



**Record Retention and Deletion Policy**

 Melbourne Infant School

Version 4

|  |  |
| --- | --- |
| **Last Reviewed** | **Resources Committee: Summer 2024/25** |
| **Reviewed By (Name)** | **School Business Manager / Headteacher** |
| **Approved by**  | **Resources Committee: Summer 2024/25** |
| **Next Review Date** | **Resources Committee: Summer 2025/26** |
| **Version produced Spring 2025** | Minor amendments indicated in green text.4. Disposal of Data- amended some wording from ‘disposed of’ to destroyed5. Transfer to Archives – this section has been re-writtenAdded a paragraph to section 6 regarding the transfer of paper copies to digital and the disposal of said paper copes8. Management Information System (MIS) section updated11. Academisation- this section has been re-writtenUpdated ‘The Education (Pupil Registration) (England) Regulations 2006’ to ‘The School Attendance (Pupil Registration) (England) Regulations 2024’**Wording and abbreviations updated throughout:** KCSiE 2024 (also updated paragraph references and hyperlinks) Updated the words ‘must’ and ‘should’to **‘will’** where necessarythroughout.**13. Retention Tables:** Amended Retention table throughout regarding when to offer certain information to the Local Authority Record Office at the end of use or when school closes. 5. School Communications- added 5.2 section which covers Pupil emails. 8.6. Directors – disqualification (MATs only) added to retention table10.11. Fire Assessments added to retention table11.4. Records relating to school vehicles (records that are not required anywhere else e.g. health and safety, litigation etc) added to retention tableUpdated info for 15.1. 15. Financial Management – School Meals, added a new section (15.4) which covers retention in relation to the breakfast club grant. 19.3- Added in retention guidance for unauthorized absence20. Special Educational Needs (SEN) updated |

This document will be reviewed annually and sooner when significant changes are made to the law

Guidance from the Department for Education about school policies can be found here: <https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts>

**Contents**

[1. How to use this document 5](#_Toc195793134)

[2. Introduction 5](#_Toc195793135)

[3. Purpose 6](#_Toc195793136)

[4. Disposal of Data 6](#_Toc195793137)

[5. Transfer of Records to Archives 7](#_Toc195793138)

[a) Storage archives, for school business purposes 7](#_Toc195793139)

[b) Historic archives, for school heritage 7](#_Toc195793140)

[6. Transfer of Records to other Media 8](#_Toc195793141)

[7. Transfer of Records to other Settings & ‘Last Known School’ 8](#_Toc195793142)

[8. Management Information System (MIS) 10](#_Toc195793143)

[9. Records relating to Child Sexual Abuse 10](#_Toc195793144)

[10. Retention of Records relating to Staff 11](#_Toc195793145)

[11. Academisation 11](#_Toc195793146)

[12. Responsibility and Monitoring 11](#_Toc195793147)

[13. Retention tables 13](#_Toc195793148)

[1. Governing Bodys 13](#_Toc195793149)

[2. Headteacher & Senior Management/Leadership Team 18](#_Toc195793150)

[3. Admissions 19](#_Toc195793151)

[4. Operational Administration 21](#_Toc195793152)

[5. School Communications 23](#_Toc195793153)

[6. HR – Recruitment 24](#_Toc195793154)

[7. HR – Operational Staff Management 26](#_Toc195793155)

[8. HR - Management of Disciplinary and Grievance Processes 29](#_Toc195793156)

[9. HR – Payroll & Pensions 31](#_Toc195793157)

[10. Health and Safety 32](#_Toc195793158)

[11. Financial Management – Risk & Insurance, Asset Management 34](#_Toc195793159)

[12. Financial Management – Accounts and Statements including Budget Management 34](#_Toc195793160)

[13. Financial Management – Contract Management 35](#_Toc195793161)

[14. Financial Management – School Fund [where one exists, or has done in the previous 7yrs] 36](#_Toc195793162)

[15. Financial Management – School Meals 36](#_Toc195793163)

[16. Property Management 37](#_Toc195793164)

[17. Pupil Education Record (see s2 Education Record (Pupil Information) Regulations 2005 ). 38](#_Toc195793165)

[18. Child Protection (CP) / Safeguarding Records 40](#_Toc195793166)

[19. Attendance 42](#_Toc195793167)

[20. Special Educational Needs (SEN) 44](#_Toc195793168)

[21. Curriculum Management 45](#_Toc195793169)

[22. Implementation of Curriculum 46](#_Toc195793170)

[23. Extra Curriculum Management 48](#_Toc195793171)

[24. Family Liaison / Early Help / Alternative Provision 49](#_Toc195793172)

[25. Local Authority 49](#_Toc195793173)

[26. Central Government 50](#_Toc195793174)

[27. Parent / Alumni Associations 50](#_Toc195793175)

[28. Recordings (meetings, calls, online lessons) 50](#_Toc195793176)

[29. Administration of Medication 51](#_Toc195793178)

[Appendix A – List of School / Trust Records and Data safely destroyed 52](#_Toc195793179)

# 1. How to use this document

This is a very big document. It can be read from front to back, but this will take time, alternatively you can select from an A-Z of relevant provisions.

**A-Z**

|  |
| --- |
| [Admissions](#_Admissions) |
| [Attendance](#_Attendance) |
| [Central Government](#_Central_Government) |
| [Child Protection (CP) / Safeguarding Records](#_Child_Protection_(CP)) |
| [Curriculum (Implementation)](#_Implementation_of_Curriculum) |
| [Curriculum Management](#_Curriculum_Management) |
| [Extra Curriculum Management](#_Extra_Curriculum_Management) |
| [Family Liaison / Early Help / Alternative Provision](#_Family_Liaison_/) |
| [Financial Management – Accounts and Statements including Budget Management](#_Financial_Management_–) |
| [Financial Management – Contract Management](#_Financial_Management_–_1) |
| [Financial Management – Risk & Insurance, Asset Management](#_Financial_Management_–_2) |
| [Financial Management – School Fund](#_Financial_Management_–_3) |
| [Financial Management – School Meals](#_Financial_Management_–_4) |
| [Governing Body](#_Governing_Body) |
| [Headteacher & Senior Management/Leadership Team](#_Headteacher_&_Senior) |
| [Health and Safety](#_Health_and_Safety) |
| [HR - Management of Disciplinary and Grievance Processes](#_HR_-_Management) |
| [HR – Operational Staff Management](#_HR_–_Operational) |
| [HR – Payroll & Pensions](#_HR_–_Payroll) |
| [HR – Recruitment](#_HR_–_Recruitment) |
| [Local Authority Returns](#_Local_Authority) |
| [Medication (Administration Records)](#_Administration_of_Medication) |
| [Operational Administration](#_Operational_Administration) |
| [Parent / Alumni Associations](#_Parent_/_Alumni) |
| [Property Management](#_Property_Management) |
| [Pupil Education Record inc SEN, Ed Psych reports](#_Pupil_Education_Record) |
| [Recording Meetings, calls, online lessons, training](#_Recordings_(meetings,_calls,) |
| [School Communications inc email & social media](#_School_Communications) |
| [Special Educational Needs (SEN)](#_Special_Educational_Needs) |
| [Work Experience / Placement (pupil)](#_Pupil_Work_Experience) |

# 2. Introduction

This record retention and deletion policy contains recommended retention periods for the different record series created and maintained by Melbourne Infant School. The schedule refers to all information whether it is held in hard copy or electronic format including cloud and web based or on third party platforms.

Some of the retention periods are governed by statute. Others are guidelines, following best practice, employed by schools throughout the United Kingdom. Every effort has been made to ensure that these retention periods are compliant with the requirements of the UK General Data Protection Regulation 2018 (UK GDPR), the Data Protection Act 2018 (DPA), the Human Rights Act 1998, the Freedom of Information Act 2000 (FOI) and the Code of Practice on Records Management (under Section 46 of the FOI).

Managing records series using these retention guidelines will be deemed to be ‘normal processing’ under the terms of the legislation noted above. If those record series are to be kept for longer or shorter periods than the time scales held in this document, the reasons for any deviation will be recorded.

# 3. Purpose

This policy, for managing records at Melbourne Infant School has been drawn up in conformity with legislation, regulations affecting schools and best practice as promoted by the Information and Records Management Society (IRMS).

