review annually	Operational use. Review needed to identify elements to retain before disposal	STANDARD DISPOSAL	
Records relating to creation or distribution of circulars to staff, parents or learners	1 YEAR after year of publication	Operational use. Review needed to identify elements to retain before disposal	STANDARD DISPOSAL	
Newsletters and other items with short operational use	1 YEAR after year of publication	Operational use. Review needed to identify elements to retain before disposal	STANDARD DISPOSAL	
Visitors' books and signing in sheet	6 YEARS after current year, then review annually	Operational use and reference / evidence in	SECURE DISPOSAL	

		claims, appeals, or litigation. Review before disposal		
Records of contracts under signature	6 YEARS from last payment on contract	Limitation Act 1980 (Section 2)	SECURE DISPOSAL	
Records of contract monitoring	2 YEARS from expiration of contract	Operational use and reference	SECURE DISPOSAL	In line with Contractual Requirements
School census returns	6 YEARS after current year	Operational and reference once copies filed with DfE	SECURE DISPOSAL	
Attendance register/returns	3 YEARS after current year (longer in case of EHCP?)	School attendance guide May 2022	SECURE DISPOSAL	
School copy of exam results	6 YEARS from current year	Operational use	SECURE DISPOSAL	
OFSTED reports and papers	Until superseded by new report / papers, then review annually	Operational use and reference	SECURE DISPOSAL	
Correspondence, other than email, created by any staff with admin responsibilities including Head Teachers (and deputy), teachers, pastoral, and support staff	3 YEARS from the date of correspondence, then review annually	Operational use and reference Common practice	SECURE DISPOSAL	
Emails	1 – 3 YEARS from creation.	Best practice, reduce SAR requirements and associated logistical nightmares	SECURE DISPOSAL	
All records relating to the administration of transport – where transport is provided	6 YEARS from date transport ends	Limitation Act 1980 (Section 2)	SECURE DISPOSAL	
INSURANCE, BUSINESS RISK & CONTINUITY				
Employers Liability Insurance documentation	40 YEARS after date on which liability policy is terminated/or ends	Employers' Liability (Compulsory Insurance Regulations)	SECURE DISPOSAL	

		1998 (Section 4, 4)		
Non-liability policies and documentation	10 YEARS after date on which policy is terminated/or ends	Business need	SECURE DISPOSAL	
Administration and correspondence relating to claims	6 YEARS after settlement or repudiation (not before claimant is 24 years old)	Business need / Limitation Act 1980, Section 2	SECURE DISPOSAL	
Business Continuity Plan	6 YEARS after being superseded	Business need / Limitation Act 1980, Section 2	SECURE DISPOSAL	
Audit documentation	6 YEARS after audit or legal action	Business need / Limitation Act 1980, Section 2	SECURE DISPOSAL	
HEALTH & SAFETY				
H&S Policy Statements	Life of policy + 6 YEARS	Limitation Act 1980 (Section 14A)	SECURE DISPOSAL	
H&S risk assessments	Life of RA + 6 YEARS	Limitation Act 1980 (Section 14A)	SECURE DISPOSAL	
Records relating to accidents/injuries at work	3 YEARS from date of accident or settlement (whichever is later) (adults) DOB + 21 YEARS (children)		SECURE DISPOSAL	
Major accident reporting (RIDDOR) for:				
<ul style="list-style-type: none"> Adults 	Date of incident + 3 YEARS (if investigation, 3 YEARS after date of conclusion)		SECURE DISPOSAL	It is possible to keep data for longer if you wish it to inform health & safety policy / strategy. If so, you must anonymise data.
<ul style="list-style-type: none"> Children 	DOB + 21 YEARS (if under 18)		SECURE DISPOSAL	
Medication administered to children.	For as long as the child is registered with APTCOO	DfE advice courtesy of Key Support Retaining first aid, accident and medical records	SECURE DISPOSAL	

