

Ormiston Academies Trust

Ormiston Rivers Academy

Records Retention policy

Policy version control

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Description of changes	<p>Changes Made July 2020-07-20 – version 2</p> <ul style="list-style-type: none"> ▪ Introduction- 1.1 hard and electronic added before record ▪ Corporate/Constitutional- Line 2, 'End of Life'; "At end of the life of the school offered to the Academy Trust. If not required." Amended to "Secure Disposal."

	<ul style="list-style-type: none"> ▪ Corporate/Constitutional- Line 3, 'End of Life'; "If these minutes contain any identifiable information they must be shredded." Amended to "Shredded." ▪ Corporate/Constitutional- Line 4, 'Reason for Retention'; "... at a later time", amended to "... later." ▪ Corporate/Constitutional-Line 6, 'Retention Period', "Locally stored documentation will be passed to OAT Head Office to review for further retention", been added and removed from 'End of Life' column, which now states "Secure disposal". ▪ Corporate/Constitutional- Line 7, 'Retention Period', "Three years after the duration plan", has been changed to "Until superseded or whilst relevant." ▪ Corporate/Constitutional- Line 8, 'Retention Period', "Three years after the duration plan", has been changed to "Until superseded or whilst relevant." ▪ 'Attendance Returns', 'Retention Period', "1 year after current year" has been amended to "Every entry is retained for a period of three years after the date if which the entry was made." ▪ 'School copy of examination results', (not individual pupils examination results) has been added. ▪ Health and Safety- 'Retention Periods'; "Health and Safety Risk assessments" amended, from 3 years to "Reviewed annually and if no longer required to be destroyed", "accident records for adults amended from 6 years to 3 years and children's accidents amended until age of 25 to 21 years. ▪ Health and Safety- "Test and Trace (COVID-19)" added to table. ▪ Property-row 2- 'Reason', "Legal document detailing tenure and/or ownership of property" replaces "Should follow property". ▪ Property-row 3- 'Reason', "Part of the operating manuals for the building", has been added. ▪ Property- row 6 'Retention Period', "completion of the works contracts signed under hand and 12 years from deed" and Building Contracts requirements added to 'Reason'. ▪ Property-row 8 'Retention Period', "completion of the works contracts signed under hand and 12 years from deed" and Building Contracts requirements added to 'Reason'. ▪ Academy Workforce- row 6- 'Retention Periods', "Once IDs have been verified for portable DBS checking, copies should not be kept", replaces "If is necessary to keep a copy, it will be places in the staff member's personnel file." ▪ Academy Workforce-row 11-'Retention Periods' amended to "Until the persons normal retirement age or 10 years from the date of the allegation (whichever is the longer). Note: allegations that are found to be malicious/unfounded should be removed from personnel files after period of 4 months.
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	<ul style="list-style-type: none">▪ Academy Workforce- “Right to Work”, “Management Instruction”, “Unfounded disciplinary action” and Disciplinary Proceedings-oral and written warning level 1” rows added.▪ Section 4 “for more information please see Email Retention Policy” has been added.▪ 6. Retention Audit Guidance- added.
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1. Document retention

Introduction

- 1.1. The main aim of this policy is to enable Ormiston Academies Trust to manage hard and electronic records effectively and in compliance with the General Data Protection Regulations (GDPR). As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.
- 1.2. Ormiston Academies Trust is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.
- 1.3. The table below sets out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.
- 1.4. For information, the tables below set out the legal and other requirements for certain categories of document. Where we have decided to keep information longer than the statutory requirement, this has been explained in the tables in Section 2.
- 1.5. Section 2 of this policy sets out the destruction procedures for documents at the end of their retention period. The Data Protection Officer (DPO) team (dpo@ormistonacademies.co.uk) and academy Data Protection Lead (DPL) shall be responsible for ensuring that this is carried out appropriately, and any questions regarding this policy should be referred to them.
- 1.6. If a document or piece of information is reaching the end of its stated retention period, but you are of the view that it should be kept longer, please refer to The Data Protection Officer (DPO) via the Data Protection Lead (DPL) who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.

