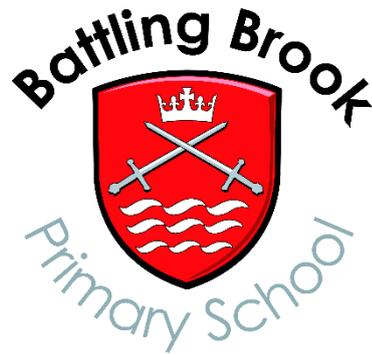


Non-Statutory Policy	
Agreed by	Head
Website	N
Staff Email	Y



# Records Management Policy

Including Retention and Disposal Schedule

Date Approved	27 <sup>th</sup> November 2024
Approved by and Position	L Mathie – Head Teacher
Review Date	Autumn 2026

Date	Update	Page no, if applicable
18/07/2024	New version of the policy, provided by the schools data protection officer	
Nov 2024	Policy updated with retention information supplied by GSD	

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## Statement of intent

**Battling Brook Primary School** is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible to the appropriate individuals. In line with the requirements of the UK GDPR, the school also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The school has created this policy to outline how records are stored, accessed, monitored, retained and disposed of to meet the school's statutory requirements.

This document complies with the requirements set out in the UK GDPR and Data Protection Act 2018.

### 1. Legal framework

This policy has due regard to legislation including, but not limited to, the following:

- UK General Data Protection Regulation (GDPR)
- EU GDPR
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- Data Protection Act 2018

This policy also has due regard to the following guidance:

- DfE (2023) 'Data protection in schools'
- DfE (2018) 'Data protection: a toolkit for schools'
- DfE (2023) 'Careers guidance and access for education and training providers'
- ESFA (2022) 'Record keeping and retention information for academies and academy trusts'
- Information Records Management Society (IRMS) (2019) 'Information Management Toolkit for Schools'
- IRMS (2019) 'Academies Toolkit'
- ICO (2023) 'How do we document our processing activities?'
- ICO (2023) 'Controllers checklist'

This policy will be implemented in accordance with the following school policies and procedures:

- Data Protection Policy
- Freedom of Information Policy
- Information Security Guidance Policy
- ICT and Internet acceptable use policy (adults)
- Data Asset Register

## **2. Roles and responsibilities**

The whole school has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.

The head teacher will hold the overall responsibility for this policy and for ensuring it is implemented correctly.

The DPO will be responsible for:

- The management of records at the school.
- Promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the head teacher.
- Ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of safely and correctly.

All staff members will be responsible for ensuring that any records they are responsible for (including emails) are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

Staff will be responsible for ensuring that when pupils use personal data for projects or coursework, they do so appropriately. This includes being compliant when storing personal data.

## **3. Management of pupil records**

Pupil records are specific documents that are used throughout a pupil's time in the education system – they are passed to each school that a pupil attends and include all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievements.

3.1 This part of the policy relates to the type of information which should be included in pupil records and sets out information about how pupil records should be managed and should be read in conjunction with the Data Protection Policy and the Privacy Notice.

3.2 The pupil record is the core record for charting the pupil's progression through the education system and should accompany the pupil to every school they attend. The information contained in the pupil record should be accurate and up to-date.

3.3 The central pupil record is kept in electronic form in SIMS but other pupil records may be taken from this and stored in other locations (such as attendance records, registers, class lists etc...). Further details on this can be found in the Privacy Notice.

3.4 Pupils (and parents) have a right to see their educational record, please refer to the Privacy Notice for details on this.

3.5 Pupil records include information obtained from the admission form and local authority at the point the pupil enters school and includes personal, medical and any special educational needs information. The pupil record may also contain information regarding pupil attainment,

annual written reports to parents and any information relating to exclusions (fixed or permanent).

3.6 Pupil records will be transferred to any new school which the pupil attends, this includes instances where the pupil moves to another primary school or where the pupil leaves primary school to join high school.

3.7 The school do not need to keep copies of any records in the pupil record once this has been transferred to a pupils new school, except if there is an ongoing legal action when the pupil leaves the school. Custody of and responsibility for the records passes to the school the pupil transfers to.

3.8 Pupil records will be transferred to the new school electronically [by the schools to schools system].

3.9 The school which the pupil attended until statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25 years.

3.10 The pupil record will be disposed of in accordance with the safe disposal of records/data section later in this policy.

3.11 If the school is requested to transfer a pupil's record outside the EEA because the pupil has moved into that area then we will do so in accordance with the data protection laws and will ensure that the country are compliant with GDPR prior to the transfer. If the institution outside the EEA are unable to show that they are compliant with the GDPR then the school will require parental consent to the transfer.

3.12 All pupil records are kept securely on an encrypted and password protected electronic system. Where paper copies of pupil records are held, these are kept securely in accordance with the Privacy Notice and Data Protection Policy.

The following information is stored in the pupil record, and will be easily accessible:

- Forename, surname, and date of birth
- Unique pupil number
- Any preferred names
- Emergency contact details and the name of the pupil's doctor
- Any allergies or other medical conditions that are important to be aware of
- Names of people with parental responsibility, including their home address(es) and telephone number(s)
- Reference to any other linked files
- Admissions form
- Details of any SEND
- Medical information relevant to the pupil's on-going education and behaviour
- Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.

Information relating to SEND and any correspondence with parents or external agencies are kept in the Assistants Head/ SENCo Officer's office

Information relating to safeguarding, and any cause for concern are recorded in CPOMs. Any concerns which are documented on paper are kept in a securely locked filing cabinet in the family liaison offices, along with archived files.

