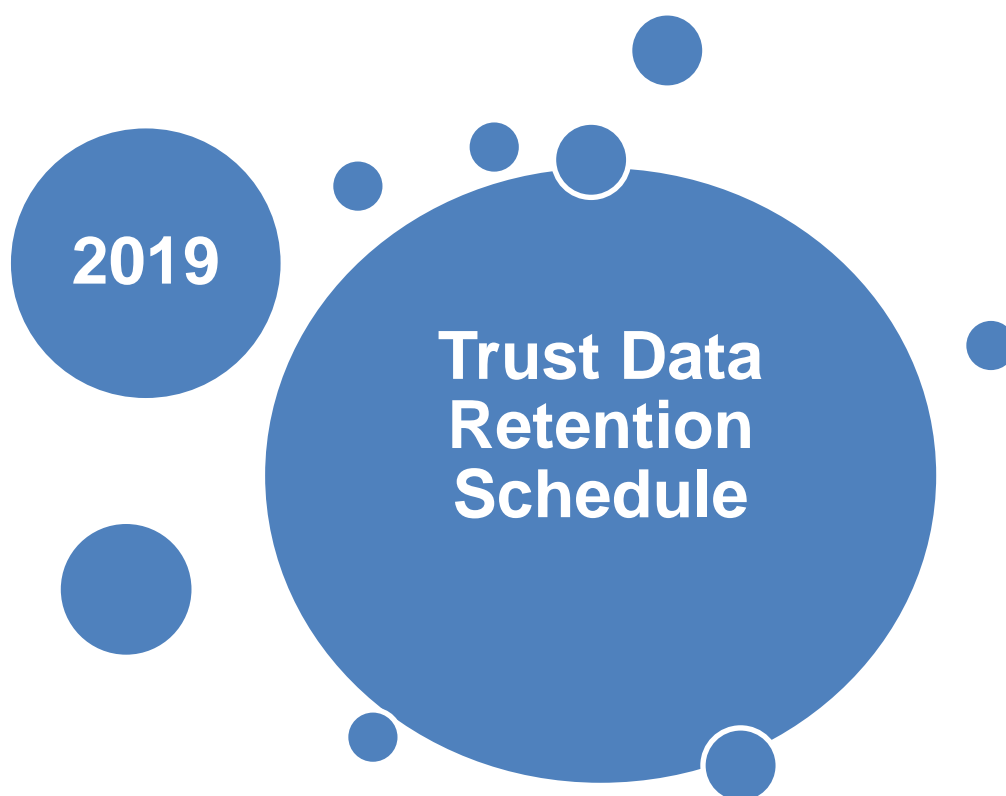
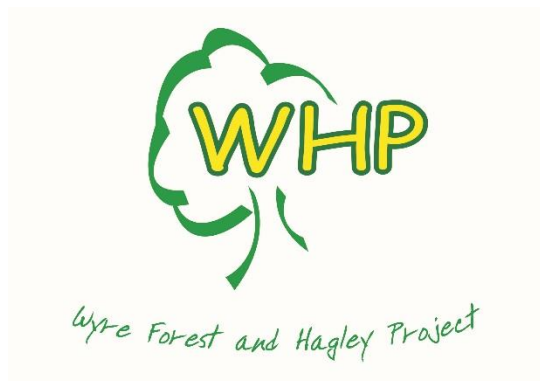


The ContinU Plus Academy

Inclusive of WHP Service





The ContinU Plus Academy

Trust Data Retention Schedule

Introduction

In the course of carrying out its various functions and activities, ContinU Plus Academy (hereafter CPA and inclusive of the WHP Service) collects information from pupils, parents and external organisations; generating a wide range of data and information which is recorded. These records can take many different forms, including:

- Pupils Records
- Letters received from parents/third parties
- File attendance notes
- Minutes
- Completed application forms
- Financial records
- Child Protection files
- Admission Registers
- e-mail communications (and any attachments)
- Photographs

Many of the above can be retained as 'hard' paper records or in electronic form. Retention of specific documents may be necessary to:

- Fulfil statutory or other regulatory requirements
- Evidence events and agreements in the case of disputes
- Meet operational needs
- Ensure the preservation of documents of historic or other value

The untimely destruction of documents could cause the school:

- Difficulty in defending litigious claims
- Operational problems
- Embarrassment
- Failure to comply with the Freedom of Information or Data Protection Acts

Conversely, the permanent retention of all documents is undesirable, and appropriate disposal is to be encouraged for the following reasons:

- There is a shortage of new storage space
- Disposal of existing documents can free up space for more productive activities
- Indefinite retention of personal data may be unlawful
- Reduction of fire risk (in the case of paper records)
- There is evidence that the de-cluttering of office accommodation can be psychologically beneficial for many workers



Safe disposal of records at the end of their administrative life – Guidance followed by staff:

All records containing personal information, or sensitive policy information should be made either unreadable or unreconstructable.

