



Kaleidoscope

Learning Trust

Embracing diverse approaches to educational excellence

Record Retention and Destruction Policy

Version and Date		Author	Committee Responsible	Review frequency	Approval	Next Review Due
1.0	17.03.2024	Miss M Duval	Trustee Board	Every 3 Years	Approved at the Trust Board 27.03.2024	27.03.2027

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1. Introduction

The main aim of this policy is to enable Kaleidoscope Learning Trust to manage hard and electronic records effectively and in compliance with 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.

Kaleidoscope Learning 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.

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.

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.

Section 2 sets out the destruction procedures for documents at the end of their retention period. The Data Protection Officer (DPO – Rebecca Whyles) will be responsible for ensuring that this is carried out appropriately, and any questions regarding this policy should be referred to them.

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 DPO 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

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
1	Records relating to Child Protection				
1.1	Child protection files	Yes	Education Act 2002, s175, related guidance "Safeguarding Children in Education", Sept 2004	DOB + 25 yrs	Secure disposal
1.2	Allegation of child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Greivance). Education Act 2002 Guidance "Dealing with Allegations of Abuse against Teachers and	Until the person's retirement age OR 10 years from the date of the allegation (whichever is the longer)	Secure disposal

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
			Other Staff" Nov 2005		
2	Records relating to Governors				
2.1	Minutes – Principal Set	No		Permanent	Must be available in school for 6 years (then can be archived elsewhere)
2.1	Minutes - Inspection Copies	No		Date of the meeting + 3 years	Secure disposal
2.2	Agendas	No		Date of the meeting	Secure disposal
2.3	Reports	No		Date of the report + 6 years	Retain in school for 6 years from report date. Can consider archiving anything important.
2.4	Annual parents' meeting papers	No		Date of the meeting + 6 years	Retain in school for 6 years from meeting date. Can consider archiving anything important.
2.5	Instruments of Government	No		Permanent	Retain in school whilst the school is open. Can then be archived elsewhere.
2.6	Trusts and Endowments	No		Permanent	Retain in school whilst operationally required. Can then be archived elsewhere.
2.7	Action Plans	No		Date of Action Plan + 3years	Secure disposal
2.8	Policy Documents	No		Expiry of Policy	Retain in school whilst policy operational (this includes if the past policy is part of a past

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
					decision process)
2.9	Complaints files	Yes		Date of resolution of complaint + 6 years	Review for further retention in the case of contentious disputes. Secure disposal
2.10	Annual reports required by the DfE	No	Education Regulations 2002. SI2002 No1171	Date of report + 10 years	Secure disposal
2.11	Proposals for schools to become or be established as Specialist Status Schools or Academies	No		Current year + 3 years	Secure disposal
3	Records relating to school management				
3.1	Log books	Yes		Date of last entry in book + 6 years	Secure disposal
3.2	Minutes of the Senior Leadership Team and other internal administrative bodies	Yes		Date of meeting + 5 years	Retain in school for 5 years from meeting date. Can consider archiving anything important.
3.3	Reports made by the Headteacher or the Management Team	Yes		Date of meeting + 3 years	Retain in school for 5 years from meeting date. Can consider archiving anything important.
3.4	Records created by Headteachers, Deputies and other staff with administrative responsibilities	Yes		Closure of file + 6 years	Secure disposal
3.5	Correspondence created by Headteachers, Deputies and other staff with administrative responsibilities			Date of correspondence + 3 years	Secure disposal
3.6	Professional development plans	Yes		Closure + 6 years	Secure disposal
3.7	School development plans			Closure + 6 years	Review for further

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
					retention. Secure disposal
3.8	Admissions (successful)	Yes		Admission + 1 year	Secure disposal
3.9	Admissions (if appeal is unsuccessful)	Yes		Resolution of case + 1 year	Secure disposal
3.10	Admissions (secondary schools – casual)	Yes		Current year + 1 year	Secure disposal
3.11	Proof of address supplied by parents as part of the admissions process	Yes		As the corresponding admission record	Secure disposal
3.12	Supplementary information form including additional information such as religion, medical conditions supplied as part of the admissions process	Yes		As the corresponding admission record	Secure disposal
4	Records relating to pupils				
4.1	Admission registers	Yes		Entry + 7 years	Retain in school for 7 years from entry.
4.2	Attendance registers	Yes		Date of register + 3 years	Secure disposal
4.3	Pupil files retained in schools	Yes			
4.3a	Primary	Yes		Retain for time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school.
4.3b	Secondary	Yes	Limitation Act 1980	Date of birth + 25 years	Transfer to another secondary school / PRU (if excluded) if required. Secure disposal.
4.4	Pupil files	Yes			
4.4a	Primary	Yes		Retain for time which the pupil remains at the	Transfer to the secondary school (or other