As well as containing Record Retention tables, this document sets out more general information and guidelines for recording, managing, storing and the disposal of data, whether they are held on paper or electronically (including online), in order to assist staff, and the school, to comply with the General Data Protection Regulation (EU) 2016/679 (GDPR) including as adopted by the United Kingdom as a result of its exit from the European Union (“UK GDPR”), Data Protection Act 2018 and the FOI. It will be read and used in conjunction with all of our related policies.

It is expected that;

* All information held by Melbourne Infant School needs to be justifiable, by reference, to its purpose.
* Melbourne Infant School will be transparent and accountable as to what data they hold.
* Melbourne Infant School will understand and explain the reasons why they hold data.
* Melbourne Infant School will be able to respond to Subject Access Requests.
* Melbourne Infant School will be able to amend, delete or transfer data promptly upon any justified request.
* Melbourne Infant School will be able to audit how personal data was collected and when and why.
* Melbourne Infant School will hold sensitive data securely, accessed only by those with reason to view it and possess a policy as to why it is needed.
* Melbourne Infant School will have retention policies that reflect the importance of records relating to child sexual abuse to victims and survivors, and that they may take decades to seek access to such records.

# 4. Disposal of Data

Article 5(e) of the UK GDPR states that personal data will 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... in order to safeguard the rights and freedoms of the data subject (‘storage limitation’)’.

Not all data needs to be destroyed. The school will determine whether records are to be selected for permanent preservation, or for destruction or to be transferred into a different format.

When information is no longer required, it will be destroyed. For confidential, sensitive or personal information, to be considered securely disposed of, it will be in a condition where it cannot either be read or reconstructed.

Skips, ‘regular’ waste disposal and ribbon shredders are not secure.

Paper records will be cross-shredded, incinerated, or pulped.

CDs/DVDs/discs will be cut into pieces. Hard copy images, AV recordings and hard disks will be dismantled and destroyed. Where third party disposal companies are employed, a certificate of destruction will be obtained. Staff working for external provider will have been trained in the handling and destruction of confidential data.

If the school receives a request for records that have not yet been destroyed, even if they should have been destroyed, that record will still be made available to the requestor.

The FOI requires the school to maintain a list of all records that have been destroyed and who authorised their destruction. This record will be retained for 15 years. The appropriate members of staff (Data Lead) will record:

* File reference and/or unique identifier
* File title or brief description of contents
* Number of files
* Name of the authorising officer

An example is contained in Annex A.

# 5. Transfer of Records to Archives

## a) Storage archives, for school business purposes

Little-used records can clutter up the work environment. Some schools and trusts relieve pressure by moving records to a storage space until the retention period runs out. A school or trust lacking room to keep its records safe from harm (such as fire, flood, unauthorised access) may transfer them to a commercial storage service with credentials such as certification to the ISO 27001 information security standard. The school or trust remains legally responsible for the records.

## b) Historic archives, for school heritage

Usually, disposal means securely destroying the documents after the retention period. But if there is an enduring historical value in the records, disposal need not mean destruction. Instead, the school or trust may offer to transfer them to the care of a dedicated archival repository, such as the relevant local authority record office (see Find an archive | The National Archives). Establishing a relationship with an archival repository is the standard method for preserving institutional heritage, as it allows the community to view historic information in a comfortable and supervised setting. Archivists are trained not just to care for the physical documents (using acid-free packaging, humidity-controlled storage, etc) but to manage requests for access in accordance with data protection legislation. They may also loan documents back to the school or trust for special occasions such as anniversary events.

To identify records of historic value, look out for “offer to local record office” in the guidance below. Other records may have obvious historic interest even if they are not mentioned (e.g. a World War II roll of honour). The school / trust should approach the record office with a list of files and agree on how and when to transfer them. It may help to set aside items for permanent preservation routinely, such as by filing a single signed copy of the minutes and key agenda papers after each meeting of the governing body, ready to offer to the repository every few years.

Attempting to set up an onsite alternative to a local record office would be a complex undertaking. A school or trust wishing to do so should consult its Data Protection Officer and approach the record office for advice on management and storage conditions. Remember that archives can include electronic data such as digital photographs, which can only be digitally preserved with the right technical interventions (see the Digital Preservation Handbook).

# 6. Transfer of Records to other Media

Where lengthy retention periods have been allocated to records, organisations will consider converting paper records to other media (e.g. digital or virtual, ‘cloud’ based). The lifespan of the media, and the ability to migrate data, will be documented in a Digital Continuity Policy. A scanning risk assessment is recommended to ensure the procedure is adequate. Further information about digital continuity can be found on the [National Archives](https://cdn.nationalarchives.gov.uk/documents/information-management/understanding-digital-continuity.pdf) website who also provide guidance on assessing and managing [digital continuity risks](https://cdn.nationalarchives.gov.uk/documents/information-management/managing-stage-3.pdf) and a digital continuity [checklist](https://cdn.nationalarchives.gov.uk/documents/information-management/testing-for-continuity-checklist.pdf). Organisations that believe that they need to retain digital records over a long period on devices, software systems or in formats that may become inaccessible due to developments in technology will seek further advice from the Data Protection Officer and their IT support staff.

Once any paper records have been digitally converted, the paper copies of these records will then be securely and confidentially disposed of ([see section 4. Disposal of Data](#_4._Disposal_of)). Melbourne Infant School will ensure that a record of destruction is held for these paper records ([see Appendix A- example of how to create a destruction record](#_Appendix_A_–)). The only records that should always be retained as physical records are any original documents such as birth certificates, passports, marriage certificates etc (it is unlikely that schools will hold these types of documents). Documents of historical significance such as logbooks may also be retained as hard copies.

# 7. Transfer of Records to other Settings & ‘Last Known School’

When a child leaves the school, all pupil records, including safeguarding/child protection records will be transferred in a secure manner, to the child’s new school. If the records contain sensitive information (e.g. Child Protection records), proof of receipt will be obtained and logged by the school’s Data Lead. [Keeping Children Safe in Education 2024](https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf) (KCSiE) states that “where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file.” All copies of data held by the school that the child has departed will then be deleted or retained in line with the retention schedule below, including all paper records and data stored electronically. Generally, a record will be kept for tracking and auditing purposes only. Schools will be aware that where electronic systems are used, sending a pupil file to the next setting does not mean that their own copy of the file is deleted, so action should be taken to delete or archive copies retained where they are no longer required by the school that the pupil has left.

There are four main categories of pupil records that need to be transferred to other settings:

* **Management Information System (MIS) data**

Data held on the MIS is extracted by the school using the Common Transfer File mechanism as specified in The Education (Pupil Information) (England) Regulations 2005 and subsequent amendments. The Department for Education specifies what data is to be included in the CTF in technical specification documentation. This will mean that the majority of information held on the MIS is transferred using the CTF method. However, it is important to note that **not all personal data is transferred, only the data sets specified in the CTF schema.** If the MIS has been used to store additional information (documents such as copies of end of year reports or letters) schools will take proactive action to ensure these are sent separately and securely. Traditionally, this sort of documentation was held in a pupil ‘buff’ file, but as organisations have turned to digital ways of working, these are frequently stored by attaching them to the digital MIS record.

* **Safeguarding/Child Protection records**

Schools frequently use vendor educational technology (edtech) products to hold and transfer these records. Many of these products include the functionality to electronically transfer a copy of (and obtain receipt for) pupil records directly to the next school, where the same product is also used by the receiving school. Where this is not possible, these products should have the functionality to download a pupil record for it to then be transferred electronically or printed out and delivered to the new school. Paper records will be dealt with carefully to ensure that these are safely received by the new school.

Some safeguarding edtech products enable schools to use the same system to record behavioural and other information in the same log. Schools will ensure that safeguarding/child protection records are clearly identified as such so that the receiving school can quickly identify this information. The school will consider if information such as behaviour notes needs to be transferred to the next setting, or whether it will be deleted if no longer required or relevant (e.g. a child’s toileting routine may be very relevant when younger, or merits/demerits received but does not need to be part of a permanent safeguarding record).

* **Special Educational Needs records**

It is becoming more common for schools to use vendor edtech products to manage these records. Whether stored in such edtech products, on Melbourne Infant School IT systems/cloud storage or on paper, the SEND co-ordinator will ensure that a complete record is compiled and passed securely to the next school.