2. Document retention period

Corporate/ Constitutional			
Document Category	Retention Period	Reason for Retention	End of life Action
Agendas for and minutes from Governing Body meetings	See Principal Set below	Meetings commonly refer to confidential issues relating to staff and may be required retrospectively.	Secure disposal
Principal Set of Governing Body meeting documentation (signed)	For the duration of the life of the academy	One copy should be retained with the master set of minutes. All other copies can be disposed of.	Secure disposal.
Inspection Copies	Three years after the date of the meeting	Retained for operational use only.	Shredded.
Reports presented to the Governing Body	25 years after the date of the meeting One copy retained with Principal Set	There may be data protection issues if the report deals with confidential issues relating to staff that may need to be referred to in the case of legal action later.	Secure disposal.
Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	Six years after the date of the meeting.	Education Act 2002 Section 33	Secure disposal

Trusts and Endowments managed by the Governing body	For the duration of the life of the academy. Locally stored documentation will be passed to OAT Head Office for review for further retention	Reference during the life of the school	Secure disposal.
Action plans created and administered by the Trust	Until superseded or whilst relevant.	Retained for operational use and reference	Secure disposal
Policy documents administered by the Governing Body	Until superseded or whilst relevant.	Retained for operational use and reference	Secure disposal
Records relating to complaints dealt with by the Academy and not escalated to the Trust.	Six years after the resolution of the complaint then review need to retain for a further six years	Disputes may be reinitiated. Status of dispute must be reviewed before deletion	Secure disposal
Annual Report created under the requirements of the Education (Governor's Annual Reports) (England)(Amendment) Regulations 2002.	10 years from the publication of the report	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Secure disposal
Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	Three years after date proposal accepted or declined	Operational use then until context of plan has been superseded	Secure disposal

Logbooks of activity in the school maintained by the headteacher	Log to be reviewed before disposal. If protection issues apply keep for 25 years. Otherwise keep for 6 years then review for remaining issues before disposal	There may be data protection issues if the log refers to confidential issues relating to staff	Secure disposal
Register of admissions	All entries preserved for three years.	School attendance Departmental advice for maintained schools, academies, independent schools and local authorities. October 2014	Secure disposal
Casual admissions to secondary schools	One year from date attendance ceases.	Operational use and a period to cater for pupils in disrupted circumstances	Secure disposal
Proofs of addresses supplied by parents as part of the admissions process	One year from year of admission.	Schools Admissions Code, Statutory guidance for admission authorities, governing bodies, local authorities, schools, adjudicators and admission appeals panels, December 2014	Secure disposal
Supplementary information form including additional information such as religion, medical conditions etc. For successful admissions	Until pupil reaches 25 years of age added to pupil file	Added to pupil file	Secure disposal
Supplementary information form including additional information such as religion, medical conditions etc. For unsuccessful admissions	Retain only until the appeal process is completed	Operational use only	Secure disposal

General File Series. Files and records retained during the work of a school that do not contain personal data or fall into any other category with an associated retention period	Five years from current year then review to identify any operational needs or unforeseen protection issues and add to pupil file if there are.	Operational use. Review needed to identify need for retention before disposal	Secure disposal
Records relating to the creation and publication of the school brochure or prospectus	Three years from year of operational use then review annually	Operational use. Review need to retain elements before disposal	Standard Disposal
Records relating to the creation and distribution of circulars to staff, parents or pupils	One year after year of publication	Operational use. Review need to retain elements before disposal	Standard Disposal
Register of admissions	All entries preserved for three years.	School attendance Departmental advice for maintained schools, academies, independent schools and local authorities. October 2014	Secure disposal
Newsletters and other items with short operational use	One year after year of publication	Operational use. Review need to retain elements before disposal	Standard Disposal
Visitors books and signing in sheets	Six years after current year then review annually	Operational use and reference/evidence in claims, appeals or litigation. Review before disposal.	Secure disposal
Records relating to the creation of management or Old Students Associations and Parent/Teacher Associations	Six years after current year then review annually	Operational and reference to cover duration of subjects' association with the school. Review before disposal	Secure disposal

