



St Mary's
Catholic Primary School and Nursery

RECORDS MANAGEMENT POLICY AND RETENTION SCHEDULE

RECORDS MANAGEMENT:

St Mary's Catholic Primary School & Nursery 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 school. 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, allowing us to achieve and audit effective management.

Scope of the Policy

- This Policy applies to all records created, received or maintained by the staff of St Mary's in the course of carrying out their work.
- Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. We may create, receive or maintain records in a hard copy or an electronic form.
- We may select a small percentage of the School's records for permanent preservation, as part of the School's archives and for historical research.

Responsibilities

- St Mary's have a corporate responsibility to maintain its records and record keeping system in accordance with the regulatory environment. The person with overall responsibility for this policy is the Head teacher.
- The Data Protection Lead will give guidance about good records management practice and will promote compliance with the policy so that we retrieve information easily, appropriately and in a timely way. They will also monitor compliance with this policy by checking, at least annually, that records are stored securely and accessed appropriately.
- Individual employees must ensure that records for which they are responsible for are accurate and are maintained and disposed of in accordance with the school's records management guidelines included within this document.

Relationships with Existing Policies

This Policy has been formulated within the context of:

- Freedom of Information Policy
- Data Protection Policy
- And with other legislation or regulations (including audit, equal opportunities and ethics) affecting St Mary's

RETENTION SCHEDULE:

The Lord Chancellor's Code of Practice on the Management of Records issued under Section 46 of the Freedom of Information Act 2000 requires us to have and implement a records retention and disposal schedule.

This document sets out details the records created and kept by us or by our commissioned partners, in such a way that we make decisions about identifying and disposing of them in a routine and timely basis.

The Retention and Disposal Schedule (Appendix A), details the legal, regulatory requirements and business needs on which we base the Record Retention and Disposal Policy.

Scope

The Retention and Disposal Schedule applies to all documents defined as records 'information created, received and maintained as evidence and information by an organisation or individual, in pursuance of legal obligations or in the transaction of business'.

The retention requirements listed here apply to all records irrespective of media and format, or the system(s) in which we hold the records, and applies to all copies including backups.

Divergence from the Retention and Disposal Schedule may be appropriate in certain circumstances. For example, a pending or actual legal action, change of legislation or regulation, or legitimate business need. Any divergence requires liaison with the Data Protection Officer.

Responsibilities

The Senior Leadership Team are responsible for ensuring that:

- record retention policies are implemented and supported by written procedures

- recordkeeping systems and arrangement of records enable identification of records due for disposal
- records, which are due for disposal are routinely identified and reviewed to ensure they are no longer required
- divergence from the Records Retention and Disposal Schedule is authorised and the Data Protection Officer is notified of changes
- staff dispose of records only in accordance with policies set out in this document
- records are disposed of appropriately considering their sensitivity, security classification and the media and format(s) in which they are held
- Computing equipment and storage media are disposed of securely ensuring all records, data and information are removed in such a way that the data is not recoverable
- records of potential historic interest or research value are identified and transferred with agreement to the appropriate archive service
- evidence of the disposal process is retained

All staff are responsible for:

- following the procedures and guidance for managing, retaining and disposing of records
- only disposing of records in accordance with the requirements outlined in this document (if authorised to do so)
- ensuring that any proposed divergence from the records retention and disposal policy is authorised and documented

Legal Requirements:

Each entry in the retention and disposal schedule details the specific legislation, regulations, guidelines or codes of practice that stipulate or recommend how long records must be kept before they are disposed of.

Some overarching legislation requires that records be kept for a certain amount of time and applies to all Schools. These include:

General Data Protection Regulation (GDPR):

Personal information must be “kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals”

The Freedom of Information Act 2000:

The Act requires us to make information available to the public unless specific exemption(s) apply. The Code of Practice issued under 46 of the Act sets out rules on how we should manage records and information, including responsibilities on all staff to implement records retention and disposal schedules.

The Independent Inquiry into Child Sexual Abuse:

On Thursday 12 March 2015, the Home Secretary established a statutory inquiry¹ under the 2005 Inquiries Act with the aim of conducting an overarching national review of the extent to which institutions in England and Wales have discharged their duty of care to protect children against sexual abuse.