Actual copies of accident and incident information are stored separately in the school's First Aid books and retained in line with the retention periods outlined in this policy. An additional copy may be placed in the pupil's file in the event of a major accident or incident.

The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend. The only exception is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, the DPO will remove these records.

Electronic records relating to a pupil's record will also be transferred to the pupils' next school.

Pupils' educational records will follow them when they leave the school; however the school may keep hold of information about pupils for a short period to allow for any queries or reports to be completed or where linked records in the school information management system have not yet reached the end of their retention period and deleting the records would cause problems.

Certain elements of pupils' records may be retained for longer, e.g. if litigation is pending, or for transfer to the Local Record Office, in accordance with the retention schedule.

In circumstances where an Independent Inquiry into Child Sexual Abuse (IICSA) is ongoing, any records relating to the IICSA will be subject to a separate indication of the appropriate retention periods. The school will never destroy any records relating to an IICSA whilst the inquiry is ongoing and will abide by the appropriate retention periods.

The school will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the school.

#### **4. Retention of emails**

4.1 Whilst emails may be used to send information, this should be done in compliance with the Data Protection Policy and any personal data should be sent via encrypted messaging to ensure compliance with the GDPR.

4.2 Emails should not be used as a means of recording and storing information; if information or attachments from the email are required to be stored or recorded then these should be saved in the appropriate place and then the email should be deleted.

4.3 Where it is necessary to keep the content of an email this should be done by saving the email in the .msg format and storing this in an appropriate place electronically. The location for storage and the appropriate retention period will depend on the class of record the content of the email comes under e.g. pupil record, part of a contract, school financial information etc...

Group email addresses will have an assigned member of staff who takes responsibility for managing the account and ensuring the correct disposal of all sent and received emails. All staff members with an email account will be responsible for managing their inbox.

Emails can act as evidence of the school's activities, i.e. in business and fulfilling statutory duties, so all relevant emails, e.g. invoices, will be retained for at least **12 months**. Invoices received and sent in emails will be uploaded to the finance system and retained in accordance with Section 8 of this policy.

The school's expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in the school's Online Safety Policy.

Correspondence created by the SLT and other members of staff with administrative responsibilities will be retained for **three** years before being reviewed and, if necessary, securely disposed of.

Personal emails, i.e. emails that do not relate to work matters or are from family members, will be deleted as soon as they are no longer needed. Staff members will review and delete any emails they no longer require at the **end of every term**.

Staff members will not, under any circumstances, create their own email archives, e.g. saving emails on to personal hard drives. Staff members will be aware that the emails they send could be required to fulfil a SAR or freedom of information (FOI) request. Emails will be drafted carefully, and staff members will review the content before sending.

Individuals, including children, have the right to submit an SAR to gain access to their personal data to verify the lawfulness of the processing – this includes accessing emails.

All SARs will be handled in accordance with the school's Data Protection Policy. FOI requests will be handled in accordance with the school's Freedom of Information Policy.

When handling a request for information, the DPO will speak to the requestor to clarify the scope of the request and whether emails will be required to fulfil the SAR or FOI request. Where an SAR has been made electronically, the information will be provided in a commonly used electronic format. All requests will be responded to without delay and at the latest, within one month of receipt.

If a request is manifestly unfounded, excessive or repetitive, a fee will be charged. All fees will be based on the administrative cost of providing the information.

Where a request is manifestly unfounded or excessive, the school holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

Staff members will discuss any queries regarding email retention with the DPO.

## **5. Identifying information**

Under the UK GDPR, all individuals have the right to data minimisation and data protection by design and default – as the data controller, the school ensures appropriate measures are in place for individuals to exercise this right.

Wherever possible, the school uses pseudonymisation, also known as the 'blurring technique', to reduce the risk of identification.

Once an individual has left the school, if identifiers such as names and dates of birth are no longer required, these are removed or less specific personal data is used, e.g. the month of birth rather than specific date – the data is blurred slightly.

Where data is required to be retained over time, e.g. attendance data, the school removes any personal data not required and keeps only the data needed – in this example, the statistics of attendance rather than personal information.

## **6. Storing and protecting information**

The SLT will undertake a business impact assessment to identify which records are vital to school management and these records will be stored in the most secure manner. Backs up are taken on a daily basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.

Where possible, backed-up information will be stored off the school premises, using a central back-up cloud service operated by EKTE.

Confidential paper records are kept in a locked filing cabinet, drawer or strong room, with restricted access. Any room or area where personal or sensitive data is stored will be locked when unattended. Confidential paper records are not left unattended or in clear view when held in a location with general access.

Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site. Where data is saved on removable storage or a portable device, the device is kept in a locked and fireproof filing cabinet, drawer or safe when not in use. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.

All electronic devices are password-protected to protect the information on the device in case of theft. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft. Staff do not use their personal laptops or computers for school purposes. All members of staff are provided with their own secure login and password.

Emails containing sensitive or confidential information are password-protected or sent via a secure encrypted or data transfer system to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email. Personal information is never put in the subject line of an email. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the UK GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.

If documents that have been taken off the school premises the staff member will documents keep them on their person. A record will be kept of any document that is taken off the school premises that logs the location of the document and when it is returned to the school site.

Before sharing data, staff always ensure that:

- They have consent from data subjects to share it.
- Adequate security is in place to protect it.
- The data recipient has been outlined in a privacy notice.

The school has data sharing agreements with all data processors and third parties with whom data is shared. These agreements are developed by the DPO and cover information about issues such as access controls and permissions.

