

# DATA RECORDS MANAGEMENT & RETENTION POLICY

FOR

ST.ANDREW'S COF E PRIMARY SCHOOL / FEERING COFE  
PRIMARY SCHOOL (ASAT)



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<p>Date: ..... Signed: .....</p> <p>To be reviewed every two years</p>		

## Records Management Policy

The ASAT collects and uses personal information about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable it to provide education and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the school complies with its statutory obligations.

The School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited. The School has adopted the Information Management ToolKit for Schools created by the SBM (School Business Management) and adheres to its principles and guidance, including the retention schedule for school records. A full copy of the Information Management ToolKit is available on the School website.

### 1. Scope of the policy

1.1 This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.

1.2 Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

1.3 A small percentage of the school's records may be selected for permanent preservation as part of the institution's archives and for historical research.

### 2. Responsibilities

2.1 The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher.

2.2 The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

2.3 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines.

### 3. Relationship with existing policies

This policy has been drawn up within the context of:

- Data Protection policy
- Information Management Toolkit
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

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## Changes to Version 1.4 (October 2019)

Section 5: Pupil Management	
5.1.1 – Pupil's Education Record	<ul style="list-style-type: none"> <li>Actions at the end of the records life – Primary – amended to include independent school, moving abroad and home schooling</li> </ul>

## Changes to Version 1.3 (September 2019)

Section of the Retention Schedule	Details
Section 1: Management of the School	
1.1. – Principal Set of Governor Minutes	<ul style="list-style-type: none"> <li>Retention period – description elaborated</li> </ul>
1.1. – Inspection copies of Governor Minutes	<ul style="list-style-type: none"> <li>Removed</li> </ul>
1.1.3 – Reports presented to the Governing Body	<ul style="list-style-type: none"> <li>Retention period amended</li> </ul>
1.1.4 – Meeting papers relating to annual parents' meeting held under section 33 of the Education Act 2002	<ul style="list-style-type: none"> <li>Data Protection Issues – changed from No to Yes</li> </ul>
1.1.5 to 1.1.21 – Governor Records (various)	<ul style="list-style-type: none"> <li>New sections</li> </ul>
1.3.4 – Register of Admissions	<ul style="list-style-type: none"> <li>Statutory Provisions amended.</li> <li>Action at the end of the records life amended</li> </ul>
1.4.5 – Visitors' Books and Signing In Sheets	<ul style="list-style-type: none"> <li>Record type amended to reflect inclusion of electronic signing in records</li> <li>Amended Retention Period</li> </ul>
1.4.7 – School Privacy Notice sent to parents	<ul style="list-style-type: none"> <li>New section</li> </ul>

