



ST JOSEPH'S CATHOLIC PRIMARY SCHOOL

INFORMATION MANAGEMENT, RETENTION AND DISPOSAL POLICY

Revision History

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1 POLICY STATEMENT

St Joseph's Catholic Primary School recognises and understands that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and contribute to the overall effective management of the school as a business and an education environment.

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 effective record management can be achieved.

Effective and adequate records and data management is necessary to: -

- Ensure that the school conducts itself in a structured, efficient and accountable manner
- Ensure that the school has an accurate flow of information and that that information is available through secure record keeping and storage systems
- Support core school business functions and provide evidence of conduct and the appropriate maintenance of associated assets, including buildings, staff, pupils and visitors.
- Meet legislative, statutory and regulatory requirements
- Assist in document policy formation and managerial decision making
- Provide continuity in the event of a disaster
- Protect the interests of the organisation and the rights of employees, clients and present and future stakeholders (pupils)
- Protection personal information and data subject rights
- Avoid inaccurate or misleading data and minimise risks to personal information

Information held for longer than is necessary carries additional risk and cost and can breach data protection rules and principles. St Joseph's Catholic Primary School only ever retain records and information for legitimate business reasons and use and comply fully with the UK data protection laws and guidance.

2 SCOPE OF POLICY

- This policy applies to all records created, received or maintained by staff (*including but not restricted to permanent, fixed term and temporary staff, any third party representatives or sub-contractors, agency workers, volunteers*) within the organisation and has been created to ensure that data records are dealt with in accordance with current legal, regulatory, contractual and business expectations and requirements.

- Data 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 or electronic copy.
- A small percentage of the school's records will be selected for permanent preservation as part of the archives and for historical research. This is usually in liaison with the local authority.

3 RESPONSIBILITIES

- The school has a corporate responsibility to maintain its records and record keeping systems in accordance with current and applicable legislation. The person with overall responsibility for this policy is the Head of School.
- The person responsible for records management in the school will provide guidance for good records management and best practice. They will promote compliance so that information can be retrieved easily, appropriately and in a timely way. Compliance will be monitored by auditing at least annually to check that records are stored securely and can be accessed by the relevant parties in line with the responsibilities of their role.
- Individual staff and employees must ensure that records for which they are responsible are accurate, maintained and disposed of in accordance with the school's records management guidelines.
- Staff have overall responsibility for the management of records and data generated by their departments' activities, namely to ensure that the records created, received and controlled are within the scope of their department, and the systems (*electronic or otherwise*) and procedures they adopt, are managed in a way which meets the aims of this policy.
- Where a DPO has been designated, they must be involved in any data retention processes and records or all archiving and destructions must be retained. Individual employees must ensure that the records for which they are responsible are complete and accurate records of their activities, and that they are maintained and disposed of in accordance with St Joseph's Catholic Primary School's protocols.

4 RELATIONSHIPS WITH ADDITIONAL POLICIES

This policy has been produced and needs to be considered alongside the following policies:

- Data Protection Policy
- Privacy Policy
- Esafety and Data Security
- And with any other applicable current legislation or regulations (including but not restricted to audit, equal opportunities, safeguarding and ethics) affecting the school.

Signed Michael Calnan _____ Head of School

Date _____

5 GENERAL DATA PROTECTION REGULATION (GDPR)

St Joseph's Catholic Primary School needs to collect personal information about the people we employ, work and deal with to effectively and compliantly carry out our everyday business functions and activities and to provide the products and services defined by our business type. This information can include (*but is not limited to*), name, address, email address, data of birth, IP address, identification number, private and confidential information, sensitive information and bank details.

In addition, we may occasionally be required to collect and use certain types of personal information to comply with the requirements of the law and/or regulations, however we are committed to collecting, processing, storing and destroying all information in accordance with the **General Data Protection Regulation**, UK data protection law and any other associated legal or regulatory body rules or codes of conduct that apply to our business and/or the information we process and store.

Our Data Retention Policy and processes comply fully with the GDPR's fifth Article 5 principle: -

Personal data shall 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 accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation').