Records of contracts under signature	Six years from last payment on contract	Limitations Act 1980	Secure disposal
Records of contract monitoring	Two years from expiration of contract	Operational use and reference	Secure disposal
Curriculum returns to LEA or Trust	Three years from year return submitted	Operational use and reference once copies filed with LEA/Trust	Secure disposal
Curriculum returns to DfE including School Census Returns	Six years after current year	Operational and reference once copies filed with DfE	Secure disposal
Attendance Returns	Every entry is retained for a period of three years after the date of which the entry was made.	Operational	Secure disposal
School copy of examination results (not individual pupils examination results)	Six years from current year	Operational and reference	Secure disposal
SATS Results	Until pupil reaches 25 years of age on pupil file. Composite records of cohorts 6 years from current year	Data protection Regulation Pupil Information Regulations 2005	Secure disposal

Newsletters and other items with short operational use	One year after year of publication	Operational use. Review need to retain elements before disposal	Standard Disposal
Visitors books and signing in sheets	Six years after current year then review annually	Operational use and reference/evidence in claims, appeals or litigation. Review before disposal.	Secure disposal
SATS Examination Papers	Until appeals and validation process has completed	Operational	Secure disposal
Planned Admission Number reports (PAN)	Six years from year of publication	Operational use and reference	Secure disposal
Value Added and Contextual Data	Six years from year of publication	Operational use and reference	Secure disposal
Secondary Transfer Sheets - Primary	Two years after year of publication	Operational use and reference	Secure disposal
Circulars and information from LEA	Remove when redundant	Operational use and reference	Secure disposal
Ofsted reports and papers	Until superseded then review annually	Operational use and reference	Secure disposal

Circulars and information from central Government	Remove when redundant	Operational use.	Secure disposal
Correspondence other than email (see below) created by any staff with administrative responsibilities including head teachers, deputy headteachers, heads of year, teachers, pastoral and support staff	Three years from the date of correspondence then review annually	Operational use and reference	Secure disposal after review

Insurance			
Document Category	Retention Period	Reason for Retention	End of life Action
Employers Liability Insurance documentation	40 years after policy commencement	Employers' Liability (Compulsory Insurance Regulations) 1998	Secure disposal
Policy Schedules and Documentation	Three years after policy termination	Commercial requirement	Secure disposal
Correspondence relating to claims	Three years after settlement	Commercial requirement	Secure disposal

Health and safety			
Document Category	Retention Period	Reason for Retention	End of life Action
Policy Statements	Three years from retirement of policy	Limitations Act 1970	Secure disposal
Health and Safety Risk Assessments	Reviewed annually and if no longer required to be destroyed	Limitations Act 1970	Secure disposal
Records relating to accident/ injury at work	12 years from date of incident with review to extend for serious accidents	Reporting of Injuries, Diseases and Dangerous Occurrences Regulation 1995	Secure disposal
Reporting of accidents to adults	Three years from date of incident	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Secure disposal
Reporting of accidents to children	21 years from date of incident	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Secure disposal
COSHH	40 years after year of creation	COSHH regulations 2002. Not applicable to records created under 1994-99 regulations.	Secure disposal

Asbestos monitoring in used areas	40 years from last action - permanent	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Secure disposal
Radiation monitoring in used areas	Until person is aged 70 years but at least 50 years in any event	HSE Guide (Radiation) The Ionising Radiations Regulations 1999	Secure disposal
Fire regulations logs	Six years from year of log entry	Fire Safety Order 2005	Secure disposal
Test and Trace (Covid-19)	21 days	NHS Mandatory requirement	Secure disposal