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
				primary school	primary school) when the child leaves the school.
4.4b	Secondary	Yes	Limitation Act 1980	Date of birth + 25 years	Transfer to another secondary school / PRU (if excluded) if required. Secure disposal.
4.5	Special Educational Needs files, reviews and individual education plans	Yes		Date of birth + 25 years	Secure disposal.
4.6	Correspondence relating to authorised absence and issues	Yes		Date of absence + 2years	Secure disposal.
4.7	Examination results				
4.7a	Public	No		Year of examination + 6 years	Secure disposal.
4.7b	Internal examination results	Yes		Current year + 5 years	Secure disposal.
4.8	Any other records created in the course of contact with pupils	Yes/No		Current year + 3 years	Review at the end of 3 years and retain with the pupil file if necessary. Secure disposal.
4.9	Statement maintained under the Education Act 1996 Section 324	Yes	Special Education Needs and Disability Act 2001 Section 1	Date of birth + 30 years	Secure disposal unless legal action is pending
4.10	Proposed statement or amended statement	Yes	Special Education Needs and Disability Act 2001 Section 1	Date of birth + 30 years	Secure disposal unless legal action is pending
4.11	Advice and information to parents regarding educational needs		Special Education Needs and Disability Act 2001 Section 2	Closure + 12 years	Secure disposal unless legal action is pending
4.12	Accessibility strategy		Special Education Needs and Disability Act 2001 Section 14	Closure + 12 years	Secure disposal unless legal action is pending

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
4.13	Parental permission slips for school trips, where there has been no major incident	Yes		Conclusion of the trip	Secure disposal unless legal action is pending
4.14	Parental permission slips for school trips, where there has been a major incident	Yes	Limitation Act 1980	Date of birth of pupil involved in the incident + 25 years	Secure disposal. Permission slips for all pupils on trip need to be retained for period to show that the rules had been followed for all pupils.
4.15	Records created by schools to obtain approval to run an educational visit outside the classroom, primary schools	No	3 part supplement of the Health & Safety of Pupils on Educational Visits (HASPEV) (1998)	Date of visit +14 years	Secure disposal
4.16	Records created by schools to obtain approval to run an educational visit outside the classroom, secondary schools	No	3 part supplement of the Health & Safety of Pupils on Educational Visits (HASPEV) (1998)	Date of visit +10 years	Secure disposal
4.17	Walking bus registered	Yes		Date of register + 3 years	This takes into account that if an incident requiring an accident report, the register will be submitted with the accident report and kept for the retention time for accident reporting. Secure disposal.
4.18	Work experience agreement	Yes		Date of birth of child +18 years	Secure disposal
5	Records relating to child curriculum				
5.1	School development plan	No		Current year +6 years	Secure disposal
5.2	Curriculum returns	No		Current year +3 years	Secure disposal
5.3	Schemes of work	No		Current year +1	It may be

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
				years	appropriate to review these records at the end of each year and allocate a new retention period. Secure disposal
5.4	Timetable	No		Current year +1 years	It may be appropriate to review these records at the end of each year and allocate a new retention period. Secure disposal
5.5	Class record books	Yes/No		Current year +1 years	It may be appropriate to review these records at the end of each year and allocate a new retention period. Secure disposal
5.6	Mark books	Yes/No		Current year +1 years	It may be appropriate to review these records at the end of each year and allocate a new retention period. Secure disposal
5.7	Record of homework set	No		Current year +1 years	It may be appropriate to review these records at the end of each year and allocate a new retention period. Secure disposal
5.8	Pupil's work	Yes		Current year +1	It may be