The Inquiry is independent of government and is supported by a panel, victims, the survivor's consultative panel and other expert advisers. The Inquiry will cover England and Wales. It will investigate a wide range of public institutions including local authorities, the police, the armed forces, schools, hospitals, children's homes, churches, and charities.

On 2nd July 2015 Justice Goddard wrote to every Head Teacher of Schools and Chief Executive of a Local Authority in England and Wales, requesting that the organisation :

“retain any and all documents; correspondence; notes; emails and all other information – however held – which contain or may contain content pertaining directly or indirectly to the sexual abuse of children or to child protection and care. For the purposes of this appendix, the word “children” relates to any person under the age of 18.”

We must not destroy, and must make available for inspection, all reports, reviews, briefings, minutes, notes and correspondence in relation to :

- allegations (substantiated or not) of individuals, organisations, institutions, public bodies or otherwise who may have been involved in, or have knowledge of, child sexual abuse, or child sexual exploitation
- allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children
- institutional failures to protect children from sexual abuse or other exploitation
- statutory responsibilities for the care of children in public or private care
- the development of policy on child protection
- the development of legislation on child protection

- the determination of the award of Honours to persons who are now demonstrated to have had a sexual interest in children or are suspected of having had such an interest.

All of these document types – in whatever format – must be “retained pending further requests from the Inquiry”

Although our records retention schedule is very clear on the destruction dates of files, the instructions received by the Inquiry constitute a legal hold as defined by section 12.3 of the code of practice issued under Section 46 of the Freedom of Information Act, which states that:

“Records should not be kept after they have ceased to be of use to the authority unless:

a) They are known to be the subject of litigation or a request for information. If so, destruction should be delayed until the litigation is complete or, in the case of a request for information, all relevant complaint and appeal provisions have been exhausted”

As such, all records that fall within the above categories are retained and not destroyed, until directed otherwise.

For any advice on clarification on whether records can be destroyed or are covered by the Inquiry retention hold, consult the Data Protection Officer.

Disposal of Records:

Provided records are not needed to comply with legal, financial or audit requirements, at the end of the retention period the records will be assessed to ensure changes in legislation, disputes and/or case reviews/enquiries/appeals do not require extended retention. This document will reflect any changes in retention or appeals legislation. If there is no reason to extend the retention period, records must be confidentially destroyed.

The disposal of records requires the authorisation of two members of staff, typically the member of staff with operational responsibility for the records and the Head teacher. These are referred to as the Information Asset Administrator (IAA) and the Information Asset Owner (IAO).

When records are being disposed of, summary information should be noted in a disposal certificate, which provides evidence that the disposal has actually been carried out. This information should be in summary form at record series level in most cases (i.e. case files of pupils aged 25 years or over as of 1st April 2011).

Information held within IT systems will also be covered by the requirements of this schedule, however, the archiving and/or disposal will have to be carried out in accordance with procedures on redundant IT systems and/or electronic data.

On this point, it is important that procedures around the archiving or disposal of documents, which are linked to electronic data, have built in mechanisms whereby both sources are handled in parallel. This will ensure electronic data is disposed of at the same time as the linked paper source and vice versa.

Retention and Disposal Schedule for Schools:

Retention policies contained within this schedule give details of record retention periods, criteria triggering the start of the retention period or disposal action, disposal action and the retention legal authority. For example, legislation, regulation, codes of practice or guidance requiring or forming the basis for keeping records.

Divergence from the retention and disposal schedule may be appropriate in certain circumstances. For example, a pending or actual legal action, investigation or inquiry, change of legislation or regulations, or to support legitimate business need.

Any divergence from the information contained in this schedule requires liaison with the Data Protection Officer.