* **Pupil ‘buff’ files**

For many schools, in recent years, the traditional pupil buff files have dwindled in relevance and importance as organisations have increasingly moved to digital storage. Schools are left with either sending or receiving folders which are very light and seemingly irrelevant. However, there will be documentation, whether on paper or electronic (on the server, in emails, in the MIS) that will be sent to the next setting that the pupil will attend. The Education (Pupil Information) (England) Regulations 2005 state that this “Educational Record” will be transferred to the next setting within 15 school days of confirmation that a pupil is registered at another school. There may be a significant amount of material that is not contained in the CTF, safeguarding or SEND records that will be transferred to the next setting. Schools may have inadvertently not adapted their records transfer practices as management of these records have moved from a paper ‘buff’ file to digital format and so this will be noted where relevant on the retention schedule below.

Schools may wish to retain some minimal ‘skeleton’ data about pupils’ admission, departure and next destination (where known) in order to respond to any requests for information about these pupils and for the historical archive. They may also wish to retain records relating to safeguarding/child protection or SEND records, even though there is no legislative requirement to do so (i.e. to have their own copy of evidence in case of any later legal action). If schools intend to create and maintain skeleton records or retain copies of records, this will be noted on the retention policy. In some instances, schools may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If the school does retain pupil records, then they will be prepared to justify this retention and will need to consider if a Data Protection Impact Assessment should be completed for any extended retention of records once a pupil has left the school. See section 17.5 below.

Responsibility for maintaining the pupil record passes to the ‘last known school’.

The school is the final or last known school if:

* secondary phase and the pupil left at 16 years old or for post-16 or independent education, or;
* at any point the pupil left for elective home education, they are missing from education, or have left the UK, or have died.

Tertiary colleges are not included in this definition, therefore the school will retain the record. However, the college will receive a copy of the child protection file, as per the requirements of KCSiE above.

The Pupil Record will be retained as a whole for 25 years from the date of birth of the pupil, after which time, if no longer required, it can be deleted or destroyed.

SEN and other support service records can be retained for a longer period of 31 years to enable defence in a “failure to provide a sufficient education” case.

If a school wishes to retain data for analysis or statistical purposes, it will be done in an anonymised fashion.

# 8. Management Information System (MIS)

The majority of pupil records and some staff records are held on the school MIS. Managing data retention on the MIS can be complex because different data sets held on the MIS have different retention requirements. School staff have limited time and resources to manage these differing retention periods and will work with their MIS provider to request support on how to efficiently delete data sets from a record without deleting the entire record (or deleting all data sets except those that are required as part of the ‘skeleton’ record for long term retention). Where this is not possible, schools may make a policy decision to retain the entirety of a record for the longest applicable retention period for a data set within the MIS (usually current plus six years). The school will set out how records will be retained in the MIS in the relevant section of the Retention Table below.

# 9. Records relating to Child Sexual Abuse

Records relating to child sexual abuse will be retained for 75 years, in line with the recommendations arising from the outcome of the [Independent Inquiry into Child Sexual Abuse](https://www.iicsa.org.uk/reports-recommendations/publications/inquiry/final-report/ii-inquirys-conclusions-and-recommendations-change/part-h-supporting-victims-and-survivors/h5-access-records.html) (IICSA). The Inquiry stated that these records should be retained for such a long period in recognition of the importance of these records to victims, but that they should be regularly reviewed during that extended retention period. Organisations will particularly need to consider digital continuity where:

* they hold digital records for staff or governors, or
* they are the ‘last known school’ responsible for this long retention period for any relevant pupil records.

Where there is evidence, or allegations of child sexual abuse, then it will almost certainly be appropriate to retain the entire pupil, staff or other record as a whole, not just the parts of the record that pertain to the abuse. Staff whose duties include reviewing or digitising records will be trained to understand the importance of any evidence or allegations of child sexual abuse that they may happen to uncover, whether that was what they were looking for and the importance of them bringing these to the attention of school leadership and/or preserving these records.

The Inquiry report also recommends that the UK government directs the Information Commissioner’s Office (ICO) to introduce a Code of Practice on retention of and access to records known to relate to child sexual abuse. This Policy will be updated in line with any Code of Practice from the ICO. The report states that such a code should set out that institutions should have:

* retention policies that reflect the importance of such records to victims and survivors, and that they may take decades to seek to access such records;
* clear and accessible procedures for victims and survivors of child sexual abuse to access such records;
* policies, procedures and training for staff responding to requests to ensure that they recognise the long-term impact of child sexual abuse and engage with the applicant with empathy.

# 10. Retention of Records relating to Staff

As stated above regarding the long-term retention of minimal pupil records, schools may wish to retain very basic ‘skeleton’ records about staff beyond the normal retention of the whole personnel/HR file. This information may include the staff name, role, contract start and end dates. This may be useful for schools who may need to respond to requests for information from/regarding staff, in the event of it being needed for litigation or other legal purpose and as part of their historical archive. If schools intend to create and maintain these records, this will be noted on the retention policy (at section 7.11 below)

# 11. Academisation

When a maintained school becomes an academy, it is legally a new organisation. However, it can still have an operational need for the records of the original school, including files relating to former pupils and employees. The Commercial Transfer Agreement that created the academy may include a section assigning responsibility for these old records, so the rights of the academy and the local authority are formally established. For instance, the agreement might direct the academy to keep the school records on trust until the retention period runs out, and to offer historically valuable documents to the local record office (see 5. Transfer of Records to Archives).

For further information regarding academy record keeping and retention information from the DfE, please see the following link:

[Record keeping and retention information for academies - GOV.UK](https://www.gov.uk/government/publications/record-keeping-and-retention-information-for-academies?utm_medium=email&utm_campaign=govuk-notifications-topic&utm_source=5018b5bb-72f7-46cf-abd2-5917acb2c4bb&utm_content=daily)

# 12. Responsibility and Monitoring

The Head Teacher holds primary and day to day responsibility, for implementing this policy. The Data Protection Officer, in conjunction with the school, is responsible for monitoring its use and effectiveness and resolving any queries with regards the interpretation of the policy.

All permissions to access data are granted by the Head Teacher and recorded in the member of staff’s personnel file.

All teaching and office staff are given training and guidance on accessing and managing on school records, to ensure compliance with the time scales laid out under the retention schedule. All members of staff, with access to records, are expected to;

* Manage their current record keeping systems using the Retention Policy.
* Only dispose of records in accordance with the requirements outlined in this policy, if authorised to do so.
* Ensure that any proposed divergence from the records retention schedule and disposal policies is authorised and documented by the Head Teacher.

This policy does not form part of any employee’s contract of employment and is not intended to have a contractual effect. However, it does reflect the school’s current practice, the requirements of current legislation and best practice and guidance. It may be amended by the school but any changes will be notified to employees within one month of the date on which the change is intended to take effect. The school may also vary any parts of the procedure, including time limits, as appropriate.