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
				years	appropriate to review these records at the end of each year and allocate a new retention period. Secure disposal
5.9	Examination results	Yes		Current year + 6 years	Secure disposal
5.10	SATs records, examination papers and results	Yes		Current year + 6 years	Secure disposal
5.11	PAN reports	Yes		Current year + 6 years	Secure disposal
5.12	Value added and contextual data	Yes		Current year + 6 years	Secure disposal
5.13	Self evaluation forms	Yes		Current year + 6 years	Secure disposal
6	Records relating to personnel records				
6.1	Timesheets, sick pay	Yes	Financial regulations	Current year + 6 years	Secure disposal
6.2	Staff personnel files	Yes		Termination + 25 years	Secure disposal
6.3	Interview notes and recruitment records	Yes		Date of interview + 6 months (unsuccessful). If appointed add to HR file	Secure disposal
6.4	Pre-employment vetting information (inc DBS checks)	Yes	DBS Guidance / Safer Recruitment / KCSIE	Date of check + 6 months	Secure disposal
6.5	Disciplinary procedures	Yes	Where the warning relates to a child protection issue see 1.2		
6.5a	Oral warnings	Yes		Date of warning + 6 months	Secure disposal
6.5b	Written warning – level one	Yes		Date of warning + 6 months	Secure disposal
6.5c	Written warning – level two	Yes		Date of warning + 12 months	Secure disposal
6.5d	Final warning	Yes		Date of warning	Secure disposal

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
				+ 18 months	
6.5e	Case not found	Yes		If Child Protection see 1.2, otherwise destroy immediately.	Secure disposal
6.6	Records relating to accident / injury at work	Yes		Date of incident + 12 years	In the case of serious accidents a further period will need to be applied. Secure disposal
6.7	Annual appraisal and assessment records	Yes		Current year + 5 years	Secure disposal
6.8	Salary cards	Yes		Last date of employment + 85 years	Secure disposal
6.9	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986	Current Year + 3 years	Secure disposal
6.10	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current Year + 6 years	Secure disposal
6.11	Proofs of identity collected as part of the process for checking "portable" enhanced DBS disclosure	Yes		Where possible these should be checked and a copy of what was checked placed on file. If felt necessary to keep any documentation this should also be placed in HR file.	Secure disposal of notes / copies and return of originals
7	Records relating to health and safety				
7.1	Accessibilty plans	Yes	Disability Discrimination Act	Current year + 6 years	Secure disposal
7.2	Accident reporting		Social security (Claims and payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992. Section 8. Limitation Act 1980		Secure disposal

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
7.2a	Adults	Yes		Date of incident + 7 years	Secure disposal
7.2b	Children	Yes		Date of Birth of child + 7 years	Secure disposal
7.3	COSHH			Current year + 10 years	Where appropriate an additional retention period may be allocated. Secure disposal
7.4	Incident reports	Yes		Current year + 20 years	Secure disposal
7.5	Policy statements			Date of expiry + 1 year	Secure disposal
7.6	Risk assessments			Current year + 3 years	Secure disposal
7.7	Process of monitoring areas where employees and persons are likely to have come in contact with asbestos			Last action + 40 years	Secure disposal
7.8	Process of monitoring areas where employees and persons are likely to have come in contact with radiation			Last action + 50 years	Secure disposal
7.9	Fire precautions log book			Current year + 6 years	Secure disposal
8	Administrative records				
8.1	Employers liability certificate			Closure of school +40 years	Secure disposal
8.2	Inventories of equipment and furniture			Current year + 6 years	Secure disposal
8.3	General file series			Current year + 5 years	Review to see if further retention period required. Secure disposal
8.4	School brochure or prospectus			Current year + 3 years	Disposal
8.5	Circulars (staff, parents, pupils)			Current year + 1 years	Review to see if further retention period required. Secure disposal

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
8.6	Newsletters, ephemera			Current year + 1 years	Review to see if further retention period required. Secure disposal
8.7	Visitors book			Current year + 1 years	Review to see if further retention period required. Secure disposal
8.8	PTA / Old pupils Associations			Current year + 6 years	Review to see if further retention period required. Secure disposal
9	Records relating to Finance				
9.1	Annual accounts		Financial Regulations	Current year + 6 years	Secure disposal
9.2	Loans and grants		Financial Regulations	Date last payment on loan + 12 years	Secure disposal
9.3	Contracts				
9.3a	Under seal			Contract completion date + 12 years	Secure disposal
9.3b	Under signature			Contract completion date + 6 years	Secure disposal
9.3c	Monitoring records			Current year + 2 years	Secure disposal
9.4	Copy orders			Current year + 2 years	Secure disposal
9.5	Budget reports, budget monitoring etc			Current year + 3 years	Secure disposal
9.6	Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	Secure disposal
9.7	Annual budget and background papers			Current year + 6 years	Secure disposal
9.8	Order books and requisitions			Current year + 6 years	Secure disposal
9.9	Delivery documentation			Current year + 6 years	Secure disposal
9.10	Debtors' record		Limitations Act	Current year + 6 years	Secure disposal
9.11	School fund – cheque			Current year + 3	Secure disposal

