



Confederation
of School Trusts



CST Professional Development



National Teacher
Accreditation

Record Retentions Policy

Confederation of School Trusts (CST)

1. INTRODUCTION

- 1.1. The main aim of this policy is to enable CST to manage our records effectively and in compliance with data protection and other regulation. 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. CST 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 Appendix sets out the legal requirements for certain categories of document. Where we have decided to keep information longer than the statutory requirement, this has been explained in the table at Section 2.
- 1.5. Section 3 of this policy sets out the destruction procedure for documents at the end of their retention period. The Chief Operating Officer and Company Secretary 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 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 Chief Operating Officer and Company Secretary 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

DOCUMENT CATEGORY	RETENTION PERIOD	REASON
Corporate/Constitutional		
Company Articles of Association, Rules/bylaws	Permanent	Companies Act 2006 Charities Act 2011
Trustee/director minutes of meetings and written resolutions	At least 10 years	Companies Act 2006 Charities Act 2011 CIO (General) Regulations 2012
Members' meetings Minutes/resolutions	At least 10 years	Companies Act 2006 Charities Act 2011 CIO (General) Regulations 2012
Documents of clear historical/archival significance	Permanent	Data Protection regulation
Contracts and agreements	Length of contract plus 6 years	Limitation Act 1980
Contracts executed as deeds	Length of contract plus 12 years	Limitation Act 1980
IP records and legal files re provision of service	Life of provision or IP plus 6 years	Limitation Act 1980
Insurance		
Employer's Liability Insurance	40 years	Employers' Liability (Compulsory Insurance Regulation) 1998
Policies	3 years after lapse	Commercial
Claims correspondence	3 years after settlement	Commercial
Health & Safety		
General records	3 years minimum	Limitation Act 1970



Accident book/records and reports	3 years after last entry or end of investigation	Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995
Charity Property		
Leases	12 years after lease has lapsed	Limitation Act 1980
Building records, plans, consents and certification and warranties etc	6 years after disposal or permanent if of historical/archival interest. Carry out review re longer retention e.g. if possible actions against contractors	Limitation Act 1980
Pension Records		
Records about employees and workers Records re the Scheme Records re active members and opt in/opt out Trust Deed/Rules and HMRC approvals Trustees' Minutes and annual accounts	For all categories see: Detailed guidance for employers: April 2017 www.Thepensionsregulator.gov.uk	
Tax and Finance		
Annual accounts and review (including transferred records on amalgamation)	Minimum 6 years Recommended: permanent record	Companies Act 2006; Charities Act 2011; CIO (General) Regulations 2012
Tax and accounting records	6 years from end of relevant tax year	Finance Act 1998; Taxes Management Act 1970
Information relevant for VAT purposes	Minimum 6 years from end of relevant period	Finance Act 1998 and HMRC Notice 700/21
Banking records/receipts book/sales ledger	6 years from transaction	Companies Act 2006; Charities Act 2011



Deed of covenant/Gift Aid declarations and correspondence re donations	6 years after last payment or 12 years if payments are outstanding or dispute over deed 6 years after completion of estate administration	As part of tax records
Employees/Administration		See generally ICO Employment Practices Code
Payroll/Employee/Income Tax and NI records: P45; P6; P11D; P60 etc	6 years from end of current year	Taxes Management Act 1970 /IT (PAYE) Regulations
Maternity pay	3 years after the end of the tax year	Statutory Maternity Pay Regulations
Sick pay	3 years after the end of the tax year	Statutory Sick Pay (General) Regulations
National Minimum wage records	3 years after the end of the tax year	National Minimum Wage Act
Foreign national ID documents	Minimum 2 years from end of employment	Immigration (Restrictions on Employment) Order 2007
HR files and training records	Maximum 6 years from end of employment	Limitation Act 1970 and Data Protection regulation
Records re working time	2 years	Working Time Regulations 1998 as amended
Job applications (CVs and related materials re unsuccessful applicants)	Recommended: 6-12 months from your notification of outcome of application	ICO Employment Practices Code (Recruitment & Selection)
Pre-employment/volunteer vetting	6 months	Disability Discrimination Act 1995 & Race Relations Act 1976 ICO Employment Practice Code



Disclosure & Barring Service checks	Record only satisfactory/unsatisfactory result and delete other information	ICO Employment Practice Code
Consultancy		
Information for onboarding to include copy passport, references and insurance cover notes	3 years after end of consultancy agreement	
Disclosure & Barring Service checks	Record only satisfactory/unsatisfactory result and delete other information	ICO Employment Practice Code
Activity/Sector		
Member organisation information (which includes individuals as involved of your membership)	Reviewed annually and deleted if organisation does not renew membership and have not asked for their information to be retained. Consent renewed every 3 years.	
Non-member organisation (which includes individuals involved as part of your membership)	Reviewed every 3 years and deleted if organisation have not asked for their information to be retained. Consent renewed every 3 years.	
Photographs	Deleted or renewed every 5 years	
Details of attendees at events/programmes	Deleted after 3 years	



3. DELETION 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.

Confidential waste

- 3.2. This should be shredded.
- 3.3. Anything that contains personal information should be treated as confidential.
- 3.4. Where deleting electronically, please refer to the Chief Operating Officer and Company Secretary to ensure that this is carried out effectively.

Other documentation

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

Automatic deletion

- 3.6. Certain information will be automatically archived by the computer systems, details of which are set out below. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact the Chief Operating Officer and Company Secretary.

Individual responsibility

- 3.7. Much of the retention and deletion of documents will be automatic, but when faced with a decision about an individual document, you should ask yourself the following:
- 3.7.1. Has the information come to the end of its useful life?
 - 3.7.2. Is there a legal requirement to keep this information or document for a set period? (Refer to the Appendix for more information)
 - 3.7.3. 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?)
 - 3.7.4. Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
 - 3.7.5. Is the document of historic or statistical significance?
- 3.8. If the decision is made to keep the document, this should be referred to the Chief Operating Officer and Company Secretary and reasons given.

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Date of review every 3 years; next review November 2023