# 13. Retention tables

| **Reference** | **File description** | **Format / How / Where this file is held** | **Responsible Role** | **Retention** |
| --- | --- | --- | --- | --- |
| **Period** | **Trigger** | **Basis** | **Action at end of use** |
| Governing Body  |
| 1.1 | Instruments of Government including Articles of Association | Digitally held on school network | Clerk | Permanent | Closure of school | Common practice | Offer to the Local Authority Record Office when the school closes |
| 1.2 | Trusts and Endowments managed by the Governing Body | Digitally held on school network | Clerk | Permanent | End of operational use | Common practice | Offer to the Local Authority Record Office when the school closes |
| 1.3 | Scheme of delegation and terms of reference for committees | Digitally held on school network | Clerk | Until superseded or whilst relevant (schools may wish to retain these records for reference purposes in case decisions need to be justified) | Expiration of terms | Common practice | If the school is unable to store these, they will be offered to the Local Authority Record Office |
| 1.4 | Governor’s Code of Conduct | Digitally held on school network | Clerk | One copy of each version should be kept for the life of the school. |  | Common practice |  |
| 1.5 | Records relating to the election of chair and vice chair | Digitally held on school network | Clerk | Once the designation has been recorded in the minutes, the records relating to the election can be destroyed | Date of appointment | Common practice | Secure disposal |
| 1.6 | Appointment of a clerk to the governing body | Digitally held on school network | Clerk | Date of end of appointment + 6 years (note HR records may require different retention) | Date of appointment | Common practice | Secure disposal |
| 1.7 | Records relating to the appointment of parent and staff governors, not appointed by the governors | Digitally held on school network | Clerk | Date of election + 6 months | Date of election | Common practice | Secure disposal |
| 1.8 | Records relating to the appointment of co-opted governors | Digitally held on school network | Clerk | 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, or for allegations involving child sexual abuse for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. | Date of appointment | Common practice | Secure disposal |
| 1.9 | Application forms – successful candidates | Paper copy – held in file in secure / locked room | Clerk | End of term in office + 1year | End of period of office | Common practice | Secure disposal |
| 1.10 | Appointment documentation:* Terms of office of serving governors, including evidence of appointment
* Governor declaration against disqualification criteria
* Register of business interests
* Training required, and received, by governors
* Induction programme for new governors
* DBS checks carried out on the clerk and members of the governing body
* Governor personnel files.
 | Digitally held on school network | Clerk | End of term of office + 6 years (note HR records may require different retention) | Date of appointment | Common practice | Secure disposal |
| 1.11 | Annual Reports | Digitally held on school network | Clerk | Date of the report + 10 years | End of the calendar year that the record was created in | Education (Governor’s Annual Reports)(England)(Amendment)Regulations 2002 and The Limitation Act 1980 | If the school is unable to store these, they will be offered to the Local Authority Record Office |
| 1.12 | Annual reports required by the Department of Education | Digitally held on school network | Clerk | Date of report + 10 years | Date of report | Common practice | Secure disposal |
| 1.13 | Meetings schedule |  |  | Current year | Date of meeting | Common practice | Secure disposal |
| 1.13 | Meetings schedule | Digitally held on school network | Clerk | Current year | Date of meeting | Common practice | Secure disposal |
| 1.14 | Agendas for Governing Body meetings | Digitally held on school network | Clerk | One copy to be retained with the master set of minutes - all other copies can be disposed of | Conclusion of meeting | Common practice | Secure disposal |
| 1.16 | Minutes of Governing Body meetings (Principal Set signed) | Digitally held on school networkPaper copy – held in file in secure / locked room | Clerk | Permanent to be held at school | Date of meeting | Common practice | If the school is unable to store these, they will be offered to the Local Authority Record Office |
| 1.17 | Action plans created and administered by the Governing Body | Digitally held on school network | Clerk | Until superseded or whilst relevant | Expiration of action plan | Common practice | Secure disposal |
| 1.18 | Reports presented to the Governing Body | Digitally held on school network | Clerk | Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently | Date of report | Common practice | If the school is unable to store these, they will be offered to the Local Authority Record Office |
| 1.19 | Policy documents created and/or administered by the Governing Body | Digitally held on school network | Headteacher | A copy of each policy will create a time line of policy development OR a robust version control which allows a snapshot of a policy at any given date.Keep all policies relating to safeguarding and child protection for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.  | Expiration of the policy | Common practice | Secure disposal |
|   | Records relating to complaints made to, and investigated by the Governing Body and/or Head Teacher | Digitally held on school network | School Business Assistant / School Business Officer | Date of the resolution of the complaint + a minimum of 6 years. If negligence or child protection/safeguarding is involved then current year + 15 years.If child sexual abuse issues are involved then for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. | Resolution of complaint |  |  |
| 1.21 | Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies | Digitally held on school network | Clerk / Headteacher | For the life of the organisation | Date proposal accepted or declined | Common practice | If the school is unable to store these, they will be offered to the Local Authority Record Office |
| 1.22 | Records relating to Governor Monitoring Visits | Digitally held on school network | Clerk / Headteacher | Date of visit + 3 years | Date of visit | Common practice | Secure disposal |
| Headteacher & Senior Management/Leadership Team |
| 2.1 | Log books of activity in the school maintained by the Head Teacher (Legislation no longer requires the completion of a school log book) | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | Date of the last entry in the log book + a minimum of 6 years and then review | Date of last entry in the log book | Common practice | If the school is unable to store these, they will be offered to the Local Authority Record Office |
| 2.2 | Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies | Digitally held on school network | Headteacher | Date of the meeting + 3 years | Date of the meeting | Common practice | If the school is unable to store these, they will be offered to the Local Authority Record Office |
| 2.3 | Correspondence created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities – **not principally concerning pupils, staff or complaints.** In those cases, correspondence will be immediately transferred to the relevant file.  | Email (see email retention period in section 5) |  | Date of correspondence + 3 years and then review | Date of correspondence | Common practice | Secure disposal |
| 2.4 | Professional Development Plans | Securely held in School Office | School Business Manager | Life of plan + 6 years | Date plan commences | Common practice | Secure disposal |
| 2.5 | School Development Plans | Digitally held on school network | Headteacher | Life of plan + 3 years | Date plan commences | Common practice | Secure disposal |
| Admissions |
| 3.1 | All records relating to the creation and implementation of the School’s Admission’s Policy | Digitally held on school network | Headteacher  | Life of the policy + 7 years then review |  | The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012andSchool Admissions CodeStatutory Guidance 2021 | Secure disposal |
| 3.2 | Admissions – if the admission is successful Proofs of address, supplied by parents, as part of the admissions processSupplementary information forms to include; religion, medical conditions etc. | Proof of address is seen but not retainedMedical conditions: digitally held on RM Integris and in classroom file (in secure location) | School Office / Teacher (classroom file) | Added to the pupil file | Date of admission |  |
| 3.3 | Admissions – if the admission is unsuccessful (where no appeal is made) | Digitally held on school network | Headteacher  | Date of applied for admission + 1 year | Date of applied for admission | Secure disposal |
| 3.4 | Admissions – if the admission is unsuccessful (where an appeal is made) | Digitally held on school network | Headteacher  | Resolution of case + 1 year | Resolution of case | Secure disposal |
| 3.5 | Register of Admissions | Digitally held on RM Integris | **School Office** | Every entry in the School admission and attendance register is to be preserved for 6 years beginning with the day on which the entry was made.Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates. | Last entry in register | The School Attendance (Pupil Registration) (England) Regulations 2024Regulations 5, 7 School Admissions CodeStatutory Guidance 2021 | Offer to the Local Authority Record Office |
| 3.6 | Proofs of address, supplied by parents, as part of the admissions process | Proof of address is seen and verified but not retained | **School Office** | Current year + 1 year | Date of admission | Secure disposal |
| 3.8 | Supplementary information forms to include; religion, medical conditions etc. For successful admissions | Medical conditions: digitally held on RM Integris and in classroom file (in secure location) | **School Office / Teacher (classroom file)** | This information will be added to the pupil file | Date of admission/annual data check | The Limitation Act 1980 | ~~Secure disposal~~ |
| 3.9 | Supplementary information forms to include; religion, medical conditions etc. For unsuccessful admissions | In School Office (in secure location) | School Office  | Until the appeal process is completed | Date of admission | Secure disposal |
