



## St Paul's C of E Academy

# DOCUMENT AND ELECTRONIC DATA RETENTION POLICY 23/25

### Contents

1	Introduction	2
2	Scope	2
3	Legal obligation	3
4	Retention Procedure	3
5	Retention of Encrypted Data	4
6	Retention of Digital Data	4
7	Archiving and Retention of Documentation	4
8	Archiving Process and Disposal	4
10	Disposal of Electrical Hardware	5
11	Document Owner	6

## 1 Introduction

---

These retention procedures apply to St Paul's C of E Academy.

This Policy covers all records and documentation, whether analogue or digital and are subject to the retention requirements of this Policy.

For the purpose of this Policy, the terms 'document' and 'records' include information in both hard copy and electronic form and have the same meaning hereby referred to as Documents or Documentation.

In certain circumstances it will be necessary to retain specific records in order to fulfil statutory or regulatory requirements and to meet operational needs. Any retention of specific records should be retained under the retention period specified in Retention of Records Schedule 1 and Retention of Digital Records Schedule 2.

Data Protection Legislation means the Data Protection Act 2018 which incorporates the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the General Data Protection Regulation which is the governing legislation that regulates data protection across the EEA. This includes any replacement legislation coming into effect from time to time.

Throughout this document we refer to the General Data Protection Regulation (GDPR) as the governing legislation that regulates data protection regulation across the EEA.

## 2 Scope

---

St Paul's C of E Academy is bound by various obligations with regard to the Documentation and electronic data it retains. These obligations include the period of retention for Documentation and when and how this Documentation is disposed.

Article 5 of GDPR provides "personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed". The purpose of this Policy is to ensure that necessary records, documents and electronic data of

---

St Paul's C of E Academy are adequately protected, archived and disposed of at the correct retention period, and to provide all staff with clear instructions regarding the appropriate retention and disposal of Documentation.

This Policy will also aid paper records and electronic data storage issues identified throughout the business and to eliminate the need to retain paper and electronic records unnecessarily.

St Paul's C of E Academy will ensure that information is not kept longer than is necessary and will retain the minimum amount of information that it is required to hold to meet its statutory functions and the provision of its services.

### 3 Legal obligation

---

General Data Protection Regulation (GDPR)

Data Protection Act 2018 (DPA)

Freedom of Information Act 2000 (FOI)

Limitation Act 1980

Companies Act 2006

The Waste Electric and Electronic Equipment Regulations 2013

### 4 Retention Procedure

---

All decisions relating to the retention and disposal of Documents should be taken in accordance with this Policy in particular:

Retention of Records Schedule – Provides the required retention periods, including the statutory minimum retention period for specific documents.

Retention of Digital Records – Provides the required retention periods for all digital documents.

In circumstances where a retention period of a specific document has expired, a review should always be carried out prior to a decision being made to dispose of the record.

## 5 Retention of Encrypted Data

---

Any information retained under this Policy that is in an encrypted format, consideration must be taken for the secure storage of any encryption keys. Encryption keys must be retained as long as the data that the keys decrypt is retained.

## 6 Retention of Digital Data

---

Any digital data including media and e mail files are retained on password protected pcs, password protected server and local network. The backup of electronic data is cloud based.

The process for accessing stored electronic data is authorised by our IT provider, the data is cloud based stored and is accessible from outside of the Academy.

All portable / removeable storage media are destroyed via specialist organisations.

All cryptographic keys, which are required for remote access are held personally by the holders and the keys for CPoms are retained in the academy safe.

## 7 Archiving and Retention of Documentation

---

Archiving is defined as the process by which inactive data, in any format is securely stored for long periods of time in accordance with a retention schedule.

St Paul's C of E Academy archives paper records are on site.

All documentation should be retained for twelve (12) months on site in a secure location, at the end of the twelve (12) month period all documentation will be shredded.

There may be exceptions where documentation will need to be retained for longer periods at site, in these instances the Finance Director will be responsible for ensuring that the documentation is held in a safe and secure location.