6 OBJECTIVES

A record is information, regardless of media, created, received, and maintained which evidences the development of, and compliance with, regulatory requirements, business practices, legal policies, financial transactions, administrative activities, business decisions or agreed actions. It is St Joseph's Catholic Primary School's objective to implement the necessary records management procedures and systems which assess and manage the following processes: -

- The creation and capture of records
- Compliance with legal, regulatory and contractual requirements
- The storage of records
- The protection of record integrity and authenticity
- The use of records and the information contained therein
- The security of records
- Access to and disposal of records

St Joseph's Catholic Primary School's objectives and principles in relation to Data Retention & Records Management are to: -

- Ensure that St Joseph's Catholic Primary School conducts itself in an orderly, efficient and accountable manner
- Undertake best practice to improve the quality and flow of information and greater coordination of records and storage systems
- Support core school functions and providing evidence of conduct and the appropriate maintenance of associated tools, resources and outputs to clients and 3rd parties
- Meet legislative, statutory and regulatory requirements
- Deliver services to staff and pupils in a consistent and equitable manner
- Provide continuity in the event of a disaster
- Protect the interests of the organisation and the rights of employees, clients and present and future stakeholders
- Ensure the safe and secure disposal of confidential data and information assets
- Ensure that records and documents are retained for the legal, contractual and regulatory period stated in accordance with each bodies rules or terms.
- Ensure that no document is retained for longer than is legally or contractually allowed
- Mitigate against risks or breaches in relation to confidential information

7 GUIDELINES & PROCEDURES

St Joseph's Catholic Primary School manage records efficiently and systematically, in a manner consistent with the GDPR requirements, ISO15489 and regulatory Codes of Practice on Records Management. Records management training is mandatory for all staff as part of St Joseph's Catholic Primary School's statutory and compliance training programme and this policy is widely disseminated to ensure a standardised approach to data retention and records management.

Records will be created, maintained and retained in order to provide information about and evidence of St Joseph's Catholic Primary School's transactions, customer, employment and activities. Retention schedules will govern the period that records will be retained and can be found in the ***Record Retention Periods*** table at the end of this document.

It is our intention to ensure that all records and the information contained therein is: -

- **Accurate** - records are always reviewed to ensure that they are a full and accurate representation of the transactions, activities or practices that they document

- **Accessible** - records are always made available and accessible when required (*with additional security permissions for select staff where applicable to the document content*)
- **Complete** - records have the content, context and structure required to allow the reconstruction of the activities, practices and transactions that they document
- **Compliant** - records always comply with any record keeping legal and regulatory requirements
- **Monitored** – staff, school and process compliance with this Data Retention Policy is regularly monitored to ensure that the objectives and principles are being complied with.

7.1 RETENTION PERIOD PROTOCOLS

All records retained during their specified periods are traceable and retrievable. All school and employee information is retained, stored and destroyed in line with legislative and regulatory guidelines.

For all data and records obtained, used and stored within St Joseph's Catholic Primary School we: -

- Carry out periodical reviews of the data retained, checking purpose, continued validity, accuracy and requirement to retain
- Establish and verify retention periods for the data, with special consideration given in the below areas: -
 - the requirements of St Joseph's Catholic Primary School
 - the type of personal data
 - the purpose of processing
 - lawful basis for processing
 - the categories of data subjects
- Where it is not possible to define a statutory or legal retention period, as per the GDPR requirement, St Joseph's Catholic Primary School will identify the criteria by which the period can be determined and provide this to the data subject on request and as part of our standard information disclosures and privacy notices
- Have processes in place to ensure that records pending audit, litigation or investigation are not destroyed or altered
- Transfer paper based records and data to an alternative media format in instances of long retention periods (*with the lifespan of the media and the ability to migrate data where necessary always being considered*)

7.2 DESIGNATED MANAGERS

All systems and records have designated owners (IAO) throughout their lifecycle to ensure accountability and a tiered approach to data retention and destruction. Owners are assigned based on role, business area and level of access to data required.

- Safeguarding, SEN - DSL/ SENCO/ Head of School/ Deputy Head
- School Business - SBM
- School Education – Head of School/ Deputy Head

7.3 DOCUMENT CLASSIFICATION

A Data Audit enables us to identify, categorise and record all personal information obtained, processed and shared by our school in our capacity as a controller and processor and has been compiled on a central register which includes: -

- What personal data we hold
- Where it came from
- Who we share it with
- Legal basis for processing it
- What format(s) is it in
- Who is responsible for it?
- Retention periods
- Access level (*i.e. full, partial, restricted etc*)

St Joseph's Catholic Primary School maintain and review their data audit on a regular basis to ensure we continue to collect, use and share data under current legislation.

We utilise 5 main classification types: -

1. **Unclassified** - information not of value and/or retained for a limited period where classification is not required or necessary
2. **Public** - information that is freely obtained from the public and as such, is not classified as being personal or confidential
3. **Internal** - information that is solely for internal use and does not process external information
4. **Personal** - information or a system that processes information that belongs to an individual and is classed as personal under the data protection laws
5. **Confidential** - private information or systems that must be secured at the highest level and are afforded access restrictions and high user authentication

The classification is used to decide what access restriction needs to be applied and the level of protection afforded to the record or data. The classification along with the asset type, content and description are then used to assess the risk level associated with the information and mitigating action can then be applied.