| Operational Administration |
| 4.1 | Records relating to the creation and publication of the school brochures or prospectus | Digitally held on school network | School Office  | Current year + 3 years | Expiration of current publication | Common practice | Offer to the Local Authority Record Office |
| 4.2 | Records relating to the creation and distribution of circulars to staff, parents or pupils | Digitally held on school network | School Office  | Current year + 1 year | Date of record | Common practice | Offer to the Local Authority Record Office |
| 4.3 | Newsletters and other items with short operational use | Digitally held on school network and on Class Dojo | School Office  | Current year + 1 year | Date of record | Common practice | Offer to the Local Authority Record Office |
| 4.4 | Visitor management systems (including electronic systems, visitors’ books and signing in sheets) | Secure location in School Office | School Office  | Current year + 6 years then review | End of calendar year | Common practice | Secure disposal |
| 4.5 | Pupil & Family Privacy Notice which is made available via the school website as part of UK GDPR compliance | Held securely by PTA |  | Date of issue + 6 years | When policy is superseded | Common practice | Secure disposal |
| 4.6 | Consents relating to school activities as part of UK GDPR compliance (e.g. consent for photographs to be published, social media / website etc as well as for mailings) | Digitally held on school network and on website | School Office  | This information will be added to the pupil file | Date of admission | Common practice |  |
| 4.7 | Security breach logs | Digitally held on school network and and in classroom file (in secure location) | School Office / Teachers (for classroom file) | Date of issue + 25 years (pupils) and 6 years (staff) | Date of implementation | Common practice | Secure disposal |
| 4.8 | Digital continuity plans which may include: - Digital Strategy- IT Disaster Recovery Procedure and Plan | Digitally held on school network | School Office  | Date of issue + 6 years | Expiration of current plan | Common practice | Secure disposal |
| 4.9 | Call Recordings (including VOIP messages and recordings) | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. |  | Date of call recording | Common practice | Secure disposal |
| 4.10 | CCTV Recordings (retention for all ‘ordinary’ footage- any footage retained for specific purposes e.g. accident will need to be considered individually regarding how long it will be retained- please see CCTV policy) | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. |  | Date of footage recording | Common practice | Secure disposal |
| School Communications |
| 5.1 | School staff / governor emails and other platforms such as Microsoft Teams containing personal data – inbox, sent items, deleted items | Digitally held on email for school year and then deleted. Key information about specific pupils and staff printed placed in pupil / staff files  | All school staff | School to determine and document hereWhere forming part of a record, information in these will be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. The Code of Practice states that there is no need to retain ephemeral material and this may be destroyed on a routine basis. | In line with guidance in Acceptable use policy | Common practice | Full deletion |
| 5.2 | Social media platforms  | Facebook only | School Office  | Two academic years and then any personal data relating to pupils is removed | End of academic yr | Common practice | Posts deleted |
| 5.3 | Website – pictures / news stories | Digitally held | School Office  | Two academic years and then any personal data relating to pupils is removed | End of academic yr | Common practice | Posts deleted |
| HR – Recruitment Information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. ([KCSiE 2024](https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf) para 424). |
| 6.1 | All records leading up to the appointment of a new Head Teacher | Held by Derbyshire County Council (DCC) | DCC | Unsuccessful attempts - date of appointment + 6 months. Successful attempts - add to the staff personnel file and retain until the end of the appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years or information containing allegations of sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. | Date of appointment | Common practice. Right to work - Immigration, Asylum and Nationality Act 2006 | Secure disposal  |
| 6.2 | All records leading up to the appointment of a new member of staff (successful candidate) | Securely held in School Office | School Business Manager | This information will be added to the staff personnel file  | Date of appointment | Common practice. Right to work - Immigration, Asylum and Nationality Act 2006 |  |
| 6.3 | All records leading up to the appointment of a new member of staff (unsuccessful candidate) | Securely held in School Office | School Business Manager | Date of appointment + 6 months  | Date of appointment | Common practice | Secure disposal |
| 6.4 | Pre-employment vetting information of successful candidates  | Securely held in School Office | School Business Manager | Application forms, references and other documents – for the duration of their employment + 6 years. Note there is no requirement to keep a copy of DBS once the details have been entered into the Single Central Record. At the end of employment, information contained in the Single Central Record will be transferred to the personnel file. | Date of receipt | Right to work - Immigration, Asylum and Nationality Act 2006.KCSiE 2024 | Secure disposal  |
| 6.5 | Proofs of identity | Securely held in School Office | School Business Manager | To be kept only as proof of right to work. Not kept for any other purpose.These documents will be added to the personal folder. Home Office requires that the documents are kept until termination of employment plus not less than 2 years. | Date of receipt | Right to work - Immigration, Asylum and Nationality Act 2006.KCSiE 2024 | Secure disposal  |
| 6.6 | Pre-employment vetting information of successful candidates – for the purposes of ensuring staff are adequately qualified | Securely held in School Office | School Business Manager | To be added to the member of staff’s personal folder | Date of receipt | KCSiE 2024 | Secure disposal  |
|  |  |  |  |  |  |  |  |
| HR – Operational Staff ManagementInformation containing allegations of sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. ([KCSiE 2024](https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf) para 424) |
| 7.1 | Staff Personnel File | Securely held in School Office | School Business Manager | Termination of employment + 6 years | Date of appointment | Limitation Act 1980 | Secure disposal  |
| 7.2 | Timesheets | Securely held in School Office | School Business Manager | Current year + 6 years | Date of appointment | Common practice | Secure disposal  |
| 7.3 | Annual appraisal/assessment records | Securely held in Headteachers Office | Headteacher  | Current year + 6 years | End of calendar year that the record was created in | Common practice | Secure disposal  |
| 7.4 | Sickness absence monitoring | Digitally held on school network / Securely held in School Office | School Business Manager | Sickness records are categorised as ‘sensitive data’. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring. Sickness records will be kept separate from accident records. Current practice recommends that sickness records will be held for the current year + 3 years. | Date of absence | Common practice & Statutory Sick Pay Act 1994 | Secure disposal |
| 7.5 | Staff training records | Securely held in School Office | School Business Manager | Keep on personnel file (see above). | Date of appointment | Common practice (unless dictated by a professional body) | Secure disposal  |
| 7.6 | Annual leave records | Securely held in School Office | School Business Manager | 6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year | End of relevant tax year | Common practice | Secure disposal |
| 7.7 | Working Time Regulations:·         Opt out forms·         Records of compliance with WTR | Securely held in School Office | School Business Manager | 2 years from the date on which they were entered into2 years after the relevant period | End of relevant tax year | Common practice | Secure disposal |
| 7.8 | Maternity/Adoption/Paternity Leave records | Securely held in School Office | School Business Manager | Current year + 3 years | End of relevant tax year | Common practice | Secure disposal |
| 7.9 | Consents for the processing of personal and sensitive data (this will be rare as the majority of staff data is processed due to:- contract (UK GDPR A9 (1) (b) - public task (UK GDPR A9 (1) (e)- legal obligation (UK GDPR A9 (1) (c)Consent (UK GDPR A9 (1) (a) is only required where one of the above is not relevant.) | Securely held in School Office | School Business Manager | For as long as the data is being processed and up to 6 years afterwards | End of employment | Common practice | Secure disposal |
| 7.10 | Staff policy acknowledgement | Digitally held on MyConcern platform or on Microsoft Forms | Headteacher | Life of the policy + 3 years | Implementation of the policy | Common practice (unless otherwise dictated eg KCSiE, H&SWA) | Secure disposal  |
| 7.11 | Staff ‘skeleton’ record (which would include a brief record of name, job role, contract start and end dates (and any information that would be needed to be included in a reference) | Digitally held on SAP system | Headteacher / School Business Manager | Permanent. These form part of the historical archives of the school.  | Archive on closure of the school.  | Common Practice.  | Offer to the Local Authority Record Office |
| 7.12 | Register of business interests | Digitally held on school network / Securely held in School Office | Headteacher / School Business Manager | Date of appointment + 6 years | Date of appointment | Common practice | Secure disposal |
| HR - Management of Disciplinary and Grievance ProcessesInformation containing allegations of sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. ([KCSiE 2024](https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf) para 424) |
