



Data Records and Management Policy

June 2023

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

1: Scope of the Policy

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

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

2: Responsibilities

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

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

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

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

3: Information Security & Business Continuity

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

The Storage & Security of Digital Data

Back Up System: The school will undertake regular back-ups of all information held electronically to enable restoration of the data in the event of an environmental or data corruption incident. The school digital backup is provided by Redstor.

The school tests that data can be restored from a back-up on a bi-monthly basis.

Controlling the Storage of Digital Data: Personal information is not to be stored on the hard drive of any laptop or PC unless the device is running encryption software.

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

Password Control: The school will ensure that data is subject to a robust password protection regime in which passwords are changed every 90 days. Password sharing is not encouraged. Staff are required to lock their PCs when they are away from their desks to prevent unauthorised use.

Location of Server Equipment: The school will ensure that the server environment is managed to prevent access by unauthorised people. The servers are in locked rooms and monitored by the IT Network Technician.

The Storage & Security of Hard Copy Data

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

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

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

4: Disclosure / Confidentiality

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

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

5. Safe Disposal of Records

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

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

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

All records are collected by Goodwins, using confidential waste bins and are shredded off site. The disposal company must provide a Certificate of Destruction.

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

6. Security Breach

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

7: Retention Guidelines

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

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

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

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

The schedule should be reviewed at least every two years.

Section 1: Management of the School

| 1.1 Governing Body | | | | | |
|--------------------|---|--|----------------------|---|--|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 1.1.1 | Minutes of Governing Body Meetings (principal set – signed) | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | | PERMANENT Although generally kept for life of organisation, Local Authority only required to make available for 10 years from date of meeting. | If the school is unable to store these then they should be offered to the County Archives Service. |
| 1.1.2 | Reports presented to the Governing Body | There may be data protection issues if the report is dealing with confidential issues relating to staff | | Although generally kept for life of organisation, Local Authority only required to make available for 10 years from date of meeting. | SECURE DISPOSAL or retain with the signed set of minutes |
| 1.1.3 | Register of attendance at full governing board meetings | Yes | | Date of the last meeting in the book + 6 years | SECURE DISPOSAL |
| 1.1.4 | Records relating to Governor monitoring visits | Yes | | Date of the visit + 3 years | SECURE DISPOSAL |
| 1.1.5 | Annual reports required by the DfE | No | | Date of report + 10 years | SECURE DISPOSAL |
| 1.1.6 | All records relating to the conversion of schools to Academy status | No | | For the life of the | Consult local archives before disposal |
| 1.1.7 | Records relating to complaints made to and investigated by the governing body or head teacher | Yes | | Major complaints: current year + 6 years. If negligence involved, then: current year + 15 years. If child protection or safeguarding issues are | SECURE DISPOSAL |

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| | | | | involved, then: current year + 40 years | |
| 1.1.8 | Correspondence sent and received by the governing body or head teacher | Potential | | General correspondence should be retained current + 3 years | SECURE DISPOSAL |
| 1.1.9 | Action plans created and administered by the governing body | | | Until superseded or whilst relevant | SECURE DISPOSAL |
| 1.1.10 | Policy documents created and administered by the governing body | | | Until superseded (the school should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the IICSA has issued its recommendations) | |
| 1.1.11 | Records relating to the appointment of a clerk to the governing body | Yes | | Date on which clerk appointment ceases + 6 years | SECURE DISPOSAL |
| 1.1.12 | Records relating to the terms of office of serving governors, including evidence of appointment | Yes | | Date appointment ceases + 6 years | |
| 1.1.13 | Records relating to governor declaration against disqualification criteria | Yes | | Date appointment ceases + 6 years | SECURE DISPOSAL |
| 1.1.14 | Register of Business Interests | Yes | | Date appointment ceases + 6 years | SECURE DISPOSAL |
| 1.1.15 | Records relating to the training required and received by Governors | Yes | | Date Governor steps down + 6 years | SECURE DISPOSAL |