## 8 Archiving Process

---

The method of archiving selected for a particular document will vary between departments and services. Any questions regarding archiving should be raised in the first instance with the department manager.

In all cases identify the documents that need to be retained in accordance with the Retention of Records Schedule. Remove all duplicates and any unnecessary papers. Obtain the agreed standard archiving box, clearly label the box and ensure it is correctly sealed. Include disposal date on label.

Any record containing confidential information must either be disposed of in a confidential waste bin or shredded using a cross-cut shredder.

Disposal of documents that do not contain confidential information may be disposed of in the normal way or recycled.

Records of disposal should be maintained by each department and should detail as a minimum the document disposed of, the date of disposal and the disposal authority.

## 9 Disposal of Electrical Hardware

---

IT equipment and devices that have the ability and capability to store personal data include:

- PC's
  - Laptops
  - Mobile Phones
-

- Multi-Functional Devices – printers / scanners
- Servers
- USB Memory Sticks and external hard drives.

IT equipment disposal must be managed by the Finance Director and signed off by the Principal and Audit Committee Chair Person at a meeting of the Audit Committee.

All computer equipment, recycling or refurbishing must be disposed of in accordance with the Waste Electric and Electronic Equipment Regulations 2013.

## 10 Document Owner

---

The School Business Manager is the owner of this document and is responsible for ensuring that this Policy is reviewed in line with the review requirements of GDPR.

## RETENTION OF RECORDS SCHEDULE

RECORD TYPE	RETENTION PERIOD/DISPOSAL METHOD	STATUTORY PROVISIONS WHERE APPLICABLE
<b>Governing Board/Management</b>		
Agenda for Governing Board & Governing Board Committee Meetings	One copy should be retained with the signed master copy of the minutes permanently in paper version	
Minutes of Governing Board and Governing Board Committee Meetings	Signed copy should be retained by the Academy permanently in paper version	
Reports presented to the Governing Board	6 years plus current Disposal by secure shredding/Electronic by permanent deletion	
Instruments of Government including Articles of Association	One copy should be retained by the Academy permanently	
Action Plans created and administered by the Governing Board	Life of plan plus 3 years Disposal by secure shredding/Electronic by permanent deletion	

Policy documents	Life of policy plus 3 years Disposal by secure shredding/Electronic deletion from software	
Minutes of SLT and/or Staff Meetings	3 years from date of meeting Electronic permanent deletion	
Reports created by SLT	Current academic year plus 6 years Following this period review need for retention, disposal by secure shredding and/or electronic permanent deletion	
Correspondence	3 years from date of meeting Disposal by secure shredding/Electronic by permanent deletion	
Professional Development Plans and School Improvement Plans	Life of plan plus 6 years Disposal by secure shredding/Electronic by permanent deletion	
All records relating to the creation and implementation of School Admissions including Code, Statutory Guidance, Policies	Life of policy plus 3 years Disposal by secure shredding/Electronic by permanent deletion	
Successful admissions documentation	Date of admission plus 1 year Disposal of paper version by secure shredding Documents scanned and held with pupil's electronic file	



Unsuccessful admissions documentation	Date of appeal/resolution of case (where applicable) plus 1 year Disposal by secure shredding/Electronic by permanent deletion	
---------------------------------------	---	--

RECORD TYPE	RETENTION PERIOD/DISPOSAL METHOD	STATUTORY PROVISIONS WHERE APPLICABLE
<b>Operational Administration</b>		
Records relating to prospectus/newsletters/school visits/general parent correspondence	Current plus 1 year Standard disposal method/Secure shredding where personal information is contained	
Records relating to Parent's Associations	Current year plus 6 years Disposal – paper copies securely shredded/Electronic records by permanent deletion	