		 The Key Leaders (thekeyssupport.com)		
Control of Substances Hazardous to Health (COSHH) documentation	Date of incident + 40 YEARS	The Control of Substances Hazardous to Health Regulations 2002 (Section 10, 5 (a)) Review for further retention in case of enforcement action or contentious disputes	SECURE DISPOSAL	
Documentation or process monitoring of areas where employees are likely to have been in contact with asbestos.	Current year + 40 YEARS	Review for further retention in case of enforcement action or contentious disputes	SECURE DISPOSAL	
Fire precaution logbooks	Current year + 6 YEARS	Limitation Act 1980 (Section 2) Risk assessment obligations of Regulatory Reform (Fire Safety Order 2005), although no retention period stated	SECURE DISPOSAL	
Records of water testing	Date of last entry + 6 YEARS	Review for further retention in case of enforcement action or contentious disputes	SECURE DISPOSAL	

PAYROLL AND PENSIONS				
Payroll wage/salary records + payroll control account	6 YEARS from end of financial year to which they relate	Charity reporting and accounting: the essentials, Section 3.2 - GOV UK	SECURE DISPOSAL	
Annual return of employees/ volunteer expenses and benefits (P11D?)	6 YEARS from end of financial year to which they relate	Charities Act 2011 (Section 131)	SECURE DISPOSAL	
Annual return of taxable pay and tax deducted	Current year + 6 YEARS	Charities Act 2011 (Section 131)	SECURE DISPOSAL	
Certificate of pay and tax deducted (P60)	Current year + 6 YEARS	Charities Act 2011 (Section 131)	SECURE DISPOSAL	
Expense records	Current year + 6 YEARS	Charities Act 2011 (Section 131)	SECURE DISPOSAL	
Income tax records, re: employees leaving (P45)	Current year + 6 YEARS	PAYE for Employers - Keeping Records: GOV.UK	SECURE DISPOSAL	
Overtime records and authorisation	Current year + 6 YEARS		SECURE DISPOSAL	
Notice to employer of tax code (P6)	Current year + 6 YEARS	Check (Taxes Management Act?)	SECURE DISPOSAL	
Notice of tax code change	Current year + 6 YEARS	Check (Taxes Management Act?)	SECURE DISPOSAL	
Pension records about employees and workers, including active members and opt-outs	6 YEARS after contract ends Opt-outs – 4 YEARS	Your ongoing duties - The Pension Regulator	SECURE DISPOSAL	
Trust Deed / Rules and HMRC approvals	6 YEARS after end of operational use (permanently?)	Detailed Guidance for Employers: (April 2017)	SECURE DISPOSAL	
Maternity, paternity and	3 YEARS after tax year in which	Statutory Maternity Pay	SECURE DISPOSAL	

adoption pay records	maternity / paternity pay period ends.	(General) Regulations 1986, revised 1999 (Section 26)		
Sick pay / calculations / certificates / self-certificates	3 YEARS after tax year end to which records relate (see notes in final column)	Sick Pay Guide (HMRC), The Statutory Maternity Pay (General) and Statutory Sick Pay (General) (Amendment) Regulations 2005 *	SECURE DISPOSAL	Guidance varies widely from 6 months to 6 years. Retention needs will likely relate to disability discrimination claims (and possibly in line with other pay records?)
Staff timesheets	2 YEARS after date of submission	Working Time Regulations 1998 as amended (Section 5 (4)(a)(iii))	SECURE DISPOSAL	
PROPERTY				
Deeds of school properties	Entire life of the school	Should follow the property/be passed to new owners	SECURE DISPOSAL	
Plans of school properties	Entire life of the school	To be passed to new owners	SECURE TRANSFER	
School property leases	12 YEARS from expiration of lease	Limitation Act 1980 (Section 19, 20)	SECURE DISPOSAL	
Letting records	6 YEARS from record creation	Limitation Act 1980 (Section 19)	SECURE DISPOSAL	
Records of maintenance by contractors	6 YEARS from record creation	Limitation Act 1980 (Section 5)	SECURE DISPOSAL	
Records of major refurbishments, warranties, planning consents, design documents, final health & safety files	13 YEARS for action against contractors (check with above?)	Limitations Act, 1980	SECURE DISPOSAL	
Building general records, certifications and warranties, etc.	6 years after property is disposed of, if not of historical interest	Limitations Act 1980 (Section 4B?)	SECURE DISPOSAL	
Inventories of furniture and equipment	6 years from creation of inventory	Limitation Act 1980 (Section 2)	SECURE DISPOSAL	

