

**St Aidan's Catholic Primary School**  
"Living and growing in Christ"

# Records Management Policy



<b>Drafted by:</b>	Executive Headteacher
<b>Approved by:</b>	Full Governing Body
<b>Approved on:</b>	December 2024
<b>Last reviewed on:</b>	December 2024
<b>Next review due:</b>	December 2025

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### 1. Aims

- 1.1. The Trust recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the Trust. This document provides the policy framework through which this effective management can be achieved and audited. It covers scope, responsibilities and relationships with existing policies.
- 1.2. Records Management is the process by which the Trust manages all aspects of any type of record, whether internally or externally generated and in any format or media type and throughout the lifecycle of a record.

### 2. Scope of the policy

- 2.1. This policy applies to all records created, received or maintained by staff in the course of carrying out its functions.
- 2.2. Records are defined as all those documents which facilitate the business carried out by the Trust 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.
- 2.3. A small percentage of the Trust's records may be selected for permanent preservation as part of our archives and for historical research.

### 3. Status of the policy

- 3.1. This policy has been approved by the Trust Board. It sets out our rules on data retention and destruction of personal information.

## 4. Relationship with existing policies

- 4.1. This policy has been drawn up within the context of:
- Freedom of Information Publication Scheme
  - Data Protection policy
  - Other legislation or regulations (including audit, equal opportunities and ethics) affecting the Trust.

## 5. Responsibilities

- 5.1. The Trust 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 at Trust level is the **Data Protection Officer** who can be contacted at [admin@st-aidans.croydon.sch.uk](mailto:admin@st-aidans.croydon.sch.uk). Any questions or concerns about the operation of this policy should be referred in the first instance to the DPO.
- 5.2. The DPO will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and timely.
- 5.3. Individual staff and employees must ensure that records for which they are responsible are accurate, maintained and disposed of in accordance with this policy.

## 6. Definition of terms

- 6.1. **Data** is information which is stored electronically, on a computer, or in certain paper-based filing systems or other media such as CCTV;
- 6.2. **Data Subjects** for the purpose of this policy include all living individuals about whom we hold Personal Data. A Data Subject need not be a UK national or resident. All Data Subjects have legal rights in relation to their Personal Data.
- 6.3. **Data Controllers** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.
- 6.4. **Data Processors** means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller;
- 6.5. **Parent** has the meaning given in the Education Act 1996 and includes any person having parental responsibility or care of a child;
- 6.6. **Personal Data** means any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## 7. Relevant data protection principles

- 7.1. The data protection principles which directly relate to the management, retention and disposal of Personal Data, are that the Personal Data must be:

- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (Article 5(1)(c) of the GDPR);
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that Personal Data that is inaccurate, having regard to the purposes for which they are processed; are erased or rectified without delay (Article 5(1)(d) of the GDPR);
- be kept in a form which permits identification of the Data Subjects for no longer than is necessary for the purposes of which the Personal Data is processed (Article 5(1)(e) of the GDPR);
- be processed in a manner which ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (Articles 5(1)(f) of the GDPR).

## 8. Data retention

- 8.1. Members of staff are expected to manage their current record keeping systems using the Retention Schedule and to take account of the different kinds of retention periods when creating any new record keeping system.

## 9. Retention periods

- 9.1. In line with Article 5(1)(e) of the GDPR, the Trust and each school will not retain Data in an identifiable form for any longer than is necessary for the purpose for which it was obtained and in determining an appropriate retention period will take into account the following;
- the current and future value of the Data;
  - the costs, risks and liabilities associated with retaining the Data in an identifiable format;
  - the ease of difficulty in ensuring the Data remains accurate and up to date;
  - any applicable statutory limitation periods;
  - any relevant guidance documents

## 10. Default retention periods

- 10.1. The 'default period' is the minimum period for which the school or Trust will retain Data. At the conclusion of the default period, the school or Trust will review the Data being held and determine whether it can be destroyed.
- 10.2. The standard default period for retaining Data will be as set out in the Information Management System for Schools produced by the Records Management Society which can be found at <https://irms.org.uk/page/AcademiesToolkit> and is linked at Schedule A.
- 10.3. Each school and the Trust will take into account the matters set out in paragraph 10 in determining whether Data will be retained beyond the default period.