Property			
Document Category	Retention Period	Reason for Retention	End of life Action
Deeds of school properties	For the duration of the life of the academy	Legal document detailing tenure and/or ownership of property.	Secure disposal
Plans of school properties	For the duration of the life of the academy	Part of the operating manuals for the building. To be passed on to new owners	Secure disposal
School property leases	12 years from expiration of lease	Limitations Act 1980	Secure disposal
Letting records	Six years from creation of record	Limitations Act 1980	Secure disposal
Records of maintenance by contractors	Six years from completion of the works contracts signed under hand and 12 years from deed	Limitations Act 1980 Building Contracts requirements	Secure disposal
Records and logs of maintenance by school staff	Six years from creation of log/record	Limitations Act 1980	Secure disposal

Building general records, certifications and warranties etc	Six years from completion of the works contracts signed under hand and 12 years from deed	Limitations Act 1980 Building Contracts requirements	Secure disposal
Inventories of furniture and equipment	Six years from creation of inventory	Limitations Act 1980	Secure disposal
Burglary, theft and vandalism report forms	Six years from creation of report	Limitations Act 1980	Secure disposal

Pension records			
Document Category	Retention Period	Reason for Retention	End of life Action
Pension records about employees and workers	Records kept by academy/OAT for six years after end of contract.	Detailed Guidance for Employers: (April 2017) www.pensions regulator.gov.uk	Secure disposal
Pension records re the Scheme	Records kept by academy/OAT for six years after end of contract.	Detailed Guidance for Employers: (April 2017) www.pensions regulator.gov.uk	Secure disposal
Pension records re active members and opt in/out	Records kept by academy/OAT for six years after end of contract.	Detailed Guidance for Employers: (April 2017) www.pensions regulator.gov.uk	Secure disposal
Pension records Trust Deed / Rules and HMRC approvals	Records kept by academy/OAT for six years after end of operational use.	Detailed Guidance for Employers: (April 2017) www.pensions regulator.gov.uk	Secure disposal
Pension records Trustees' Minutes and annual accounts	Records kept by academy/OAT for six years after end of operational usefulness.	Detailed Guidance for Employers: (April 2017) www.pensions regulator.gov.uk	Secure disposal
Pension records Policy including investment policies	Policies kept by academy/OAT for six years after end of operational usefulness.	Detailed Guidance for Employers: (April 2017) www.pensions regulator.gov.uk	Secure disposal

Maternity Pay Records	Three years from creation of record	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Secure disposal
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Six years from creation of record	Retirement Benefits Schemes (Information Powers) Regulations 1995	Secure disposal

Tax and finance			
Document Category	Retention Period	Reason for Retention	End of life Action
Annual accounts including payroll	Six years from year of accounts	Requirement of HMRC and the DfE academies financial handbook	Secure disposal
Loans and grants	12 years from last payment of loan then review annually	Requirement of HMRC and the DfE academies financial handbook	Secure disposal
Pupil grant applications	Three years from and of year of application year then review annually	Requirement of HMRC and the DfE academies financial handbook	Secure disposal
Budget management records and associated paperwork	Three years from life of budget	Requirement of HMRC and the DfE academies financial handbook	Secure disposal
Invoices, receipts, orders, requisitions, delivery notices	Six years from financial year of transaction	Requirement of HMRC and the DfE academies financial handbook	Secure disposal
Banking records and associated paperwork	Six years from financial year in which record or document created	Requirement of HMRC and the DfE academies financial handbook	Secure disposal

Records of identification and collection of debt	Six years from financial year of record creation	Requirement of HMRC and the DfE academies financial handbook	Secure disposal
School fund cheque books, paying in books, ledgers, invoices, receipts, bank statements, journey books	Six years from year item created	Requirement of HMRC and the DfE academies financial handbook	Secure disposal

