



GODALMING LEARNING PARTNERSHIP

# Information Management Policy & Records Retention Schedule

## Oct 2022

*New policy prepared after training sessions with the IRMS and using a recommended model as a basis.*

| Document control   |                             | POLICY LEVEL: Non-Statutory |   |
|--------------------|-----------------------------|-----------------------------|---|
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| 1.0                | 09 May 2022                 | R Dunnage                   | First Published Version: Reflects IRMS Guidance Feb 2020 Addition of Sections 2, 3, 5, 8, 10, 11. Expanded S. 4, 6 and 12.<br>Includes a NEW Internal Review Procedure & Retention Schedule bespoke to GLP. |

This policy has been written with consideration given to schools' working practices. By adopting this Godalming Learning Partnership model policy, schools reduce their policy management workload.

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## 1. Introduction

- 1.1. **Witley C of E Infant** school is committed to maintaining the confidentiality of information we hold about pupils, parents, staff and volunteers. In line with the requirements of the General Data Protection Regulation (GDPR), the GLP has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were originally intended.
- 1.2. This policy outlines how information will be processed, stored, accessed, monitored, retained and disposed of, to meet the Trust's statutory requirements to comply with the General Data Protection Regulation and other relevant statutory legislation.
- 1.3. Information assets (or 'records') are defined as all documents and materials, regardless of format, which facilitate the activities carried out by the Trust. These records may be created, received and maintained in hard copy or electronically (including emails).
- 1.4. The GLP will manage records in line with the Records Retention Schedule, to ensure that it can meet Freedom of Information requests and respond to data subject access requests under the GDPR and other financial or legal requirements.
- 1.5. The retention periods are based on the latest guidance from the Information Records Management Society (IRMS) and are not an exhaustive list of records that may be kept by schools. Where the IRMS has not provided guidance for disposal methods or retention periods, good practice recommendations have been provided. Schools should consult the GLP Data Protection Officer for further guidance.

## 2. Definitions

- 2.1. 'Headteacher' refers to the role of Head of School, Headteacher and Executive Headteacher
- 2.2. 'School' refers to **Witley C of E Infant** school
- 2.3. 'Pupil' refers to all pupils on roll

## 3. Legal Framework and related Policies

- 3.1. This policy has due regard to the following legislation and guidance including, but not limited to, the following:
  - General Data Protection Regulation (2016)
  - Freedom of Information Act 2000
  - Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
  - Data Protection Act 2018
  - The Education (Independent School Standards) Regulations 2014 (with reference to educational record)
  - Information Records Management Society 'Information Management Toolkit for Schools' 2020
- 3.2. The following policies also apply
  - E Safety Policy
  - Data Protection & GDPR Policy (Including Data Breaches Procedure)
  - Privacy Notices
  - Acceptable Use Policy (Staff)
  - Staff Code of Conduct
  - Safeguarding and Child Protection Policy
  - HR Policies including Grievance, Disciplinary and Capability

## 4. Responsibilities

- 4.1. **Witley C of E Infant** school has a corporate responsibility to maintain its records and records management systems in accordance with legislation.
- 4.2. The GLP Data Protection Officer is responsible for providing guidance and advice on good records management practice and promoting compliance with this policy. Such guidance is formulated within the context of existing school policies and guidelines regarding data protection, national legislation and sector-wide standards.
- 4.3. The Headteacher is responsible for ensuring this policy is implemented and that all records are stored securely, in accordance with the retention periods outlined, recorded, and are disposed of correctly.
- 4.4. The Headteacher may delegate to the Data Protection Lead in their school the responsibility for maintaining the information asset register (IAR) and the record of processing activity (RoPA) in accordance with per Article 30 of GDPR and steps 2–5 of the Department for Education (DfE) Data Protection Toolkit for Schools. The GLP's Information & Documentation Processing Record template fulfils the requirements of these two documents.
- 4.5. It is essential that all records have an identified Information Asset Owner (IAO) whose responsibility it is to ensure records are managed in accordance with school's Data Protection Policies and the GDPR.
- 4.6. The Data Protection Officer will provide support and guidance to schools to ensure the Information & Documentation Processing Record is kept up to date. Maintaining the Record is not a one-off activity and the document needs to be regularly reviewed.
- 4.7. Records containing Personally Identifiable Information (PII) must be identified in the school's Information & Documentation Processing Record to ensure the school meets its obligations under GDPR to have a current data map. For example, 'HR records' would be entered, outlining the data fields, the purpose for processing/ retention, the IAO, location, and retention. This information must be reviewable by the school's Data Protection Lead to ensure that data sources are managed in line with policy and can be identified in the event of a Data Subject Access Request.
- 4.8. All staff are responsible for ensuring that any records for which they are responsible or which they process are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.
- 4.9. The school's onboarding and offboarding procedures will ensure managed access to systems and records. This should include limits on how users access the resources, which user actions can be performed, and what resources users can access.
- 4.10. As individuals in schools often have access to personal or sensitive data, training will be provided to ensure that they are aware of the associated risks, their responsibilities (including confidentiality responsibilities), and the consequences of unauthorised access or disclosure. Training will be given to staff, volunteers and contractors and a record of their training maintained.

## 5. Storage and security

- 5.1. As a general principle, the GLP favours electronic storage of information, in order to:
  - a) assist data sharing where appropriate
  - b) ensure access to information by authorized users
  - c) ensure availability of information in the event of disaster recovery or business continuity
  - d) minimise duplication of data e.g. information stored in a school's management information system will not also be printed and stored in a paper file.

- 5.2. The school's Acceptable Use Policy for Staff details measures to ensure safe and secure storage and access to electronic records and should be read in conjunction with this policy.
- 5.3. Schools must ensure that key information is securely stored and can still be accessed in the event of a data breach including loss of access due to fire or flood or malware, to limit any loss or theft of data.
- 5.4. It is strongly recommended that schools should store key information in DfE approved enterprise-level cloud storage such as Microsoft Office or G Suite, to ensure access in the event of school closures.
- 5.5. Confidential paper records must be kept in a locked filing cabinet, drawer or safe, with restricted access. They must not be left unattended or in clear view when held in a location with general access.
- 5.6. Use of memory sticks is strongly discouraged. Schools must liaise with their IT Manager if exceptional circumstances require them to be used, such as large image files, and any memory stick must be encrypted with secure password access.
- 5.7. All electronic devices must be password-protected to protect the information on the device in case of theft.
- 5.8. All members of staff are provided with their own secure login and password which must not be divulged to anyone else.
- 5.9. All staff members should implement a clear desk policy to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer or safe with restricted access.
- 5.10. Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of school containing sensitive information should be supervised at all times.
- 5.11. The physical security of the school's buildings and storage systems, and access to them, is reviewed by the School Business Manager, the Designated Safeguarding Lead and the DPO to evaluate the risks of vandalism, burglary or theft, safeguarding risk or data security and provide guidance on measures to reduce risk accordingly.