| 8.1 | Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded | In employee file, held securely in School OfficeCopy also held securely in Headteacher Office | School Business Manager / Headteacher | Until the person’s normal retirement age or 10 years from the date of allegation, whichever is longer, then review. Information containing allegations of sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse NB – allegations that are found to be malicious will be removed from personnel files, from the date they are proven to be unfounded. | Date of referral | KCSiE 2024 and Working Together to Safeguard Children | Secure disposal  |
| 8.2 | Disciplinary proceedings:Verbal warning | In employee file, held securely in School Office | School Business Manager / Headteacher | Date of warning + 6 months | Date of warning | KCSiE 2024 | Secure disposal  |
| 8.3 | Disciplinary proceedings:Written warning (level 1) | In employee file, held securely in School Office | School Business Manager / Headteacher | Date of warning + 6 months | Date of warning | KCSiE 2024 | Secure disposal  |
| 8.3 | Disciplinary proceedings:Written warning (level 2) | In employee file, held securely in School Office | School Business Manager / Headteacher | Date of warning + 12 months | Date of warning | KCSiE 2024 | Secure disposal  |
| 8.4 | Disciplinary proceedings:Final Warning | In employee file, held securely in School Office | School Business Manager / Headteacher | Date of warning + 18 months | Date of warning | KCSiE 2024 | Secure disposal  |
| 8.5 | Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings) | In employee file, held securely in School Office | School Business Manager / Headteacher | If the incident is child protection related then see above; otherwise dispose following the conclusion of the case | Date of resolution | KCSiE 2024 | Secure disposal  |
| N.B. 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 at a later date, and then defend themselves by denying they would undertake such an action, reference to the earlier proceedings may show that they should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that they had e.g. “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. |
|  |
| HR – Payroll & Pensions |
| 9.1 | Maternity Pay Records | In employee file, held securely in School Office and/or on SAP Payroll system | School Business Manager / Headteacher | Current year + 3 years | End of the financial year in which the maternity pay period ends | Statutory Maternity Pay (General) Regulations 1986 | Secure disposal |
| 9.2 | Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity | In employee file, held securely in School Office and/or on SAP Payroll system | School Business Manager / Headteacher | Current year + 6 years | End of the financial year | Retirement Benefits Schemes (Information Powers) Regulations 1995 | Secure disposal |
| 9.3 | Batches, Bonus Sheets, Car Loans, Car Mileage Output, Insurance, Members Allowance Register, National Insurance (Schedule of payments), Part Time Fee claims, Payroll (gross/net, weekly or monthly), Payroll Reports, Payslips (copies), Pension Payroll, Superannuation adjustments and reports | In employee file, held securely in School Office and/or on SAP Payroll system | School Business Manager / Headteacher | Current year + 6 years | End of the financial year | Taxes and Management Act 1970, Income and Corporation Taxes Act 1988 | Secure disposal |
| 9.4 | Bonus sheets, Car Allowance claims, Overtime | In employee file, held securely in School Office and/or on SAP Payroll system | School Business Manager / Headteacher | Current year + 3 years | End of the financial year | Taxes and Management Act 1970, Income and Corporation Taxes Act 1988 | Secure disposal |
| 9.5 | Income Tax P60, Personal bank details. Tax Forms P6/P11/P11D/P35/P45/P46/P48 | In employee file, held securely in School Office and/or on SAP Payroll system | School Business Manager / Headteacher | Current year + 6 years | End of the financial year | Common practice | Secure disposal |
| 9.6 | Absence records, Sickness records, Staff returns, Time Sheets/Clock Cards/Flexitime | In employee file, held securely in School Office and/or on SAP Payroll system | School Business Manager / Headteacher | Current year + 3 years | End of the financial year | Common practice | Secure disposal |
| 9.7 | Statutory Sick Pay | In employee file, held securely in School Office and/or on SAP Payroll system | School Business Manager / Headteacher | Current year + 3 years | End of the financial year | Common practice | Secure disposal |
|  |  |  |  |  |  |  |  |
| Health and Safety |
| 10.1 | Accessibility Plans | Digitally held on school network | Headteacher | Current year + 6 years | End of the calendar year that the records was created in | Equality Act 2010 and The Limitation Act 1980 | Secure disposal |
| 10.2 | Health and Safety Policy Statements | Digitally held on school network | School Business Manager | Life of the policy + 3 years | Implementation of the policy | Common practice | Secure disposal |
| 10.3 | Health and Safety Risk Assessments | Digitally held on school network | School Business Manager | Life of the assessment + 3 years | Implementation of the assessment | Common practice | Secure disposal |
| 10.4 | Adults: Accident reporting (reportable accidents - <https://www.hse.gov.uk/riddor/reportable-incidents.htm>) and <https://www.hse.gov.uk/pubns/edis1.htm>  | Securely held in Accident Book (located in Accessible Toilet) | Headteacher | Retain for 7 years | Date of incident | Common practice | Secure disposal |
| 10.5 | Children: Accident reporting (reportable accidents - <https://www.hse.gov.uk/riddor/reportable-incidents.htm>) and <https://www.hse.gov.uk/pubns/edis1.htm> | Securely held in Accident Book (located in Accessible Toilet) | Headteacher | Retain for 25 years | Date of birth | Common practice | Secure disposal |
| 10.6 | Minor incidents (non reportable in 10.4 & 10.5 above) accident book | Securely located in each Classroom | Teacher | Retain for 3 years | End of academic year | Common practice and The Social Security (Claims and Payments Regulations 1979) Regulation 25 | Secure disposal |
| 10.7 | Control of Substances Hazardous to Health (COSHH) | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | Current year + 40 years | Last action on file | The Control of Substances Hazardous to Health Regulations 2002 | Secure disposal |
| 10.8 | Process of monitoring areas where employees/pupils are likely to come into contact with asbestos | Red Box in inner foyer | Headteacher / School Business Manager | Last action + 40 years | Last action on file | The Control of Asbestos at Work Health Regulations 2012 | Secure disposal |
| 10.9 | Process of monitoring areas where employees/pupils are likely to come into contact with radiation | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | Last action + 50 years | Last action on file | The Ionising Radiations Regulation 2017 | Secure disposal |
| 10.10 | Fire Precautions log books | Red Box in inner foyer | Headteacher / School Business Manager | Current year + 3 years | End of calendar year | Common practice | Secure disposal |
| 10.11 | Fire Assessments | Red Box in inner foyer | Headteacher / School Business Manager | Life of the risk assessment + 6 years | End of calendar year | Fire Service Order 2005 and The Limitation Act 1980 | Secure disposal |
|  |  |  |  |  |  |  |  |
| Financial Management – Risk & Insurance, Asset Management  |
| 11.1 | Employer’s Liability Insurance Certificate | Displayed in inner school foyer | School Business Manager | Date of closure + 40 years | Closure of school | Common practice | Offer to Local Record Office |
| 11.2 | Inventories of furniture and equipment | Equipment only: on school inventory held on SAP | School Business Manager | Current year + 6 years | End of calendar year | Common practice | Secure disposal |
| 11.3 | Burglary, theft and vandalism report forms | Insurance section in County / secure location in school office | School Business Manager | Current year + 6 years | End of calendar year | Common practice | Secure disposal |
| 11.4 | Records relating to school/trust vehicles (records that are not required anywhere else e.g. health and safety, litigation etc) | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL | 6 years from the disposal of the vehicle | End of calendar year | The Limitation Act 1980 | Secure disposal |
|  |  |  |  |  |  |  |  |
| Financial Management – Accounts and Statements including Budget Management |
| 12.1 | Annual accounts | Secure location in school office | School Business Manager | Current year + 6 years | End of financial year | Common practice | Offer to Local Record Office |
| 12.2 | Loans and grants managed by the school | Grants only - Secure location in school office and on school network | School Business Manager | Date of last payment on the loan + 12 years then review | End of financial year | Standard financial regulations | Secure disposal |
| 12.3 | Student Grant applications | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | Current year + 3 years | End of financial year | Standard financial regulations | Secure disposal |
| 12.4 | All records relating to the creation and managements of budgets, including the Annual Budget statement, and background papers | Digitally held on school network and on SAP | Headteacher / School Business Manager | Current financial year + 3 years | End of financial year | Common practice | Secure disposal |
| 12.5 | Invoices, receipts, order books and requisitions, delivery notices, VAT records | Secure location in School Office | School Business Manager | Current financial year + 6 years | End of financial year | Standard financial regulations and Record Keeping (VAT Notice 700/21) | Secure disposal |
| 12.6 | Records relating to the collection and banking of monies | Digitally held on school network / secure location in School Office | School Business Manager | Current financial year + 6 years | End of financial year | Standard financial regulations | Secure disposal |
| 12.7 | Records relating to the identification and collection of debt | Digitally held on school network / secure location in School Office | School Business Manager | Current financial year + 6 years | End of financial year | Standard financial regulations and The Limitation Act 1980 | Secure disposal |
| 12.8 | Pupil Premium Fund records, including evidence of successful FSM eligibility checks | Digitally held on Perspective / RM Integris and a hard copy is held in a secure location in the School Office | Headteacher | Date pupil leaves the provision + 6 years | End of financial year | Common practice | Secure disposal |
|  |  |  |  |  |  |  |  |
