



Our Lady of Walsingham Catholic Multi Academy Trust Records Management Policy

The Trust 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 each Trust school (hereafter known as “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. It covers:

- Scope
- Responsibilities
- Relationships with existing policies
- Managing pupil records
- Managing staff records
- Retention schedule

1. Scope of the policy

- 1.1 This policy applies to all records created, received or maintained by permanent and temporary staff of the school in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school.
- 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 electronic format e.g. paper documents, scanned documents, e-mails which document business activities and decisions, audio and video recordings, text messages, notes of telephone conversations, spreadsheets, Word documents, presentations etc.

2. Responsibilities

- 2.1 The governing body of the school has a statutory responsibility to maintain the school records and record keeping systems in accordance with the regulatory environment specific to each school. The responsibility is delegated to the Head of School or Headteacher of the school.
- 2.2 The person responsible for day-to-day operational management in the school will give guidance on 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 The school will manage and document its records disposal process in line with the Records Retention Schedule. This will help to ensure that it can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (subject access requests "SARs").
- 2.4 Individual staff and employees must ensure, with respect to records for which they are responsible, that they:
 - 2.4.1 Manage the school's records consistently in accordance with the school's policies and procedures;
 - 2.4.2 Properly document their actions and decisions;
 - 2.4.3 Hold personal information securely;
 - 2.4.4 Only share personal information appropriately and do not disclose it to any unauthorised third party;
 - 2.4.5 Dispose of records securely in accordance with the school's Record Retention Schedule.

3. Responsibilities

- 3.1 The pupil record should be seen as the core record charting an individual pupil's progress through the education system. The pupil record should accompany the pupil to every school they attend and should contain information that is accurate, objective and easy to access.

3.2 Recording information

- 3.2.1 Pupils have a right of access to their educational record under the General Data Protection Regulation. This right exists until the point that the record is destroyed. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

3.3 Opening a file

3.3.1 These guidelines apply to information created and stored in both physical and electronic format.

3.3.2 The pupil record starts its life when a file is opened for each new pupil as they begin school. This is the file which will follow the pupil for the rest of his/her school career. If pre-printed file covers are not being used then the following information should appear on the front of the paper file:

- Surname
- Forename
- DOB
- Unique Pupil Number

3.3.3 It is essential that these files, which contain personal information, are managed against the Trust's information security and business continuity policies.

3.4 Items which should be included on the pupil record

- Record of transfer from Early Years setting
- Admission Form
- Data Collection/Checking Form – current
- Annual written report to parents
- National Curriculum and Religious Education locally agreed syllabus record sheets
- Any information relating to a major incident involving the child
- Statements/Plans, reports, etc. for educational support, e.g. SEN, Speech and Language
- Medical information relevant to the child's on-going education/behaviour
- Child protection reports/disclosures and supporting documentation
- Any information relating to exclusions (fixed or permanent)
- Specific correspondence with parents or outside agencies relating to major issues
- Summary details of complaints made by the parents or the pupil relevant to the child's on-going education/ behaviour
- Examination Results – pupil copy
- SATS Results
- Photography (image) consents (this is the school's record) – this needs to be removed from the file before transferring to another school

3.4.1 The following records should be stored separately to the pupil record as they are subject to shorter retention periods and if they are placed on the file then it will involve a lot of unnecessary weeding of the files before they are transferred to another school.

- Attendance Registers and Information
- Absence (authorised) notes and correspondence
- Parental consent forms for trips/outings
- Accident forms (a copy can be placed on the pupil record if it is a major incident)
- Medicine consent and administering records (this is the school's record)
- Copies of birth certificates, passports, etc.
- Generic correspondence with parents about minor issues (i.e. 'Dear Parent')
- Pupil work, drawings, etc.
- Previous data collection forms which have been superseded

3.5 Transferring the pupil record between schools

3.5.1 The pupil record should not be weeded before transfer between schools unless any records with a short retention period have been placed in the file. It is important to remember that the information which may seem unnecessary to the person weeding the file may be a vital piece of information required at a later stage.

3.5.2 Schools do not need to keep copies of any records in the pupil record 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.