- Paper records should be shredded using a cross-cutting shredder
- CDs / DVDs / Floppy Disks should be cut into pieces
- Audio / Video Tapes and Fax Rolls should be dismantled and shredded
- Hard Disks should be dismantled and sanded

Any other records should be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways. Do not put records in with the regular waste or a skip unless there is no other alternative.

There are companies who can provide confidential waste bins and other services which can be purchased to ensure that records are disposed of in an appropriate way.

The shredding needs to be planned with specific dates and all records should be identified as to the date of destruction.

It is important to understand that if the records are recorded as to be destroyed but have not yet been destroyed and a request for the records has been received they **MUST** still be provided.

Where records are destroyed internally, the process must ensure that all records that are recorded are authorised to be destroyed by a Senior Manager and the destruction recorded. Records should be shredded as soon as the record has been documented as being destroyed.

**All disposals should be documented in the destruction log at Appendix 1.
Copies of all logs should be maintained.**

Transfer of records to the Archives

Where records have been identified as being worthy of permanent preservation arrangements should be made to transfer the records to the County Archives Service. The school should contact the local record office if there is a requirement to permanently archive the records.



Legal Requirements

Data Protection Act (DPA) 2018

The Senior Leadership Team need to be aware that, under the DPA, personal data processed for any purpose must not be kept for longer than is necessary and only for that purpose.

In other words, retaining documents or records that contain personal data beyond the length of time necessary for the purpose for which that data was obtained is unlawful.

General Data Protection Regulation (GDPR)

The new European Union (EU) GDPR was formally adopted by the European Parliament and the GDPR has taken effect from 25th May 2018. Although the Brexit Referendum raised some concerns; the government has now confirmed that the UK will be implementing the GDPR.

Under the GDPR data subjects have the right to have their data 'erased' in certain specified situations – in essence where the processing fails to satisfy the requirements of the GDPR. The right can be exercised against controllers, who must respond without undue delay.

The Freedom of Information Act (FOIA) 2000

The Act requires the school to make information available to the public unless specific exemptions(s) apply. The Lord Chancellor's Code of Practice on the Management of Records issued under Section 46 of the Freedom of Information Act 2000 sets out rules on how we should manage records and information, including responsibilities on all staff to implement records retention and disposal schedules.

The Goddard Enquiry

On 12 March 2015, the Home Secretary established a statutory inquiry under the 2005 Inquiries Act with the aim of conducting an overarching national review of the extent to which institutions in England and Wales have discharged their duty of care to protect children against sexual abuse.

On 15th July 2015, Justice Goddard wrote to every Chief Executive of a Local Authority in England and Wales, requesting that:

'retain any and all documents; correspondence; notes; emails and all other information however held- which contain or may contain content pertaining directly or indirectly to the sexual abuse of children or to child protection and care. For the purposes of this appendix, the word "children" relates to any person under the age of 18.'



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Child Protection			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	Child Protection files	DOB + 25 years ¹	SECURE DISPOSAL
2.	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer	SECURE DISPOSAL

¹This amendment has been made in consultation with the Safeguarding Children Group.

² From January 1st 2005 subject access is permitted into unstructured filing systems and log books and other records created within the school containing details about the activities of individual pupils and members of staff will become subject to the Data Protection Act 1998

June 2019

Governors			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	Minutes		
	• Principal set (signed)	Permanent	Retain in school for 6 years from date of meeting
	• Inspection copies	Date of meeting + 3 years	SECURE DISPOSAL [If these minutes contain any sensitive personal information they should be shredded]
2.	Agendas	Date of meeting	SECURE DISPOSAL
3.	Reports	Date of report + 6 years	Retain in school for 6 years from date of meeting
4.	Annual Parents' meeting papers	Date of report + 6 years	Retain in school for 6 years from date of meeting
5.	Instruments of Government	Permanent	Retain in school whilst school is open
6.	Trusts and Endowments	Permanent	Retain in school whilst operationally required
7.	Action Plans	Date of action plan + 3 years	SECURE DISPOSAL
8.	Policy documents	Expiry of policy	Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)
9.	Complaints files	Date of resolution of complaint + 6 years	Retain in school for the first six years. Review for further retention in the case of contentious disputes. Routine complaints. SECURE DISPOSAL
10.	Annual Reports required by the Department for Education	Date of report + 10 years	Retain in the school for 10 years from the date of the last entry SECURE DISPOSAL
11.	Proposals for schools to become, No or be established as Specialist Status schools	Current year + 3 years	Retain in the school for 3 years from the date of the last entry SECURE DISPOSAL

