



Mount Carmel

R.C. HIGH SCHOOL



Retention and Disposal Policy

Last review date: July 2026 - Mr B Georgy

Next review date: July 2027 – Mr B Georgy

A Family of Faith & Learning

The School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the 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 through which this effective management can be achieved and audited. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

1. Scope of the policy

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

2. Responsibilities

- 2.1. The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Head of the School.
- 2.2. The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- 2.3. Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the school's records management guidelines.

3. Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information publication scheme
- Data Protection policy
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

NB: Please be aware that this guidance applies to all types of record, whether they are in paper or digital format.

Disposal

1. Disposal of records that have reached the end of the minimum retention period allocated

The fifth data protection principle⁹ states that:

Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

At Mount Carmel, the School Records Managers will ensure that records that are no longer required for business use are reviewed as soon as possible under the criteria set out so that only the

appropriate records are destroyed. Refer to the Retention Guidelines in Appendix 1

2. Safe destruction of records

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

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

*Please refer to our Digital Communication Policy

Once shredded all documentation will be disposed of in an appropriate way and all shredding disposals will be planned with specific dates and all records will be identified as to the date of destruction.

As our records are destroyed internally, the process will ensure that all records are recorded and authorised to be destroyed by a Senior Manager and the destruction recorded. Records should be shredded as soon as the record has been documented as being destroyed.

3. Recording of all archiving, permanent destruction and digitisation of records

An Excel spreadsheet will be maintained to record all archiving, permanent destruction and digitization of records.

Appendix 1: Management of the School Retention Periods

This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Headteacher and the senior management team, the admissions process and operational administration.

1. Records Relating to Child Protection

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
1.1	Child protection files	Yes	Education Act 2002, section 175 and Keeping Children Safe in Education (KCSIE) 2025.	Date of birth + 25 years (review for longer if legal or safeguarding reasons)	Secure disposal
1.2	Allegation of child protection nature against a member of staff, including where the allegation is unfounded	Yes	Education Act 2002 s175 and KCSIE (2025) guidance on managing allegations	Until the person's normal retirement age or 10 years from the allegation date, whichever is longer (review for ongoing safeguarding relevance)	Secure disposal

2. Records Relating to Governors

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
2.1	Minutes -				
2.1a	Principal set (signed)	No		Permanent	Must be available in school for 6 years from the meeting. Can then be archived/stored elsewhere.
2.1b	Inspection copies	No		Date of meeting + 3 years	Secure disposal
2.2	Agendas	No		Date of meeting	Secure disposal
2.3	Reports	No		Date of report + 6 years	Retain in school for 6 years from report date. Can consider archiving/storing anything important.
2.4	Annual parents' meeting papers	No		Retain for 6 years from meeting date	Secure disposal after 6 years unless required for archival purposes
2.5	Instruments of Government	No		Permanent	Retain in school whilst school open. Can then be archived/stored elsewhere.
2.6	Trusts and Endowments	No		Permanent	Retain in school whilst operationally required. Can then be archived/stored elsewhere.
2.7	Action plans	No		Date of action plan + 3 years	Secure disposal

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
2.8	Policy documents	No		Until superseded + 6 years (if policy formed part of significant decision-making)	Secure disposal
2.9	Complaints files	Yes		Date of resolution of complaint + 6 years	Review for further retention in the case of contentious disputes. Secure disposal.
2.10	Annual reports required by the Department for Education	No	Current DfE guidance	Date of report + 6 years	Secure disposal
2.11	Proposals for schools to become or be established as Specialist Status schools	No		Remove if no longer relevant, or retain for historical archive only	Secure disposal (if not archived)

3. Records Relating to School Management

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
3.1	Log books	Yes		Date of last entry + 6 years, or transfer to local authority/school archive if of historic value	Secure disposal or archive
3.2	Minutes of the senior management team and other internal administrative bodies	Yes		Date of meeting + 5 years	Retain in school for 5 years from meeting date. Can consider archiving/storing anything important.
3.3	Reports made by the head teacher or management team	Yes		Date of report + 3 years	Retain in school for 3 years from report date. Can consider archiving/storing anything important.
3.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Closure of file + 6 years	Secure disposal
3.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Date of correspondence + 3 years	Secure disposal
3.6	Professional development plans	Yes		Closure + 6 years	Secure disposal
3.7	School development plans	No		End of plan + 6 years	Review for further retention. Secure disposal.
3.8	Admissions - successful	Yes		Date of admission + 6 years	Secure disposal
3.9	Admissions - unsuccessful	Yes		Resolution of appeal + 6	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
				years	
3.10	Admissions - secondary schools - casual	Yes		Current year + 6 years	Secure disposal
3.11	Proof of address supplied by parents as part of the admissions process	Yes		Retain for the same 6-year period as the related admission record	Secure disposal
3.12	Supplementary information forms (e.g. religion, medical conditions)	Yes		Retain for the same 6-year period as the related admission record	Secure disposal