1.4.8 – Parental consent related to GDPR	<ul style="list-style-type: none"> <li>• New section</li> </ul>
<b>Section 2: HR Management of the School</b>	
2.1.4 – Pre-employment vetting information – DBS checks	<ul style="list-style-type: none"> <li>• Data Protection Issues – changed from No to Yes</li> <li>• Statutory Provisions – updated to KCSiE 2019</li> </ul>
2.2.1 – Staff Personal File	<ul style="list-style-type: none"> <li>• Retention Period amended to reflect IICSA enquiries</li> </ul>
Timesheets	<ul style="list-style-type: none"> <li>• Removed from retention schedule</li> </ul>
2.2.2 – Annual Appraisal (was section 2.2.3)	<ul style="list-style-type: none"> <li>• Retention Period amended</li> </ul>
2.2.3 to 2.2.6 (various)	<ul style="list-style-type: none"> <li>• New sections</li> </ul>
2.3 – Management of Disciplinary & Grievance Process	<ul style="list-style-type: none"> <li>• New introductory note</li> </ul>
2.3.1 – Allegation of a child protection nature	<ul style="list-style-type: none"> <li>• Statutory Provisions amended</li> <li>• Retention Period amended</li> </ul>
2.4 – Payroll & Pensions (was section 2.5) 2.4.1 to 2.4.27	<ul style="list-style-type: none"> <li>• New sections</li> </ul>
<b>Section 3: Financial Management of the School</b>	
3.4 Pupil Finance 3.4.1 to 3.4.2	<ul style="list-style-type: none"> <li>• New section</li> </ul>
<b>Section 4: Property Management</b>	
4.1.3 – Records relating to accident/injury at work	<ul style="list-style-type: none"> <li>• Statutory Provisions – amended</li> <li>• Retention Period Adults – amended</li> <li>• Retention Period Children – amended</li> </ul>
4.1.9 – Fire precaution log books	<ul style="list-style-type: none"> <li>• New section</li> </ul>
4.3 Maintenance 4.3.1 and 4.3.2	<ul style="list-style-type: none"> <li>• Retention Periods amended</li> </ul>
<b>Section 5: Pupil Management</b>	
Pupil Management	<ul style="list-style-type: none"> <li>• New introductory note</li> </ul>
5.1.1 – Pupil's Education Record	<ul style="list-style-type: none"> <li>• Statutory Provisions amended</li> <li>• Actions at the end of the records life – Primary – amended</li> <li>• Actions at the end of the records life – Secondary - amended</li> </ul>
5.1.2 – Examination Results	<ul style="list-style-type: none"> <li>• Actions at the end of the records life – public - amended</li> </ul>
5.1.3 – Child Protection Information held on pupil file	<ul style="list-style-type: none"> <li>• Statutory Provisions – amended</li> <li>• Retention Period – amended</li> <li>• Actions at the end of the records life – amended</li> </ul>
5.1.4 – Child Protection Information held in separate files	<ul style="list-style-type: none"> <li>• Statutory Provisions – amended</li> <li>• Retention Period – amended</li> </ul>
5.2.2 – Correspondence relating to authorised absence	<ul style="list-style-type: none"> <li>• Data Protection Issues – changed from blank to Potential</li> </ul>

5.3.1 – Special Educational Needs files, reviews and Individual Education Plans	<ul style="list-style-type: none"> <li>• Record Type – amended</li> <li>• Statutory Provisions – amended</li> <li>• Retention Period – amended</li> <li>• Actions at the end of the records life – amended</li> </ul>
5.3.2 to 5.3.4	<ul style="list-style-type: none"> <li>• Removed</li> </ul>
<b>Section 6: Curriculum Management</b>	
6.1.6 and 6.1.7 – Moderation	<ul style="list-style-type: none"> <li>• New section</li> </ul>
<b>Section 7: Extra Curricular Activities</b>	
7.1.1 and 7.1.2 – Records created by schools to obtain approval	<ul style="list-style-type: none"> <li>• Sections removed</li> </ul>
Walking Bus (was 7.2)	<ul style="list-style-type: none"> <li>• Section removed</li> </ul>
7.2.1: Family Liaison Officers and Home School Liaison Assistants 7.2.1 to 7.2.6	<ul style="list-style-type: none"> <li>• Actions at the end of the records life - amended</li> </ul>
7.3 Parent Teacher Associations and Alumni Associations	<ul style="list-style-type: none"> <li>• New section</li> </ul>

## **Data Records Management & Retention Policy**

The school recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

### **1: Scope of the Policy**

This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.

Records are defined as all those documents that facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

### **2: Responsibilities**

The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Executive Headteacher, Mrs Bridgette Gough.

The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way.

The Data Protection Officer will monitor compliance with this policy by surveying at least bi-annually to check if records are stored securely and can be accessed appropriately.

Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the school's retention guidelines.

### **3: Information Security & Business Continuity**

In order to protect the data and records the school is responsible for, the following security measures will be implemented.

#### **The Storage & Security of Digital Data**

**Back Up System:** The school will undertake regular back-ups of all information held electronically to enable restoration of the data in the event of an environmental or data corruption incident. This includes regular on site backups with cold backups stored in a fireproof safe. Backup drives swapped by members of staff periodically.

The school tests that data can be restored from a back-up on a regular basis. On every IT support visit (fortnightly), the backups are checked for operation and test restores undertaken. Logs of results are kept by IT provider and are available upon request.