Burglary, vandalism and theft reports	6 years from report creation	Limitation Act 1980 (Section 2)	SECURE DISPOSAL	
TAX AND FINANCE				
Annual accounts including payroll	6 YEARS from end of financial year.	HMRC requirement: Running a limited company: your responsibilities Charities Act 2011 (Section 131)	SECURE DISPOSAL	
Loans and grants	12 YEARS from last repayment, then renew annually	Limitation Act 1980	SECURE DISPOSAL	
Leases	6 YEARS from end of lease	Limitation Act 1980	SECURE DISPOSAL	
Budget management records and associated paperwork	3 YEARS from budget period ending (or 6 YEARS from financial year end, re: Charities Act Section 131?)	HMRC requirement - Running a limited company: your responsibilities	SECURE DISPOSAL	
Invoices, orders, receipts, requisitions, delivery notices	6 YEARS from end of financial year when transaction took place Longer in case of machinery and equipment expected to last more than 6 YEARS.	HMRC requirement: Companies House accounts guidance GOV.UK Charities Act 2011 (Section 131)	SECURE DISPOSAL	
Invoice – revenue	6 YEARS from end of financial year in which transaction was made	HMRC requirement: Companies House accounts guidance GOV.UK	SECURE DISPOSAL	
Invoice – capital item	10 YEARS from document's financial year end	Companies Act Charities Act 2011 HMRC requirement	SECURE DISPOSAL	

Successful quotations for capital expenditure	PERMANENT	Business best practice Charities Act 2011 (Section 130, 131) Buzzacott retention of accounting records best practice		
Petty cash records	6 YEARS from financial transaction year end		SECURE DISPOSAL	
Banking records and associated paperwork	6 YEARS from financial transaction year end	HMRC requirement: Companies House accounts guidance GOV.UK Charities Act 2011 (Section 130, 131)	SECURE DISPOSAL	
School fund cheque books, paying in books, bank statements, receipts, journey books	6 YEARS from end of financial year when record was created	HMRC requirement: Companies House accounts guidance GOV.UK Charities Act, 2011 (Section 131)	SECURE DISPOSAL	
Bank paying in counterfoils				
Bank reconciliations				
Bank statements				
Payments cash book/ record of payments made				
Purchase ledger				
Receipts cash book				
Sales ledger				
Remittance advices				

Correspondence re: donations				
Deeds of covenant				
Records of identification and collection of debt	6 YEARS from end of financial year when record was created	HMRC requirement: Companies House accounts guidance GOV.UK Charities Act, 2011 (Section 131)	SECURE DISPOSAL	
Legacies	6 YEARS after the estate concerned has been wound up	Data Protection Act, Limitation Act 1980	SECURE DISPOSAL	
Transfer pricing documents and other records supporting organisation's tax return	6 YEARS after end of accounting period the tax return relates to / the date on which the enquiry period for the tax return closes	Finance Act 2022 (Schedule 10, Part 1, Section 22)	SECURE DISPOSAL	
Record of all delivery of goods or services for VAT purposes	6 YEARS from the date the record was created	VAT Act 1994 (check)	SECURE DISPOSAL	
Stamp duty land tax documents, including evidence of tax relief due to charitable purposes	6 YEARS from the effective date of the transaction / the date on which tax enquiry into a return is completed / the end of the period during which HMRC should have power to make an enquiry into the return.	Finance Act 2022 (Schedule 10, Part 1, Section 22)	SECURE DISPOSAL	
GRANTS, FUNDING AGREEMENTS, DONATIONCS, ETC				
All grant funding	6 YEARS minimum after end of financial year in which last payment took place. Review annually thereafter.	Individual agreements will have own record retention requests, but follow this as a minimum.	SECURE DISPOSAL	
Donation records	6 YEARS minimum after end of financial year in which donation took place.	Charities Act, 2011 (Section 131)	SECURE DISPOSAL	