7.4 SUSPENSION OF RECORD DISPOSAL FOR LITIGATION OR CLAIMS

If St Joseph's Catholic Primary School is served with any legal request for records or information, any employee becomes the subject of an audit or investigation or we are notified of the commencement of any litigation against our firm, we will suspend the disposal of any scheduled records until we are able to determine the requirement for any such records as part of a legal requirement.

7.5 STORAGE AND ACCESS OF RECORDS AND DATA

Documents are grouped together by category and then in clear date order of destruction when stored and/or archived. Documents are always retained in a secure location, with the designated owner and above being the only ones to have access. Once the retention period has elapsed, the documents are either reviewed, archived or confidentially destroyed dependant on their purpose, classification and action type.

8 EXPIRATION OF RETENTION PERIOD

Once a record or data has reached its designated retention period date, the designated owner should refer to the retention register for the action to be taken. Not all data or records are expected to be deleted upon expiration; sometimes it is sufficient to anonymise the data in accordance with the GDPR requirements or to archive records for a further period.

8.1 DESTRUCTION AND DISPOSAL OF RECORDS AND DATA

All information of a confidential or sensitive nature on paper, card, microfiche or electronic media must be securely destroyed when it is no longer required. This ensures compliance with the Data Protection laws and the duty of confidentiality we owe to our employees, pupils, and any other party whose data we hold.

St Joseph's Catholic Primary School is committed to the secure and safe disposal of any confidential waste and information assets in accordance with legal obligations and that we do so in an ethical and compliant manner. We confirm that our approach and procedures comply with the laws and provisions made in the General Data Protection Regulation (GDPR) and that staff are trained and advised accordingly on the procedures and controls in place.

8.2 PAPER RECORDS

Due to the nature of our business, St Joseph's Catholic Primary School retains paper based personal information and as such, has a duty to ensure that it is disposed of in a secure, confidential and compliant manner. St Joseph's Catholic Primary School utilise **Onsite-Shredding or A Professional Shredding Service Provider** to dispose of all paper materials.

Employee shredding machines and confidential waste sacks are made available and where we use a service provider for large disposals, regular collections take place to ensure that confidential data is disposed of appropriately.

8.3 ELECTRONIC AND IT RECORDS AND SYSTEMS

St Joseph's Catholic Primary School uses numerous systems, computers and technology equipment in the running of our business. From time to time, such assets must be disposed of and due to the information processed and held on these whilst they are active, this disposal must be handled in an ethical and secure manner.

The deletion of electronic records must be organised in conjunction with the IT Department who will ensure the removal of all data from the medium so that it cannot be reconstructed. When records or data files are identified for disposal, details must be provided to the designated owner to maintain an effective and up to date a register of destroyed records.

Only the IT Department can authorise the disposal of any IT equipment and they must accept and authorise such assets from the department personally. Where possible, information is wiped from the equipment through use of software and formatting, however this can still leave imprints or personal information that is accessible and so we also comply with the secure disposal of all assets.

In all disposal instances, the IT Department must complete a disposal form and confirm successful deletion and destruction of each asset. This must also include a valid certificate of disposal from the service provider removing the formatted or shredded asset. Once disposal has occurred, the IT Department is responsible for liaising with the information Asset Owner and updating the Information Asset Register for the asset that has been removed.

It is the explicit responsibility of the asset owner and IT Department to ensure that all relevant data has been sufficiently removed from the IT device and backed up before requesting disposal and/or prior to the scheduled pickup.

8.4 INTERNAL CORRESPONDENCE AND GENERAL MEMORANDA

Unless otherwise stated in this policy or the retention periods register, correspondence and internal memoranda should be retained for the same period as the document to which they pertain or support (i.e. *where a memo pertains to a contract or personal file, the relevant retention period and filing should be observed*).

Where correspondence or memoranda do not pertain to any documents having already be assigned a retention period, they should be deleted or shredded once the purpose and usefulness of the content ceases or at a maximum, 2 years.

Examples of correspondence and routine memoranda include (but are not limited to): -

- Internal emails
- Meeting notes and agendas
- General inquiries and replies
- Letter, notes or emails of inconsequential subject matter

9 COMPLIANCE AND MONITORING

St Joseph's Catholic Primary School are committed to ensuring the continued compliance with this policy and any associated legislation and undertake regular audits and monitoring of our records, their management, archiving and retention.

10 RETENTION PERIODS

Section 14 of this policy contains our regulatory, statutory and school retention periods and the subsequent actions upon reaching said dates. Where no defined or legal period exists for a record, the default standard retention period is 6 years plus the current year (*referred to as 6 years + 1*).