Academy workforce			
Document Category	Retention Period	Reason for Retention	End of life Action
All application records associated with the unsuccessful staff candidates	Six months after the date of appointment	Various discrimination Acts, minimum retention periods for records relating to advertising of vacancies and job applications.	Secure disposal
All records associated with the successful application of staff candidates	Details required to create a personal file retained until six years after termination of employment. All other information retained for six months	Limitation Act 1980 (Section 2)	Secure disposal
All records concerning the appointment of other workers e.g. contractors, consultants, temporary workers	One year after termination of arrangement. Review before disposal	Operational use. Review to identify claims, appeals and any other ongoing process	Secure disposal
Pre-employment DBS checks	Record only satisfactory/unsatisfactory. If copy kept no longer than six months	Part 4 of the Schedule to the (Independent School Standards) Regulations 2007	Secure disposal
Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	If it is necessary to keep a copy, it will be placed in the staff member's personnel file.	DfE Statutory Guidance "Working together to safeguard children."	Secure disposal
Right to Work	Evidence of RTW should be kept during employment and retain for	An employer's guide to Right To Work check (Home Office January 2019)	Secure disposal

	the period as the personnel file post leaving for six years		
Staff appraisal/assessment	Six years after year they apply to.	Limitation Act 1970	Secure disposal
Staff Personal File	Six years from termination of employment	Limitation Act 1980 (Section 2)	Secure disposal
Timesheets	Two years after year they apply to.	Working Time Regulations 1998 as amended	Secure disposal
Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Until the persons normal retirement age or 10 years from the date of the allegation (whichever is longer). Note: allegations that found to be malicious/unfounded should be removed from personnel files after period of 4 months.	Keeping children safe in education Statutory guidance for schools and colleges March 2015	Secure disposal
Management Instruction	12 months	OAT Disciplinary policy	Secure disposal

Unfounded disciplinary action	Four months unless related to safeguarding. See section above	OAT Disciplinary Policy OAT Safeguarding Policy	Secure disposal
Disciplinary Proceedings – oral and written warning level 1	Six months from date of warning	ICO Guidance, Employment Practices Code and supplementary guidance.	Secure Disposal
Disciplinary Proceedings – written warning level 2	One year from date of warning	CO Guidance, Employment Practices Code and supplementary guidance.	Secure Disposal
Disciplinary Proceedings –final warning	18 months from date of warning	CO Guidance, Employment Practices Code and supplementary guidance.	Secure Disposal
Disciplinary Proceedings –case not found	Dispose at conclusion. If child protection related see above	CO Guidance, Employment Practices Code and supplementary guidance.	Secure Disposal
Sick Pay / Calculations / Certificates / Self-certificates	Three years after tax year end in which period ends Sick Pay Guide (HMRC)	The Statutory Maternity Pay (General) and Statutory Sick Pay (General) (Amendment) Regulations 2005	Secure disposal

Pupils			
Document Category	Retention Period	Reason for Retention	End of life Action
FSM registers	Six years from year of register	Operational. Cover duration of Ever6 status.	Secure disposal
Registers for school meals and summary sheets	Three years from year of register	Operational and reference	Secure disposal
Pupil Educational Record - Primary	Duration of pupil's attendance at primary school.	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	<p>The file must follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> ▪ to another primary school ▪ to a secondary school ▪ to a pupil referral unit ▪ If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period <p>Secure disposal</p>

Pupil Educational Record - Secondary	Until pupil reaches 25 years of age	Data protection Regulation Pupil Information Regulations 2005	Secure disposal
Pupil copies of public and internal examination results	Until pupil reaches 25 years of age (on pupil file)	Uncollected certificates should be returned to the examination board	Returned to examination board
Child protection information held on pupil file	In sealed envelope on pupil file until pupil reaches 25 years of age	Keeping children safe in education Statutory guidance for schools and colleges March 2015; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015	Secure disposal
Child protection information stored outside of pupil file.	Until pupil reaches 25 years of age. Principal copy with the appropriate local authority.	Keeping children safe in education Statutory guidance for schools and colleges March 2015; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015	Secure disposal
Attendance Registers	Paper Registers: Three years after recording attendance Electronic Register: Three years after the end of the school year	Pupil Registration Regulations 2006. Regulation 14 School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Secure Disposal