### Exceptions to the Default Period

- 10.4. In most cases, Data will be securely disposed of when it reaches the end of the

retention period. When assessing whether Data should be retained beyond the retention period, the school or the Trust will consider whether;

- the data is subject to a current request pursuant to the GDPR;
- the school or the Trust is subject of, or involved in ongoing legal action to which the Data is or may be relevant;
- the Data is or could be needed in connection with an ongoing investigation;
- the Data is processed solely for archiving purposes in the public interest, scientific or historical research purposes of statistical purposes, and the school has put in place appropriate and technical and organisational measures;
- there are changes to the regulatory or statutory framework which require the Data to be retained for a longer period;
- the Data Subject has exercised their right to restrict the processing of the Data in accordance with Articles 18 of the GDPR

## 11. Storage of data

- 11.1. Data will be stored in accordance securely with access limited to only the post holders that need the data to complete their roles and responsibilities.

## 12. Disposal of data

- 12.1. When Data identified for disposal is destroyed a register of the Data destroyed must be kept.
- 12.2. The destruction of Data is an irreversible act and must be clearly documented on a 'Register of Destroyed Data' which is sent to the Data Protection Officer on an ad hoc basis or upon request. All Data identified for disposal must be destroyed under confidential conditions by the School or Trust.
- 12.3. The School or Trust may subcontract to another organisation to dispose of Data under confidential conditions.
- 12.4. Where the School or Trust sub-contracts its obligation to securely dispose of Data to a sub-contractor or other third party, the School or Trust will satisfy itself of the sub-contractor/third party's experience and competence to do so.
- 12.5. The decision for the destruction and disposal of Data must be proposed by the Academy Data Protection Lead and agreed by the Data Protection Officer.

## 13. Disposal of IT assets

- 13.1. When an IT asset or device has been identified as no longer being required, the School and the Trust must consider what will happen to the device and whether it should be reused, recycled or destroyed.
- 13.2. Whether a device is being reused, recycled or destroyed it is important that the School or Trust considers the security implications associated with each method.
- 13.3. The School or Trust must consider in all cases, what personal data may be leaving the School or Trust along with the device and a written record must be maintained of the device, how data was deleted or erased, and the person/company to whom the device was given, transferred or sold to.

- 13.4. The School or Trust may subcontract to another organisation to dispose of IT Assets and data under confidential conditions.
- 13.5. The decision for the destruction and disposal of Data or IT Assets must be proposed by the Academy Data Protection Lead and agreed by the Data Protection Officer.

## 14. Manual records

- 14.1. Where Data is held in paper or other manual form, the default period for retaining Data has expired and none of the exceptions for retaining Data beyond the default period as set out in section 10 is satisfied, the School or Trust will ensure that the Data is shredded or otherwise confidentially disposed of by the School or Trust or by a person duly authorised by the School or Trust to confidentially destroy the Data.

## 15. Electronic records

- 15.1. Where Data is held in an electronic format the School or Trust will, where feasible, use its reasonable endeavours to:
  - 15.2. Put the Data beyond use so that the Data is no longer on a live electronic system and cannot be accessed by a Data Processor;
  - 15.3. Permanently delete the Data from the School or Trust electronic systems when and where this becomes possible. This School will only engage Data Processors that are able to provide sufficient guarantees in relation to the secure disposal of Data.
  - 15.4. Where the steps set out in 14.1 are complied with, the School or Trust will consider the Data to be 'put beyond use' and this Data will not be used in order to respond to a Subject Access Request.

## 16. Policy review

- 16.1. It is the responsibility of the directors to facilitate the review of this policy on a regular basis. Recommendations for any amendments should be reported to the DPO.
- 16.2. We will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives.

## 17. Enquiries

- 17.1. Further information about this Data Protection Policy is available from the DPO.
- 17.2. General information about the Act can be obtained from the Information Commissioner's Office: [www.ico.gov.uk](http://www.ico.gov.uk)

<b>1 Governance of the Academy Trust</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
1.1	Governance Statement	No		Life of governance statement + 6 years	Secure Disposal
1.2	Articles of Association	No		Life of the Academy	
1.3	Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	Secure Disposal
1.4	Memorandum of Understanding of Shared Governance among Schools	No	Companies Act 2006 Section 355	Life of Memorandum of Understanding + 6 years	Secure Disposal
1.5	Constitution	No		Life of the Academy	
1.6	Special Resolutions to amend the Constitution	No		Life of the Academy	
1.7	Written Scheme of Delegation	No	Companies Act 2006 section 355	Life of Written Scheme of Delegation + 10 years	Secure Disposal
1.8	Directors – Appointment	No		Life of appointment + 6 years	Secure Disposal
1.9	Directors – Disqualification	No	Company Directors Disqualification Act 1986	Date of disqualification + 15 years	Secure Disposal
1.10	Directors – Termination of Office	No		Date of termination + 6 years	Secure Disposal
1.11	Annual Report – Trustees Report	No	Companies Act 2006 section 355	Date of report + 10 years	Secure Disposal
1.12	Annual Report and Accounts	No	Companies Act 2006	Date of report + 10 years	Secure Disposal