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|--------|---|-----|--|-----------------------------------|-----------------|
| 1.1.16 | Records relating to the induction programme for new governors | Yes | | Date appointment ceases + 6 years | SECURE DISPOSAL |
| 1.1.17 | Records relating to DBS checks carried out on clerk and members of the governing body | Yes | | Date of DBS check + 6 months | SECURE DISPOSAL |
| 1.1.18 | Governor personnel files | Yes | | Date appointment ceases + 6 years | SECURE DISPOSAL |

1.2 Senior Leadership Team

| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
|-------|--------------------------------|------------------------|----------------------|-----------------------------|---------------------------------------|
| 1.2.1 | Professional Development Plans | Yes | | Life of then plan + 6 years | SECURE DISPOSAL |
| 1.2.2 | School Development Plans | No | | Life of the plan + 3 years | SECURE DISPOSAL |

1.3 Admissions

| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
|-------|---|------------------------|--|--|---------------------------------------|
| 1.3.1 | All records relating to the creation and implementation of the School Admissions Policy | No | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014 | Life of the policy + 3 years then review | SECURE DISPOSAL |
| 1.3.2 | Admissions – if the admission is successful | Yes | School Admissions Code Statutory guidance for | Date of admission + 1 year | SECURE DISPOSAL |

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|-------|---|-----|--|--|--|
| | | | admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014 | | |
| 1.3.3 | Admissions – if the appeal is unsuccessful | Yes | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014 | Resolution of case + 1 year | SECURE DISPOSAL |
| 1.3.4 | Register of Admissions | Yes | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014 | Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made | REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school Or Transfer to the appropriate County Archives Service |
| 1.3.5 | Admissions – Secondary Schools – Casual | Yes | | Current year + 1 year | SECURE DISPOSAL |
| 1.3.6 | Proofs of address supplied by parents as part of the admissions process | Yes | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014 | Current year + 1 year | SECURE DISPOSAL |

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|-------|---|-----|--|---|-----------------|
| 1.3.7 | Supplementary Information form including additional information such as religion, medical conditions etc. | Yes | | | |
| 1.3.8 | For successful admissions | | | The information should be added to the pupil file | SECURE DISPOSAL |
| 1.3.9 | For unsuccessful admissions | | | Until appeals process completed (GDPR) | SECURE DISPOSAL |

| 1.4 Operational Administration | | | | | |
|--------------------------------|---|------------------------|----------------------|---|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 1.4.1 | General file series | No | | Current year + 5 years then REVIEW | SECURE DISPOSAL |
| 1.4.2 | Newsletters and other items with a short operational use | No | | Current year + 1 year | SECURE DISPOSAL |
| 1.4.3 | Visitors' Books and Signing in Sheets, electronic visitors' management systems. | Yes | | Last entry + 6 years then | SECURE DISPOSAL |
| 1.4.4 | Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations | No | | Current year + 6 years then REVIEW | SECURE DISPOSAL |
| 1.4.5 | School Privacy Notice which is sent to parents as of GDPR compliance | | | Until superseded + 6 years | |
| 1.4.6 | Consents relating to school activities as part of GDPR compliance (for example | Yes | | Consent will last whilst the pupil attends the school it can therefore be destroyed when the pupil leaves | SECURE DISPOSAL |

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| | consent to be sent circulars or mailings) | | | | |
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Section 2: HR Management of the School

| 2.1 Recruitment | | | | | |
|-----------------|--|------------------------|--|---|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 2.1.1 | All records leading up to the appointment of a new headteacher | Yes | | Date of appointment + 6 years | SECURE DISPOSAL |
| 2.1.2 | All records leading up to the appointment of a new member of staff – unsuccessful candidates | Yes | | Date of appointment of successful candidate + 6 months | SECURE DISPOSAL |
| 2.1.3 | All records leading up to the appointment of a new member of staff – successful candidate | Yes | | All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months | SECURE DISPOSAL |
| 2.1.4 | Pre-employment vetting information – DBS checks | Yes | DBS Update Service Employer Guide June 2014: keeping children safe in education 2021 (Statutory Guidance from Dept. of Education) Sections 230 - 233 | The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months | |
| 2.1.5 | Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure | Yes | | Where possible these should be checked, and a note kept of what has been checked. If it is felt necessary to keep copy documentation, then this should be placed on the member of staff’s personal file | |