RECORD TYPE	RETENTION PERIOD/DISPOSAL METHOD	STATUTORY PROVISIONS WHERE APPLICABLE
<b>Recruitment/HR Records/ Payroll &amp; Pensions</b>		
All records leading up to the appointment of the Principal	Date of appointment plus 6 years, held by HR Disposal by secure shredding/Electronic by permanent deletion	
All records leading up to the appointment of new staff – unsuccessful candidates	Date of appointment plus 6 months Disposal by secure shredding/Electronic by permanent deletion	
All records leading up to the appointment of new staff – successful candidate	Date of appointment and for the duration of employment plus 6 years Disposal by secure shredding/Electronic by permanent deletion	
Pre-employment vetting information – DBS information/References/Qualification certificates etc	Date of completion and for the duration of employment plus 6 years Disposal by secure shredding/Electronic by permanent deletion	
Proof of Identity	Upon verification of documents and DBS issue, paper copies are securely shredded. Scanned copies are held electronically with personal HR file in Sims.net. Electronic disposal by permanent deletion following termination of contract plus 6 years.	

Staff HR File	Termination of employment plus 6 years Disposal by secure shredding/Electronic by permanent deletion	Limitation Act 1980
Overtime Claims	Current year plus 6 years Disposal by secure shredding/Electronic by permanent deletion	
Annual Appraisals/Assessment Records	Termination of employment plus 6 years Disposal by secure shredding/Electronic by permanent deletion	
Maternity Pay Records	Current year plus 6 years Disposal by secure shredding/Electronic by permanent deletion	Stat Maternity Pay Regulations 1999
Retirement Benefits	Current year plus 6 years Disposal by secure shredding/Electronic by permanent deletion	Retirement Benefits Scheme 1995

RECORD TYPE	RETENTION PERIOD/DISPOSAL METHOD	STATUTORY PROVISIONS WHERE APPLICABLE
<b>Management of Disciplinary/Grievance Procedures</b>		
Allegation of child protection nature against a member of staff including where the allegation is unfounded	Retirement plus 10 years from the date of the allegation whichever is longer. Review relevance following this period. Disposal by secure shredding/Electronic by permanent deletion	Keeping Children Safe in Education and Working together to Safeguard Children guidance
Disciplinary Proceedings	Oral Warning – 6 months Written Warning – 12 months Final Warning – 18 months Disposal by secure shredding/Electronic by permanent deletion	

RECORD TYPE	RETENTION PERIOD/DISPOSAL METHOD	STATUTORY PROVISIONS WHERE APPLICABLE
<b>Health &amp; Safety</b>		
Health & Safety Policy Documents/Statements/ Assessments/Risk Assessments	Life of policy plus 3 years Disposal by secure shredding/Electronic by permanent deletion	

Records relating to accident or injury at work	Date of incident plus 12 years, revise for serious accidents Disposal by secure shredding/Electronic by permanent deletion	Social Security Regulations 1979, Social Security Admin Act 1992, Limitation Act 1980
Accident Reporting	Adults: Date of incident plus 6 years Children: Date of Birth of child plus 25 years Disposal by secure shredding/Electronic by permanent deletion	
COSHH Data	Current year plus 40 years Disposal by secure shredding/Electronic by permanent deletion	COSHH Regulations 2002
Asbestos Monitoring/Records	Last action plus 40 years Disposal by secure shredding/Electronic by permanent deletion	Control of Asbestos at Work Regulations 2012
Fire Log Books	Current year plus 6 years Disposal by secure shredding/Electronic by permanent deletion	

RECORD TYPE	RETENTION PERIOD/DISPOSAL METHOD	STATUTORY PROVISIONS WHERE APPLICABLE
Financial Management/Property Management and Maintenance		
Employer's Liability Certificate	Closure of school plus 40 years Disposal by secure shredding/Electronic by permanent deletion	
Asset Management	Current year plus 6 years Electronic disposal by permanent deletion	
Burglary, Theft and Vandalism Reports	Current year plus 6 years Disposal by secure shredding/Electronic by permanent deletion	
Annual Accounts	Current year plus 6 years Disposal by secure shredding/Electronic by permanent deletion	
Loans/Grant Information	Date of last payments plus 12 years, review/retain if applicable following this period Disposal by secure shredding/Electronic by permanent deletion	