<b>1 Governance of the Academy Trust</b>					
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			section 355		
1.13	Annual Return	No	Companies Act 2006 section 355	Date of report + 10 years	Secure Disposal
1.14	Appointment of Trustees and Governors and Directors	Yes		Life of appointment + 6 years	Secure Disposal
1.15	Statement of Trustees Responsibilities	No		Life of appointment + 6 years	Secure Disposal
1.16	Appointment and removal of Members	No		Life of appointment + 6 years	Secure Disposal
1.17	Strategic Review	No		Date of the review + 6 years	Secure Disposal

<b>2 Board of Directors, Members Meetings and Governing Body</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	OFFER TO ARCHIVES
2.2	Board Decisions	Could be if the decisions refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
2.3	Board Meeting: Annual Schedule of Business	No		Current year	Secure Disposal
2.4	Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	Secure Disposal
2.5	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES
2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting <sup>5</sup>	OFFER TO ARCHIVES
2.7	Records relating to the management of the Annual General Meeting <sup>6</sup>	Could be if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting <sup>7</sup>	OFFER TO ARCHIVES

<b>2 Board of Directors, Members Meetings and Governing Body</b>					
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2.8	<b>Agendas for Governing Body meetings</b>	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	Secure Disposal
2.9	Minutes of, and papers considered at, meetings of the Governing Body and its committees	May be data protection issues, if the meeting is dealing with confidential issues relating to staff			
2.10	Principal Set (signed)			Life of Academy	
2.11	Inspection Copies <sup>9</sup>			Date of meeting + 3 years	Secure Disposal
2.12	Reports presented to the Governing Body	May be data protection issues, if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be	Secure Disposal

<b>2 Board of Directors, Members Meetings and Governing Body</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
				kept for the life of the Academy	
2.13	Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	Secure Disposal
2.14	Trusts and Endowments managed by the Governing Body	No		PERMANENT	
2.15	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	Secure Disposal
2.16	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	Secure Disposal
2.17	Register of Directors		Companies Act 2006	Life of the Academy + 6 years	Secure Disposal

<b>2 Board of Directors, Members Meetings and Governing Body</b>					
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2.18	Register of Directors' interests [this is not a statutory register]			Life of the Academy + 6 years	Secure Disposal
2.19	Register of Directors' residential addresses		Companies Act 2006	Life of the Academy + 6 years	Secure Disposal
2.20	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	Secure Disposal
2.21	Register of members		Companies Act 2006	Life of the Academy + 6 years	Secure Disposal
2.22	Register of secretaries		Companies Act 2006	Life of the Academy + 6 years	Secure Disposal
2.23	Register of Trustees interests			Life of the Academy + 6 years	Secure Disposal
2.24	Declaration of Interests Statements [Governors] [this is not a statutory register]			Life of the Academy + 6 years	Secure Disposal

<b>3 Funding and Finance</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
3.1	Statement of financial activities for the year	No		Current financial year + 6 years	Secure Disposal
3.2	Financial planning	No		Current financial year + 6 years	Secure Disposal
3.3	Value for money statement	No		Current financial year + 6 years	Secure Disposal
3.4	Records relating to the management of VAT	No		Current financial year + 6 years	Secure Disposal
3.5	Whole of government accounts returns	No		Current financial year + 6 years	Secure Disposal
3.6	Borrowing powers	No		Current financial year + 6 years	Secure Disposal
3.7	Budget plan	No		Current financial year + 6 years	Secure Disposal
3.8	Charging and remissions policy	No		Date policy superseded + 3 years	Secure Disposal
3.9	Audit Committee and appointment of responsible officers	No		Life of the Academy	Secure Disposal
3.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	Secure Disposal

<b>3 Funding and Finance</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	Secure Disposal
3.12	Funding Agreement with Secretary of State and supplemental funding agreements <sup>11</sup>	No		Date of last payment of funding + 6 years	Secure Disposal
3.13	Funding Agreement – Termination of the funding agreement <sup>12</sup>			Date of last payment of funding + 6 years	Secure Disposal
3.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	Secure Disposal
3.15	Funding Records – Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	Secure Disposal
3.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	Secure Disposal
3.17	Funding records <sup>14</sup>	No		Date of last payment of funding + 6 years	Secure Disposal
3.18	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	Secure Disposal
3.19	Records relating to loans	No		Date of last payment on loan + 6 years if the loan is under	Secure Disposal