A record is kept of what level of access each staff member has to data. This record details information including:

- What level of access each staff member has.
- Limits on how staff members access data.
- What actions staff members can perform.
- What level of access is changed or retained when a staff member changes role within the school.
- Who is able to authorise requests to change permissions and access.

All staff members implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information is stored in a securely locked filing cabinet, drawer or safe with restricted access.

Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.

Staff are required to use their school login details to use photocopiers and printers.

The physical security of the school's buildings and storage systems, and access to them, is reviewed **termly** by the site manager in conjunction with the SBM. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the head teacher and extra measures to secure data storage will be put in place.

All systems that allow staff and pupils to remotely access information from the school's network whilst they are not physically at the school have strong security controls in place which are reviewed **termly** by the SBM / DPO.

The SBM / DPO decides what restrictions are necessary to prevent information or records being downloaded, transferred or printed while the user is not on the school site.

The school takes its duties under the UK GDPR seriously and any unauthorised disclosures may result in disciplinary action.

The head teacher is responsible for ensuring continuity and recovery measures are in place to ensure the security of protected data. Any damage to or theft of data will be managed in accordance with the school's Data and Cyber-security Breach Prevention and Management Plan.

As a result of the UK's exit of the EU data controllers and processors follow the UK GDPR, and the Data Protection Act 2018, where:

- As UK data controllers, they collect, store or process the personal data of individuals residing in the UK.
- As non-UK data controllers, they offer goods or services to, or monitor the behaviour of, UK residents.

Data controllers and processors follow the EU GDPR where:

- They collect, store or process the personal data of individuals residing in the EU.
- As non-EU data controllers, they offer goods or services to, or monitor the behaviour of, EU residents.

## **7. Accessing information**

We are transparent with data subjects, the information we hold and how it can be accessed.

All members of staff, parents of registered pupils and other users of the school, e.g. visitors and third-party clubs, are entitled to:

- Know what information the school holds and processes about them or their child and why.
- Understand how to gain access to it.
- Understand how to provide and withdraw consent to information being held.
- Understand what the school is doing to comply with its obligations under the UK GDPR.

All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the UK GDPR, to access certain personal data being held about them or their child.

Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents. Pupils who are considered by the school to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

The school will adhere to the provisions outlined in the school's Data Protection Policy when responding to requests seeking access to personal information.

## **8. Record of processing activities**

The school will maintain a record of processing activities, to capture all the important information about data processing activities.

The school will adopt the following procedure when developing and maintaining its record:

- Identify personal data assets, locating all the personal data the school has received
- Compile the personal data assets into a list
- Add extra information about the school's personal data assets in the list, developed to suit the school's individual needs

The school's record of processing activities will contain the following mandatory information as a minimum:

- Name and contact details of the school
- Name and contact details of the school's data protection officer
- Name and contact details of any joint controllers
- Purposes of carrying out personal data processing
- Categories of personal data which the school processes
- Categories of individuals whose personal data the school process
- Categories of organisations with which the school shares personal data
- Schedule for retaining each category of personal data
- General description of the school's technical and organisational security

More details about further information that the record of processing activities will be included via the following prompts:

- Source of personal data
- Category of personal data
- Whether the school is a data controller, data processor, a joint controller, or has a controller-processor contract in place
- Access and use
- Data retention and destruction
- Comments, rights, and subject access requests
- Security and personal data breaches
- Automated decision-making

## **9. Digital continuity statement**

Digital data that is retained for longer than six years will be identified by the School Business Manage and named as part of a Digital Continuity Statement. The data will be archived to dedicated files on the school's server, which are password-protected – this will be backed-up in accordance with Section 12 of this policy.

Memory sticks are never used to store digital data, subject to a Digital Continuity Statement.

The ICT technician will review new and existing storage methods **annually** and, where appropriate, add them to the digital continuity statement.

The following information will be included within the Digital Continuity Statement:

- A statement of the business purposes and statutory requirements for keeping the records
- The names of the individuals responsible for long term data preservation
- A description of the information assets to be covered by the digital preservation statement
- A description of when the record needs to be captured into the approved file formats
- A description of the appropriate supported file formats for long-term preservation
- A description of the retention of all software specification information and licence information

- A description of how access to the information asset register is to be managed in accordance with the UK GDPR

## **10. Information audit**

The school conducts information audits on an **annual** basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the UK GDPR. This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information
- Knowledge
- Apps and portals

The information audit may be completed in a number of ways, including, but not limited to:

- Interviews with staff members with key responsibilities – to identify information and information flows, etc.
- Questionnaires to key staff members to identify information and information flows, etc.
- A mixture of the above.

The DPO is responsible for completing the information audit. The information audit will include the following:

- The school's data needs
- The information needed to meet those needs
- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

The DPO will consult with staff members involved in the information audit process to ensure that the information is accurate.

Once it has been confirmed that the information is accurate, the DPO will record all details on the school's Data Asset Register.

An information asset owner is assigned to each asset or group of assets. They will be responsible for managing the asset appropriately, ensuring it meets the school's requirements, and for monitoring risks and opportunities.

The information displayed on the Data Asset Register will be shared with the Head Teacher to gain their approval.

## **11. Disposal of data**

Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.

All records containing personal or sensitive information will be made either unreadable or unreconstructable.

Where disposal of information is outlined as secure disposal, this will be shredded or pulped. Electronic information will be scrubbed clean and, where possible, cut, archived or digitalised. The DPO will keep a record of all files that have been destroyed.