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

| 2.2 Operational Staff Management | | | | | |
|----------------------------------|-------------------------------------|------------------------|---------------------------------|--|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 2.2.1 | Staff Personal File | Yes | Limitation Act 1980 (section 2) | Termination of Employment + 6 years Unless the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case, then the file will need to be retained until IICSA enquiries are complete. | SECURE DISPOSAL |
| 2.2.2 | Annual appraisal/assessment records | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.2.3 | Sickness Absence Monitoring | Yes | | Keep Separate from accident records. Where sickness pay is not paid then current year + 3 is acceptable. | |

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

2.3 Management of Disciplinary & Grievance Process

Note:

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

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

| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
|-------|---|------------------------|---|--|---|
| 2.3.1 | Allegation of a child protection nature against a member of staff including where the allegation is unfounded | Yes | “Keeping children safe in education Statutory guidance for schools and colleges September 2021”; “Working together to safeguard children. | Until the person’s normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note | SECURE DISPOSAL These records must be shredded |

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| | | | A guide to inter-agency working to safeguard and promote the welfare of children 2018” | allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned UNLESS the member of staff is part of any case which falls under the terms of reference of IICSA, then the files will need to be retained until IICSA enquiries are complete. | |
| 2.3.2 | Disciplinary Proceedings | Yes | | | |
| | Oral warning | | | Date of warning + 6 months | SECURE DISPOSAL After the active period, the warning will remain permanently on the employee's personnel file but will be disregarded in deciding the outcome of future disciplinary proceedings. |
| | Written warning | | | Date of warning + 6 months | |
| | Final warning | | | Date of warning + 12 months | |
| | Case not found | | | If the incident is child protection related, then see above otherwise dispose of at the conclusion of the case | |
| | | | | | SECURE DISPOSAL |

| 2.4 Payroll and Pensions | | | | | |
|--------------------------|----------------|------------------------|----------------------|------------------------|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 2.4.1 | Absence record | Yes | | Current year + 3 years | SECURE DISPOSAL |
| 2.4.2 | Batches | Yes | | Current year + 6 years | SECURE DISPOSAL |

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|--------|---|-----|--|------------------------------|-----------------|
| 2.4.3 | Bonus sheets | Yes | | Current year + 3 years | SECURE DISPOSAL |
| 2.4.4 | Car allowance claims | Yes | | Current year + 3 years | SECURE DISPOSAL |
| 2.4.5 | Car loans | Yes | | Completion of loan + 6 years | SECURE DISPOSAL |
| 2.4.6 | Car mileage output | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.4.7 | Elements | Yes | | Current year + 2 years | SECURE DISPOSAL |
| 2.4.8 | Income tax form P60 | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.4.9 | Insurance | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.4.10 | Maternity Payment | Yes | | Current year + 3 years | SECURE DISPOSAL |
| 2.4.11 | Members allowance register | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.4.12 | National Insurance schedule of payments | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.4.13 | Overtime | Yes | | Current year + 3 years | SECURE DISPOSAL |
| 2.4.14 | Part time fee claims | Yes | | Current year + 6 years | SECURE DISPOSAL |