<b>3 Funding and Finance</b>					
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				£10,000 or date of last payment on loan + 12 years if the loan is over £10,000	
3.20	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	Secure Disposal
3.21	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	Secure Disposal
3.22	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	Secure Disposal
3.23	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	Secure Disposal
3.24	Payroll records	Yes		Date payroll run + 6 years	Secure Disposal

<b>3 Funding and Finance</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
3.25	Insurance policies	No		Date the policy expires + 6 years	Secure Disposal
3.26	Records relating to the settlement of insurance claims	No		Date claim settled + 6 years	Secure Disposal
3.27	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	Secure Disposal
3.28	Investment policies	No		Life of the investment + 6 years	Secure Disposal
3.29	Management of Endowment Funds	No		Life of the fund + 6 years	Secure Disposal
3.30	Annual accounts	No		Current year + 6 years	Secure Disposal
3.31	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	Secure Disposal
3.32	Student Grant applications	Yes		Current year + 3 years	Secure Disposal
3.33	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No		Life of the budget + 3 years	Secure Disposal

<b>3 Funding and Finance</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
3.34	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	Secure Disposal
3.35	Records relating to the collection and banking of monies	No		Current financial year + 6 years	Secure Disposal
3.36	Records relating to the identification and collection of debt	No		Current financial year + 6 years	Secure Disposal
3.37	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	Secure Disposal
3.38	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	Secure Disposal
3.39	Records relating to the monitoring of contracts	No		Current year + 2 years	Secure Disposal
3.40	Inventories of furniture and equipment	No		Current year + 6 years	Secure Disposal
3.41	Burglary, theft and vandalism report forms	No		Current year + 6 years	Secure Disposal
3.42	Records relating to the leasing of shared	No		Current year + 6	Secure Disposal

<b>3 Funding and Finance</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
	facilities, such as sports centres			years	
3.43	Land and building valuations	No		Date valuation superseded + 6 years	Secure Disposal
3.44	Disposal of assets	No		Date asset disposed of + 6 years	Secure Disposal
3.45	Community School leases for land	No		Date lease expires + 6 years	Secure Disposal
3.46	Commercial transfer arrangements	No		Date of transfer + 6 years	Secure Disposal
3.47	Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	Secure Disposal
3.48	Transfers of freehold land	No		Life of land ownership then transfer to new owner	Secure Disposal
3.49	School Fund – Cheque books	No		Current year + 6 years	Secure Disposal
3.50	School Fund – Paying in books	No		Current year + 6 years	Secure Disposal
3.51	School Fund – Ledger	No		Current year + 6	Secure Disposal

<b>3 Funding and Finance</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
				years	
3.52	School Fund – Invoices	No		Current year + 6 years	Secure Disposal
3.53	School Fund – Receipts	No		Current year + 6 years	Secure Disposal
3.54	School Fund – Bank statements	No		Current year + 6 years	Secure Disposal
3.55	School Fund – Journey books	No		Current year + 6 years	Secure Disposal
3.56	Free school meals registers	Yes		Current year + 6 years	Secure Disposal
3.57	School meals registers	Yes		Current year + 3 years	Secure Disposal
3.58	School meals summary sheets	No		Current year + 3 years	Secure Disposal

<b>4 Policies, Frameworks and Overarching Requirements</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
4.1	Data Protection Policy, including data protection notification	No		Date policy superseded + 6 years	Secure Disposal
4.2	Freedom of Information Policy	No		Date policy superseded + 6 years	Secure Disposal
4.3	Information Security Breach Policy	No		Date policy superseded + 6 years	Secure Disposal
4.4	Special Educational Needs Policy	No		Date policy superseded + 6 years	Secure Disposal
4.5	Complaints Policy	No		Date policy superseded + 6 years	Secure Disposal
4.6	Risk and Control Framework	No		Life of framework + 6 years	Secure Disposal
4.7	Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	Secure Disposal
4.8	Home School Agreements <sup>16</sup>	No		Date agreement revised + 6 years	Secure Disposal
4.9	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	Secure Disposal