Where the disposal action is indicated as reviewed before it is disposed, the DPO will review the information against its administrative value – if the information should be kept for administrative value, the DPO will keep a record of this.

If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

Where information has been kept for administrative purposes, the DPO will review the information again after **three** years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every **three** subsequent years.

Where information must be kept permanently, this information is exempt from the normal review procedures.

Records and information that might be of relevant to the Independent Inquiry into Child Sexual Abuse (IICSA) will not be disposed of or destroyed.

## **12. School closures and record keeping**

### **Academy closure**

If the academy is closing, the trust will follow the DfE's guidance on what should happen to records retained by the trust, which can be found in the DfE's '[Record keeping and retention information for academies and academy trusts](#)' guidance.

### **Sale or re-use of the site**

If the school site is being sold or re-allocated to another use, the LA will take responsibility for the records from the date the school closes.

### **Merger of schools**

If the school merges with another school to create one school, the new school will be responsible for retaining all current records originating from the former schools.

The DPO will determine the outcome of each group of records; these outcomes are as follows:

- Securely destroy all records that are expired and due for disposal, in accordance with the retention periods outlined in this policy.
- Transfer to the successor school or academy all records that are current and that will be required by the new school or academy.

- Transfer to the LA all records that are dormant but still need to be retained to comply with legal and business retention requirements.
- Transfer to the local record office any records with historical value.

## 12. Managing records

The School Business Manager in conjunction with the DPO will identify which records need to be destroyed or transferred to the relevant body – they will allocate personnel as necessary to sort through records.

The SBM/ DPO will notify the other organisations as soon as possible so that necessary disposal, storage and transfer arrangements can be made. The school's ICT provider will also be notified so that arrangements can be made to ensure the safe transfer or deletion of electronic records, including all back-up copies.

When sorting records, the Senior Leadership Team will:

- Review all records held within the school as soon as notification of closure is received, including paper and electronic records.
- Use the retention periods outlined in this policy to categorise the records into those to be destroyed and those that need to be transferred.
- Contact the relevant body to make arrangements for the safe and secure transfer of records.
- Sort, list and box the records in preparation for the transfer, ensuring records are stored in a safe environment whilst awaiting collection.
- Plan how the disposal of records will be undertaken.
- Sort expired records in readiness for confidential disposal, ensuring they are stored securely whilst awaiting disposal.

All forms of storage will be completely emptied before the building is vacated or before disposal. Records awaiting transfer will be held in a secure area. The identity of any third parties collecting or disposing of records will be checked and a collection receipt will be obtained.

Records will be disposed of in line with the '[Disposal of data](#)' section of this policy. Electronic records will be either transferred to the new body or deleted. All ICT equipment will be decommissioned in accordance with the school's ICT Acceptable Use Policy.

No records will be left behind once the school building is vacated.

## Retention & Disposal schedule

### **Retention of pupil records and other pupil-related information**

The table below outlines the school's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will be destroyed in line with the retention periods below.

- 1 Governing Body
  - 1.1 Management of Governing Body
  - 1.2 Governor Management
  
- 2 School Management
  - 2.1 Head Teacher and Senior Management Team
  - 2.2 Operational Administration
  - 2.3 Human Resources
  - 2.4 Health and Safety
  - 2.5 Financial Management
  - 2.6 Property Management
  
- 3 Pupil Management
  - 3.1 Admissions Process
  - 3.2 Pupil's Educational Record
  - 3.3 Attendance
  - 3.4 Special Educational Needs
  
- 4 Curriculum and Extra-Curricular Activities
  - 4.1 Statistics and Management Information
  - 4.2 Implementation of Curriculum
  - 4.3 School Trips
  - 4.4 School Support Organisations
  
- 5 Central Government and Local Authority
  - 5.1 Local Authority
  - 5.2 Central Government

## 1. Governing Body

This section relates to retention periods relevant to the roles and responsibilities of the governing body.

For further information about governing body records please refer to: "The constitution of governing bodies of maintained schools

Statutory guidance for governing bodies of maintained schools and local authorities in England August 2017"

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/640562/The constitution of governing bodies of maintained schools 2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/640562/The_constitution_of_governing_bodies_of_maintained_schools_2017.pdf)

1.1 Management of Governing Body					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
1.1.1	Instruments of government		For the life of the school	Consult local archives before disposal	
1.1.2	Trusts and endowments		For the life of the school	Consult local archives before disposal	
1.1.3	Records relating to the election of parent and staff governors not appointed by the governors		Date of election + 6 months	SECURE DISPOSAL	Yes
1.1.4	Records relating to the appointment of co-opted governors		Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children). In this case retain for 25 years	SECURE DISPOSAL	Yes
1.1.5	Records relating to the election of chair and vice chair		Once the decision has been recorded in the minutes, the records relating to the election can be destroyed	SECURE DISPOSAL	Yes

1.1.6	Scheme of dele- gation and terms of reference for committees		Until superseded or whilst relevant [Schools may wish to retain these records for reference purposes in case decisions need to be justified]	These could be offered to the archives if appropriate	
1.1.7	Meetings schedule		Current year	STANDARD DISPOSAL	
1.1.8	Agendas - principal copy		Where possible the agenda should be stored with the principal set of the minutes	Consult local archives before disposal	Potential
1.1.9	Minutes - principal set (signed)		Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting	Consult local archives before disposal	Potential
1.1.10	Reports made to the governors' meeting which are referred to in the minutes		Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting	Consult local archives before disposal	Potential
1.1.11	Register of attend- ance at Full govern- ing board meetings		Date of last meet- ing in the book + 6 years	SECURE DISPOSAL	Yes
1.1.12	Papers relating to the management of the annual parents' meeting		Date of meeting + 6 years	SECURE DISPOSAL	Yes
1.1.13	Agendas - additional copies		Date of meeting	STANDARD DISPOSAL	
1.1.14	Records relating to Govern- or Monitor- ing Visits		Date of the visit + 3 years	SECURE DISPOSAL	Yes
1.1.15	Annual Reports re- quired by the DoE		Date of report + 10 years	SECURE DISPOSAL	