4. Records Relating to Pupils

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
4.1	Admission registers	Yes	Education (Pupil Registration) Regulations 2024	Date of entry + 6 years	Secure disposal
4.2	Attendance registers	Yes	Education (Pupil Registration) Regulations 2024	Date of register + 6 years	Secure disposal
4.3	Pupil files retained in schools				
4.3a	Primary	Yes		Retain for time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school.
4.3b	Secondary	Yes	Limitation Act 1980	Date of birth + 25 years	Transfer to another secondary school if required. In the case of exclusion it may be appropriate to transfer the record to the Pupil Referral Unit. Secure disposal
4.5	Special Educational Needs (SEN) files, reviews and individual education plans	Yes		Date of birth + 35 years (or longer if legal case or ongoing support)	Secure disposal
4.6	Correspondence relating to authorised absence and issues	Yes		Date of absence + 3 years	Secure disposal
4.7	Examination results				
4.7a	Public	No		Year of examination + 6 years	Secure disposal
4.7b	Internal examination results	Yes		Current year + 5 years	Secure disposal
4.8	Any other records created in the course of	Yes		Current year + 3 years	Review at the end of 3 years and retain with pupil file if

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
	contact with pupils				necessary. Secure disposal
4.9	Statement maintained under the Education Act 1996 Section 324	Yes	Special Educational Needs and Disability Act 2001; updated SEND Code of Practice (2015)	Date of birth + 35 years or until case closure + 6 years (whichever longer)	Secure disposal unless legal action is pending
4.10	Proposed or amended statement	Yes	Special Educational Needs and Disability Act 2001	Date of birth + 35 years or until case closure + 6 years (whichever longer)	Secure disposal unless legal action is pending
4.11	Advice and information to parents regarding educational needs	Yes	SEND Code of Practice (2015)	Closure + 12 years (review for longer if legal action or EHC plan)	Secure disposal unless legal action is pending
4.12	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001	Closure + 12 years	Secure disposal unless legal action is pending
4.13	Parental permission slips for school trips, where there has been no major incident	Yes		Conclusion of the trip	Secure disposal unless legal action is pending
4.14	Parental permission slips for school trips, where there has been a major incident	Yes	Limitation Act 1980	Date of birth of pupil involved in the incident + 25 years	Secure disposal. Permission slips for all pupils on trip need to be retained for period to show that the rules had been followed for all pupils.
4.15	Records created by schools to obtain approval to run an educational visit outside the classroom, primary schools	No	Outdoor Education Advisers' Panel (OEAP) National Guidance (current edition)	Date of visit + 14 years	Secure disposal
4.16	Records created by schools to obtain approval to run an educational visit outside the classroom, secondary schools	No	Outdoor Education Advisers' Panel (OEAP) National Guidance (current edition)	Date of visit + 10 years	Secure disposal
4.17	Walking bus registers	Yes		Date of register + 3 years	This takes into account that if an incident requiring an accident report, the register will be submitted with the accident report and kept for the retention time for accident reporting. Secure disposal

5. Records Relating to Child's Curriculum

Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
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Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
5.1	School development plan	No		Lifetime of plan + 3 years (minimum)	Review for historical significance, then secure disposal
5.2	Curriculum returns	No		Current year + 3 years	Secure disposal
5.3	Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.4	Timetable	No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.5	Class record books	Yes		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.6	Mark books	Yes		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.7	Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.8	Pupils' work	Yes		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.9	Examination results	Yes		Current year + 6 years	Secure disposal
5.10	SATs records, examination papers and results	Yes		Current year + 6 years	Secure disposal
5.11	PAN reports	Yes		Current year + 6 years	Secure disposal
5.12	Value added and contextual data	Yes		Current year + 6 years	Secure disposal
5.13	Self evaluation forms	Yes		Current year + 6 years	Secure disposal