3.5.3 Records can be delivered or collected in person, with signed confirmation for tracking purposes.

3.5.4 Pupil Records should not be sent by post. If the use of post is absolutely necessary, they should be sent by 'Special Delivery Guaranteed' or via a reputable and secure courier to a pre-informed named contact, along with a list of the enclosed files. The new school should sign a copy of the list to confirm receipt of the files and securely return to the previous school.

3.5.5 If held electronically, records may be sent to a named contact via secure encrypted e-mail, or other secure transfer method.

3.6 Responsibility for the pupil record once the pupil leaves the school

3.6.1 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

3.7 Safe destruction of the pupil record

- Pupil records will contain personal and confidential information and so must be destroyed securely
- Electronic copies must be securely deleted, and hard copies disposed of as confidential waste

3.8 Transfer of a pupil record outside the EU area

If a request is received to transfer the Pupil Record or other information about a pupil to a school outside of the European Union (EU), schools should contact the Local Authority or their Data Protection Officer for further advice.

3.9 Storage of pupil records

3.9.1 All pupil records should be kept securely at all times. Paper records, for example, should be kept in lockable storage areas with restricted access, and the contents should be secure within the file. Equally, electronic records should have appropriate security.

3.9.2 Access arrangements for pupil records should ensure that confidentiality is maintained whilst equally enabling information to be shared lawfully and appropriately, and to be accessible for those authorised to see it.

4. Managing staff records

4.1 The principles applied to pupil data equally apply to personal information held and stored about the school's workforce.

4.2 In general, the school holds information about staff that relates to:

- Recruitment and selection
- Employment records
- Pay and pensions
- Monitoring at work, including performance management
- Information about workers health

4.3 The definitive staff file will be retained by the responsible person with the school. This will facilitate disposal and will safeguard sensitive information.

- 4.4 Employee records held in electronic databases will be retained for the same periods as that for the equivalent paper records.

5. Safe Destruction of General Personal Data

- 5.1 Disposal of both physical and digitally held data is to be carried out in line with the Trust retention schedule unless there is a recorded overriding reason why it is necessary to retain the data (e.g. Legal obligation).
- 5.2 All records containing personal information or sensitive policy information must be made unreadable or destroyed in a way where the data cannot be reconstructed (e.g. cross-cut shredder, secure disposal bin).
- 5.3 Hard drives and other digital storage devices that are no longer required, have failed or have reached the end of their serviceable life should be destroyed using secure methods. E.g. shredding or through a certified secure destruction company.
- 5.4 All legacy storage media (e.g. tape, floppy disks, etc.) should be destroyed in the same way as any form of current storage media.

6. Retention guidelines

- 6.1 Our records retention schedule outlines the Trust's specific policy and procedures for holding personal data and to ensure that it is securely disposed of when no longer needed, to reduce the risk that it will become inaccurate, out of date or irrelevant.
- 6.2 Disposal of personal data should be recorded by the school. This record should be retained for future review.

| Governing Body | | | | | |
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| 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 delegation and terms of reference for committees | | Until superseded or whilst relevant [Schools may wish to retain these records for reference purposes in case | These could be offered to the archives if appropriate | |

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| | | | decisions need to be justified] | | |
| 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 attendance at Full governing board meetings | | Date of last meeting 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 Governor Monitoring Visits | | Date of the visit + 3 years | SECURE DISPOSAL | Yes |
| 1.1.15 | Annual Reports required by the DoE | | Date of report + 10 years | SECURE DISPOSAL | |

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| 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 headteacher | | 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 | | | | | |
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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal 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 | | Date of DBS check + 6 months | SECURE DISPOSAL | Yes |

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| | members of the governing body | | | | |
| 1.2.9 | Governor personnel files | | Date appointment ceases + 6 years | SECURE DISPOSAL | Yes |

| Management of the School | | | | | |
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| 2.1 Headteacher 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 |

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| 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 | |
| 2.1.5 | Correspondence created by headteachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | | Current year + 3 years | SECURE DISPOSAL | |
| 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 | |
| 2.1.7 | School development plans | | Life of the plan + 3 years | SECURE DISPOSAL | |

| 2.2 Operational Administration | | | | | |
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| | 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, | | Last entry in the visitor book + 6 years (in case of claims by | SECURE DISPOSAL | Yes |