1.1.16	All records relating to the conversion of schools to Academy status		For the life of the organisation	Consult local archives before disposal	
1.1.17	Records relating to complaints made to and investigated by the governing body or head teacher		Major complaints: current year + 6 years. If negligence involved then: current year + 15 years If child protection or safeguarding issues are involved then: current year + 40 years	SECURE DISPOSAL	Yes
1.1.18	Correspondence sent and received by the governing body or head teacher		General correspondence should be retained for current year + 3 years	SECURE DISPOSAL	Potential
1.1.19	Action plans created and administered by the governing body		Until superseded or whilst relevant	SECURE DISPOSAL	
1.1.20	Policy documents created and administered by the governing body		Until superseded [The school should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the IICSA has issued its recommendations. ]		

1.2 Governor Management					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Personal the Information
1.2.1	Records relating to the appointment of a clerk to the governing body		Date on which clerk appointment ceases + 6 years	SECURE DISPOSAL	Yes
1.2.2	Records relating to the terms of office of serving governors, including evidence of appointment		Date appointment ceases + 6 years		Yes
1.2.3	Records relating to governor declaration against disqualification criteria		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes
1.2.4	Register of business interests		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes
1.2.5	Governors Code of Conduct		This is expected to be a dynamic document; one copy of each version should be kept for the life of the organisation		
1.2.6	Records relating to the training required and received by Governors		Date Governor steps down + 6 years	SECURE DISPOSAL	Yes
1.2.7	Records relating to the induction programme for new governors		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes
1.2.8	Records relating to DBS checks carried out on clerk and members of the governing body		Date of DBS check + 6 months	SECURE DISPOSAL	Yes
1.2.9	Governor personnel files		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes

## 2. Management of the School

This section relates to retention periods associated with the processes involved in managing the school, including Human Resources, Financial Management, Payroll and Property Management.

2.1 Head Teacher and Senior Management Team					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.1.1	Log books of activity in the school maintained by the Head Teacher		Date of last entry in the book + minimum of 6 years, then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate	Potential
2.1.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies		Date of the meeting + 3 years then review annually, or as required if not destroyed	SECURE DISPOSAL	Potential
2.1.3	Reports created by the Head Teacher or the Management Team		Date of the report + a minimum of 3 years then review annually or as required if not destroyed	SECURE DISPOSAL	Potential
2.1.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities which do not fall under any other category		Current academic year + 6 years then review annually, or as required if not destroyed	SECURE DISPOSAL	Potential
2.1.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities		Current year + 3 years	SECURE DISPOSAL	Potential
2.1.6	Professional development plans		These should be held on the individual's personnel record. If not then termination of employment + 6 years	SECURE DISPOSAL	Potential
2.1.7	School development plans		Life of the plan + 3 years	SECURE DISPOSAL	

2.2 Operational Administration					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.2.1	General file series which do not fit under any other category		Current year + 5 years, then review	SECURE DISPOSAL	Potential
2.2.2	Records relating to the creation and publication of the school brochure or prospectus		Current academic year + 3 years	The school could preserve a copy for their archive otherwise STANDARD DISPOSAL	
2.2.3	Records relating to the creation and distribution of circulars to staff, parents or pupils		Current academic year + 1 year	STANDARD DISPOSAL	
2.2.4	School Privacy Notice which is sent to parents as part of GDPR compliance		Until superseded + 6 years		
2.2.5	Consents relating to school activities as part of GDPR compliance (for example, consent to be sent circulars or mailings)		Consent will last whilst the pupil attends the school, it can therefore be destroyed when the pupil leaves	SECURE DISPOSAL	Yes
2.2.6	Newsletters and other items with a short operational use		Current academic year + 1 year [Schools may decide to archive one copy]	STANDARD DISPOSAL	
2.2.7	Visitor management systems (including electronic systems, visitors books and signing-in sheets)		Last entry in the visitors book + 6 years (in case of claims by parents or pupils about various actions).	SECURE DISPOSAL	Yes
2.2.8	Walking bus registers		Date of register + 6 years	SECURE DISPOSAL	Yes