APPENDIX 1 – THE RETENTION AND DISPOSAL SCHEDULE

1.0 MANAGEMENT OF THE SCHOOL

1.1 THE GOVERNING BODY

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Agendas for Governing Body Meetings	There may be some data protection issues if the meeting is dealing with confidential issues relating to staff		Retain one copy with the master set of minutes. All other copies can be disposed of	Secure Disposal
Minutes of Governing Body Meetings	There may be some data protection issues if the meeting is dealing with confidential issues relating to staff			
Principal Set			PERMANENT	Not Applicable
Inspection Copies			Date of Meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded

Reports presented to the Governing Body	There may be some data protection issues if the meeting is dealing with confidential issues relating to staff		Keep reports for a minimum of 6 years. However, if the reports refer directly to an individual then the reports should be kept permanently	Secure Disposal or retained with a signed set of minutes
Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	Secure Disposal
Instruments of Government including Articles of Association	No		PERMANENT	Not Applicable
Trusts and Endowments managed by the Governing Body	No		PERMANENT	Not Applicable
Action Plans created and administered by the Governing Body	No		Life of the action plan + 3 years	Secure Disposal
Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years	Secure Disposal
Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in the case of continuous disputes	Secure Disposal
Annual Reports created under the requirements of the Education (Governors Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	Secure Disposal

Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date proposal accepted or declined + 3 years	Secure Disposal
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1.2 THE HEAD TEACHER AND SENIOR LEADERSHIP TEAM

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Logbooks of activity in the school maintained by the Head Teacher	There may be data protection issues if the logbook refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then review	Secure Disposal
Minutes of the Senior Leadership Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then review	Secure Disposal
Records created by the Head teacher or the Senior Leadership Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then review	Secure Disposal
Records created by the Head Teacher, Deputy Head Teacher, Senior Leadership Team and other members of staff with administrative responsibilities	There may be data protection issues if the record refers to individual pupils or members of staff		Current academic year + 6 years then review	Secure Disposal

Correspondence created by the Head Teacher, Deputy Head Teacher, Senior Leadership Team and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then review	Secure Disposal
Professional Development Plans	Yes		Life of plan + 6 years	Secure Disposal
School Development Plan	No		Life of plan + 3 years	Secure Disposal

1.3 THE ADMISSIONS PROCESS

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
All records relating to the creation and implementation of the School's Admission Policy	No	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admissions appeals panels December 2014	Life of the policy + 3 years then review	Secure Disposal
Admissions – if the admission is successful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admissions appeals panels December 2014	Date of admission + 1 year	Secure Disposal
Admission- if the appeal is unsuccessful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admissions appeals panels December 2014	Resolution of case + 1 year	Secure Disposal
Register of Admissions	Yes	School attendance, Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of three years after	Review – Schools may wish to consider keeping the admission register permanently as often

			the date on which the entry was made	schools receive enquiries from past pupils to confirm the dates they attended the school
Admissions – Secondary Schools - Casual	Yes		Current year + 1 year	Secure Disposal
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, schools adjudicators and admissions appeals panels December 2014	Current year + 1 year	Secure Disposal
Supplementary Information Form including additional information such as religion, medical conditions etc.	Yes			
Successful admissions			This information should be added to the pupil file	Secure Disposal
Unsuccessful admission			Until appeals process completed	Secure Disposal

1.4 OPERATIONAL ADMINISTRATION

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
General file series	No		Current year + 5 years then review	Secure Disposal
Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	Standard Disposal
Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	Standard Disposal
Newsletters and other items with a short operational use	No		Current year + 1 year	Standard Disposal
Visitors Books and Signing in Sheets	Yes		Current year + 6 years then review	Secure Disposal
Records relating to the creation and management of Parent Teachers Associations and/or Old Pupils Associations	No		Current year + 6 years then review	Secure Disposal

2.0 HUMAN RESOURCES RECRUITMENT

2.1 RECRUITMENT

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years	Secure Disposal
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
All records leading up to the appointment of a new member of staff – successful candidates	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
Pre-employment vetting information – DBS Checks	No	DBS Update Service Employer Guide June 2014 Keeping Children Safe in Education July 2015 (Statutory Guidance from Department of Education) Sections 73,74	The school does not have to keep copies of the DBS certificates. If the school does so, the copy must NOT be retained for more than 6 months	Secure Disposal

<p>Proofs of identity collected as part of the process of checking 'portable' enhanced DBS Disclosure</p>	<p>Yes</p>		<p>Where possible, these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then it should be placed on the member of staff's personnel file</p>	
<p>Pre-employment vetting information – Evidence proving the right to work in the United Kingdom</p>	<p>Yes</p>	<p>An employer's guide to right to work checks (Home Office 2015)</p>	<p>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 plus not less than two years</p>	