| Financial Management – Contract Management  |
| 13.1 | All records relating to the management of contracts under seal | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | Current year + 12 years | End of contract | The Limitation Act 1980 | Secure disposal |
| 13.2 | All records relating to the management of contracts under signature | Secure location in School Office | School Business Manager | Current year + 6 years | End of contract | The Limitation Act 1980 | Secure disposal |
| 13.3 | Records relating to the monitoring of contracts | Secure location in School Office | School Business Manager | Current year + 6 or 12 years | End of calendar year | The Limitation Act 1980 | Secure disposal |
|  |  |  |  |  |  |  |  |
| Financial Management – School Fund [where one exists, or has done in the previous 7yrs] |
| 14.1 | School Fund:* cheque books and paying in books
* ledger
* invoices
* receipts
* bank statements
* journey books
 | Secure location in School Office | School Business Manager | Current year + 6 years | End of use | Financial Services Act 2012, HMRC regulationsCompanies Act 2006 | Secure disposal |
|  |  |  |  |  |  |  |  |
| Financial Management – School Meals |
| 15.1 | Free School Meals Register, including evidence of successful FSM eligibility checks | [MIS] | Headteacher | Date pupil leaves the provision + 6 years | End of financial year | Common practice | Secure disposal |
| 15.2 | School Meals Register | [MIS] | School Office | Current year + 3 years | End of calendar year | Common practice | Secure disposal |
| 15.3 | School Meals Summary Sheets | [MIS] | School Office | Current year + 3 years | End of calendar year | Common practice | Secure disposal |
| 15.4 | Data for the purposes of the DfE breakfast club provision | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL – THIS IS PROVIDED BY A THIRD PARTY | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL – THIS IS PROVIDED BY A THIRD PARTY | Current year + 7 years | End of the Academic year | [Breakfast clubs early adopters: conditions of grant for the 2024 to 2025 academic year, beginning from 22 April 2025 - GOV.UK](https://www.gov.uk/government/publications/breakfast-club-early-adopters-grant-2024-to-2025-academic-year/breakfast-clubs-early-adopters-conditions-of-grant-for-the-2024-to-2025-academic-year-beginning-from-22-april-2025) | Secure Disposal |
|  |  |  |  |  |  |  |  |
| Property Management |
| 16.1 | Title deeds of properties belonging to the school/trust | Derbyshire County Council (property leased)  | Derbyshire County Council | Permanent. These will follow the property unless the property has been registered with the Land Registry | Archive upon closure | Common practice | Offer to Local Authority Record Office |
| 16.2 | All records relating to the maintenance carried out by contractors | Secure location in School Office | School Office | Current financial year + 6 yearsRecords relating to rewiring, major alterations etc will be retained in the health and safety file whilst the building belongs to the school and will be passed onto any new owners if the building is leased or sold. | End of financial year that the record was created in  | Common practice and Record Keeping (VAT Notice 700/21) | Secure disposal |
| 16.3 | All records relating to the maintenance carried out by school employees, including maintenance log book | Secure location in School Office | School Office | Current calendar year + 6 yearsRecords relating to rewiring, major alterations etc will be retained in the health and safety file whilst the building belongs to the school/trust and will be passed onto any new owners if the building is leased or sold. | End of calendar year that the record was created in | Common practice and Record Keeping (VAT Notice 700/21) | Secure disposal |
| 16.4 | Plans of property belonging to the school/trust | Derbyshire County Council (property leased)  | Derbyshire County Council | These will be retained whilst the building belongs to the school/trust and will be passed onto any new owners, if the building is leased or sold. | Transfer of asset | Common practice | Offer to Local Authority Record Office |
| 16.5 | Leases of property leased by, or to, the school/trust | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL | Expiry of lease + 6 years | Commencement of lease | Common practice | Secure disposal |
| 16.6 | Records relating to the letting of school/trust premises | Secure location in School Office | School Office | Current financial year + 6 years | End of financial year that the record was created in | Common practice | Secure disposal |
|  |  |  |  |  |  |  |  |
| Pupil Education Record (see [s2 Education Record (Pupil Information) Regulations 2005](https://www.legislation.gov.uk/uksi/2005/1437/made) ). Much of this information is stored in electronic form on the school’s Management Information System [insert name].SEN is dealt with in [section 20](#_Special_Educational_Needs). |
| 17.1 | Primary | [MIS] | Headteacher | Retain whilst the child remains at the primary school. Records may be kept on the MIS in an archive or ‘former roll’ area) after a pupil has left the school – see [1.7 Last School](#_4.7_Transfer_of) and 1.8 Management Information System | Date pupil changes school | Education (Pupil Information)(England) Regulations 2005 | The file will follow the pupil when they leave the primary school (see [1.7 Last School](#_4.7_Transfer_of). If pupil does not attend a secondary school, or the child dies, then records will be retained as per 17.2 below ) |
| 17.4 | Examination Results - Pupil CopiesInternal | [MIS] | Headteacher | This information will be added to the pupil file | Date of examination | Common practice | Secure disposal |
| 17.5 | Pupil ‘skeleton’ record (which would include a brief record of pupil names, UPNs, date of birth, address, parent details, date of admission, date of departure and destination (if known))  | [MIS] | Headteacher | Permanent. These form part of the historical archives.  | Archive on closure of the school/trust.  | Common Practice.  | Offer to the Local Authority Record Office |
| Child Protection (CP) / Safeguarding Records |
| 18.1 | Child Protection Information - Primary | Digitally held on MyConcern platform | Headteacher | CP files will be transferred to the new school as soon as possible (5 days), to maintain continuity.Ensure secure transit, and a confirmation of receipt willbe obtained. The CP file will be transferred separately from the main pupil file.Please add a note here if you use a safeguarding platform and you intend to retain a copy of the log once the child has left for secondary | Date pupil changes school(Where a child is removed from the roll to be educated at home/missing from education, see below) | [KCSiE 2024](https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf) & Annex C | Transferred to new or Secondary school. Duplicates will be securely disposed of. |
| 18.3 | Child Protection (CP) Information – Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths. | Digitally held on MyConcern platform | Headteacher | Retain for 25 years from the child’s date of birth, then review. Information relating to child sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. | Date removed from roll | Common Practice (there is guidance in KCSiE, but not as to retention period) | Transfer to LA Coordinator for Missing Children andSecure disposal  |
| 18.4 | Child Protection (CP) Information – Child is removed from the roll and is Elective Home Educated | Digitally held on MyConcern platform | Headteacher | Retain for 25 years from the child’s date of birth, then review. Information relating to child sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. | Date removed from roll | Common Practice (there is guidance in KCSiE, but not as to retention period) | Transfer to LA Elective Home Education CoordinatorandSecure disposal  |
| 18.5 | Filtering & Monitoring Logs. Where these indicate a child protection/safeguarding concern, the log will be added to the pupil CP Information and retained in line with the periods in 18.1-18.4. | Digitally held – ICT Filtering Provider (EKA Quantum in 2025) | I Digitally held – ICT Filtering Provider (EKA Quantum in 2025) | Retained for one year | Date of log | Common Practice | Deletion |
|  |  |  |  |  |  |  |  |
| Attendance |
| 19.1 | Attendance Registers | [MIS] | Headteacher | Every entry in the School admission and attendance register is to be preserved for 6 years beginning with the day on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates. | Last entry in register | The School Attendance (Pupil Registration) (England) Regulations 2024Regulations 5, 7  | Secure disposal |
| 19.2 | Correspondence relating to authorized absence | [MIS] and digitally held on school network | Headteacher | Date of absence + 2 years | Date of absence | DfE School attendanceGuidance for maintained schools,academies, independent schools andlocal authoritiesMay 2022  | Secure disposal |
| 19.3 | Correspondence relating to unauthorized absence | [MIS] and digitally held on school network | Headteacher | Date of absence + 3 years | Date of absence | Section 23 of the Anti-Social Behaviour Act 2003 | Secure disposal |
|  |  |  |  |  |  |  |  |
| Special Educational Needs (SEN) |
| 20.1 | Statements and Reviews of Special Educational Needs under [Section 324 and 328 of the Education Act 1996](https://www.legislation.gov.uk/ukpga/1996/56/section/324) and any amendments made to the plan – Primary | Securely held in SEN lead’s classroom / digitally on school network | **SENCO** | Retain for duration of attendance at school | Date pupil changes school | The Limitation Act 1980 | Transfer to new or Secondary School |
| 20.3 | Individual Education Plans and Education Health Care Plan (EHCP) and all other SEN files -Primary | Securely held in SEN lead’s classroom / digitally on school network | **SENCO** | Retain for duration of attendance at school | Date pupil changes school | The Limitation Act 1980 | Transfer to new or Secondary School |
|  |  |  |  |  |  |  |  |
| Curriculum Management |
| 21.1 | Curriculum returns | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | **THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL.** | Current year + 3 years | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 21.2 | Curriculum development | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | **THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL.** | Current year + 6 years | End of the calendar year that the record was created in | Common practice | Offer to the Local Authority Record Office |