**Controlling the Storage of Digital Data:** Personal information is not to be stored on the hard drive of any laptop or PC unless the device is running encryption software. Any new windows devices leaving the premises will have full bitlocker encryption.

The school's Bring Your Own Device policy outlines how data can be accessed and stored on personal devices.

**Password Control:** The school will ensure that data is subject to a robust password protection regime. Currently password minimum length is set to 6 characters and set as a complex requirement. It will remember the previous 24 passwords. Protection against a brute-force attack on all passwords by allowing no more than 5 incorrect password attempts in a 10 minute period. In the event of this, Active directory will lock the account for 30 minutes. Password sharing is not encouraged. Staff are required to lock their PCs when they are away from their desks to prevent unauthorised use.

**Location of Server Equipment:** The school will ensure that the server environment is managed to prevent access by unauthorised people. Servers are in a locked server cabinet.

## **The Storage & Security of Hard Copy Data**

**Storage of Physical Records:** The school recommends that all physical records are stored in filing cabinets, drawers or cupboards. Sensitive physical records should be kept in a lockable storage area. This is to prevent unauthorised access but also to protect against the risk of fire and flooding.

**Unauthorised Access, Theft or Loss:** Staff are encouraged not to take personal data on staff or students out of the school unless there is no alternative. Records held within the school should be in lockable cabinets.

**Clear Desk Policy:** In order to avoid unauthorised access to physical records which contain sensitive or personal information and to protect physical records from fire and/or flood damage, the school operates a clear desk policy. This involves the removal of the physical records to a cupboard or drawer (lockable where appropriate). It does not mean that the desk has to be cleared of all contents.

## **4: Disclosure / Confidentiality**

Staff are made aware of the importance of ensuring that personal information is only disclosed to people who are entitled to receive it and that consideration has been given to the General Data Protection Regulations. This is outlined in the Staff Handbook.

If the school receives a request for information from a third party, then the process outlined in the Third Party Requests for Information Process should be followed.

## **5. Safe Disposal of Records**

The General Data Protection Regulations give individuals the Right to Erasure which means that records should not be kept for any longer than is necessary in relation to the purpose for which it was originally collected/processed (see section 6 Retention Guidelines).

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

- Paper records should be shredded using a cross-cutting shredder
- CDs/DVDs/Floppy Discs should be cut into pieces
- Audio/Video Tapes and Fax Rolls should be dismantled and shredded
- Hard discs should be dismantled and sanded



All equipment is removed from the premises and secure destruction of data is completed offsite (by an approved third party). All records must be shredded on site in the presence of an employee. The disposal company must provide a Certificate of Destruction.

Where an external company is used to destroy hardware, the disposal company must provide a Certificate of Destruction.

## 6. Security Breach

In the event of an incident involving the loss of information or records held by the school, the Data Breach Policy should be followed.

## 7: Retention Guidelines

*This retention schedule is based upon the schedule provided by the Information and Records Management Society (v6 2019). Each Local Authority has their own retention schedule which may differ from these suggestions. Advice should be taken as to whether the LA require your setting to follow their own retention schedule or not.*

This retention schedule contains recommended retention periods for the different records created and maintained by schools in the course of their business. The schedule refers to all information regardless of the media in which it is stored.

Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the Data Protection Act 2018 (DPA).

Managing records using these retention guidelines will be deemed to be 'normal processing' under the legislation mentioned above. If records are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented.

The schedule should be reviewed at least every two years.