Authorised absence confirmation communications	Two years after current year	Education Act 1996 Section 7	Secure disposal
SEN reviews, files and IEPs	Until pupil reaches 25 years of age on pupil file	Limitation Act 1980 (Section 2)	Secure disposal
Statement of SEN made under section 234 of the Education Act 1990 including subsequent amendments	Until pupil reaches 25 years of age on pupil file. In the case of documentation subject to a legal hold review annually after the initial 25-year period.	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Secure disposal.
Educational needs advice and information to parents	Until pupil reaches 25 years of age on pupil file. In the case of documentation subject to a legal hold review annually after the initial 25 year period.	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 2	Secure disposal.
Accessibility Strategy	Until pupil reaches 25 years of age on pupil file. In the case of documentation subject to a legal hold review annually after the initial 25-year 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	One year after current year then review need for retention on a case-by-case basis	Operational and reference	Secure disposal
Pupil's work	Returned to pupil at the end of the current year otherwise one year after current year	Classed with curriculum items above but you can justify retaining for purposes such as moderation samples, display or analysis. In all cases consider offering the original to the pupil/parent and retaining copies	Secure disposal
Records of approvals for educational visits - Primary	14 years after date of visit	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice"	Secure disposal
Records of approvals for educational visits - Secondary	10 years after date of visit	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice"	Secure disposal
Consent forms for educational visits with no major incident	Conclusion of trip	Of no further use and retention unnecessary	Secure disposal
Consent forms for educational visits with a major incident	Until pupil reaches 25 years of age	Limitation Act 1980 (Section 2)	Secure disposal

Registers for walking buses	Three years after the date of the register	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
School/Home Liaison Day Books	Two years after current date then review annually	Operational use	Secure disposal
School/Home Liaison reports from other agencies if included in their own case file	Until child leaves the school	Operational use	Secure disposal
School/Home Liaison referral forms	While referral is current	Operational use	Secure disposal
School/Home Liaison contact data sheets	Current year then review. Remove if no longer active	Operational use	Secure disposal
School/Home Liaison contact database entries	Current year then review. Remove if no longer active	Operational use	Secure disposal
School/Home Liaison Registers	Two years after year register created	Operational use	Secure disposal

Parents			
Document Category	Retention Period	Reason for Retention	End of life Action
Parent details as a pupil contact	One year from current year then review annually	Schools Admissions Code, Statutory guidance for admission authorities, governing bodies, local authorities, schools, adjudicators and admission appeals panels, December 2014	Secure disposal
Messaging services	Operational use and review to delete after six months then dispose. Review content to produce hard-copy and retain as detailed in appropriate section	Operational	Deletion
Consents	Operational. Disposal once recorded	Operational	Secure disposal
Photographs of parents	Operational, dispose when no longer in use	Subject to consent	Secure disposal
Cashless Catering records	For information extracted from cashless catering processors one year after year containing transactions	Operational	Secure disposal
Other documents produced by the academy	Three years from the date of issue then review	Operational use and reference	Secure disposal after review

Alumni/ alumnae			
Document Category	Retention Period	Reason for Retention	End of life Action
Records of former pupils kept by Alumni associations	One year after subject is no longer engaged in the association	Operational	Secure disposal

Freedom of information and Subject access request			
Document Category	Retention Period	Reason for Retention	End of life Action
Freedom of Information	Seven years or for pupil related files when pupil reaches 25 years of age.	Operational	Secure disposal
Data Breach Records (e.g. actual or record of assessment of risk impact assessments)	Seven years or for pupil related files when pupil reaches 25 years of age.	Operational	Secure Disposal
Subject Access Requests	Seven years or for pupil related files when pupil reaches 25 years of age.	Operational	Secure Disposal
Complaints	Seven years or for pupil related files when pupil reaches 25 years of age.	Operational	Secure Disposal

3. Deletion and retention of documents

3.1. When a document is at the end of its retention period, it should be dealt with in accordance with this policy

3.2. Confidential waste (Secure Disposal)

3.2.1. This should be made available for collection in the confidential waste bins or sacks or shredded through OAT assessed compliant data disposal organisations

3.2.2. Anything that contains personal information should be treated as confidential.

3.3. Other documentation (Standard Disposal)

3.3.1. Other documentation can be deleted or placed in recycling bins where appropriate.

3.4. Automatic deletion

3.4.1. Certain information will be automatically archived by the computer systems. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact the ICT lead in your academy or The Web Services Manager for Head Office.