June 2019

Management			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	Log Books	Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry
2.	Minutes of the Senior Management Team and other internal administrative bodies	Yes Date of meeting + 5 years	Retain in the school for 5 years from meeting
3.	Reports made by the head teacher or the management team	Yes Date of report + 3 years	Retain in the school for 3 years from meeting
4.	Records created by Headteachers, Deputy Headteachers, Heads of Year and other members of staff with administrative responsibilities	Closure of file +6 years	SECURE DISPOSAL
5.	Correspondence created by Headteachers, Deputy Headteachers, Heads of Year and other members of staff with administrative responsibilities	Date of correspondence + 3 years	SECURE DISPOSAL
6.	Professional development plans	Closure + 6 years	SECURE DISPOSAL
7.	School development plans	Closure + 6 years	Review
8.	Admissions - if the admission is successful	Admission + 1 year	SECURE DISPOSAL
9.	Admissions - if the appeal is unsuccessful	Resolution of case + 1 year	SECURE DISPOSAL
10.	Admissions - Secondary Schools -Casual	Current year + 1year	SECURE DISPOSAL
11.	Proofs of address supplied by parents as part of the admissions process	Current year + 1year	SECURE DISPOSAL

June 2019

Pupils			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	Admission Registers	Date of last entry in the book (or file) + 6 years Reconsider Retention Period. Feedback from Teaching Relative was thought to be 7 Year Retention. These records are no longer generated in paper but electronically held using SIMS software.	Retain in the school for 6 years from the date of the last entry then consider transfer to the Archives
2.	Attendance registers	Date of register + 3 years	SECURE DISPOSAL [If these records are retained electronically any backup copies should be destroyed at the same time]
3.	Pupil Files Retained in Schools Secondary	DOB of the pupil + 25 years ³	SECURE DISPOSAL
4.	Special Educational Needs files, reviews and Individual Education Plans	DOB of the pupil + 25 years the review NOTE: This retention period is the minimum period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time 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.	SECURE DISPOSAL

³ If these records are retained on the pupil file or in their National Record of Achievement they need only to be kept for as long as operationally necessary.

June 2019

Pupils continued			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
5.	Correspondence Relating to Authorised Absence and Issues	Date of absence + 2 years	SECURE DISPOSAL
6.	Examination results		
	• Public	Year of examinations + 6 years	SECURE DISPOSAL
	• Internal examination results	Current year + 5 years ⁵	SECURE DISPOSAL
7.	Any other records created in the course of contact with pupils	Current year +3 years	Review at the end of 3 years and either allocate a further retention period or SECURE DISPOSAL
8.	Statement maintained under The Education Act 1996 – Section 324	DOB + 30 years	SECURE DISPOSAL unless legal action is pending
9.	Proposed statement or amended statement	DOB + 30 years	SECURE DISPOSAL unless legal action is pending
10.	Advice and information to parents regarding educational needs	Closure + 12 years	SECURE DISPOSAL unless legal action is pending
11.	Accessibility Strategy	Closure + 12 years	SECURE DISPOSAL unless legal action is pending
12.	Parental permission slips for school trips - where there has been no major incident	Conclusion of the trip	SECURE DISPOSAL
13.	Parental permission slips for school trips - where there has been a major incident	DOB of the pupil involved in the incident + 25 years The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils	SECURE DISPOSAL
14.	Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Primary Schools	Date of visit + 14 years ⁶	SECURE DISPOSAL
15.	Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Secondary Schools	Date of visit + 10 years	SECURE DISPOSAL