## 6. Email

- 6.1. Staff and governors must not use their own personal email addresses for school purposes.
- 6.2. The consequences of an e-mail containing sensitive information being sent to an unauthorised person can result in a fine of up to 20 million euros (or equivalent in sterling) or restrictions on processing from the Information Commissioner, along with adverse publicity for your school. Confidential or sensitive information should be sent by a secure encrypted e-mail or data transfer system. Personal information (such as a pupil's name) should never be used in the subject line of an e-mail.
- 6.3. Circular emails to parents should in preference be sent using third-party communication systems to ensure security of recipients. The school uses **Arbor** for this purpose. Where emails must be sent, they must be sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 6.4. E-mail systems are commonly used to store information which should be stored somewhere else. E-mail and attachments that needs to be kept should be identified by content, for example: *Does it form part of a pupil record? Is it part of a contract? Does it relate to an employee?* They should then be saved into an appropriate electronic filing system. Where the text of the e-mail adds to the context or value of the attached documents, it may be necessary to keep the whole e-mail. Information contained within e-mails may need to be transferred or logged in the appropriate place (e.g., the management information system (MIS) or behaviour management system). Once this is done, the original should be deleted.
- 6.5. The retention period for keeping information held as email files should correspond with the types of records found in the Records Retention Schedule below.

- 6.6. All staff should adopt best practice guidance and routinely delete emails over 12 months old. This will assist greatly in reducing the amount of information potentially disclosable in the event that a subject access request is received.

## **7. Confidentiality**

- 7.1. It may be appropriate to label records or archives as 'Confidential'. This does not exempt the record from being admissible under the Freedom of Information Act 2000.
- 7.2. The school takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.
- 7.3. E-mails may be disclosed in response to a Freedom of Information or Subject Access Request and in legal cases. Electronic messages can be legally binding.
- 7.4. Before sharing data, staff must always ensure that:
- They have consent from data subjects to share it.
  - Adequate security is in place to protect it.
  - The data recipient has been outlined in a privacy notice.

## **8. Information Audit**

- 8.1. The Data Protection Officer will conduct an information audit on an annual basis with the school's Data Protection Lead (the School Business Manager) against all information held by the school to evaluate the information each is holding, receiving and using, and to ensure that this is correctly managed in accordance with the GDPR. The audit may involve interviews or questionnaires with key operational staff to identify information and information flows which may include the following:
- Paper documents and records
  - Electronic documents and records
  - Databases
  - Sound recordings
  - Video and photographic records
  - Hybrid files, containing both paper and electronic information
  - Archives and archive logs

## **9. Data Gathering and Storage**

- 9.1. Information will only be gathered and stored for specified purposes.
- 9.2. In order to be able to respond to requests for information the school will implement effective records management practices to enable staff to identify whether data is held and, if it is, locate it quickly and easily.
- 9.3. Administrators and managers are strongly recommended to create electronic filing systems (folders) which reflect the categories below in order to ensure efficient management of records on an ongoing basis and timely disposal as required.
- 9.4. Where information is held in third party systems e.g. SIMS, there is no requirement to also hold a paper copy and the duplication of records is not considered good practice.
- 9.5. All records must be securely stored. Schools must risk assess those records held only in paper format, assessing the risks of loss of access, for example through fire or theft, in particular those records of a confidential nature, such as personnel records and consider appropriate back up.
- 9.6. Electronic records must be backed up whether through DfE approved enterprise-level cloud storage such as

## 10. Publication Scheme

- 10.1. The school will adopt and publish the appropriate model publication scheme, as recommended by the DfE, Information Commissioner and approved by school governors.

## 11. Dealing with Requests for Information

- 11.1. Theoretically any request for information is a request under the Freedom of Information Act, however this school has taken the decision that it will not consider any request that forms part of the normal pattern of work to be a Freedom of Information request. Only those requests which are considered to be outside the normal remit of the service provided will be recorded as Freedom of Information requests.
- 11.2. The school will assist applicants in making their request to have access to information held by the school.
- 11.3. Assistance will be given to applicants whose requests need to be transferred to another public authority (e.g. school, council, hospital).
- 11.4. The school will exercise its duty to confirm or deny the existence of requested data, subject to any exemptions that may apply.
- 11.5. The school aims to supply data requested within 20 working days (or in line with the Information Commissioner's current policy during school holidays), subject to any exemptions that may apply, and the estimated cost of complying with the request falling within the current defined charge limit.
- 11.6. If a response will take longer than 10 working days to respond an acknowledgement will be sent to the person making the request, informing them when the information will be supplied.
- 11.7. There is no charge for making a Freedom of Information Act request. However, if we estimate that it would cost more than £450 (calculated at 18 hours work at a flat rate of £25 per hour) to retrieve the information, we are entitled to refuse your request. The rules on charging and fees are set out in section 12 of the Act and in the Freedom of Information and Data Protection Appropriate Limit and Fees Regulations 2004.
- 11.8. We may charge for photocopying and other direct costs. The first £15 of photocopying will be undertaken free of charge, and after that we may charge you 10 pence per page. We will always let you know in advance if there are costs associated with your request that we will look to recover.
- 11.9. A designated member of staff (the School Business Manager) will be responsible for ensuring requests are fulfilled within the stipulated deadline and recording details of the request on the school's Information Requests Record.
- 11.10. Persons requesting data will be supplied with a copy of our complaints procedure upon request. Any complaints regarding Freedom of Information requests must firstly be addressed by the school. If, once we have had opportunity to reconsider our decision, we believe the initial response was correct, the applicant shall be entitled to take the matter to the Information Commissioner's Office and, ultimately, to an Information Tribunal.
- 11.11. Copies of data supplied will be retained for two years from the date it was put into the public domain.