6. Records Relating to Personnel Records

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
6.1	Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	Secure disposal
6.2	Staff personnel files	Yes		Termination + 6 years (retain longer for safeguarding, pension or insurance purposes)	Secure disposal
6.3	Interview notes and recruitment records	Yes		Date of interview notes + 6 months if unsuccessful. If successful place in personnel	Secure disposal

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
				file.	
6.4	Pre-employment vetting information (including DBS checks)	Yes	DBS Code of Practice	Date of check + 6 months (retain record of check reference number only)	Secure disposal
6.5	Disciplinary proceedings		Where the warning relates to child protection issues, see 1.2		
6.5a	Oral warning	Yes		Date of warning + 6 months	Secure disposal
6.5b	Written warning - level one	Yes		Date of warning + 6 months	Secure disposal
6.5c	Written warning - level two	Yes		Date of warning + 12 months	Secure disposal
6.5d	Final warning	Yes		Date of warning + 18 months	Secure disposal
6.5e	Case not found	Yes		If child protection see 1.2, otherwise destroy immediately	Secure disposal
6.6	Records relating to accident/injury at work	Yes		Date of incident + 12 years	In case of serious accidents a further retention period will need to be applied. Secure disposal
6.7	Annual appraisal and assessment records	Yes		Current year + 5 years	Secure disposal
6.8	Salary cards	Yes		Last date of employment + 6 years (or as required by pension scheme)	Secure disposal
6.9	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI 1999/567)	Current year + 3 years	Secure disposal
6.10	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	Secure disposal
6.11	Proofs of identity collected as part of the process for checking "portable" enhanced DBS disclosure	Yes		Where possible these should be checked and a note/copy of what was checked placed on personnel file. If felt necessary to keep any documentation this should also be placed in personnel file.	Secure disposal of notes/copies and return of originals.

7. Records Relating to Health and Safety

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
7.1	Accessibility plans	Yes	Equality Act 2010	Current year + 6 years	Secure disposal
7.2	Accident reporting				
7.2a	Accident reporting - Adults	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25; Social Security Administration Act 1992 Section 8; Limitation Act 1980	Date of incident + 7 years	Secure disposal
7.2b	Accident reporting - Children	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25; Social Security Administration Act 1992 Section 8; Limitation Act 1980	Date of birth + 21 years (extend if serious injury or legal case)	Secure disposal
7.3	COSHH	No (unless staff names are included, then Yes)		Current year + 10 years	Where appropriate an additional retention period may be allocated. Secure disposal
7.4	Incident reports	Yes		Current year + 20 years	Secure disposal
7.5	Policy statements	No		Date of expiry + 1 year	Secure disposal
7.6	Risk assessments	No		Current year + 3 years	Secure disposal
7.7	Process of monitoring areas where employees and persons are likely to have come in contact with asbestos	No		Last action + 40 years	Secure disposal
7.8	Process of monitoring areas where employees and persons are likely to have come in contact with radiation	No		Last action + 50 years	Secure disposal
7.9	Fire precautions log book	No		Current year + 6 years	Secure disposal

8. Administrative Records

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
8.1	Employer's liability certificate	No		Closure of school + 40 years	Secure disposal
8.2	Inventories of equipment and furniture	No		Current year + 6 years	Secure disposal
8.3	General file series	Yes (only if personal)		Current year + 5 years	Review to see if further

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
		information is included; otherwise No)			retention period required. Secure disposal
8.4	School brochure or prospectus	No		Keep one copy permanently for school archive; others – retain current year + 3 years	Disposal
8.5	Circulars (staff, parents, pupils)	Yes		Current year + 1 year	Review to see if further retention period required. Secure disposal
8.6	Newsletters, ephemera	Yes (if names appear)		Current year + 1 year	Review to see if further retention period required. Secure disposal
8.7	Visitors book	Yes	UK GDPR	Current year + 2 years (anonymise data after 12 months where possible)	Review to see if further retention period required. Secure disposal
8.8	PTA/Old Pupils Associations	Yes		Current year + 6 years	Review to see if further retention period required. Secure disposal