WORKFORCE				
All application records of unsuccessful candidates	6 MONTHS – 1 YEAR after appointment date of successful candidate	Numerous discrimination Acts, minimum retention periods for records relating to advertising of job vacancies and applications, Limitation Act 1980 for defamation actions (1 YEAR period)	SECURE DISPOSAL	
All records linked to successful application of staff candidates	6 YEARS after termination of employment (for details required for personnel file). All other information retained for 6 MONTHS	Limitation Act 1980 (Section 2)	SECURE DISPOSAL	
All records concerning hiring/contracting of other workers, such as consultants, contractors, and temporary workers	6 YEARS after arrangement termination. Review before disposal	Operational use. Review to identify claims, appeals and any ongoing processes	SECURE DISPOSAL	
Pre-employment DBS checks	Record either of the following: “satisfactory/ not satisfactory”. If a copy is kept, no longer than 6 MONTHS	ICO Employment Practices Code 1.7.2	SECURE DISPOSAL	
Proofs of identity collected as part of enhanced DBS process – checking ‘portability’ in exclusion.	6 MONTHS from check.	ICO Employment Practices Code 1.7.2	SECURE DISPOSAL	
Pre-employment vetting info – Right to work in UK	2 YEARS after employment ends.	An employer's guide to right-to-work checks (Home Office, April 2022)	SECURE DISPOSAL	

Staff personnel file and training records, including employment contracts,	6 YEARS after employment terminated. 12 YEARS if contract was signed as a deed Ensure that sensitive information is kept in a secure place and separated from non-sensitive information	Limitation Act 1980 (Section 2) Limitation Act 1980 (Section 8) (for deeds)	SECURE DISPOSAL	
Staff appraisal/assessment	6 YEARS after the year they take place	Limitation Act 1980 (Section 5)	SECURE DISPOSAL	
Allegation of a child protection nature against a member of staff, including where this is unfounded	On staff reaching normal pension age or 10 YEARS from allegation, whichever is LONGER. If an allegation is substantiated, unsubstantiated, or unfounded, copies to be moved to personal file and copied to subject. Malicious allegations to be removed from file.	Keeping Children Safe in Education 2022 (Section 415, 417)	SECURE DISPOSAL	
Disciplinary proceedings – oral and written warning, level 1	Active for 6 MONTHS from date of warning. Keep note for 6 YEARS after employment ends.	Discipline and Grievances at work: the ACAS guide Limitation Act, 1980 (Section 2)	SECURE DISPOSAL	Not to be referred to in future disciplinary matters after date of resolution + 2 YEARS
Disciplinary proceedings – written warning, level 2	Active for 1 YEAR from date of warning. Keep note for 6 YEARS after employment ends.	Discipline and Grievances at work: the ACAS guide Limitation Act 1980 (Section 2)	SECURE DISPOSAL	Not to be referred to in future disciplinary matters after date of resolution + 2 YEARS