## 2.3 Human Resources

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Recruitment</b>					
2.3.1	All records leading up to the appointment of a headteacher		Unsuccessful attempts. Date of appointment plus 6 months. Add to personnel file and retain until end of appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years	SECURE DISPOSAL	Yes
2.3.2	All records leading up to the appointment of a member of staff/governor – unsuccessful candidates		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL	Yes
2.3.3	Pre-employment vetting information – DBS Checks – successful candidates	DBS Update Service Employer Guide June 2014; Keeping Children Safe in Education, 2018 (Statutory Guidance from DoE) Sections 73, 74	Application forms, references and other documents – for the duration of the employee's employment + 6 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Recruitment</b>					
2.3.4	Forms of proof of identity collected as part of the process of checking "portable" enhanced DBS disclosure		Where possible this process should be carried out using the on-line system. If it is necessary to take a copy of documentation then it should be retained on the staff personal file.	SECURE DISPOSAL	Yes
2.3.5	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom – successful candidates	An Employer's Guide to Right to Work Checks [Home Office, May 2015]	Where possible these documents should be added to the staff personnel file [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of employment + not less than 2 years	SECURE DISPOSAL	Yes
<b>Operational Staff Management</b>					
2.3.6	Staff personnel file	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years, unless the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete	SECURE DISPOSAL	Yes
2.3.7	Annual appraisal/assessment records		Current year + 6 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Operational Staff Management</b>					
2.3.8	Sickness absence monitoring		<p>Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records.</p> <p>It could be argued that where sickness pay is not paid then current year + 3 years is acceptable, whilst if sickness pay is made then it becomes a financial record and current year + 6 years applies. The actual retention may depend on the internal auditors. Most seem to accept current year + 3 years as being acceptable as this gives them, 'benefits' and Inland Revenue have time to investigate if they need to</p>	SECURE DISPOSAL	Yes
2.3.9	Staff training – where the training leads to continuing professional development		Length of time required by the professional body	SECURE DISPOSAL	Yes
2.3.10	Staff training – except where dealing with children, e.g. first aid or health and safety		This should be retained on the personnel file [see 2.3.1 above]	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Operational Staff Management</b>					
2.3.11	Staff training – where the training relates to children (e.g. safeguarding or other child related training)		Date of the training + 40 years [This retention period reflects that the IICSA may wish to see training records as part of an investigation]	SECURE DISPOSAL	Yes
<b>Disciplinary and Grievance Processes</b>					
Where schools are in any doubt as to which categories disciplinary records fall under, then HR or legal advice should be sought from the Local Authority or Academy trust					
2.3.12	Records relating to any allegation of a child protection nature against a member of staff	“Keeping children safe in education Statutory guidance for schools and colleges September 2018” “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018”	Until the person’s normal retirement age or 10 years from the date of the allegation (whichever is the longer) then REVIEW. Note: allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned UNLESS the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete	SECURE DISPOSAL These records must be shredded	Yes
2.3.13	Disciplinary proceedings				Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
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**Disciplinary and Grievance Processes**

Note:  
 The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.

Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line, and they defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim.

Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.

	Oral warning		Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file]	
	Written warning – level 1		Date of warning + 6 months		
	Written warning – level 2		Date of warning + 12 months		
	Final warning		Date of warning + 18 months		
	Case not found		If the incident is related to child protection then see above, otherwise dispose of at the conclusion of the case	SECURE DISPOSAL	

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Payroll and Pensions</b>					
2.3.14	Absence record		Current year + 3 years	SECURE DISPOSAL	Yes
2.3.15	Batches	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.16	Bonus sheets	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL	Yes
2.3.17	Car allowance claims	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL	Yes
2.3.18	Car loans	Taxes Management Act 1970 Income and Corporation Taxes 1988	Completion of loan + 6 years	SECURE DISPOSAL	Yes
2.3.19	Car mileage output	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.20	Elements		Current year + 2 years	SECURE DISPOSAL	Yes
2.3.21	Income tax form P60		Current year + 6 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Payroll and Pensions</b>					
2.3.22	Insurance	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.23	Maternity payment		Current year + 3 years	SECURE DISPOSAL	Yes
2.3.24	Members allowance register	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.25	National Insurance – schedule of payments	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.26	Overtime	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL	Yes
2.3.27	Part time fee claims	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.28	Pay packet receipt by employee		Current year + 2 years	SECURE DISPOSAL	Yes
2.3.29	Payroll awards		Current year + 6 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Payroll and Pensions</b>					
2.3.30	Payroll – gross/net weekly or monthly	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.31	Payroll reports	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.32	Payslips – copies	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.33	Pension payroll	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.34	Personal bank details	If employment ceases then end of employment + 6 years	Until superseded + 3 years	SECURE DISPOSAL	Yes
2.3.35	Sickness records		Current year + 3 years	SECURE DISPOSAL	Yes
2.3.36	Staff returns		Current year + 3 years	SECURE DISPOSAL	Yes
2.3.37	Superannuation adjustments	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Payroll and Pensions</b>					
	Superannuation reports	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.38	Tax forms P6/P11/P11D/P35/P45/P46/P48	The minimum requirement - as stated in Inland Revenue Booklet 490 - is for at least 3 years after the end of the tax year to which they apply. Originals must be retained in paper/ electronic format. It is a corporate decision to retain for current year + 6 years. Employees should retain records for 22 months after current tax year	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.39	Time sheets/clock cards/flexitime		Current year + 3 years	SECURE DISPOSAL	Yes

2.4 Health and Safety					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.4.1	Health and safety policy statements		Life of policy + 3 years	SECURE DISPOSAL	
2.4.2	Health and safety risk assessments		Life of risk assessment + 3 years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred	SECURE DISPOSAL	
2.4.3	Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	<p>Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</p> <p>Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628</p> <p>Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628</p> <p>Social Security Administration Act 1992 Section 8.</p> <p>Social Security (Claims and Payments) Amendment (No 30) Regulations 1993 SI 1993 No 2113</p> <p>Allows the information to be kept electronically</p>	<p>The Accident Book – BI 510 - 3 years after last entry in the book</p> <p>This includes the new format to be used from 1/1/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR</p>	SECURE DISPOSAL	Yes