## 12. Applying Exemptions

- 12.1. A full list of exemptions can be found at the Information Commissioner's website. There are two types of exemption – absolute and qualified. In practice there are very few which are likely to be applied by the education sector.
- 12.2. The decision to apply absolute exemptions will not be taken by individual members of staff but by a constituted group of at least three of the following: a governor, Headteacher, Deputy Headteacher, Data Protection Officer.

- 12.3. The decision to apply qualified exemptions will not be taken by individual members of staff but by a constituted group of at least three of the following: a governor, Headteacher, Deputy Headteacher, Data Protection Officer. Even if the group decides information should not be disclosed, a public interest test will be carried out when applying qualified exemptions, to decide whether the public interest in disclosure outweighs the objection to disclosure. If it does the information must be disclosed.
- 12.4. Advice will be sought from the Local Authority's Legal Services if there is any doubt as to whether information should be disclosed.

### **13. Logging Requests Received**

- 13.1. The school will keep a record of all requests received for monitoring purposes, noting:
  - the date the request was received,
  - name and contact details of the person or organisation making the request
  - the date the request was fulfilled or refused,
  - the reason for any exemption being applied,
  - the reason for any failure to meet the 20 day deadline.

### **14. Retention Schedule**

- 14.1. The retention schedule refers to records, regardless of the media in which they are stored.
- 14.2. Managing records against the retention schedule is deemed to be "normal processing" under the General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000. Members of staff should be aware that once a Freedom of Information request is received or a legal hold imposed, then records disposal must be stopped.
- 14.3. 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 General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000.
- 14.4. Managing records using these retention guidelines will be deemed to be "normal processing" under the legislation mentioned above. If record series are to be kept for longer or shorter periods than those laid out in this document, the reasons for this need to be documented in each school's Information & Documentation Log.

### **15. Disposal of Data**

- 15.1. All paper records produced through the day-to-day operations of the school containing personal identifying information must be disposed of by secure destruction e.g. via crosscut shredder.
- 15.2. Where the Retention Schedule mentions SECURE DISPOSAL, this must be via a confidential waste disposal service which provides confidential waste bins, or via crosscut shredder.
- 15.3. All schools must keep an electronic log of archived records, held and managed by the school Data Protection Lead. The log must record the date and method of secure destruction of records due for destruction at the end of the requisite retention period.
- 15.4. Data Protection Leads are responsible for risk assessing whether records normally due for destruction, e.g. complaints records, should be retained for longer and recording this on the archives log.
- 15.5. School IT technicians can provide support and guidance to schools regarding secure disposal of computer and electronic records through approved recycling services.



## 16. Transferring Pupil Records

- 16.1. Where a pupil transfers to a new school, it is vital to ensure swift transfers of information to the new school to ensure appropriate decisions can be made regarding a pupil, using relevant and accurate information.
- 16.2. The pupil record should not be weeded before transfer, unless any duplicates or records with a short retention period have been included; these can be removed and securely destroyed.
- 16.3. The following should be transferred to the next school within 15 school days of receipt of confirmation that a pupil is registered at another school:
  - Common Transfer File (CTF) from the School Information Management System via the school2school system, when used
  - Any elements of the pupil record, held in any format, not transferred as part of the CTF
  - SEN or other support service information, including behaviour, as only limited information may be included in the CTF
- 16.4. Child protection information must be securely delivered as soon as possible by the Designated Safeguarding Lead (DSL) or a member of their team to their equivalent at the new school.
- 16.5. Schools must ensure the information is kept secure and traceable during transfer. Pupil records should not be sent by post, even Special Delivery. They may be delivered or collected in person, with signed confirmation.
- 16.6. If held electronically, records may be sent to a named contact via secure encrypted email, or other secure transfer method
- 16.7. If the pupil is transferring to an independent school or a post-16 establishment, the existing school/college should transfer copies of relevant information only and retain the original full record as the last known school.
- 16.8. 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), the school seek written consent from the parent prior to forwarding any information to the new school and should retain a copy of the original full record as the last known school.

## 17. Monitoring and Review

- 17.1. This policy will be reviewed every two years by the GLP Data Protection Officer or when best practice guidance is updated.

*End*

[Appendix 1](#) Internal Review Process

[Appendix 2](#) Records Retention Schedule April 2022

The Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR) provide you with the right of access to information held by Witley C of E Infant school. The school will make every effort to ensure that requests are answered promptly and professionally. However, if you are not satisfied, you have the right to request a review into the response that you have received regarding your request for information or to complain about our handling of your request. There is a legal requirement under the EIR for public authorities to have an internal review procedure in place. The Information Commissioner's Office (ICO) recommends that it is good practice for authorities to also have a review process for Freedom of Information Act (FOIA) requests, and consequently the school has adopted this procedure for dealing with reviews into, or complaints about, requests dealt with under the FOIA.

In this procedure, 'complaint' refers to an expression of dissatisfaction with the school's compliance with the above legislation or a request for an internal review of the decision to withhold information in response to a request to access recorded information held by the School.

### *What can you request a review about?*

- i.** Complain about the way we handled your request
- ii.** Our failure to respond within 20 working days following the date of receipt, excluding any day which is not a school day (equates to a period of 20 school days) or 60 working days, whichever is the shorter period; or to explain why longer than this timescale was required.
- iii.** Our failure to provide proper advice and assistance.
- iv.** Our failure to provide information in the requested format.
- v.** Our failure to properly explain any reasons for refusing the request.
- vi.** If you disagree with our interpretation of your request.
- vii.** Request an internal review about a decision to:
  - a. Refuse access to information.
  - b. Withhold some or all of the information requested.

### *What can't you request a review about?*

- i.** Not liking the answer you have received, for example, a report shows the school's expenditure, and you think more / less should have been spent on some items.

If you are unhappy with the implications of the information provided to you, you will need to discuss this with the Headteacher or Chair of Governors outside of the FOIA / EIR process.

### *How do I request a review or complain about your handling of my request?*

You must put your request for an internal review or complaint about our handling of your request in writing. Please send this to the school via the office, email: [office@witley.surrey.sch.uk](mailto:office@witley.surrey.sch.uk)

Your request should be made within 40 working days after receipt of our response. Unless there are extenuating circumstances, requests made more than 40 working days after the response will not be considered.