2.2 OPERATIONAL STAFF MANAGEMENT

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Staff Personnel File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	Secure Disposal
Timesheets	Yes		Current year + 6 years	Secure Disposal
Annual appraisal/assessment records	Yes		Current year + 5 years	Secure Disposal

2.3 MANAGEMENT OF DISCIPLINARY AND GRIEVANCE PROCESSES

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
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 school and colleges March 2015; 'Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015'	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then review. Note allegations that are found to be malicious should be removed from personnel files. If found that they are to be kept on the file and a copy provided to the person concerned	Secure Disposal These records must be shredded
Disciplinary Proceedings	Yes			
Oral Warning			Date of warning + 6 months	Secure Disposal (If warnings are placed on personnel files then they must be removed from the file)
Written Warning – Level 1			Date of warning + 6 months	
Written Warning – Level 2			Date of warning + 12 months	
Final Warning			Date of warning + 18 months	
Case Not Found			Child protection related see above otherwise dispose of at the conclusion of the case	Secure Disposal

2.4 HEALTH AND SAFETY

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Health and Safety Policy Statements	No		Life of policy + 3 years	Secure Disposal
Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	Secure Disposal
Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	Secure Disposal
Accident Reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
Adults			Date of the incident + 6 years	Secure Disposal
Children			DOB of the child + 25 years	Secure Disposal
Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No	Current year + 40 years	Secure Disposal

		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)		
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
Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	Secure Disposal
Fire Precautions Logbooks	No		Current year + 6 years	Secure Disposal

2.5 PAYROLL AND PENSIONS

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	Secure Disposal
Records held under Retirement Benefits Scheme (Information Powers) Regulations 1995	Yes		Current year + 6 years	Secure Disposal

3.0 FINANCIAL MANAGEMENT OF THE SCHOOL

3.1 RISK MANAGEMENT AND INSURANCE

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	Secure Disposal

3.2 ASSET MANAGEMENT

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Inventories of furniture and equipment	No		Current year + 6 years	Secure Disposal
Burglary, theft and vandalism report forms	No		Current year + 6 years	Secure Disposal

3.3 ACCOUNTS AND STATEMENTS INCLUDING BUDGET MANAGEMENT

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Annual Accounts	No		Current year + 6 years	Standard Disposal
Loans and grants managed by the school	No		Date of the last payment on the loan + 12 years	Secure Disposal
Student grant applications	Yes		Current year + 3 years	Secure Disposal
All records relating to the creation and management of the budget including the Annual Budget statement and background papers	No		Lifetime of the budget + 3 years	Secure Disposal
Invoices, receipts, order books, requisitions, delivery notices	No		Current year + 6 years	Secure Disposal
Records relating to the collection and banking of monies	No		Current year + 6 years	Secure Disposal
Records relating to the identification and collection of debt	No		Current year + 6 years	Secure Disposal

3.4 CONTRACT MANAGEMENT

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
All records relating to the management of contract under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	Secure Disposal
All records relating to the management of contract under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	Secure Disposal
Records relating to the monitoring of contracts	No		Current year +2 years	Secure Disposal

3.5 SCHOOL FUND

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
School Fund – Cheque Books	No		Current year + 6 years	Secure Disposal
School Fund – Paying In Books	No		Current year + 6 years	Secure Disposal
School Fund - Ledger	No		Current year + 6 years	Secure Disposal
School Fund - Invoices	No		Current year + 6 years	Secure Disposal
School Fund - Receipts	No		Current year + 6 years	Secure Disposal
School Fund – Bank Statements	No		Current year + 6 years	Secure Disposal
School Fund – Journey Books	No		Current year + 6 years	Secure Disposal

3.6 SCHOOL MEALS MANAGEMENT

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Free School Meals Registers	Yes		Current year + 6 years	Secure Disposal
School Meals Registers	Yes		Current year + 3 years	Secure Disposal
School Meals Summary Sheets	No		Current year + 3 years	Secure Disposal

4.0 PROPERTY

4.1 PROPERTY MANAGEMENT

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
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	
Plans of property belong 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	
Leases of property leased by or to the school	No		Expiry of lease + 6 years	Secure Disposal
Records relating to the letting of school premises	No		Current financial year + 6 years	Secure Disposal