## Section 1: Management of the School

1.1 Governing Body					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
1.1.1	Agendas for Governing Body	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of.	SECURE DISPOSAL
1.1.2	Minutes of Governing Body Meetings (principal set – signed)	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		PERMANENT Although generally kept for life of organisation, Local Authority only required to make available for 10 years from date of meeting.	If the school is unable to store these then they should be offered to the County Archives Service.
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the report is dealing with confidential issues relating to staff		Although generally kept for life of organisation, Local Authority only required to make available for 10 years from date of meeting.	SECURE DISPOSAL or retain with the signed set of minutes
1.1.4	Meeting papers relating to annual parents' meeting held under section 33 of the Education Act 2002	Yes	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
1.1.5	Register of attendance at full governing board meetings	Yes		Date of the last meeting in the book + 6 years	SECURE DISPOSAL
1.1.6	Records relating to Governor monitoring visits	Yes		Date of the visit + 3 years	SECURE DISPOSAL
1.1.7	Annual reports required by the DfE	No		Date of report + 10 years	SECURE DISPOSAL

1.1.8	All records relating to the conversion of schools to Academy status	No		For the life of the academy	Consult local archives before disposal
1.1.9	Records relating to complaints made to and investigated by the governing body or head teacher	Yes		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
1.1.10	Correspondence sent and received by the governing body or head teacher	Potential		General correspondence should be retained current + 3 years	SECURE DISPOSAL
1.1.11	Action plans created and administered by the governing body			Until superseded or whilst relevant	SECURE DISPOSAL
1.1.12	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)	
1.1.13	Records relating to the appointment of a clerk to the governing body	Yes		Date on which clerk appointment ceases + 6 years	SECURE DISPOSAL
1.1.14	Records relating to the terms of office of serving governors, including evidence of appointment	Yes		Date appointment ceases + 6 years	

1.1.15	Records relating to governor declaration against disqualification criteria	Yes		Date appointment ceases + 6 years	SECURE DISPOSAL
1.1.16	Register of Business Interests	Yes		Date appointment ceases + 6 years	SECURE DISPOSAL
1.1.17	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	
1.1.18	Records relating to the training required and received by Governors	Yes		Date Governor steps down + 6 years	SECURE DISPOSAL
1.1.19	Records relating to the induction programme for new governors	Yes		Date appointment ceases + 6 years	SECURE DISPOSAL
1.1.20	Records relating to DBS checks carried out on clerk and members of the governing body	Yes		Date of DBS check + 6 months	SECURE DISPOSAL
1.1.21	Governor personnel files	Yes		Date appointment ceases + 6 years	SECURE DISPOSAL

## 1.2 Senior Leadership Team

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
1.2.1	Logbooks of activity in the school maintained by the Head Teacher	There may be data protection issues if the logbook refers to individual members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if

					appropriate.
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then review	SECURE DISPOSAL
1.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + 3 years then review	SECURE DISPOSAL
1.2.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the report refers to individual pupils or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL
1.2.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the report refers to individual pupils or members of staff		Date of correspondence + 3 years then review	SECURE DISPOSAL
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
1.2.7	School Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL

### 1.3 Admissions

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
1.3.1	All records relating to the creation and	No	School Admissions Code for Statutory guidance	Life of the policy + 3 years then review	SECURE DISPOSAL

	implementation of the School Admissions Policy		admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014		
1.3.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL
1.3.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
1.3.4	Register of Admissions	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school  Or

					Transfer to the appropriate County Archives Service
1.3.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
1.3.6	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL
1.3.7	Supplementary Information form including additional information such as religion, medical conditions etc.	Yes			
	For successful admissions			The information should be added to the pupil file	SECURE DISPOSAL
	For unsuccessful admissions			Until appeals process completed (GDPR)	SECURE DISPOSAL

#### 1.4 Operational Administration

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
1.4.1	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
1.4.2	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	SECURE DISPOSAL

1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	SECURE DISPOSAL
1.4.4	Newsletters and other items with a short operational use	No		Current year + 1 year	SECURE DISPOSAL
1.4.5	Visitors' Books and Signing in Sheets, electronic visitors' management systems.	Yes		Last entry + 6 years then REVIEW	SECURE DISPOSAL
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL
1.4.7	School Privacy Notice which is sent to parents as of GDPR compliance			Until superseded + 6 years	
1.4.8	Consents relating to school activities as part of GDPR compliance (for example consent to be sent circulars or mailings)	Yes		Consent will last whilst the pupil attends the school it can therefore be destroyed when the pupil leaves	SECURE DISPOSAL