Disciplinary proceedings – written warning, final warning	Active for 18 MONTHS from date of warning. Keep note for 6 YEARS after employment ends.	Discipline and Grievances at work: the ACAS guide Limitation Act 1980 (Section 2)	SECURE DISPOSAL	Not to be referred to in future disciplinary matters after date of resolution + 2 YEARS
Disciplinary proceedings – case not found	Disposal at conclusion. If child protection related, 10 YEARS or until normal pension age, whichever is longer	ICO guidance, Employment Practices Code and supplementary guidance 2.13.1 Keeping children safe in education 2023 (publishing.service.gov.uk) , paragraphs 417-419	SECURE DISPOSAL	
Redundancy details, calculations of payments, refunds, notifications to Secretary of State	6 YEARS after end of employment	Best practice	SECURE DISPOSAL	
Sickness absence management	6 YEARS after end of employment	Common practice, no longer statutory. CIPD recommends 6 MONTHS for disability discrimination, 3 YEARS for personal injury, and 6 YEARS for contract breach. Must be kept separate from accidents and incidents data; categorised as sensitive data.	SECURE DISPOSAL	

Sickness absence – fit notes	2 YEARS after date of issue		SECURE DISPOSAL	
TRAINING				
First Aid Training	End of employment + 6 YEARS	Statutory retention period – Health & Safety (First Aid) Regulations 1981 (3 YEARS from training date for records) Limitation Act 1980 – (Section 2, incorporating Section 11)	SECURE DISPOSAL	
Fire Warden Training	End of employment + 6 YEARS	Limitation Act 1980 (Section 2, also covering Section 11)	SECURE DISPOSAL	
Health & Safety employee training	End of employment + 6 YEARS	Limitation Act 1980 (Section 2, also covering Section 11)	SECURE DISPOSAL	
LEARNER FILES				
Learner Educational Record	Until end of academic year following learner's DOB + 31 YEARS	DPA 2018 Pupil Information Regulations 2005	SECURE DISPOSAL	
Child protection information held on learner file	DOB + 31 YEARS To be passed to new school if learner moves.	KCSIE 2023, Working Together to Safeguard Children	SECURE DISPOSAL	* Provisional –to be finalised when government response to IICSA report
Child protection information stored outside of learner file	Learner DOB + 31 YEARS Main copy with local authority	KCSIE 2023, Working Together to Safeguard Children	SECURE DISPOSAL	DSL has responsibility for the safe transfer of child protection files
Attendance registers	Electronic register – 3 YEARS after the end of school year where registrations took place	Pupil Registration Regulations 2006, Regulation 14	SECURE DISPOSAL	Register should only routinely be amended where the reason for absence cannot

		School attendance guidance: May 2022		be established at the time and it is necessary to correct the entry. Where amendments are made, you must ensure the register shows the original entry, the amended entry, the reason for amendment, the date on which amendment was made, and the name/title of the person who made the amendment.
Authorised absence confirmation & communications	3 YEARS after date of absence	School attendance guidance: May 2022	SECURE DISPOSAL	
SEN reviews, files and IEPs	Until learner reaches 31 YEARS of age (DOB + 25 years for EHCP + 6 years laid out in Limitation Act) (for documents on learner file) 75 YEARS for Looked After Children	Limitation Act 1980 (Section 2)	SECURE DISPOSAL	
Statement of SEN made under Section 234 of the Education Act 1990 including subsequent amendments	Until learner reaches 31 YEARS of age on learner file. In case of documentation subject to a legal hold, review annually after initial period	Education Act 1996 Special Educational Needs and Disability Act 2001 (Section 1)	SECURE DISPOSAL	
Educational needs advice and information to parents	Until learner reaches 31 YEARS of age on learner file. In case of documentation subject to legal hold, review annually after initial period.	Education Act 1996 Special Educational Needs and Disability Act 2001 (Section 2)	SECURE DISPOSAL	