Please clearly explain the reasons why you disagree with our response or are dissatisfied with our handling of your request. You may provide supporting evidence if applicable, and any information provided will be used to help assess your request.

### *What can I expect?*

- i.** Your request for a review of our response, or the handling of it, will be considered free of charge.
- ii.** It will be acknowledged promptly and within 5 school days of receipt.
- iii.** You will be informed of the target date for a response.
- iv.** Requests for review of responses to, or the handling of, requests will be dealt with as soon as possible, and in

any event, within 20 working days following the date of receipt, excluding any day which is not a school day (this effectively equates to a period of 20 school days); or 60 working days, whichever is the shorter period, in accordance with the FOI Code of Practice.

- v.** In exceptional circumstances (for example, the review is complex, requires consultation with third parties or the relevant information is of a high volume) it may be necessary to extend the deadline for response. Any extension will be for no more than an additional 20 working days. If this is the case, you will be informed and given an explanation of the delay, and a new deadline will be confirmed.
- vi.** The review of responses to, or the handling of, requests, will be dealt with in a fair and impartial manner. As such the review will be undertaken by a panel of 2 nominated governors who did not deal with your original request.
- vii.** The governors on the reviewing panel will be supported by the Data Protection Officer to ensure correct understanding of FOIA and EIR legislation.
- viii.** The reviewing panel will make a fresh decision based on all available evidence at the date of your request. As part of this process, the panel may need to consult with the member of staff that provided the information originally.
- ix.** The reviewing panel will make a decision about the validity of the exemptions applied, and whether the school has complied with its statutory duties. The panel will let the requester know, in writing, the outcome of the review, giving a full explanation.

#### *Possible Outcome Action that will be taken*

- i.** *Information should be disclosed which was previously withheld:* The information in question will be provided as soon as practicable and you will be informed how soon this will be.
- ii.** *Procedures have not been properly followed by the school:* An apology will be provided. Appropriate steps will be taken to prevent similar errors occurring in future. Any recommendations to improve our internal processes to prevent a future occurrence will be made to the Governing Body / Headteacher.
- iii.** *The initial decision to withhold information is upheld, or otherwise, in the School's favour:* You will be informed of the decision and the reasons for this, and told about your right to appeal to the ICO. Please note that abuse of the review procedure, such as repeated requests for review, where there are insufficient grounds, following every request made, may be considered vexatious or unreasonable behaviour.

#### *What can I do if I am not satisfied with the response?*

If your request for a review of our response, or handling of this, is not resolved to your satisfaction, you have the right of appeal to the ICO for a decision.

The ICO can be contacted as follows:

The Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
**W:** [www.ico.org.uk](http://www.ico.org.uk)  
**T:** 0303 123 1113



# Records Retention Schedule

## Appendix 2

## Records Retention Schedule April 2022

| Document control          |                           | POLICY LEVEL: Non-Statutory |   |
|---------------------------|---------------------------|-----------------------------|---|
| <b>Approval level</b>     | Governing Body            | <b>Approved Date</b>        |   |
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| 1.0                       | April 2022                | R Dunnage (DPO)             | First Published Version: Reflects IRMS 2019 & LA guidance which has been updated to reflect legislation changes up to April 2022. |

### Introduction

This Retention Schedule is based on the guidelines set out in the Institute of Records Management Society's Toolkit for schools 2019. It has been cross-checked with the Local Authority expectations and updated to reflect the legislation in place in April 2022 e.g. UK GDPR, the 2022 Keeping Children Safe in Education (KCSIE).

### Guidance

This document should be used with reference to the school's Information Management Policy.

Records can include electronic information; there is no requirement to retain duplicate records in electronic and paper format and doing so would not meet the data minimisation requirements of the UK GDPR.

### Organisation and Storage

Staff are strongly recommended to create electronic filing systems (folders) which reflect the categories below in order to ensure efficient management of records on an ongoing basis and timely disposal as required.

Where information is held in third party systems, e.g. Arbor, there is no requirement to also hold a paper copy and the duplication of records is not considered good practice.

All records must be securely stored. Schools must risk assess those records held only in paper format, assessing the risks of loss of access, for example through fire or theft, in particular those records of a confidential nature, such as personnel records and consider appropriate back up.

Confidential waste disposal or crosscut shredders must be used for the secure disposal of records where required.

### Review

This Schedule will be reviewed every 2 years as part of the bi-annual review of data protection policies and documents.

### Glossary

EHCP = Education, Health & Care Plan

IICSA = Independent Inquiry into Child Sexual Abuse

KCSIE = Keeping Children Safe in Education 2022

SEND = Special Educational Needs & Disabilities

# Records Retention Schedule

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# Records Retention Schedule

## 1. Governing Body

This section contains retention periods connected to the work and responsibilities of the governing body.

For further information about governing body records, see: “The constitution of governing bodies of maintained schools: Statutory guidance for governing bodies of maintained schools and local authorities in England August 2017”

| 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 decisions need to be justified]  | These could be offered to the archives if appropriate  |                      |
| 1.1.7                            | Meetings schedule   |                      | Current year  | STANDARD DISPOSAL                                      |                      |

## Records Retention Schedule

|        | Basic file description   | Statutory Provisions | Retention Period [Operational]   | Action at end of the administrative life of the record | Personal Information |
|--------|--|----------------------|--|--|----------------------|
| 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  |                      |
| 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 headteacher |                      | <b>Major</b> complaints: current year + 6 yrs;<br>If <b>negligence</b> involved then: current year + 15 yrs;<br>If <b>child protection or safeguarding</b> issues are involved then: current year + 40 yrs | SECURE DISPOSAL  | Yes                  |

## Records Retention Schedule

|        | Basic file description   | Statutory Provisions | Retention Period [Operational]                                       | Action at end of the administrative life of the record | Personal Information |
|--------|--|----------------------|--|--|----------------------|
| 1.1.18 | Correspondence sent and received by the governing body or head teacher |                      | General correspondence should be retained for current year + 3 years | SECURE DISPOSAL  | Potential            |
| 1.1.19 | Action plans created and administered by the governing body            |                      | Until superseded or whilst relevant                                  | SECURE DISPOSAL  |                      |
| 1.1.20 | Policy documents created and administered by the governing body        |                      | Until superseded   |  |                      |

| 1.2 Governor Management |   |                      |   |  |                      |
|-------------------------|---|----------------------|---|--|----------------------|
|                         | 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                  |