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|--------|---|-----|--|--|-----------------|
| 2.4.15 | Pay packet receipt by employee | Yes | | Current year + 2 years | SECURE DISPOSAL |
| 2.4.16 | Payroll awards | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.4.17 | Payroll – gross/net weekly or monthly | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.4.18 | Payroll reports | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.4.19 | Payslips – copies | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.4.20 | Pension payroll | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.4.21 | Personal bank details | Yes | | Until superseded + 3 years If employment ceases then end of employment+ 6 years | SECURE DISPOSAL |
| 2.4.22 | Sickness Records | Yes | | Current year + 3 years | SECURE DISPOSAL |
| 2.4.23 | Staff returns | Yes | | Current year + 3 years | SECURE DISPOSAL |
| 2.4.24 | Superannuation adjustments | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.4.25 | Superannuation reports | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.4.26 | Tax forms P6, P11, P11D, P35, P45, P46, P48 | Yes | | Corporate decision to retain for current+ 6 years | SECURE DISPOSAL |

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|--------|-------------------------------------|-----|--|------------------------|-----------------|
| 2.4.27 | Time sheets, clock cards, flexitime | Yes | | Current year + 3 years | SECURE DISPOSAL |
|--------|-------------------------------------|-----|--|------------------------|-----------------|

| 2.5 Other Personnel Records | | | | | |
|-----------------------------|---------------------------------------|------------------------|----------------------|---|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 2.5.1 | Volunteer Personnel Records | Yes | | Any relevant papers relating to the engagement of volunteers can be retained (as per 2.1) but only for as long as their engagement with the school lasts. | SECURE DISPOSAL |
| 2.5.2 | Governor / Trustee Records | Yes | | Any relevant papers relating to the engagement of governors can be retained (as per 2.1) but only for their term of office plus 1 year. | SECURE DISPOSAL |
| 2.5.3 | Third party workers, supply staff etc | Yes | | The school should receive written confirmation that all checks have been undertaken, but not copies of the evidence, from the employing organisation. Where copies of such documents are received, they must not be retained by the school. The school may retain a copy of the identification documents, | SECURE DISPOSAL |

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| | | | | but these documents must be destroyed when the individual ceases working at the school. | |
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Section 3: Financial Management of the School

| 3.1 Risk Management & Insurance | | | | | |
|---------------------------------|--|------------------------|----------------------|----------------------------------|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 3.1.1 | Employer's Liability Insurance Certificate | No | | Closure of the school + 40 years | SECURE DISPOSAL |

| 3.2 Asset Management | | | | | |
|----------------------|--|------------------------|----------------------|------------------------|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 3.2.1 | Inventories of furniture and equipment | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.2.2 | Burglary, theft and vandalism report forms | No | | Current year + 6 years | SECURE DISPOSAL |

| 3.3 Accounts & Statements including Budget Management | | | | | |
|---|---|------------------------|----------------------|---|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 3.3.1 | Annual Accounts | No | | Current year + 6 years | STANDARD DISPOSAL |
| 3.3.2 | Loans and grants managed by the school | No | | Date of last payment on the loan + 12 years then REVIEW | SECURE DISPOSAL |
| 3.3.3 | Student Grant applications | Yes | | Current year + 3 years | SECURE DISPOSAL |
| 3.3.4 | All records relating to the creation and management of budgets including the Annual Budget statements and background papers | No | | Life of the budget + 3 years | SECURE DISPOSAL |

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

3.4 Pupil Finance

| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
|-------|-----------------------------|------------------------|----------------------|---|---------------------------------------|
| 3.4.1 | Pupil Premium Grant records | Yes | | Date pupil leaves the provision + 6 years | SECURE DISPOSAL |