3.5. Individual responsibility

3.5.1. This should be made available for collection in the confidential waste bins or sacks or shredded through OAT assessed compliant data disposal organisations

3.5.1.1. Has the information come to the end of its useful life?

3.5.1.2. Is there a legal requirement to keep this information or document for a set period?

3.5.1.3. Would the information be likely to be needed in the case of any legal proceedings? In particular, is it potentially relevant to an historic child abuse enquiry? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)

3.5.1.4. Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?

3.5.1.5. Is the document of historic or statistical significance?

3.5.1.6. If the decision is made to keep the document, this must be referred to the Data Protection Officer via the Data Protection Lead of an individual academy and reasons given.

4. Deletion and retention of data stored as email for more information please see email retention policy

- 4.1. Email must only be retained for as long as stipulated in the OAT Email Policy.
- 4.2. Email services have an operational function and are not provided for the storage or filing of documents and as such emails must be reviewed and dealt with promptly.
- 4.3. Emails that contain information that exists elsewhere on the academy's systems must be deleted within the period stated in the OAT Email Policy.
- 4.4. Information that is attached to or contained within emails is subject to a retention period as detailed within section 2 of this document.

5. Deletion and retention of user accounts, including email and other third-party services

5.1. Network accounts

- 5.1.1. will be locked as soon as the user leaves the employment of the Trust or its academies.
- 5.1.2. a decision on the retention of data should be decided within 90 days. The files and emails should be moved to the required appropriate storage during this time

5.2. Third party services

- 5.2.1. A list of the users third party access should already be known for each user or should be able to be ascertained quickly
- 5.2.2. All third-party access should be removed immediately upon the user leaving the Trust.

6. Retention Audit Guidance

- 6.1. It is the responsibility of the Data Protection Lead (DPL) and local IT to ensure retention audits are conducted at regular intervals. This can be done on a termly basis, half termly or any other interval the academy deems appropriate.
- 6.2. The Retention Audit findings need to be documented and sent to OAT Data Protection Officer:
dpo@ormistonacademies.co.uk
- 6.3. It is recommended that all staff at your academy have reviewed the Record Retention Policy and Email Retention Policy, so that any questions about these policies can be raised and addressed before conducting a retention audit.
- 6.4. The retention audit should be conducted on a random sample of staff and data types if possible, avoid staff doing the same job role. For example, if you conducted your audit on 10 members of staff, and they were all teaching staff, this would not include a variety of job roles. Data types can be picked from the sections of the Record Retention Policy E.g. Health and Safety Documents.
- 6.5. The below questionnaire should be completed by the staff member included in the audit and where possible, the information provided verified by the DPL and/local IT member. For example, if the staff member states they delete emails within the required retention period then a check of the staff email account should show this is the case
- 6.6. Sample Record Retention Audit Questionnaire for Staff:

Staff job title: _____
Date of Audit: _____
Name of Auditor: _____
Auditor's job title: _____

Please ensure you answer all the questions below independently.

1. I can locate policies relating to data retention and know who in my academy can assist with questions?
2. Routine emails not relating to pupils, safeguarding or another legitimate reason should be retained for no longer than?
- 2a. Do you have emails older than this period? If yes, approximately how many emails?
3. Do you know your academy's policy/procedure on deleting confidential data?
- 3b. Can you please outline what the process is?
4. How often do you review the documents you manage?
5. **[Insert a question regarding retention that is specific to the staff members role.]** For example, a teaching staff member could be asked, 'how long we are required to keep Pupil's work?'

Any questions about this policy should be directed to you Data Protection Lead or OAT Data Protection Officer: dpo@ormistonacademies.co.uk