## Records Retention Schedule

|       | Basic file description  | Statutory Provisions | Retention Period [Operational]    | Action at end of the administrative life of the record | Personal Information |
|-------|---|----------------------|-----------------------------------|--|----------------------|
| 1.2.7 | Records relating to the induction programme for new governors                         |                      | Date appointment ceases + 6 years | SECURE DISPOSAL  | Yes                  |
| 1.2.8 | Records relating to DBS checks carried out on clerk and members of the governing body |                      | Date of DBS check + 6 months      | SECURE DISPOSAL  | Yes                  |
| 1.2.9 | Governor personnel files  |                      | Date appointment ceases + 6 years | SECURE DISPOSAL  | Yes                  |

## 2. Management of the School

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

| 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                                      | Logbooks 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            |

## Records Retention Schedule

|       | Basic file description   | Statutory Provisions | Retention Period [Operational]   | Action at end of the administrative life of the record | Personal Information |
|-------|--|----------------------|--|--|----------------------|
| 2.1.4 | Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities which do not fall under any other category |                      | Current academic year + 6 years then review annually, or as required if not destroyed                      | SECURE DISPOSAL  | Potential            |
| 2.1.5 | Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities                                     |                      | Current year + 3 years   | SECURE DISPOSAL  | Potential            |
| 2.1.6 | Professional development plans   |                      | These should be held on the individual's personnel record. If not then termination of employment + 6 years | SECURE DISPOSAL  | Potential            |
| 2.1.7 | School development plans   |                      | Life of the plan + 3 years   | SECURE DISPOSAL  |                      |

| 2.1 Operational Administration |  |                      |                                     |  |                      |
|--------------------------------|--|----------------------|-------------------------------------|--|----------------------|
|                                | Basic file description   | Statutory Provisions | Retention Period [Operational]      | Action at end of the administrative life of the record                         | Personal Information |
| 2.2.1                          | General file series which do not fit under any other category                              |                      | Current year + 5 years, then review | SECURE DISPOSAL  | Potential            |
| 2.2.2                          | Records relating to the creation and publication of the school brochure or prospectus      |                      | Current academic year + 3 years     | The school could preserve a copy for their archive otherwise STANDARD DISPOSAL |                      |
| 2.2.3                          | Records relating to the creation and distribution of circulars to staff, parents or pupils |                      | Current academic year + 1 year      | STANDARD DISPOSAL  |                      |

## Records Retention Schedule

|       | Basic file description   | Statutory Provisions | Retention Period [Operational]   | Action at end of the administrative life of the record | Personal Information |
|-------|--|----------------------|--|--|----------------------|
| 2.2.4 | School Privacy Notice which is sent to parents as part of UK GDPR compliance   |                      | Until superseded + 6 years   |  |                      |
| 2.2.5 | Consents relating to school activities as part of UK GDPR compliance (for example, consent to be sent circulars or mailings) |                      | Consent will last whilst the pupil attends the school, it can therefore be destroyed when the pupil leaves | SECURE DISPOSAL  | Yes                  |
| 2.2.6 | Newsletters and other items with a short operational use   |                      | Current academic year + 1 year [Schools may decide to archive one copy]                                    | STANDARD DISPOSAL                                      |                      |
| 2.2.7 | Visitor management systems (including electronic systems, visitors books and signing-in sheets)                              |                      | Last entry in the visitors book + 6 years (in case of claims by parents or pupils about various actions).  | SECURE DISPOSAL  | Yes                  |
| 2.2.8 | Walking bus registers  |                      | Date of register + 6 years   | SECURE DISPOSAL  | Yes                  |

### 2.3 Human Resources

|                    | Basic file description  | Statutory Provisions | Retention Period [Operational]  | Action at end of the administrative life of the record | Personal Information |
|--------------------|---|----------------------|---|--|----------------------|
| <b>Recruitment</b> |   |                      |   |  |                      |
| 2.3.1              | All records leading up to the appointment of a headteacher  |                      | Unsuccessful attempts. Date of appointment plus 6 months.<br><br>Add to personnel file and retain until end of appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years | SECURE DISPOSAL  | Yes                  |
| 2.3.2              | All records leading up to the appointment of a member of staff/governor – unsuccessful candidates |                      | Date of appointment of successful candidate + 6 months  | SECURE DISPOSAL  | Yes                  |

## Records Retention Schedule

|                                     | Basic file description  | Statutory Provisions  | Retention Period [Operational]  | Action at end of the administrative life of the record | Personal Information |
|-------------------------------------|---|---|---|--|----------------------|
| 2.3.3                               | Pre-employment vetting information – DBS Checks – successful candidates   | DBS Update Service Employer Guide; KCSIE (Statutory Guidance from DoFE) | 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                             | Where possible these documents should be added to the staff personnel file [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of employment + not less than 2 years | SECURE DISPOSAL  | Yes                  |
| <b>Operational Staff Management</b> |   |   |   |  |                      |
|                                     | 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 are complete    | SECURE DISPOSAL  | Yes                  |
| 2.3.7                               | Annual appraisal/ assessment records  |   | Current year + 6 years  | SECURE DISPOSAL  | Yes                  |

## Records Retention Schedule

|        | Basic file description  | Statutory Provisions | Retention Period [Operational]   | Action at end of the administrative life of the record | Personal Information |
|--------|---|----------------------|--|--|----------------------|
| 2.3.8  | Sickness absence monitoring   |                      | <p>Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records.</p> <p>It could be argued that where sickness pay is not paid then current year + 3 years is acceptable, whilst if sickness pay is made then it becomes a financial record and current year + 6 years applies. The actual retention may depend on the internal auditors. Most seem to accept current year + 3 years as being acceptable as this gives them, 'benefits' and Inland Revenue time to investigate if they need to</p> | SECURE DISPOSAL  | Yes                  |
| 2.3.9  | Staff training – where the training leads to continuing professional development                            |                      | Length of time required by the professional body   | SECURE DISPOSAL  | Yes                  |
| 2.3.10 | Staff training – except where dealing with children, e.g. first aid or health and safety                    |                      | This should be retained on the personnel file [see 2.3.1 above]  | SECURE DISPOSAL  | Yes                  |
| 2.3.11 | Staff training – where the training relates to children (e.g. safeguarding or other child related training) |                      | <p>Date of the training + 40 years</p> <p>[This retention period reflects that the IICSA may wish to see training records as part of an investigation]</p>   | SECURE DISPOSAL  | Yes                  |