3.5 Contract Management

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

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

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

Section 4: Property Management

| 4.1 Health & Safety | | | | | | |
|---------------------|--|------------------------|---|-----------------------------------|---------------------------------------|--|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life | |
| 4.1.1 | Health and Safety Policy Statements | No | | Life of policy + 3 years | SECURE DISPOSAL | |
| 4.1.2 | Health and Safety Risk Assessments | No | | Life of Risk assessment + 3 years | SECURE DISPOSAL | |
| 4.1.3 | Accident Reporting (Adults and Children detailed separately below) | Yes | <p>Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</p> <p>Social Security (Claims and Payments) Regulations 1979 SI 1979 No 628</p> <p>Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 19/9 No 628</p> <p>Social Administration Act 1992 Section 8</p> <p>Social Security (Claims and Payments) Amendment (No</p> | | | |

| | | | | | |
|--|--|-----|---|---|-----------------|
| | | | 30 Regulations 1993 SI 1993 No 2113 Allows the information to be kept electronically | | |
| | Adults (Over 18 years of age at time of incident) | Yes | | <p>The Accident Book- BI 510 – 3 years after last entry in the book</p> <p>This includes the new format to be used from 1/1/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for4 a further 3 years from the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR</p> | SECURE DISPOSAL |
| | Children (Under 18 years of age at time of incident) | Yes | | <p>The Accident Book- BI 510 – 3 years after last entry in the book</p> <p>This includes the new format to be used from 1/1/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for4 a</p> | SECURE DISPOSAL |

| | | | | | |
|-------|--|-----|---|---|-----------------|
| | | | | further 3 years from the last entry Completed pages must be kept secure with restricted access. Data Protect Act 2018 and GDPR | |
| 4.1.4 | Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see http://www.hse.gov.uk/RIDDOR/ | Yes | Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12 (2) | Date of incident + 3 years provided that all records relating the incident are held on personnel file | |
| 4.1.5 | Control of Substances Hazardous to Health (COSHH) | No | Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18(2) | Current year + 40 years | SECURE DISPOSAL |
| 4.1.6 | Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos | No | Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19 | Last action + 40 years | SECURE DISPOSAL |
| 4.1.7 | Process of monitoring of areas where employees and persons are likely to have become in contact with radiation | No | The Ionising Radiation Regulations 2017 SI 2017 No 1075 Regulation 11 | Last action + 50 years | SECURE DISPOSAL |

| | | | | | |
|-------|---|----|--|---|-----------------|
| | | | As amended by SI 2018 No 390 Personal Protective Equipment (Enforcement) Regulations 2018 | | |
| 4.1.8 | Fire precautions logbooks | | | Current year + 6 years | SECURE DISPOSAL |
| 4.1.9 | Health and safety file to show current state of building including all alterations (wiring, plumbing, building works etc), to be passed on in the case of change of ownership | No | | Pass to new owner on sale or transfer of building | |

4.2 Property Management

| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
|-------|---|------------------------|----------------------|---|---------------------------------------|
| 4.2.1 | Title deeds of properties belonging to the school | No | | PERMANENT These should follow the property unless the property has been registered with the Land Registry | |
| 4.2.2 | Plans of property belonging to the school | No | | These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold | |
| 4.2.3 | Leases of property leased by or to the school | No | | Expiry of lease + 6 years | SECURE DISPOSAL |

| | | | | | |
|-------|--|----|--|----------------------------------|-----------------|
| 4.2.4 | Records relating to the letting of school premises | No | | Current financial year + 6 years | SECURE DISPOSAL |
|-------|--|----|--|----------------------------------|-----------------|

| 4.3 Maintenance | | | | | |
|-----------------|--|------------------------|----------------------|--|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 4.3.1 | All records relating to the maintenance of the school carried out by contractors | No | | These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold | SECURE DISPOSAL |
| 4.3.2 | All records relating to the maintenance of the school carried out by school employees including maintenance logbooks | No | | These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold | SECURE DISPOSAL |

Section 5: Pupil Management

Please note that any record containing pupil information may be subject to the requirements of IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.