| 21.3 | Examination Results (School’s copy) | Digitally held on Insight / RM Integris | Year 2 Teachers / School Office | Current year + 6 years | Date of examination | Common practice | Secure disposal |
| 21.4 | SATs Results | Digitally held on Insight / RM Integris | Year 2 Teachers / School Office | The SATS result will be recorded on the pupil’s educational file and will therefore be retained until the pupil reaches the ages of 25 years. The school/trust may wish to keep a composite record of all the whole year SATS results. These could be kept for the current year + 6 years to allow suitable comparison | Date that results are released | Common practice | Secure disposal |
| 21.5 | SATs Examination papers | Secure location in Headteachers Office | Year 2 Teachers | The examination papers will be kept until any appeals/validation process is complete | Date of examination | Common practice | Secure disposal |
| 21.6 | Published Admission Number (PAN) Reports | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | **THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL.** | Current year + 6 years | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 21.7 | Value Added and Contextual Data | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | **THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL.** | Current year + 6 years | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 21.8 | Self-Evaluation Forms | Digitally held on school network | Headteacher | Current year + 6 years | Date of completion | Common practice | Secure disposal |
| 21.9 | Internal Moderation | Secure location in classrooms | Teacher | Academic year + 1 academic year | Date of commencement | Common practice | Secure disposal |
| 21.10 | External Moderation | Secure location in classrooms | Teacher | Until superseded | Date of commencement | Common practice | Secure disposal |
|  |  |  |  |  |  |  |  |
| Implementation of Curriculum |
| 22.1 | Schemes of Work | Digitally held on school network  | Headteacher  | Current year + 1 year | End of the academic year that the record was created in | Common practice | Review these records at the end of each year and allocate a further retention period or secure disposal |
| 22.2 | Timetable | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | Current year + 1 year | End of the academic year that the record was created in | Common practice | Secure disposal |
| 22.3 | Class Record books, mark books, homework records (eg teacher spreadsheets etc) | Secure location in classrooms / on Dojo platform | Teachers | Current year + 1 year | End of the academic year that the record was created in | Common practice | Secure disposal |
| 22.4 | Pupil work | Returned to the child at the end of the school year | Teachers | Where possible, pupils’ work will be returned to the pupil at the end of the academic year. If this is not, currently policy then it will be retained for the current year +1 | End of the academic year that the record was created in | Common practice | Secure disposal |
| 22.5 | Online learning platforms | Class Dojo / SeeSaw | Teacher responsible for each platform | As above. Work will be cleared from platforms at the end of the following academic year | End of the academic year that the record was created in | Common practice | Secure disposal |
| 22.6 | Teacher diaries & Notebooks | Secure location in classrooms  | Teachers | Contents will be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. Destroyed within 3 months. | Expiration of diary. Completion of notebook | Common practice | Secure disposal |
| Extra Curriculum Management |
| 23.1 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Primary schools) where there has not been a Major Incident (Records created might include risk assessments) | Evolve | EVC  | Date of visit + 14 years | Date of visit | The Health and Safety at Work Act 1974 | Secure disposal |
| 23.2 | Parental consent forms for school trips where there has been no Major Incident | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL.  | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | No retention is required |  | Common practice | Secure disposal |
| 23.3 | Records created by schools to obtain approval for to run an Educational Visit outside the Classroom, **where there has been a Major Incident**(Records created might include risk assessments) | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL.  | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | Retain for 25 years from the date of birth of the pupil/s involved in the incident | Pupil’s DOB | The Limitation Act 1980 | Secure disposal |
| 23.4 | Parental consent forms for school trips, **where there has been a Major Incident** | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL.  | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | Retain for 25 years from the date of birth of the pupil/s involved in the incident.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 | Pupil’s DOB | The Limitation Act 1980 | Secure disposal |
|  |  |  |  |  |  |  |  |
| Family Liaison / Early Help / Alternative Provision |
| 24.1 | Day books | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | **THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL.** | Current year + 2 years then review | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 24.2 | Reports for outside agencies – where the report has been included on the agency case file | Secure location in Headteachers Office / My Concern Platform | Headteacher / SLT | Whilst the child is attending school and then destroy | Date of completion of report | Common practice | Secure disposal  |
| 24.3 | Referral forms | Secure location in Headteachers Office / My Concern Platform | Headteacher / SLT | While the referral is current | Date of completion of form | Common practice | Secure disposal  |
| 24.5 | Contact data sheets and database entries | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL.  | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | Current year then review – if contact is no longer active then destroy | End of the calendar year that the record was created in | Common practice | Secure disposal  |
| 24.6 | Group registers | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL.  | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. | Current year + 2 years | Last entry in register | Common practice | Secure disposal |
|  |  |  |  |  |  |  |  |
| Local Authority |
| 25.2 | Attendance Returns | RM Integris | **School Office** | Current year + 1 year | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 25.3 | School Census Returns | RM Integris | **School Office** | Current year + 5 years | Completion of return | Common practice | Secure disposal |
| 25.4 | Circulars and other information sent from the Local Authority | RM Integris | **School Office** | Operational use | Date of issue | Common practice | Secure disposal |
|  |  |  |  |  |  |  |  |
| Central Government |
| 26.1 | OFSTED reports and papers | Secure location in Headteachers Office  | Headteacher  | Retain whilst current | Date new report is issued | Common practice | Offer to Local Authority Record Office |
| 26.2 | Returns made to central government, including Schools financial value standard (SFVS) and assurance statement | Secure location in Office  | Headteacher  | Current year + 6 years | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 26.3 | Circulars and other information sent from central government | Email | Headteacher | Operational use | Date of issue | Common practice | Secure disposal |
|  |  |  |  |  |  |  |  |
| Parent / Alumni Associations |
| 27.1 | Records relating to the creation and management of PTA and Old Pupil Associations | Securely held by PTA | Chair of the PTA | Current year + 6 years | Date of foundation | Common practice | Offer to the Local Authority Record Office |
|  |  |  |  |  |  |  |  |
| Recordings (meetings, calls, online lessons) – please adapt this section to suit ensuring it is consistent with the Acceptable Use policy |
| 28.1 | Incoming & Outgoing calls | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. – None are recorded | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. – None are recorded |  |  | Common practice |  |
| 28.2 | Meetings | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. – None are recorded | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. – None are recorded |  |  | Common practice |  |
| 28.3 | Online lessons | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. – None are recorded | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. – None are recorded |  |  | Common practice |  |
| 28.4 | Staff training | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. – None are recorded | THIS IS NOT CURRENTLY APPLICABLE TO THE SCHOOL. – None are recorded |  |  | Common practice |  |
| Administration of Medication |
| 30.1 | Non-prescription medicines and remedies inc painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers | Medicines: held in staff room or in officeDocumentation: held in student file and electronically on Medical Tracker | School Office / Online Medical Tracker platform | Current year + 1 year | Date of administration | Limitation Act 1980 | Secure disposal |
| 30.2 | All other administration of medication not covered by 30.1 including, but not limited to: peg feeding, injections, treatments for serious conditions such as diabetes, ADHD or depression | Medicines: held in staff room or in officeDocumentation: held in student file and electronically on Medical Tracker | School Office / Online Medical Tracker platform | Date of birth of the pupil + 25 years | Date of administration | Limitation Act 1980 | Secure disposal |

# Appendix A – List of School Records and Data safely destroyed

**Specimen Checklist for Annual Review of School Records and Safe Data Destruction**

The following is an example of how to create a destruction record – this could be a spreadsheet.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Reference Number | File/Record Title | Description | Reference or Cataloguing Information | Number of Files Destroyed | Method of Destruction | Confirm;1. Safely Destroyed
2. In accordance with Data Retention Guidelines

Yes/No | Name of Authorising Officer |
| 1.  | School invoices | Copies of purchase invoices dated 2011/12 | Folders marked ‘Purchase Invoices 2011/13’ 1-3 | 3 Folders | Cross shredded | Yes | J Smith (Head) |