June 2019

Pupils continued

	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
16.	Walking Bus registers	Date of register +3 years. This takes into account the fact that 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	SECURE DISPOSAL [If these records are retained electronically any backup copies should be destroyed at the same time]
17.	Records of WHP Family Support		
	<ul style="list-style-type: none"> Parental consent forms 	6 Years	WCC Framework I guidance followed
	<ul style="list-style-type: none"> Assessments 		
	<ul style="list-style-type: none"> Opening and closing data e.g. Strengths and Difficulties Questionnaire 		
	<ul style="list-style-type: none"> Communications with external services 		
	<ul style="list-style-type: none"> Evaluations 		
	<ul style="list-style-type: none"> Any other records created through family support provision 		
18.	Records of WHP Parenting Courses		
	<ul style="list-style-type: none"> Parental consent forms 		
	<ul style="list-style-type: none"> Opening and closing data e.g. Parenting Scale 		
	<ul style="list-style-type: none"> Communications with external services 		
	<ul style="list-style-type: none"> Evaluations 		
	<ul style="list-style-type: none"> Any other records created through course provision 		

⁵ If these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary.

⁶ This retention period has been set in agreement with the Safeguarding Children's Officer.

June 2019

Curriculum			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	School Development Plan	Current year + 6 years	SECURE DISPOSAL
2.	Curriculum returns	Current year + 3 years	SECURE DISPOSAL
3.	Schemes of work	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
4.	Timetable	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
5.	Class record books	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
6.	Mark Books	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
7.	Record of homework set	Current year +1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
8.	Pupils' work	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
9.	Examination results	Current year + 6 years	SECURE DISPOSAL
10.	PAN reports	Current year + 6 years	SECURE DISPOSAL
11.	Value Asses & Contextual Data	Current year + 6 years	SECURE DISPOSAL
12.	Self-Evaluation forms	Current year + 6 years	SECURE DISPOSAL

June 2019

Personnel Records held in Schools

	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	Timesheets, sick pay	Current year + 6 years	SECURE DISPOSAL
2.	Staff Personal files	Termination + 7 years	SECURE DISPOSAL
3.	Interview notes and recruitment records	Date of interview + 6 months	SECURE DISPOSAL
4.	Pre-employment vetting information (including DBS checks)	Date of check + 6 months	SECURE DISPOSAL [by the designated member of staff]
5.	Disciplinary proceedings:		
	• oral warning	Date of warning + 6 months	SECURE DISPOSAL ⁷
	• written warning - level one	Date of warning + 6 months	SECURE DISPOSAL
	• written warning - level two	Date of warning + 12 months	SECURE DISPOSAL
	• final warning	Date of warning + 18 months	SECURE DISPOSAL
	• case not found	If child protection related please see safeguarding officer otherwise SECURE DISPOSAL immediately at the conclusion of the case	SECURE DISPOSAL
6.	Records relating to accident/injury at work	Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
7.	Annual appraisal/ assessment records	Current year + 5 years	SECURE DISPOSAL
8.	Salary cards	Last date of employment + 5 years	SECURE DISPOSAL
9.	Maternity pay records	Current year + 3 years	SECURE DISPOSAL
10.	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current year + 6 years	SECURE DISPOSAL
11.	Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's personal file.	

⁷ If this is placed on a personal file it must be weeded from the file.

June 2019

Health and Safety			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	Accessibility Plans	Current year + 6 years	SECURE DISPOSAL
2.	Accident Reporting		
	• Adults	Date of incident + 7 years	SECURE DISPOSAL
	• Children	DOB of child + 25 years ⁸	SECURE DISPOSAL
3.	COSHH	Current year + 10 years [where appropriate an additional retention period may be allocated]	SECURE DISPOSAL
4.	Incident reports	Current year + 20 years	SECURE DISPOSAL
5.	Policy Statements	Date of expiry + 1 year	SECURE DISPOSAL
6.	Risk Assessments	Current year + 3 years	SECURE DISPOSAL
7.	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	Last action + 40 years	SECURE DISPOSAL
8.	Process of monitoring of areas where employees and persons are likely to have come in contact with radiation	Last action + 50 years	SECURE DISPOSAL
9.	Fire Precautions log books	Current year + 6 years	SECURE DISPOSAL

⁸ A child may make a claim for negligence for 7 years from their 18th birthday. To ensure that all records are kept until the pupil reaches the age of 25 this retention period has been applied.