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| | visitor books and signing-in sheets) | | parents or pupils about various actions). | | |
| 2.2.8 | Walking bus registers | | Date of register + 6 years | SECURE DISPOSAL | Yes |
| 2.2.9 | Single Central Record | ISA guidelines | Keep until school closure | Consider transferring to Archives or SHRED or delete securely | Yes |

| 2.3 Human Resources | | | | | |
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| Recruitment | | | | | |
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 2.3.1 | All records leading up to the appointment of a headteacher | | <p>Unsuccessful candidates - date of appointment plus 6 months.</p> <p>Successful candidates - 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</p> | SECURE DISPOSAL | Yes |
| 2.3.2 | All records leading up to the appointment of a staff governor – unsuccessful | | Date of appointment of successful candidate + 6 months | SECURE DISPOSAL | Yes |

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| 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 |
| 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 |

| Operational Staff Management | | | | | |
|-------------------------------------|-------------------------------------|------------------------------------|--|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 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 complete | SECURE DISPOSAL | Yes |
| 2.3.7 | Annual appraisal/assessment records | | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.8 | Sickness absence monitoring | | 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. 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 | SECURE DISPOSAL | Yes |

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| | | | 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 | | |
| 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 |
| 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 |

| Disciplinary & Grievance Processes | | | | | |
|------------------------------------|---|---|---|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 2.3.12 | Records relating to any allegation of a child protection nature against a member of staff | <p>“Keeping children safe in education Statutory guidance for schools and colleges September 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>Until the person’s normal retirement age or 10 years from the date of the allegation (whichever is the longer) then REVIEW.</p> <p>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</p> | <p>SECURE DISPOSAL</p> <p>These records must be shredded</p> | Yes |
| 2.3.13 | Disciplinary proceedings | | | | Yes |
| | Oral warning | | Date of warning + 6 months | SECURE DISPOSAL | |

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| | Written warning – level 1 | | Date of warning + 6 months | [If warnings are placed on personal files then they must be weeded from the file] | |
| | 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 | |

| Payroll & Pensions | | | | | |
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| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 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 | Current year + 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 |

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| 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 |
| 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 |

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| 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 |
| 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 |

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| 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 |
| | Superannuation reports | Taxes Management Act 1970 Income and Corporation Taxes1988 | 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 |
| 2.3.40 | Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 . | | Current year + 6 years | SECURE DISPOSAL | Yes |

| 2.4 Health & Safety | | | | | |
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| | 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 book 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>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 |

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| | | <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> | | | |
| 2.4.4 | <p>Accident reporting records relating to individuals who are under 18 years of age at the time of the incident</p> | <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</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 in line with the Data Protection Act 2018 and GDPR</p> | SECURE DISPOSAL | Yes |

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|-------|---|---|---|-----------------|-----|
| | | 30) Regulations 1993 SI 1993 No 2113 Allows the information to be kept electronically | | | |
| 2.4.5 | Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For further information see following link: http://www.hse.gov.uk/RIDDOR | 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 |
| 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. | The Ionising Radiation Regulations 2017. SI 2017 No 1075 Regulation 11 As amended by SI 2018 No 390 | 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. | SECURE DISPOSAL | |

| | | | | | |
|--------|--|--|--|-----------------|--|
| | Maintenance records or controls, safety features and PPE ----- Dose assessment and recording | Personal Protective Equipment (Enforcement) Regulations 2018 | ----- 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 | | |
| 2.4.9 | Fire Precautions log books | | Current year + 3 years | SECURE DISPOSAL | |
| 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 | | | | | |
|--|--|----------------------|--|---|----------------------|
| Risk Management & Insurance | | | | | |
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 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 | | | | | |
|-------------------------|--|----------------------|--------------------------------|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 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 & Statements (including Budget Management) | | | | | |
|--|---|----------------------|---|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 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 | |
| 2.5.6 | All records relating to the creation and management of budgets, including the annual budget statement and background 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 | |

| Pupil Finance | | | | | |
|----------------------|----------------------------|----------------------|---|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 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 |

| Contract Management | | | | | |
|----------------------------|---|----------------------|---|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 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 | |