# Records Retention Schedule

## Disciplinary and Grievance Processes

Where schools are in any doubt as to which categories disciplinary records fall under, then HR or legal advice should be sought from the Local Authority.

|        | 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 | KCSIE;<br>Working together to safeguard children:<br>A guide to inter-agency working to safe-guard and promote the welfare of children. | Until the person’s normal retirement age or 10 years from the date of the allegation (whichever is the longer) then REVIEW.<br>Note: allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned UNLESS the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete | SECURE DISPOSAL<br>These records must be shredded      | Yes                  |

**Note:**

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

Any disciplinary proceedings data will be a record of an important event in the course of the employer’s relationship with the employee. Should the same employee be accused of similar misconduct five years down the line, and 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 and then claim at tribunal that he or she had “fifteen years of unblemished service”, the record of the disciplinary proceedings would be effective evidence to counter this claim.

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

|        |                          |  |  |  |     |
|--------|--------------------------|--|--|--|-----|
| 2.3.13 | Disciplinary proceedings |  |  |  | Yes |
|--------|--------------------------|--|--|--|-----|

## Records Retention Schedule

|  |                              |  |   |   |  |
|--|------------------------------|--|---|---|--|
|  | Oral warning                 |  | Date of warning<br>+ 6 months   | SECURE DISPOSAL<br>[If warnings are placed on personal files then they must be weeded from the file |  |
|  | Written warning<br>– level 1 |  | Date of warning<br>+ 6 months   |   |  |
|  | Written warning<br>– level 2 |  | Date of warning<br>+ 12 months  |   |  |
|  | Final warning                |  | Date of warning<br>+ 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 and Pensions

|        |                      |  |                                 |                 |     |
|--------|----------------------|--|---------------------------------|-----------------|-----|
| 2.3.14 | Absence record       |  | Current year<br>+ 3 years       | SECURE DISPOSAL | Yes |
| 2.3.15 | Batches              | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years          | SECURE DISPOSAL | Yes |
| 2.3.16 | Bonus sheets         | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year<br>+ 3 years       | SECURE DISPOSAL | Yes |
| 2.3.17 | Car allowance claims | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year<br>+ 3 years       | SECURE DISPOSAL | Yes |
| 2.3.18 | Car loans            | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Completion of loan<br>+ 6 years | SECURE DISPOSAL | Yes |
| 2.3.19 | Car mileage output   | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years          | SECURE DISPOSAL | Yes |

## Records Retention Schedule

|        |          |  |                        |                 |     |
|--------|----------|--|------------------------|-----------------|-----|
| 2.3.20 | Elements |  | Current year + 2 years | SECURE DISPOSAL | Yes |
|--------|----------|--|------------------------|-----------------|-----|



## Records Retention Schedule

|        | Basic file description                    | Statutory Provisions   | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|--------|---|--|--------------------------------|--|----------------------|
| 2.3.21 | Income tax form P60                       |  | Current year + 6 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.22 | Insurance                                 | Taxes Management Act 1970<br>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<br>Income and Corporation Taxes 1988 | Current year + 6 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.25 | National Insurance – schedule of payments | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.26 | Overtime                                  | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 3 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.27 | Part time fee claims                      | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.28 | Pay packet receipt by employee            |  | Current year + 2 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.29 | Payroll awards                            |  | Current year + 6 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.30 | Payroll – gross/net weekly or monthly     | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.31 | Payroll reports                           | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.32 | Payslips – copies                         | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years         | SECURE DISPOSAL  | Yes                  |

## Records Retention Schedule

|                             | Basic file description                 | Statutory Provisions   | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-----------------------------|--|--|--------------------------------|--|----------------------|
| <b>Payroll and Pensions</b> |  |  |                                |  |                      |
| 2.3.33                      | Pension payroll                        | Taxes Management Act 1970<br>Income and Corporation Taxes 1988   | Current year + 6 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.34                      | Personal bank details                  | If employment ceases then end of employment + 6 years  | Until superseded + 3 years     | SECURE DISPOSAL  | Yes                  |
| 2.3.35                      | Sickness records                       |  | Current year + 3 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.36                      | Staff returns                          |  | Current year + 3 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.37                      | Superannuation adjustments             | Taxes Management Act 1970<br>Income and Corporation Taxes 1988   | Current year + 6 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.38                      | Superannuation reports                 | Taxes Management Act 1970<br>Income and Corporation Taxes 1988   | Current year + 6 years         | SECURE DISPOSAL  | Yes                  |
| 2.3.39                      | 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                  |
| 2.3.40                      | Time sheets/clock cards/flexitime      |  | Current year + 3 years         | SECURE DISPOSAL  | Yes                  |

## Records Retention Schedule

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

## Records Retention Schedule

| 2.4 Health and Safety |  |  |  |  |                      |
|-----------------------|--|--|--|--|----------------------|
|                       | Basic file description   | Statutory Provisions   | Retention Period [Operational]   | Action at end of the administrative life of the record | Personal Information |
| 2.4.4                 | Accident reporting records relating to individuals who are under 18 years of age at the time of the incident   | <p>Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</p> <p>Social Security (Claims and Payments) Regulations 1979.</p> <p>SI 1979 No 628</p> <p>Social Security (Claims and Payments) Regulations SI 1987 No 1968</p> <p>Revokes all but Part 1 of SI 1979 No 628</p> <p>Social Security Administration Act 1992 Section 8.</p> <p>Social Security (Claims and Payments) Amendment (No 30 Regulations 1999 SI 1993 No 2113</p> <p>Allows the information to be kept electronically</p> | <p>The Accident Book – BI 510 - 3 years after last entry in the book</p> <p>This includes the new format to be used from 1/1/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protection Act 2018 and UK GDPR</p> | SECURE DISPOSAL  | Yes                  |
| 2.4.5                 | Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see <a href="http://www.hse.gov.uk/RIDDOR/">http://www.hse.gov.uk/RIDDOR/</a> | <p>Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471</p> <p>Regulation 12(2)</p>  | <p>Date of incident + 3 years provided that all records relating to the incident are held on personnel file [see 2.4.2 above]</p>  | SECURE DISPOSAL  | Yes                  |