June 2019

Adminstration			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	Employer's Liability certificate	Closure of the school + 40 years	SECURE DISPOSAL
2.	Inventories of equipment & furniture	Current year + 6 years	SECURE DISPOSAL
3.	General file series	Current year + 5 years	Review to see whether a further retention period is required
4.	School brochure or prospectus	Current year + 3 years	
5.	Circulars (staff/parents/pupils)	Current year +1 year	SECURE DISPOSAL
6.	Newsletters, ephemera	Current year + 1 year	Review to see whether a further retention period is required
7.	Visitors book	Current year + 2 years	Review to see whether a further retention period is required
8.	PTA/Old Pupils Associations	Current year + 6 years	Review to see whether a further retention period is required

June 2019

Finance			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	Annual Accounts	Current year + 6 years	
2.	Loans and grants	Date of last payment on loan + 12 years	Review to see whether a further retention period is required
3.	Contracts		
	• under seal	Contract completion date + 12 years	SECURE DISPOSAL
	• under signature	Contract completion date + 6 years	SECURE DISPOSAL
	• monitoring records	Current year + 2 years	SECURE DISPOSAL
4.	Copy orders	Current year + 2 years	SECURE DISPOSAL
5.	Budget reports, budget monitoring etc.	Current year + 3 years	SECURE DISPOSAL
6.	Invoice, receipts and other records covered by the Financial Regulations	Current year + 6 years	SECURE DISPOSAL
7.	Annual Budget and background papers	Current year + 6 years	SECURE DISPOSAL
8.	Order books and requisitions	Current year + 6 years	SECURE DISPOSAL
9.	Delivery Documentation	Current year + 6 years	SECURE DISPOSAL
10.	Debtors' Records	Current year + 6 years	SECURE DISPOSAL
11.	School Fund-Chequebooks	Current year + 3 years	SECURE DISPOSAL
12.	School Fund - Paying in books	Current year + 6 years then review	SECURE DISPOSAL
13.	School Fund - Ledger	Current year + 6 years then review	SECURE DISPOSAL
14.	School Fund - Invoices	Current year + 6 years then review	SECURE DISPOSAL
15.	School Fund - Receipts	Current year + 6 years	SECURE DISPOSAL
16.	School Fund - Bank statements	Current year + 6 years then review	SECURE DISPOSAL
17.	School Fund - School Journey books	Current year + 6 years then review	SECURE DISPOSAL
18.	Student grant applications	Current year + 3 years	SECURE DISPOSAL
19.	Free school meals registers	Current year + 6 years	SECURE DISPOSAL
20.	Petty cash books	Current year + 6 year	SECURE DISPOSAL

June 2019

Property			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	Title Deeds	Permanent	Permanent, these should follow the property unless the property has been registered at the Land Registry
2.	Plans	Permanent	Retain in school whilst operational
3.	Maintenance and contractors	Current year + 6 years	SECURE DISPOSAL
4.	Leases	Expiry of lease+ 6 years	SECURE DISPOSAL
5.	Lettings	Current year + 3 years	SECURE DISPOSAL
6.	Burglary, theft and vandalism report forms	Current year + 6 years	SECURE DISPOSAL
7.	Maintenance log books	Current year + 6 years	SECURE DISPOSAL
8.	Contractors' Reports	Current year + 6 years	SECURE DISPOSAL

Local Authority			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	Attendance returns	Current year + 1 year	SECURE DISPOSAL
2.	Circulars from LA	Whilst required operationally	Review to see whether a further retention period is required

June 2019

Department for Education			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	HMI reports	These do not need to be kept any longer	
2.	OFSTED reports and papers	Replace former report with any new inspection report	Review to see whether a further retention period is required
3.	Returns	Current year + 6 years	SECURE DISPOSAL
4.	Circulars from Department for Education	Whilst operationally required	Review to see whether a further retention period is required
Connexions			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	Service level agreements	Until superseded	SECURE DISPOSAL
2.	Work Experience agreement	DOB of child + 18 years	SECURE DISPOSAL
3.	Alternative Provision agreements	DOB of child + 18 years	SECURE DISPOSAL
Family Liaison Officers and Home School Liaison Assistants			
	Basic file description	Retention Period [operational]	Action at the end of the administrative life of the record
1.	Day Books	Current year + 2 years then review	SECURE DISPOSAL
2.	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Whilst the child is attending the school then destroy	SECURE DISPOSAL
3.	Referral forms	While the referral is current	SECURE DISPOSAL
4.	Contact data sheets	Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
5.	Contact database entries	Current year then review, if contact is no longer active then destroy	DELETE
6.	Group Registers	Current year + 2 years	SECURE DISPOSAL