## Section 2: HR Management of the School

2.1 Recruitment					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
2.1.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS checks	Yes	DBS Update Service Employer Guide June 2014: keeping children safe in education 2019 (Statutory Guidance from Dept. of Education) Sections 73, 74	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months	
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible these should be checked, and a note kept of what has been checked. If it is felt necessary to keep copy documentation, then this should be placed on the member of staff’s personal file	

2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	An employer's guide to right to work checks [Home Office May 2015]	Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately the Home Office requires that the documents are kept for termination of Employment + 2 years	
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## 2.2 Operational Staff Management

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
2.2.1	Staff Personal File	Yes	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
2.2.2	Annual appraisal/assessment records	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Sickness Absence Monitoring	Yes		Keep Separate from accident records.  Where sickness pay is not paid then current year + 3 is acceptable.	

				Where sickness pay is paid, becomes a financial record so current year + 6 applies.	
2.2.4	Staff Training – where training leads to continuing professional development	Yes		Length of time required by the professional body	SECURE DISPOSAL
2.2.5	Staff Training – except where dealing with children e.g. first aid or health and safety	Yes		Retained on the personnel file (Termination of employment + 6 years)	SECURE DISPOSAL
2.2.6	Staff Training - where the training relates to children e.g. safeguarding or other child related training.	Yes		Date of the training + 40years. The IICSA may wish to see training records as part of an investigation	SECURE DISPOSAL

## 2.3 Management of Disciplinary & Grievance Process

### 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 on an important event in the course of the employer's relationship with the employee. Should the same employee be accused on similar misconduct five years down the line, and then 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 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.

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2019"; "Working	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the	SECURE DISPOSAL These records must be shredded

	unfounded		together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018”	longer than 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, then the files will need to be retained until IICSA enquiries are complete.	
2.3.2	Disciplinary Proceedings	Yes			
	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 child protection related, then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL

## 2.4 Payroll and Pensions

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
2.4.1	Absence record	Yes		Current year + 3 years	SECURE DISPOSAL
2.4.2	Batches	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.3	Bonus sheets	Yes		Current year + 3 years	SECURE DISPOSAL
2.4.4	Car allowance claims	Yes		Current year + 3 years	SECURE DISPOSAL
2.4.5	Car loans	Yes		Completion of loan + 6 years	SECURE DISPOSAL
2.4.6	Car mileage output	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.7	Elements	Yes		Current year + 2 years	SECURE DISPOSAL
2.4.8	Income tax form P60	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.9	Insurance	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.10	Maternity Payment	Yes		Current year + 3 years	SECURE DISPOSAL
2.4.11	Members allowance register	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.12	National Insurance schedule of payments	Yes		Current year + 6 years	SECURE DISPOSAL

2.4.13	Overtime	Yes		Current year + 3 years	SECURE DISPOSAL
2.4.14	Part time fee claims	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.15	Pay packet receipt by employee	Yes		Current year + 2 years	SECURE DISPOSAL
2.4.16	Payroll awards	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.17	Payroll – gross/net weekly or monthly	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.18	Payroll reports	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.19	Payslips – copies	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.20	Pension payroll	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.21	Personal bank details	Yes		Until superseded + 3 years If employment ceases then end of employment + 6 years	SECURE DISPOSAL
2.4.22	Sickness Records	Yes		Current year + 3 years	SECURE DISPOSAL
2.4.23	Staff returns	Yes		Current year + 3 years	SECURE DISPOSAL
2.4.24	Superannuation adjustments	Yes		Current year + 6 years	SECURE DISPOSAL

2.4.25	Superannuation reports	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.26	Tax forms P6, P11, P11D, P35, P45, P46, P48	Yes		Corporate decision to retain for current + 6 years	SECURE DISPOSAL
2.4.27	Time sheets, clock cards, flexitime	Yes		Current year + 3 years	SECURE DISPOSAL