<b>5 Recruitment</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
5.1	All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years	Secure Disposal
5.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	Secure Disposal
5.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	Secure Disposal
5.4	Pre-employment vetting information – DBS Checks <sup>18</sup>	No	DBS Update Service Employer Guide June 2014	The organisation should take a copy of the DBS certificate when it is shown to them by the individual and should be added to the Staff Personal File	Secure Disposal
5.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible, these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File	Secure Disposal
5.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom <sup>19</sup>	Yes	An employer’s guide to right to work checks [Home Office May 2015]	Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office	Secure Disposal

<b>5 Recruitment</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
				requires that the documents are kept for termination of employment plus not less than 2 years	
5.7	Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	Secure Disposa
5.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	Secure Disposa

<b>6 Operational Staff Management</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
6.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980 (Section 2)	Termination of employment + 6 years	Secure Disposal
6.2	Timesheets	Yes		Current year + 6 years	Secure Disposal
6.3	Annual appraisal/assessment records	Yes		Current year + 5 years	Secure Disposal
6.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	Secure Disposal
6.5	Training needs analysis	No		Current year + 1 year	Secure Disposal

<b>7 Management of Disciplinary and Grievance Processes</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
7.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded <sup>20</sup>	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	Until the person’s normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	Secure Disposal
7.2	Disciplinary Proceedings	Yes			
7.3	• Oral warning			Date of warning + 6 months	Secure Disposal
7.4	level 1 • Written warning –			Date of warning + 6 months	
7.5	level 2 • Written warning –			Date of warning + 12 months	
7.6	• Final warning			Date of warning + 18 months	
7.7	• Case not found			If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	Secure Disposal

<b>8 Health and Safety</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
8.1	Health and Safety policy statements	No		Life of policy + 3 years	Secure Disposal
8.2	Health and Safety risk assessments	No		Life of risk assessment + 3 years	Secure Disposal
8.3	Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	Secure Disposal
8.4	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format  The incident reporting form may be retained as below	
8.5	• Adults			Date of incident + 6 years	Secure Disposal
8.6	• Children			Date of birth of the child + 25 years	Secure Disposal
8.7	Control of Substances Hazardous to Health (COSHH)	No		Current year + 10 years then REVIEW	Secure Disposal

<b>8 Health and Safety</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
8.8	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No		Last action + 40 years	Secure Disposal
8.9	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		Last action + 50 years	Secure Disposal
8.10	Fire precautions log books	No		Current year + 6 years	Secure Disposal
8.11	Fire risk assessments	No	Fire Service Order 2005	Life of the risk assessment + 6 years	Secure Disposal
8.12	Incident reports	Yes		Current year + 20 years	Secure Disposal

<b>9 Admissions</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
9.1	All records relating to the creation and implementation of the School Admissions' Policy	No	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then REVIEW	Secure Disposal
9.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Date of admission + 1 year	Secure Disposal
9.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	Secure Disposal
9.4	Register of admissions	Yes	School attendance:	Every entry in the	REVIEW

<b>9 Admissions</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
			Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	admission register must be preserved for a period of 3 years after the date on which the entry was made <sup>26</sup>	Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates they attended the school
9.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	Secure Disposal
9.6	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Current year + 1 year	Secure Disposal
9.7	Supplementary information form, including	Yes			

<b>9 Admissions</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
	additional information such as religion and medical conditions				
9.8	<ul style="list-style-type: none"> <li>• For successful admissions</li> </ul>			This information should be added to the pupil file	Secure Disposal
9.9	<ul style="list-style-type: none"> <li>• For unsuccessful admissions</li> </ul>			Until appeals process completed	Secure Disposal

<b>10 Head Teacher and Senior Management Team</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
10.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the County Archives Service, if appropriate
10.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then REVIEW	Secure Disposal
10.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or		Date of the report + a minimum of 3 years then REVIEW	Secure Disposal

<b>10 Head Teacher and Senior Management Team</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
		members of staff			
10.4	Records created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then REVIEW	Secure Disposal
10.5	Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then REVIEW	Secure Disposal
10.6	Professional Development Plans	Yes		Life of the plan + 6 years	Secure Disposal

<b>11 Operational Administration</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
11.1	Management of complaints	Yes		Date complaint resolved + 3 years	Secure Disposal
11.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	Secure Disposal
11.3	Records relating to the management of software licences	No		Date licence expires + 6 years	Secure Disposal
11.4	General file series	No		Current year + 5 years then REVIEW	Secure Disposal
11.5	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	Secure Disposal
11.6	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	Secure Disposal
11.7	Newsletters and other items with a short operational use	No		Current year + 1 year	Secure Disposal
11.8	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	Secure Disposal
11.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	Secure Disposal