| 5.1 Pupil's Educational Record | | | | | |
|--------------------------------|---|------------------------|---|---|--|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 5.1.1 | Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 | Yes | The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 As amended by SI 2018 No 688 | | |
| | Primary | | | Retain whilst the child remains at primary school | The files should follow the pupil when he/she leaves the primary school. This will include: <ul style="list-style-type: none"> • To another primary school • To a secondary school • To a pupil referral unit • To an independent school • Moving abroad For those pupils moving to home schooling the file should be returned to the LA. |
| | Secondary | | Limitation Act 1980 (Section 2) | Date of Birth of the pupil + 25 years | REVIEW |
| 5.1.2 | Examination Results – Pupil Copies | Yes | | | |

| | | | | | |
|-------|---|-----|---|--|---|
| | Public | | | This information should be added to the pupil file | All uncollected certificates should be returned to the examination board after reasonable attempts to contact the pupil have failed |
| | Internal | | | This information should be added to the pupil file | |
| 5.1.3 | Child Protection information held on pupil file | Yes | “Keeping children safe in education Statutory guidance for schools and colleges 2021”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018 | If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period as the pupil file. Note: these records will be subject to any instruction given by IICSA | SECURE DISPOSAL – these records MUST be shredded |
| 5.1.4 | Child Protection information held in separate files | Yes | “Keeping children safe in education Statutory guidance for schools and colleges 2021”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018 | DOB of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record. Note: These records will be subject to any instruction given by IICSA | SECURE DISPOSAL – these records MUST be shredded |

| 5.2 Attendance | | | | | |
|----------------|---|------------------------|---|--|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 5.2.1 | Attendance Registers | Yes | School attendance: Departmental advice for maintained schools, academies independent schools and local authorities October 2014 | Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made. | SECURE DISPOSAL |
| 5.2.2 | Correspondence relating to any absence (authorised or unauthorised) | Potential | Education Act 1996 Section 7 | Current academic year + 2 years | SECURE DISPOSAL |

| 5.3 Special Educational Needs | | | | | |
|-------------------------------|--|------------------------|--|---|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 5.3.1 | Special Educational Needs files, reviews and Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy | Yes | Children and Family's Act 2014: Special Educational Needs and Disability Act 2001 Section 14 | Date of birth of the pupil + 31 years (Education, Health and Care Plan is valid until the individual reaches the 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 |

Section 6: Curriculum Management

| 6.1 Statistics and Management Information | | | | | |
|---|--|------------------------|----------------------|---|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 6.1.1 | Curriculum returns | No | | Current year + 3 years | SECURE DISPOSAL |
| 6.1.2 | Examination Results (Schools Copy) | Yes | | Current year + 6 years | SECURE DISPOSAL |
| | SATS records - | Yes | | | |
| | Results | | | The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SAT's results. These could be kept for current year + 6 years to allow suitable comparison | SECURE DISPOSAL |
| | Examination Papers | | | The examination papers should be kept until any appeals/validation process is complete | SECURE DISPOSAL |
| 6.1.3 | Published Admission Number (PAN) Reports | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 6.1.4 | Value Added and Contextual Data | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 6.1.5 | Self-Evaluation forms | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 6.1.6 | Internal Moderation | Yes | | Academic year + 1 academic year | SECURE DISPOSAL |
| 6.1.7 | External Moderation | Yes | | Until superseded | SECURE DISPOSAL |

Section 7: Extra Curricular Activities

| 7.1 Educational Visits outside the Classroom | | | | | |
|--|--|------------------------|---------------------------------|--|---------------------------------------|
| | Record Type | Data Protection Issues | Statutory Provisions | Retention Period | Action at the end of the records life |
| 7.1.1 | Parental consent forms for school trips where there has been no major incident | Yes | | Although the consent forms could be retained for DOB + 22 years, the school may wish to complete a risk assessment to assess whether the forms are likely to be required and could make a decision to dispose of the consent forms at the end of the trip (or at the end of the academic year). This is a pragmatic approach and if in doubt the school should seek legal advice | |
| 7.1.2 | Parental permission slips for school trips – where there has been a major incident | Yes | Limitation Act 1980 (Section 2) | DOB of the pupil involved in the incident + 25 years. The permission slips for all the pupils on the trip need to be retained to show the rules had been followed for all pupils | |

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

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