9. Records Relating to Finance

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
9.1	Annual accounts	No	Financial Regulations	Current year + 6 years	Secure disposal
9.2	Loans and grants	No	Financial Regulations	Date of last payment on loan + 12 years	Secure disposal
9.3	Contracts				
9.3a	Under seal	Yes (if signatories named)		Contract completion date + 12 years	Secure disposal
9.3b	Under signature	Yes		Contract completion date + 6 years	Secure disposal
9.3c	Monitoring records	No		Current year + 2 years	Secure disposal
9.4	Copy orders	No		Current year + 2 years	Secure disposal
9.5	Budget reports, budget monitoring etc.	No		Current year + 3 years	Secure disposal
9.6	Invoice, receipts and other records covered by the Financial Regulations	Yes (names or addresses)	Financial Regulations	Current year + 6 years	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
9.7	Annual budget and background papers	No		Current year + 6 years	Secure disposal
9.8	Order books and requisitions	No		Current year + 6 years	Secure disposal
9.9	Delivery documentation	No		Current year + 6 years	Secure disposal
9.10	Debtors' records	Yes	Limitations Act	Current year + 6 years	Secure disposal
9.11	School fund - Cheque books	Yes	Financial Regulations	Current year + 6 years	Secure disposal
9.12	School fund - Paying in books	Yes		Current year + 6 years	Secure disposal
9.13	School fund - Ledger	Yes		Current year + 6 years	Secure disposal
9.14	School fund - Invoices	Yes		Current year + 6 years	Secure disposal
9.15	School fund - Receipts	Yes		Current year + 6 years	Secure disposal
9.16	School fund - Bank statements	Yes		Current year + 6 years	Secure disposal
9.17	School fund - School journey books	Yes		Current year + 6 years	Secure disposal
9.18	Student grant applications	Yes		Current year + 6 years	Secure disposal
9.19	Free school meals registers	Yes		Current year + 6 years	Secure disposal
9.20	Petty cash books	Yes		Current year + 6 years	Secure disposal

10. Records Relating to Property

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
10.1	Title deeds	No		Permanent	These should follow the property
10.2	Plans	No		Permanent – offer to local authority record office or archive when no longer required on site	Retain in school whilst operational. Can then be archived/stored elsewhere.
10.3	Maintenance and contractors	Yes	Financial Regulations	Current year + 6 years	Secure disposal
10.4	Leases	Yes		Expiry of lease + 6 years	Secure disposal
10.5	Lettings	Yes		Current year + 3 years	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
10.6	Burglary, theft and vandalism report forms	Yes		Current year + 6 years	Secure disposal
10.7	Maintenance log books	No		Last entry + 10 years	Secure disposal
10.8	Contractors' reports	Yes (if names are listed)		Current year + 6 years	Secure disposal

11. Records Relating to Local Authorities

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
11.1	Secondary transfer sheets (primary)	Yes		Current year + 2 years	Secure disposal
11.2	Attendance returns	Yes		Current year + 1 year	Secure disposal
11.3	Circulars from LEA	No		Whilst required operationally	Review to see if further retention period required. Disposal

12. Records Relating to the Department for Education

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
12.1	HMI reports	No		Keep most recent inspection report; retain previous report + 6 years for reference or historical archive	Secure disposal or archive
12.2	OFSTED reports and papers	No		Retain most recent inspection report; keep previous version + 6 years	Secure disposal or archive
12.3	Returns	No		Current year + 6 years	Secure disposal
12.4	Circulars from the Department for Education (DfE)	No		Whilst required operationally	Review to see if further retention period required. Disposal

13. Records Relating to Optum

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
13.1	Service level agreements	No		Until superseded	Secure disposal
13.2	Work experience agreement	Yes	Limitation Act 1980	Date of birth + 21 years (retain longer if an incident or claim is possible)	Secure disposal

14. Records Relating to School Meals

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
14.1	Dinner register	Yes		Current year + 3 years	Secure disposal
14.2	School meals summary sheets	Yes		Current year + 3 years	Secure disposal

15. Records Relating to Family Liaison Officers and Home School Liaison Assistants

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
15.1	Day books	Yes		Current year + 2 years	Review to see if further retention period required. Secure disposal
15.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst the child is attending the school	Secure disposal
15.3	Referral forms	Yes		While the referral is current	Secure disposal
15.4	Contact data sheets	Yes		Current year then review	If contact is no longer active secure disposal
15.5	Contact database entries	Yes		Current year then review	If contact is no longer active secure delete
15.6	Group registers	Yes		Current year + 2 years	Secure disposal