School Fund

| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|--------|-------------------------------|----------------------|--------------------------------|--|----------------------|
| 2.5.15 | School Fund - Cheque books | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.16 | School Fund - Paying in books | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.17 | School Fund – Ledger | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.18 | School Fund – Invoices | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.19 | School Fund – Receipts | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.20 | School Fund - Bank statements | | Current year + 6 years | SECURE DISPOSAL | |
| 2.5.21 | School Fund – Journey Books | | Current year + 6 years | SECURE DISPOSAL | |

| School Meals Management | | | | | |
|--------------------------------|---|----------------------|--------------------------------|--|----------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 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 | | | | | |
|--------------------------------|--|----------------------|--|--|----------------------|
| Property Management | | | | | |
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 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

| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-------|--|----------------------|--|--|----------------------|
| 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 | |

Pupil Management

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 | Yes |
| 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 admission 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 |

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|---------|---|--|--|---|-----|
| 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 into the admissions register must be preserved for a period of 3 years after the date the entry was made | REVIEW Schools may wish to consider keeping the register permanently as an archive record as they often receive enquiries from past students regarding the dates they were in attendance | |
| 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 |
| 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: To another primary school To a secondary school To a pupil referral unit | |
| 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 | | |
| 3.2.3 | Child Protection information held in the 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 kept on the pupil file these should be stored in a sealed envelope and then retained for the same amount of time as the pupil file.</p> <p>Note: These records will be subject to any instruction given by the IICSA</p> | <p>SECURE DISPOSAL</p> <p>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 the information will be found on the Local Authority Social Services record.</p> <p>Note: These records will be subject to any instruction given by the IICSA</p> | <p>SECURE DISPOSAL</p> <p>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 |
| 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 |

Curriculum & 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 | | <p>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.</p> <p>The school may wish to keep a composite record of all of the whole year's SATs results. These could be kept for current year + 6 years to allow suitable comparison</p> | 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 |

| | | | | | |
|---------|---------------------------------|--|---------------------------------|-----------------|-----|
| 4.1.4 | 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 + 1 academic year | SECURE DISPOSAL | Yes |
| 4.1.5.2 | External moderation | | Until superseded | SECURE DISPOSAL | Yes |
| 4.1.6 | Curriculum Development | | Current year + 6 years | SECURE DISPOSAL | |
| 4.1.7 | Schools Syllabus | | Current year + 1 year | SECURE DISPOSAL | |

| 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 | | <p>Although the consent forms could be retained for DOB + 22 years, the school may wish to complete a risk assessment to assess if the forms are going to be required and could decide to destroy them at the conclusion of the trip or the end of the academic year.</p> <p>This is a pragmatic approach and is suggested the school seek legal advice if they are unsure</p> | SECURE DISPOSAL | Yes |
| 4.3.2 | Parental consent forms for school trips - where there has been a major incident | Limitation Act 1980 (Section 2) | <p>Date of birth of the pupil involved in the incident + 25 years. The permission slips for all the pupils on the trip</p> <p>need to be retained to show that the rules had been followed for all pupils.</p> | SECURE DISPOSAL | Yes |

| 4.4 School Support Organisations | | | | | |
|---|--|-----------------------------|---|---|-----------------------------|
| Family Liaison Officers and Home School Liaison Assistants | | | | | |
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 4.4.1 | Day books | | Current year + 2 years then review | SECURE DISPOSAL | Yes |
| 4.4.2 | 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 |
| 4.4.3 | Referral forms | | While the referral is current | SECURE DISPOSAL | Yes |
| 4.4.4 | Contact data sheets | | Current year then review, if contact is no longer active then destroy | SECURE DISPOSAL | Yes |
| 4.4.5 | Contact database entries | | Current year then review, if contact is no longer active then destroy | SECURE DISPOSAL | Yes |
| 4.4.6 | Group registers | | Current year + 2 years | SECURE DISPOSAL | Yes |
| 4.4.7 | CAFs | | Current year + 6 years | SECURE DISPOSAL | Yes |

| Parent Teacher Associations and Old Pupils Associations | | | | | |
|--|---|-----------------------------|---------------------------------------|---|-----------------------------|
| | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 4.4.7 | Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations | | Current year + 6 years then review | SECURE DISPOSAL | |

| 5 Central Government 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 | |