## 2.5 Other Personnel Records

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
2.5.1	Volunteer Personnel Records	Yes		Any relevant papers relating to the engagement of volunteers can be retained (as per 2.1) but only for as long as their engagement with the school lasts.	SECURE DISPOSAL
2.5.2	Governor / Trustee Records	Yes		Any relevant papers relating to the engagement of governors can be retained (as per 2.1) but only for their term of office + 1 year.	SECURE DISPOSAL
2.5.3	Third party workers, supply staff etc	Yes		The school should receive written confirmation that all checks have been undertaken, but not copies	SECURE DISPOSAL

				<p>of the evidence, from the employing organisation. Where copies of such documents are received, they must not be retained by the school. The school may retain a copy of the identification documents, but these documents must be destroyed when the individual ceases working at the school.</p>	
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### Section 3: Financial Management of the School

#### 3.1 Risk Management & Insurance

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.1.1	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL

#### 3.2 Asset Management

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL

#### 3.3 Accounts & Statements including Budget Management

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.3.1	Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
3.3.2	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
3.3.3	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statements and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL

3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.6	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.7	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL

### 3.4 Pupil Finance

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.4.1	Student grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
3.4.2	Pupil Premium Grant records	Yes		Date pupil leaves the provision + 6 years	SECURE DISPOSAL

### 3.5 Contract Management

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.5.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on contract + 12 years	SECURE DISPOSAL
3.5.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on contract + 6 years	SECURE DISPOSAL
3.5.3	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL

3.56 School Fund					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.6.1	School fund - Cheque books	No		Current year + 6 years	SECURE DISPOSAL
3.6.2	School fund - Paying in books	No		Current year + 6 years	SECURE DISPOSAL
3.6.3	School fund - Ledger	No		Current year + 6 years	SECURE DISPOSAL
3.6.4	School fund - Invoices	No		Current year + 6 years	SECURE DISPOSAL
3.6.5	School fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
3.6.6	School fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
3.6.7	School fund – Journey Books	No		Current year + 6 years	SECURE DISPOSAL

3.7 School Meals Management					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.7.1	Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.7.2	School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
3.7.3	School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL

## Section 4: Property Management

4.1 Health & Safety					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
4.1.1	Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL
4.1.2	Health and Safety Risk Assessments	No		Life of Risk assessment + 3 years	SECURE DISPOSAL
4.1.3	Accident Reporting (Adults and Children detailed separately below)	Yes	<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 19/9 No 628</p> <p>Social Administration Act 1992 Section 8</p> <p>Social Security (Claims and Payments) Amendment (No 30 Regulations 1993</p>		

			SI 1993 No 2113  Allows the information to be kept electronically		
	Adults (Over 18 years of age at time of incident)	Yes		<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
	Children (Under 18 years of age at time of incident)	Yes		<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</p>	SECURE DISPOSAL

				<p>a further 3 years from the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protect Act 2018 and GDPR</p>	
4.1.4	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>	Yes	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 the incident are held on personnel file	
4.1.5	Control of Substances Hazardous to Health (COSHH)	No	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)	Current year + 40 years	SECURE DISPOSAL
4.1.6	Process of monitoring of areas where employees and persons are likely to have come in to contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
4.1.7	Process of monitoring of areas where employees and persons are likely to have come in to contact	No	The Ionising Radiation Regulations 2017 SI 2017 No 1075	Last action + 50 years	SECURE DISPOSAL

	with radiation		Regulation 11  As amended by SI 2018 No 390 Personal Protective Equipment (Enforcement) Regulations 2018		
4.1.8	Fire precautions logbooks			Current year + 6 years	SECURE DISPOSAL
4.1.9	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	No		Pass to new owner on sale or transfer of building	

## 4.2 Property Management

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
4.2.1	Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry	
4.2.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold	

4.2.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.2.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL

### 4.3 Maintenance

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
4.3.1	All records relating to the maintenance of the school carried out by contractors	No		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	SECURE DISPOSAL
4.3.2	All records relating to the maintenance of the school carried out by school employees including maintenance logbooks	No		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	SECURE DISPOSAL



## Section 5: Pupil Management

**Please note** that any record containing pupil information may be subject to the requirements of 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 or take independent legal advice.