## 2.4 Health and Safety

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.4.4	Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	<p>Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</p> <p>Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628</p> <p>Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628</p> <p>Social Security Administration Act 1992 Section 8.</p> <p>Social Security (Claims and Payments) Amendment (No 30 Regulations 1993 SI 1993 No 2113</p> <p>Allows the information to be kept electronically</p>	<p>The Accident Book – BI 510 - 3 years after last entry in the book</p> <p>This includes the new format to be used from 1/1/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR</p>	SECURE DISPOSAL	Yes
2.4.5	Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see <a href="http://www.hse.gov.uk/RIDDOR/">http://www.hse.gov.uk/RIDDOR/</a>	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2)	Date of incident + 3 years provided that all records relating to the incident are held on personnel file [see 2.4.2 above]	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.4.6	Control of Substances Hazardous to Health (COSHH)	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	Date of incident + 40 years	SECURE DISPOSAL	
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL	
2.4.8	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation. Maintenance records or controls, safety features and PPE ----- --- Dose assessment and recording	The Ionising Radiation Regulations 2017. SI 2017 No 1075 Regulation 11  As amended by SI 2018 No 390 Personal Protective Equipment (Enforcement) Regulations 2018	2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. ----- --- To keep the records made and maintained (or a copy of these records) until the person to whom the record relates has or would have attained the age of 75 years, but in any event for at least 30 years from when the record was made	SECURE DISPOSAL	
2.4.9	Fire Precautions log books		Current year + 3 years	SECURE DISPOSAL	

2.4 Health and Safety					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.4.10	Health and safety file to show current state of building, including all alterations (wiring, plumbing, building works, etc.), to be passed on in the case of change of ownership		Pass to new owner on sale or transfer of building		
2.5 Financial Management					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Risk Management and Insurance					
2.5.1	Employer's Liability Insurance Certificate		Closure of the school + 40 years [May be kept electronically]	SECURE DISPOSAL To be passed to the Local Authority if the school closes	
Asset Management					
2.5.2	Inventories of furniture and equipment		Current year + 6 years	SECURE DISPOSAL	
2.5.3	Burglary, theft and vandalism report forms		Current year + 6 years	SECURE DISPOSAL	
Accounts and Statements (including budget management)					
2.5.4	Annual accounts		Current year + 6 years	STANDARD DISPOSAL	
2.5.5	Loans and grants managed by the school		Date of last payment on the loan + 12 years then review	SECURE DISPOSAL	

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Accounts and Statements (including budget management)</b>					
2.5.6	All records relating to the creation and management of budgets, including the annual budget statement and back-ground papers		Life of the budget + 3 years	SECURE DISPOSAL	
2.5.7	Invoices, receipts, order books and requisitions, delivery notices		Current financial year + 6 years	SECURE DISPOSAL	
2.5.8	Records relating to the collection and banking of monies		Current financial year + 6 years	SECURE DISPOSAL	
2.5.9	Records relating to the identification and collection of debt		Final payment of debt + 6 years	SECURE DISPOSAL	
<b>Pupil Finance</b>					
2.5.10	Student Grant applications		Current year + 3 years	SECURE DISPOSAL	Yes
2.5.11	Pupil Premium Fund records		Date pupil leaves the provision + 6 years	SECURE DISPOSAL	Yes
<b>Contract Management</b>					
2.5.12	All records relating to the management of contracts under seal	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL	
2.5.13	All records relating to the management of contracts under signature	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL	
2.5.14	Records relating to the monitoring of contracts		Life of contract + 6 or 12 years	SECURE DISPOSAL	

2.5 Financial Management					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>School Meals Management</b>					
2.5.22	Free school meals registers (where the register is used as a basis for funding)		Current year + 6 years	SECURE DISPOSAL	Yes
2.5.23	School meals registers		Current year + 3 years	SECURE DISPOSAL	Yes
2.5.24	School meals summary sheets		Current year + 3 years	SECURE DISPOSAL	Yes
2.6 Property Management					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Property Management</b>					
2.6.1	Title deeds of properties belonging to the school		These should follow the property unless the property has been registered with the Land Registry		
2.6.2	Plans of property belonging to the school		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10		
2.6.3	Leases of property leased by or to the school		Expiry of lease + 6 years	SECURE DISPOSAL	
2.6.4	Records relating to the letting of school premises		Current financial year + 6 years	SECURE DISPOSAL	

## Maintenance

2.6.5	All records relating to the maintenance of the school carried out by contractors		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10	SECURE DISPOSAL	
2.6.6	All records relating to the maintenance of the school carried out by school employees, including maintenance log books		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10	SECURE DISPOSAL	

## 2 Pupil Management

This section relates to the retention periods associated to the processes involved in managing a pupil's journey through school, including the admissions process.

3.1 Admissions Process					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
3.1.1	All records relating to the creation and implementation of the School Admissions Policy	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL	
3.1.2	Admissions – if the admission is successful	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL	Yes
3.1.3	Admissions – if the appeal is unsuccessful	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL	Yes
3.1.4	Register of Admissions	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made	REVIEW Schools may wish to consider keeping the admission register permanently as an archive record as often schools receive enquiries from past pupils to confirm the dates they attended the school or to transfer these records to the appropriate County Archives Service	

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
3.1.5	Admissions – Secondary Schools – Casual		Current year + 1 year	SECURE DISPOSAL	Yes
3.1.6	Proofs of address supplied by parents as part of the admissions process	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL	Yes
3.1.7	Supplementary information form including additional information such as religion, medical conditions etc.				Yes
3.1.7.1	For successful admissions		This information should be added to the pupil file	SECURE DISPOSAL	
3.1.7.2	For unsuccessful admissions		Until appeals process completed (GDPR)	SECURE DISPOSAL	