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
	books			years	
9.12	School fund – Paying in books			Current year + 6 years	Secure disposal
9.13	School fund – Ledger			Current year + 6 years	Secure disposal
9.14	School fund – Invoices			Current year + 6 years	Secure disposal
9.15	School fund – receipts			Current year + 6 years	Secure disposal
9.16	School fund – bank statements			Current year + 6 years	Secure disposal
9.17	School fund – School journey books			Current year + 6 years	Secure disposal
9.18	Student grant applications	Yes		Current year + 3 years	Secure disposal
9.19	Free school meals registers	Yes		Current year + 6 years	Secure disposal
9.20	Service Level Agreements			Until superseded	Secure disposal
9.21	Petty cash books			Current year + 6 years	Secure disposal
10	Records relating to property				
10.1	Title deeds			Permanent	These should follow the property
10.2	Plans			Permanent	Retain in school whilst operational. Can then be archived.
10.3	Maintenance and contractors		Financial Regulations	Current year + 6 years	Secure disposal
10.4	Leases			Expiry of lease + 6 years	Secure disposal
10.5	Lettings			Current year + 3 years	Secure disposal
10.6	Burglary, theft and vandalism report forms			Current year + 6 years	Secure disposal
10.7	Maintenance log books			Last entry + 10 years	Secure disposal
10.8	Contractors' report			Current year + 6 years	Secure disposal

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
11	Records relating to local authorities				
11.1	Secondary transfer sheets (primary)	Yes		Current year + 2 years	Secure disposal
11.2	Attendance returns	Yes		Current year + 1 years	Secure disposal
11.3	Circulars from LEA	Yes		Whilst required operationally	Review to see if further retention period required. Disposal
12	Records relating to the Department for Education				
12.1	HMI reports			These do not need to be kept any longer	Secure disposal
12.2	OFSTED reports and papers			Replace former report with new inspection report	Review to see if further retention period required. Secure disposal
12.3	Returns			Current year + 6 years	Secure disposal
12.4	Circulars from Department of Education			Whilst required operationally	Review to see if further retention period required. Disposal
13	Records relating to school meals				
13.1	Dinner registers			Current year + 3 years	Secure disposal
13.2	School meals summary sheets			Current year + 3 years	Secure disposal
14	Records relating to Family Liaison Officers and Home School Liaison Assistants				
14.1	Day books	Yes		Current year + 2 years	Review to see if further retention period is required. Secure disposal.
14.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency	Yes		Whilst the child is attending the school.	Secure disposal.
14.3	Referral forms	Yes		Whilst the referral is current	Secure disposal.
14.4	Contact data sheets	Yes		Current year then review	If contract is no longer active

	File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at end of Administrative Life of the record
					secure disposal.
14.5	Contact database entries	Yes		Current year then review	If contract is no longer active then secure delete.
14.6	Group registers	Yes		Current year + 2 years	Secure disposal

3. Deletion and retention of documents

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

Confidential waste (Secure Disposal)

These documents should be placed in the confidential waste bins located within the Academy. These documents are collected by a KLT assessed compliant data disposal organisation.

Anything that contains personal information should be treated as confidential.

Other documentation (Standard Disposal)

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

Automatic deletion

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 DPO who will liaise with the IT Managed Service.

Individual Responsibility

Before a document is disposed of, consider

- Has the information come to the end of its useful life?
- Is there a legal requirement to keep this information or document for a set period?

- Would the information be likely to be needed in the case of any legal proceedings? Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?
- Would the document be useful for the organisation as a precedent, learning document or for performance management processes?
- Is the document of historic or statistical significance?

If the decision is made to keep the document, this must be referred to the DPO with reasons given.

4. Deletion and retention of data stored as email

Emails 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.

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

Network Accounts

These will be locked as the user leaves the employment of the Trust or one of the Academies.

A decision on the retention of the data should be made within 90 days and the files / emails should be moved to an appropriate storage during this time.