Records relating to the creation and management of annual budgets and monitoring	Life of budget plus 6 years Disposal by secure shredding/Electronic by permanent deletion	
Orders/Delivery Information/Invoices/ Receipts/Income/Banking/ Bank Reconciliation/VAT	Current year plus 6 years Disposal by secure shredding/Electronic by permanent deletion	
Records relating to contract management and service level agreements	Last payment on contract plus 12 years (under seal) 6 years under signature Disposal by secure shredding/Electronic by permanent deletion	Limitation Act 1980
Records relating to the management and monitoring of contracts	Current plus 2 years Disposal by secure shredding/Electronic by permanent deletion	
Records relating to School Fund Manager transactions	Current year plus 6 years Disposal by secure shredding/Electronic by permanent deletion	
Property Title Deeds	Permanent	
Plans of the property	Retained onsite until building is leased or sold	
Records relating to Lettings	Current year plus 6 years Disposal by secure shredding/Electronic by permanent deletion	

Records relating to contract maintenance	Current year plus 6 years Disposal by secure shredding/Electronic by permanent deletion	
Maintenance Log Books	Current year plus 6 years Disposal by secure shredding/Electronic by permanent deletion	

RECORD TYPE	RETENTION PERIOD/DISPOSAL METHOD	STATUTORY PROVISIONS WHERE APPLICABLE
<b>Pupil Management</b>		
General primary pupil data	Electronic pupil data is held whilst the pupil remains in primary school, then electronically transferred to secondary school, or another primary school, should the pupil change schools. Any paper records obtained during this period will be scanned and electronically stored within the pupil documents field and transferred accordingly, along with assessment results Disposal by permanent deletion from software six years after transfer.	Pupils Information England Regulations 2005



Child Protection/Safeguarding pupil information held in separate files	Date of Birth of pupil plus 25 years, then review and assess if documents require further retention. **Further consideration will take place with regard to primary school retaining files or all records transferring to secondary school and/or another primary school where applicable. **Further consideration will take place with regard to the retention of safeguarding software. Disposal by secure shredding	Keeping Children Safe in Education and Working Together to Safeguard Children
SEN pupil information/documents held in separate files	**See above Disposal by secure shredding	Limitation Act 1980
Statements/amendments to Statements	**See above Disposal by secure shredding	Education Act 1996, SEN & Disability Act 2001
Attendance Registers	Attendance data is electronically stored with the individual pupil records and is available to retrieve until the pupil records are deleted. Disposal by electronic deletion	
Correspondence relating to authorised absence	As attendance data above	Education Act 1996
Curriculum assessment results	Retained with pupil data electronically until transfer to secondary school Disposal by electronic deletion	

Examination Papers	Papers should be retained until any appeals/validation processes are complete Disposal by secure shredding	
Published Admission Numbers	Current year plus 6 years Disposal by secure shredding	
Value Added & Contextual Data	Current year plus 6 years Disposal by electronically deleted from software	
SEF	Current year plus 6 years Disposal by electronically deleted from software	
Schemes of Work/ Timetables/Marked Books/ Records of Homework/ Pupil's Work	Current year plus 1 year Disposal by secure shredding	

RECORD TYPE	RETENTION PERIOD/DISPOSAL METHOD	STATUTORY PROVISIONS WHERE APPLICABLE
<b>Educational Visits</b>		
Records relating to educational activities outside of the classroom which require approval from the LA	Date of visit plus 14 years Disposal by secure shredding/Electronic by permanent deletion	
Parental consent forms	Conclusion of visit Disposal by secure shredding/Electronic by permanent deletion	

Parental consent forms where there has been a major incident	Date of birth of all pupils who attended plus 25 years Disposal by secure shredding/Electronic by permanent deletion	
--	---	--

Reviewed: February 2023  
Agreed: March 2023  
Review Date: February  
2024