## 3.2 Pupil's Educational Record

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<p><b>Please note</b> that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority academy trust or take independent legal advice.</p>					
3.2.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 As amended by SI 2018 No 688			Yes
3.2.1.1	Primary		Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school. This will include: <ul style="list-style-type: none"> <li>• To another primary school</li> <li>• To a secondary school</li> <li>• To a pupil referral unit</li> </ul>	
3.2.1.2	Secondary	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	REVIEW	
3.2.2	Examination Results – pupil copies				Yes
3.2.2.1	Public		This information should be added to the pupil file	All uncollected certificates should be returned to the examination board after reasonable attempts to contact the pupil have failed	
3.2.2.2	Internal		This information should be added to the pupil file		

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
3.2.3	Child protection information held on pupil file	<p>“Keeping children safe in education Statutory guidance for schools and colleges 2018”;</p> <p>“Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018”</p>	<p>If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same time period as the pupil file. Note: These records will be subject to any instruction given by IICSA</p>	<p>SECURE DISPOSAL These records must be shredded</p>	Yes
3.2.4	Child protection information held in separate files	<p>“Keeping children safe in education Statutory guidance for schools and colleges 2018”;</p> <p>“Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018”</p>	<p>DOB of the child + 25 years then review</p> <p>This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record</p> <p>Note: These records will be subject to any instruction given by IICSA</p>	<p>SECURE DISPOSAL These records must be shredded</p>	Yes

### 3.3 Attendance

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
3.3.1	Attendance Registers	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made.	SECURE DISPOSAL	Yes
3.3.2	Correspondence relating to any absence (authorised or unauthorised)	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL	Potential

### 3.4 Special Educational Needs

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
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**Please note** that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority academy trust or take independent legal advice.

3.4.1	Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Children and Family's Act 2014; Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 31 years [Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act]	SECURE DISPOSAL	Yes
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### 3 Curriculum and Extra Curricular Activities

This section contains retention periods connected to the processes involved in managing the curriculum and extra-curricular activities.

4.1 Statistics and Management Information					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
4.1.1	Curriculum returns		Current year + 3 years	SECURE DISPOSAL	No
4.1.2	Examination Results (school's copy)		Current year + 6 years	SECURE DISPOSAL	Yes
4.1.2.1	SATS records				Yes
4.1.2.2	Results		The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year's SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL	
4.1.2.3	Examination Papers		The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL	
4.1.3	Published Admission Number (PAN) Reports		Current year + 6 years	SECURE DISPOSAL	Yes

## 4.1 Statistics and Management Information

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
4.1.4	Value Added and Contextual Data		Current year + 6 years	SECURE DISPOSAL	Yes
4.1.5	Self-Evaluation Forms			SECURE DISPOSAL	Yes
4.1.5.1	Internal moderation		Academic year plus 1 academic year	SECURE DISPOSAL	Yes
4.1.5.2	External moderation		Until superseded	SECURE DISPOSAL	Yes

## 4.2 Implementation of Curriculum

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
4.2.1	Schemes of work		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL	
4.2.2	Timetable		Current year + 1 year		
4.2.3	Class record books		Current year + 1 year		
4.2.4	Mark books		Current year + 1 year		
4.2.5	Record of home- work set		Current year + 1 year		
4.2.6	Pupil's work		Where possible, the pupil's work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	SECURE DISPOSAL	

### 4.3 School Trips

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
4.3.1	Parental consent forms for school trips where there has been no major incident		Although the consent forms could be retained for Date of birth + 22 years, the school may wish to complete a risk assessment to assess whether the forms are likely to be required and could decide to dispose of the consent forms at the end of the trip (or at the end of the academic year). This is a pragmatic approach and if in doubt the school should seek legal advice	SECURE DISPOSAL	Yes
4.3.2	Parental permission slips for school trips – where there has been a major incident	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	SECURE DISPOSAL	Yes

## 4.4 School Support Organisations

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
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### Family Liaison Officers and Home School Liaison Assistants

4.4.1	Reports for outside agencies - where the report has been included on the case file created by the outside agency		Whilst child is attending school and then destroy	SECURE DISPOSAL	Yes
4.4.2	Referral forms		While the referral is current	SECURE DISPOSAL	Yes
4.4.3	Contact data sheets		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL	Yes
4.4.4	Contact database entries		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL	Yes
4.4.5	Group registers		Current year + 2 years	SECURE DISPOSAL	Yes

### Parent Teacher Associations and Old Pupils Associations

4.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations		Current year + 6 years then review	SECURE DISPOSAL	
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## 5. Central Government and Local Authority

This section covers records created during the course of interaction between the school and local authority

5.1 Local Authority					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
5.1.1	Secondary Transfer Sheets (primary)		Current year + 2 years	SECURE DISPOSAL	Yes
5.1.2	Attendance returns		Current year + 1 year	SECURE DISPOSAL	Yes
5.1.3	School census returns		Current year + 5 years	SECURE DISPOSAL	
5.1.4	Circulars and other information sent from the local authority		Operational use	SECURE DISPOSAL	
5.2 Central Government					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
5.2.1	OFSTED reports and papers where a physical copy is held		Life of the report then review	SECURE DISPOSAL	
5.2.2	Returns made to central government		Current year + 6 years	SECURE DISPOSAL	
5.2.3	Circulars and other information sent from central government		Operational use	SECURE DISPOSAL	