5.1 Pupil's Educational Record					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 As amended by SI 2018 No 688		
	Primary			Retain whilst the child remains at primary school	<p>The files should follow the pupil when he/she leaves the primary school. This will include:</p> <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> <li>• To an independent school</li> <li>• Moving abroad</li> </ul> <p>For those pupils moving to home schooling the file should be returned to the LA.</p>
	Secondary		Limitation Act 1980 (Section	Date of Birth of the pupil +	REVIEW

			2)	25 years	
5.1.2	Examination Results – Pupil Copies	Yes			
	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
	Internal			This information should be added to the pupil file	
5.1.3	Child Protection information held on pupil file	Yes	“Keeping children safe in education Statutory guidance for schools and colleges 2018”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018	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 period as the pupil file. Note: these records will be subject to any instruction given by IICSA	SECURE DISPOSAL – these records MUST be shredded
5.1.4	Child Protection information held in separate files	Yes	“Keeping children safe in education Statutory guidance for schools and colleges 2018”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018	DOB of the child + 25 years then review. 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.	SECURE DISPOSAL – these records MUST be shredded

				Note: These records will be subject to any instruction given by IICSA	
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## 5.2 Attendance

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
5.2.1	Attendance Registers	Yes	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 three years after the date on which the entry was made.	SECURE DISPOSAL
5.2.2	Correspondence relating to any absence (authorised or unauthorised)	Potential	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL

## 5.3 Special Educational Needs

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
5.3.1	Special Educational Needs files, reviews and Health and Care Plan, including advice and information	Yes	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	SECURE DISPOSAL

	provided to parents regarding educational needs and accessibility strategy			age of 25 years – the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act	
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## Section 6: Curriculum Management

6.1 Statistics and Management Information					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination Results (Schools Copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	SATS records -	Yes			
	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 SAT's results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL
	Examination Papers			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self-Evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.6	Internal Moderation	Yes		Academic year + 1 academic year	SECURE DISPOSAL

6.1.7	External Moderation	Yes		Until superseded	SECURE DISPOSAL
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6.2 Implementation of Curriculum					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
6.2.1	Schemes of Work	No		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
6.2.2	Timetable	No		Current Year + 1 year	
6.2.3	Class Record Books	No		Current Year + 1 year	
6.2.4	Mark Books	No		Current Year + 1 year	
6.2.5	Record of Homework set	No		Current Year + 1 year	
6.2.6	Pupil's Work	No		Where possible 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

## Section 7: Extra Curricular Activities

### 7.1 Educational Visits outside the Classroom

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
7.1.1	Parental consent forms for school trips where there has been no major incident	Yes		Although the consent forms could be retained for DOB + 22 years, the school may wish to complete a risk assessment to assess whether the forms are likely to be required and could make a decision 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	
7.1.2	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB 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 the rules had been followed for all pupils	

7.2 Family Liaison Officers and Home School Liaison Assistants					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
7.2.1	Day Books	Yes		Current year + 2 years then review	SECURE DISPOSAL
7.2.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	SECURE DISPOSAL
7.2.3	Referral Forms	Yes		While the referral is current	SECURE DISPOSAL
7.2.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
7.2.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
7.2.6	Group Registers	Yes		Current year + 2 years	SECURE DISPOSAL

7.3 Parent Teacher Associations and Alumni Associations					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
7.3.1	Records relating the creation and management of Parent Teacher Associations and/or Alumni Associations			Current year + 6 years then review	SECURE DISPOSAL



## Section 8: Central Government & Local Authority

### 8.1 Local Authority

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years
8.1.2	Attendance Returns	Yes		Current year + 1 year
8.1.3	School Census Returns	No		Current year + 5 years
8.1.4	Circulars and other information sent from the Local Authority	No		Operational use

### 8.2 Central Government

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period
8.2.1	OFSTED reports and papers	No		Life of the report REVIEW
8.2.2	Returns made to central government	No		Current year + 6 years
8.2.3	Circulars and other information sent from central government	No		Operational use