Accessibility strategy	Until learner reaches 31 YEARS of age (on learner file) In case of documentation subject to legal hold, review annually after initial period.	Education Act 1996 Special Educational Needs and Disability Act 2001 (Section 2)	SECURE DISPOSAL	
Schemes of work, timetables, class records, mark books, homework records and images produced in association with curriculum activities.	1 YEAR after current year of individual learner curriculum 'completion', then review need for retention on a case-by-case basis	Operational and reference (IRMS TOOLKIT) PSHE 3 year rolling curriculum for individuals – retain for 1 year after completion?	SECURE DISPOSAL	
Learner's work	Returned to learner at end of current year, copies to be kept for 1 YEAR after current year	Classed with curriculum items above but can justify retaining for purposes such as moderation samples, display or analysis. In all cases, consider offering the original to learner/parent and retaining copies. Limitation Act 1980, Section 2	SECURE DISPOSAL	
Consent forms for educational visits with no major incidents	Conclusion of trip + 3 YEARS	No further use, retention unnecessary	SECURE DISPOSAL	
Consent form for educational visits with major incident	Learner reaches 25 YEARS of age EHCP – 31 YEARS LAC – 75 YEARS	Limitation Act 1980 (Section 2, 11)	SECURE DISPOSAL	
PARENTS				

Parent details as a learner contact	1 YEAR from current year, then review annually	In line with School Admissions Code as best practice	SECURE DISPOSAL	
Messaging services	Operational use and review for deletion after 6 MONTHS.	Operational use. Review content to produce hard-copy and retain as appropriate	SECURE DELETION	
General consents	DOB + 31 YEARS (for EHCP holders) DOB + 25 YEARS for non-EHCP 75 YEARS FOR child protection and LAC	Operational	SECURE DISPOSAL	
Photographs of parents	Operational, dispose when no longer in use/ present within organisation	Operational	SECURE DISPOSAL	
Other documents produced by the school which have no personal data	3 YEARS from date of issue, then review	Operational use and reference	SECURE DISPOSAL	
CCTV, VIDEOS AND PHOTOGRAPHS				
CCTV footage	Up to 30 DAYS 6 MONTHS following outcome of any formal decision or appeal relating to disciplinary matter or dismissal claim (ICO best practice guidance)	Review for further retention if recording may be required for reasons such as accidents or incidents. Footage may also be required in relation to parental complaints, disciplinary matters, learner exclusions, bullying incidents or health & safety matters.	SECURE DELETION	

		<p>If subject to an SAR, the footage must be retained.</p> <p>This SAR must take place within the 30 day limit.</p> <p>APTCCO should consider the relevant limitation periods for claims being brought and seek advice as necessary</p>		
Photographs of learners for internal admin purposes – e.g. identification or evidence of learning	Only to be retained as long as they are required for the purpose for which they are required		SECURE DISPOSAL	
Photographs or videos of learners for marketing reasons – e.g. website, prospectus.	Only to be retained as long as they are required for the purpose for which they are required		SECURE DISPOSAL	
DATA BREACH and SUBJECT ACCESS REQUEST RECORDS				
Data breach records (e.g., actual or record of assessment of risk impact)	7 YEARS, or for learner-related files, DOB + 31 YEARS of age	Operational	SECURE DISPOSAL	
Subject Access Requests	7 YEARS, or for learner-related files, DOB + 31 YEARS of age	Operational	SECURE DISPOSAL	ICO currently reviewing guidance based on IICSA recommendations – likely to change in future so have put 31 YEARS as interim measure.
Complaints	7 YEARS, or for learner-related files, DOB + 31 YEARS	Operational	SECURE DISPOSAL	As above re: ICO, IICSA

A PLACE TO CALL OUR OWN

Policy/Procedure for: Retention – Archive and Records Management

RECORD OF CHANGES

DATE	AUTHOR	DETAILS OF CHANGES
September 2023	Compliance Lead & IT Systems Coordinator	V1 creation of policy in line with ICO guidelines

EMPLOYEE RECORD OF HAVING READ THE POLICY

Title of Policy: Retention - Records and Archives Management Policy

I have read and understand the principles contained in the named policy.

PRINT FULL NAME	SIGNATURE	DATE