4.2 MAINTENANCE

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	Secure Disposal
All records relating to the maintenance of the school carried out by school employees including maintenance log books	No		Current year + 6 years	Secure Disposal

5.0 PUPIL MANAGEMENT

5.1 PUPIL'S EDUCATIONAL RECORD

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations Primary	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
			Retain whilst the child remains at the primary school	<p>The file should follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> to another primary school to a secondary school to a pupil referral unit <p>If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention</p>

Secondary		Limitation Act 1980	Date of Birth of the pupil	Secure Disposal
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.
Internal			This information should be added to the pupil file	
<p>This review took place as the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention</p>				
Child Protection information held on pupil file	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	If any records relating to child protection issues are placed on the pupil file, it should be in sealed envelope and then a retained for the same period as the pupil file.	Secure Disposal – these records MUST be shredded

Child protection information held in separate files	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	DOB of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	Secure Disposal – these records MUST be shredded
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5.2 ATTENDANCE

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
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
Correspondence relating to authorised absence	Yes	Education Act 1996 Section 7	Current academic year + 2 years	Secure Disposal

5.3 SPECIAL EDUCATIONAL NEEDS

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	<p>REVIEW</p> <p>NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.</p>

Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	Secure Disposal unless the document is subject to a legal hold
Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	Secure Disposal unless the document is subject to a legal hold
Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	Secure Disposal unless the document is subject to a legal hold

6.0 CURRICULUM MANAGEMENT

6.1 STATISTICS AND MANAGEMENT INFORMATION

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Curriculum Returns	No		Current year + 3 years	Secure Disposal
Examination Results (Schools Copy)	Yes		Current year + 6 years	Secure Disposal
SATS Records/Results	Yes		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 SATs 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

Published Admission Number (PAN) Reports	Yes		Current year + 6 years	Secure Disposal
Value Added and Contextual Data	Yes		Current year + 6 years	Secure Disposal
Self Evaluation Forms	Yes		Current year + 6 years	Secure Disposal

6.2 IMPLEMENTATION OF THE CURRICULUM

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Schemes of Work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL
Timetable	No		Current year + 1 year	
Class Record Books	No		Current year + 1 year	
Mark Books	No		Current year + 1 year	
Record of homework set	No		Current year + 1 year	
Pupils' Work	No		Where possible pupils' 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	

7.0 EXTRA CURRICULAR ACTIVITIES

7.1 EDUACTIONAL VISITS OUTSIDE THE CLASSROOM

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Outdoor Education Advisers’ Panel National Guidance website http://oeapng.info specifically Section 3 - “Legal Framework and Employer Systems” and Section 4 - “Good Practice”.	Date of visit + 14 years	Secure Disposal
Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Outdoor Education Advisers’ Panel National Guidance website http://oeapng.info specifically Section 3 - “Legal Framework and Employer Systems” and Section 4 - “Good Practice”.	Date of visit + 10 years	Secure Disposal
Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low

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 that the rules had been followed for all pupils	
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7.2 WALKING BUS

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Walking Bus Registers	Yes		Date of register + 3 years This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting	Secure Disposal [If these records are retained electronically any back up copies should be destroyed at the same time]

7.3 FAMILY LIAISON OFFICERS AND HOME SCHOOL LIAISON ASSISTANTS

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Day Books	Yes		Current year + 2 years then review	Secure Disposal
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
Referral forms	Yes		While the referral is current	Secure Disposal
Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	Secure Disposal
Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	Secure Disposal
Group Registers	Yes		Current year + 2 years	Secure Disposal

8.0 CENTRAL GOVERNMENT AND LOCAL AUTHORITY

8.1 LOCAL AUTHORITY

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	Secure Disposal
Attendance Returns	Yes		Current year + 1 year	Secure Disposal
School Census Returns	No		Current year + 5 years	Secure Disposal
Circulars and other information sent from the Local Authority	No		Operational use	Secure Disposal

8.2 CENTRAL GOVERNMENT

BASIC FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD
OFSTED reports and papers	No		Life of the report then REVIEW	Secure Disposal
Returns made to central government	No		Current year + 6 years	Secure Disposal
Circulars and other information sent from central government	No		Operational use	Secure Disposal