## Records Retention Schedule

|        | Basic file description  | Statutory Provisions  | Retention Period [Operational]  | Action at end of the administrative life of the record | Personal Information |
|--------|---|---|---|--|----------------------|
| 2.4.6  | Control of Substances Hazardous to Health (COSHH)   | Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made.<br>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<br>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.<br>Maintenance records or controls, safety features and PPE<br><br>-----<br>Dose assessment and recording | The Ionising Radiation Regulations 2017.<br>SI 2017 No 1075<br>Regulation 11<br><br>As amended by SI 2018 No 390<br>Personal Protective Equipment (Enforcement) Regulations 2018  | 2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination.<br><br>-----<br>To keep the records made and maintained (or a copy of these records) until the person to whom the record relates has or would have attained the age of 75 years, but in any event for at least 30 years from when the record was made | SECURE DISPOSAL  |                      |
| 2.4.9  | Fire Precautions logbooks   |   | 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   |  |                      |

## Records Retention Schedule

| 2.5 Financial Management                                     |   |                      |   |   |                      |
|--|---|----------------------|---|---|----------------------|
|  | Basic file description  | Statutory Provisions | Retention Period [Operational]                                | Action at end of the administrative life of the record                      | Personal Information |
| <b>Risk Management and Insurance</b>                         |   |                      |   |   |                      |
| 2.5.1  | Employer's Liability Insurance Certificate  |                      | Closure of the school + 40 years [May be kept electronically] | SECURE DISPOSAL<br>To be passed to the Local Authority if the school closes |                      |
| <b>Asset Management</b>                                      |   |                      |   |   |                      |
| 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   |                      |
| <b>Accounts and Statements (including budget management)</b> |   |                      |   |   |                      |
| 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   |                      |

## Records Retention Schedule

|                            | Basic file description  | Statutory Provisions | Retention Period [Operational]            | Action at end of the administrative life of the record | Personal Information |
|----------------------------|---|----------------------|---|--|----------------------|
| <b>Pupil Finance</b>       |   |                      |   |  |                      |
| 2.5.10                     | Student Grant applications  |                      | Current year + 3 years                    | SECURE DISPOSAL  | Yes                  |
| 2.5.11                     | Pupil Premium Fund records  |                      | Date pupil leaves the provision + 6 years | SECURE DISPOSAL  | Yes                  |
| <b>Contract Management</b> |   |                      |   |  |                      |
| 2.5.12                     | All records relating to the management of contracts under seal      | Limitation Act 1980  | Last payment on the contract + 12 years   | SECURE DISPOSAL  |                      |
| 2.5.13                     | All records relating to the management of contracts under signature | Limitation Act 1980  | Last payment on the contract + 6 years    | SECURE DISPOSAL  |                      |
| 2.5.14                     | Records relating to the monitoring of contracts                     |                      | Life of contract + 6 or 12 years          | SECURE DISPOSAL  |                      |
| <b>School Fund</b>         |   |                      |   |  |                      |
| 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  |                      |

## Records Retention Schedule

|                                | Basic file description  | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|--------------------------------|---|----------------------|--------------------------------|--|----------------------|
| <b>School Meals Management</b> |   |                      |                                |  |                      |
| 2.5.22                         | Free school meals registers (where the register is used as a basis for funding) |                      | Current year + 6 years         | SECURE DISPOSAL  | Yes                  |
| 2.5.23                         | School meals registers  |                      | Current year + 3 years         | SECURE DISPOSAL  | Yes                  |
| 2.5.24                         | School meals summary sheets   |                      | Current year + 3 years         | SECURE DISPOSAL  | Yes                  |

| <b>2.6 Property Management</b> |  |                      |  |  |                      |
|--------------------------------|--|----------------------|--|--|----------------------|
|                                | Basic file description                             | Statutory Provisions | Retention Period [Operational]   | Action at end of the administrative life of the record | Personal Information |
| <b>Property Management</b>     |  |                      |  |  |                      |
| 2.6.1                          | Title deeds of properties belonging to the school  |                      | These should follow the property unless the property has been registered with the Land Registry  |  |                      |
| 2.6.2                          | Plans of property belonging to the school          |                      | These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10 |  |                      |
| 2.6.3                          | Leases of property leased by or to the school      |                      | Expiry of lease + 6 years  | SECURE DISPOSAL  |                      |
| 2.6.4                          | Records relating to the letting of school premises |                      | Current financial year + 6 years   | SECURE DISPOSAL  |                      |



## Records Retention Schedule

|                    | Basic file description  | Statutory Provisions | Retention Period [Operational]   | Action at end of the administrative life of the record | Personal Information |
|--------------------|---|----------------------|--|--|----------------------|
| <b>Maintenance</b> |   |                      |  |  |                      |
| 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 logbooks |                      | 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  |                      |

### 3. Pupil Management

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

| <b>3.1 Admissions Process</b> |   |   |  |  |                      |
|-------------------------------|---|---|--|--|----------------------|
|                               | 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<br>Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels 2021 | Life of the policy + 3 years then review | SECURE DISPOSAL  |                      |
| 3.1.2                         | Admissions – if the admission is successful   | School Admissions Code<br>Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels 2021 | Date of admission + 1 year               | SECURE DISPOSAL  | Yes                  |

## Records Retention Schedule

|         | Basic file description  | Statutory Provisions  | Retention Period [Operational]   | Action at end of the administrative life of the record   | Personal Information |
|---------|---|---|--|--|----------------------|
| 3.1.3   | Admissions – if the appeal is unsuccessful  | School Admissions Code<br>Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels 2021 | Resolution of case<br>+ 1 year   | SECURE DISPOSAL  | Yes                  |
| 3.1.4   | Register of Admissions  | School Admissions Code<br>Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels 2021 | Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made | REVIEW<br>Schools may wish to consider keeping the admission register permanently as an archive record as often schools receive enquiries from past pupils to confirm the dates they attended the school or to transfer these records to the appropriate County Archives Service |                      |
| 3.1.5   | Admissions – Secondary Schools – Casual   |   | Current year<br>+ 1 year   | SECURE DISPOSAL  | Yes                  |
| 3.1.6   | Proofs of address supplied by parents as part of the admissions process                                   | School Admissions Code<br>Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels 2021 | Current year<br>+ 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 (UK GDPR)  | SECURE DISPOSAL  |                      |