<b>12 Property Management</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
12.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	
12.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold	
12.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	Secure Disposal
12.4	Records relating to the letting of school premises	No		Current financial year + 6 years	Secure Disposal
12.5	Business continuity and disaster recovery plans	No		Date the plan superseded + 3 years	Secure Disposal
12.6	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	Secure Disposal
12.7	All records relating to the maintenance of the school carried out by school employees, including maintenance log books	No		Current year + 6 years	Secure Disposal
12.8	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	Secure Disposal
12.9	The process of managing allocation and maintenance of vehicles, e.g., lists of who was	N	Limitation Act 1980 (Section 2)	Disposal of the vehicle + 6 years	Secure Disposal

<b>12 Property Management</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
	driving the vehicles and when, maintenance				
12.10	Service logs and vehicle logs	N	Limitation Act 1980 (Section 2)	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	Secure Disposal
12.11	GPS tracking data relating to the vehicles	N	Limitation Act 1980 (Section 2)	Date of journey + 6 years	Secure Disposal

<b>13 Pupil Management</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
13.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
13.2	<ul style="list-style-type: none"> <li>• Primary</li> </ul>			Retain whilst the child remains at the primary school	<p>The file should follow the pupil when they leave the primary school.<sup>1</sup> This will include:</p> <ul style="list-style-type: none"> <li>• To another primary school</li> <li>• To a secondary school</li> <li>• To a pupil referral unit</li> </ul>
13.3	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	Secure Disposal

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<sup>1</sup> If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period.

If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA.

<b>13 Pupil Management</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
13.4	Examination results – pupil copies Public	Yes		This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
13.5	Examination results – pupil copies Internal			This information should be added to the pupil file	
13.6	Child protection information held on pupil file	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file	Secure Disposal
13.7	Child protection information held in separate files	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	Secure Disposal

<b>13 Pupil Management</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
			2015"		
13.8	Attendance registers	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	Secure Disposal
13.9	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	Secure Disposal
13.10	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 year <sup>2</sup>	
13.11	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	Secure Disposal
13.12	Advice and information provided to parents regarding educational needs	Yes	Special Educational	Date of birth of the pupil + 25 years [This would normally be	Secure Disposal

<sup>2</sup> This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time in order to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period – this should be documented.

<b>13 Pupil Management</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
			Needs and Disability Act 2001 Section 2	retained on the pupil file]	
13.13	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	Secure Disposal

<b>14 Curriculum Management</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
14.1	Curriculum returns	No		Current year + 3 years	Secure Disposal
14.2	Examination results (schools copy)	Yes		Current year + 6 years	Secure Disposal
14.3	SATs records – Results	Yes		The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison.	Secure disposal
14.4	Examination papers			The examination papers should be kept until any appeals/validation process is complete	Secure Disposal
14.5	Published Admission Number (PAN) reports	Yes		Current year + 6 years	Secure Disposal
14.6	Value added and contextual data	Yes		Current year + 6 years	Secure Disposal
14.7	Self-evaluation forms	Yes		Current year + 6 years	Secure Disposal

<b>14 Curriculum Management</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
14.8	Schemes of work	No		Current year + 1 year <sup>3</sup>	Secure Disposal
14.9	Timetable	No		Current year + 1 year	
14.10	Class record books	No		Current year + 1 year	
14.11	Mark books	No		Current year + 1 year	
14.12	Record of homework set	No		Current year + 1 year	
14.13	Pupils' work	No		Where possible, work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	Secure Disposal

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<sup>3</sup> It may be appropriate to review these records at the end of each year and allocate a further retention period, or, secure disposal.

<b>15 Extracurricular Activities</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
15.1	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Primary schools	No	Outdoor Education Advisers' Panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice".	Date of visit + 14 years	Secure Disposal
15.2	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	
15.3	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	
15.4	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	Secure Disposal

<b>16 Central Government and Local Authority (LA)</b>					
<b>Ref.</b>	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>Action at End of Admin. Life</b>
16.1	School, pre-school and nursery transfer sheets	Yes		Current year + 2 years	Secure Disposal
16.2	Attendance returns	Yes		Current year + 1 year	Secure Disposal
16.3	School census returns	No		Current year + 5 years	Secure Disposal
16.4	OFSTED reports and papers	No		Life of the report then review	Secure Disposal
16.5	Returns made to central government	No		Current year + 6 years	Secure Disposal
16.6	Circulars and other information sent from central government	No		Operational use	Secure Disposal