## Records Retention Schedule

| 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 |
| Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice. |   |  |   |  |                      |
| 3.2.1   | Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 | The Education (Pupil Information) (England) Regulations<br>2005 SI 2005 No. 1437<br>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:<br>To another primary school<br>To a secondary school<br>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    |  |                      |

## Records Retention Schedule

|       | Basic file description                              | Statutory Provisions   | Retention Period [Operational]   | Action at end of the administrative life of the record | Personal Information |
|-------|---|--|--|--|----------------------|
| 3.2.3 | Child protection information held on pupil file     | “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 of time as the pupil file.<br>Note: These records will be subject to any instruction given by IICSA   | SECURE DISPOSAL<br>These records must be shredded      | Yes                  |
| 3.2.4 | Child protection information held in separate files | KCSIE;<br>Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children   | DOB of the child + 25 years then review<br><br>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<br><br>Note: These records will be subject to any instruction given by IICSA | SECURE DISPOSAL<br>These records must be shredded      | Yes                  |

## Records Retention Schedule

| 3.3 Attendance  |   |  |  |  |                      |
|---|---|--|--|--|----------------------|
|   | Basic file description  | Statutory Provisions   | Retention Period [Operational]   | Action at end of the administrative life of the record | Personal Information |
| Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice. |   |  |  |  |                      |
| 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 & Disabilities  |   |   |  |  |                      |
|---|---|---|--|--|----------------------|
|   | Basic file description  | Statutory Provisions  | Retention Period [Operational]   | Action at end of the administrative life of the record | Personal Information |
| Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice. |   |   |  |  |                      |
| 3.4.1   | Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy | Children and Family's Act 2014; Special Educational Needs and Disability Act 2001<br>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                  |

# Records Retention Schedule

## 4. Curriculum and Extra Curricular Activities

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

| 4.1 Statistics and Management Information |  |                      |  |  |                      |
|---|--|----------------------|--|--|----------------------|
|   | Basic file description                   | Statutory Provisions | Retention Period [Operational]   | Action at end of the administrative life of the record | Personal Information |
| 4.1.1                                     | Curriculum returns                       |                      | Current year + 3 years   | SECURE DISPOSAL  | No                   |
| 4.1.2                                     | Examination Results (school's copy)      |                      | Current year + 6 years   | SECURE DISPOSAL  | Yes                  |
| 4.1.2.1                                   | SATS records                             |                      |  |  | Yes                  |
| 4.1.2.2                                   | Results                                  |                      | The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years.<br><br>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 | 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 plus 1 academic year   | SECURE DISPOSAL  | Yes                  |
| 4.1.5.2                                   | External moderation                      |                      | Until superseded   | SECURE DISPOSAL  | Yes                  |

| 4.2 Implementation of Curriculum |                          |                      |   |  |                      |
|----------------------------------|--------------------------|----------------------|---|--|----------------------|
|                                  | Basic file description   | Statutory Provisions | Retention Period [Operational]  | Action at end of the administrative life of the record   | Personal Information |
| 4.2.1                            | Schemes of work          |                      | Current year + 1 year   | It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL |                      |
| 4.2.2                            | Timetable                |                      | Current year + 1 year   |  |                      |
| 4.2.3                            | Class record books       |                      | Current year + 1 year   |  |                      |
| 4.2.4                            | Mark books               |                      | Current year + 1 year   |  |                      |
| 4.2.5                            | Record of home- work set |                      | Current year + 1 year   |  |                      |
| 4.2.6                            | Pupil's work             |                      | Where possible, the pupil's work should be returned to the pupil at the end of the academic year. If this is not the school's policy then current year + 1 year | SECURE DISPOSAL  |                      |

| 4.3 School trips |  |                      |  |  |                      |
|------------------|--|----------------------|--|--|----------------------|
|                  | Basic file description   | Statutory Provisions | Retention Period [Operational]   | Action at end of the administrative life of the record | Personal Information |
| 4.3.1            | Parental consent forms for school trips where there has been no major incident |                      | Although the consent forms could be retained for Date of birth + 22 years, the school may wish to complete a risk assessment to assess whether the forms are likely to be required and could 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 | SECURE DISPOSAL  | Yes                  |

|       |  |                                 |   |                 |     |
|-------|--|---------------------------------|---|-----------------|-----|
| 4.3.2 | Parental permission slips for school trips – where there has been a major incident | Limitation Act 1980 (Section 2) | Date of birth of the pupil involved in the incident + 25 years<br><br>The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils | SECURE DISPOSAL | Yes |
|-------|--|---------------------------------|---|-----------------|-----|

#### 4.4 School Support Organisations

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

##### Family Liaison Officers and Home School Link Workers

|       |  |  |   |                 |     |
|-------|--|--|---|-----------------|-----|
| 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 |

##### Parent Teacher Associations and Old Pupils Associations

|       |   |  |                                    |                 |  |
|-------|---|--|------------------------------------|-----------------|--|
| 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

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

| 5.1 Local Authority |   |                      |                                |  |                      |
|---------------------|---|----------------------|--------------------------------|--|----------------------|
|                     | Basic file description  | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 5.1.1               | Secondary Transfer Sheets (primary)                           |                      | Current year + 2 years         | SECURE DISPOSAL  | Yes                  |
| 5.1.2               | Attendance returns  |                      | Current year + 1 year          | SECURE DISPOSAL  | Yes                  |
| 5.1.3               | School census returns   |                      | Current year + 5 years         | SECURE DISPOSAL  |                      |
| 5.1.4               | Circulars and other information sent from the local authority |                      | Operational use                | SECURE DISPOSAL  |                      |

| 5.2 Central Government |  |                      |                                |  |                      |
|------------------------|--|----------------------|--------------------------------|--|----------------------|
|                        | Basic file description                                       | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
| 5.2.1                  | OFSTED reports and papers where a physical copy is held      |                      | Life of the report then review | SECURE DISPOSAL  |                      |
| 5.2.2                  | Returns made to central government                           |                      | Current year + 6 years         | SECURE DISPOSAL  |                      |
| 5.2.3                  | Circulars and other information sent from central government |                      | Operational use                | SECURE DISPOSAL  |                      |

End