Note: The retention periods that have been set have been taken from various sources including but not restricted to Babcock 4s (Education), IRMS (Tribal Education Ltd). When this document is ratified some but not all retention periods stated can be reviewed and adjusted. I recommend a 'best practice' approach and the standard default retention period quoted above be adopted if we are unsure. After ratification the retention periods will be set and will have to be adhered to.

11 SCHOOL CLOSURES AND RECORD KEEPING

When a school closes it must seek advice from the Local Authority as to the storage, recording, and transfer of all documents.

The school will have records which will need to be assessed and either:

1. Securely disposed of; or
2. Stored securely until they reach the end of the statutory retention period; or

3. Transferred to another organisation (for example the local authority, or where appropriate the successor body such as an Academy).

4. Transferred to the appropriate County Record Office.

It is the responsibility of each Local Authority [LA] to manage the records of closed schools until they have reached the end of their administrative life and to arrange for their disposal when required.

There may be a number of different reasons why schools close which may affect where school records need to be stored.

- If the school has been closed and the site is being sold or reallocated to another use then the LA should take responsibility for the records from the date the school closes.
- If two schools have merged and function as one school, it will be necessary for the new school to retain any records originating from the two schools for the appropriate time.
- If a secondary school closes and subsequently becomes an Academy, the records relating to the pupils who are transferring to the Academy will be transferred. If the Academy is retaining the current buildings, then all records relating to the maintenance of the buildings should also be transferred. All other records become the responsibility of the Local Authority.

12 SAFE DISPOSAL OF RECORDS AT THE END OF THEIR REQUIRED RETENTION

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

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

In each organisation, local records managers must 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. The local review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained by the organisation for research or litigation purposes.

Refer to the Retention Guidelines at the end of the policy.

Whatever decisions are made they need to be documented as part of the records management policy within the organisation.

2. Safe destruction of records.

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

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

Any other records should be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways. Do not put records in with the regular waste or a skip unless there is no other alternative.

There are companies who can provide confidential waste bins and other services which can be purchased to ensure that records are disposed of in an appropriate way.

- Where an external provider is used it is recommended that all records must be shredded on-site in the presence of an employee. The organisation must also be able to prove that the records have been destroyed by the company who should provide a Certificate of Destruction. Staff working for the external provider should have been trained in the handling of confidential documents.
 - The shredding needs to be planned with specific dates and all records should be identified as to the date of destruction.

It is important to understand that if the records are recorded as to be destroyed but have not yet been destroyed and a request for the records has been received they **MUST** still be provided.

Where records are destroyed internally, the process must ensure that all records are 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.

Freedom of Information Act 2000 (FoIA 2000): The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction.

Members of staff should record at least:

- File reference (or other unique identifier);
- File title (or brief description);
- Number of files and date range
- The name of the authorising officer
- Date action taken

Following this guidance will ensure that the school is compliant with the General Data Protection Regulation 2018 and the Freedom of Information Act 2000.

Transfer of records to the Archives

Where records have been identified as being worthy of permanent preservation arrangements should be made to transfer the records to the County Archives Service. The school should contact the local record office if there is a requirement to permanently archive the records, and the records will continue to be managed via the DPA 1998 and the FoIA 2000. If you would like to retain archive records in a special archive room in the school for use with pupils and parents please contact the local record office for specialist advice.

Transfer of information to other media

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as microform or digital media. The lifespan of the media and the ability to migrate data where necessary should always be considered. Consideration should also be given to the legal admissibility of records that have been converted from paper to electronic media. It is essential to have procedures in place so that conversion is done in a standard way. This means that organisations can prove that the electronic version is a genuine original and could not have been tampered with in any way. Reference should be made to 'British Standard 10008:2008 'evidential weight and legal admissibility of electronic information' when preparing such procedures.

Recording of all archiving, permanent destruction and digitisation of records

Sample appendices are provided for the recording of all records to be used at the end of this policy. These records could be kept in an Excel spreadsheet or other database format.

13 APPENDICES

Schedule of Records Transferred by: (Name of School)

to (Name of Organisation/Record Office)

Date:	Description/ Volume:

Signed:
Name:
Job Title:
Organisation:

Signed:
Name:
Job Title:
Organisation:

Please return to the Records Manager for retention.

Proforma: Personal Individual records to be converted to electronic media.

Unique Identifier	Full Name	Date of Birth	Type of Record	Date of Digitisation

Signed:
Name:
Job Title:
Organisation:

Signed:
Name:
Job Title:
Organisation:

Please contact the responsible line manger before destruction of any records.

14 RETENTION REGISTER

Management of School				
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. It also includes the admissions process and operational administration.				
Governing Body				
RECORD	RETENTION PERIOD/STATUTORY PROVISIONS	Data Protection Issues	ACTION	Notes
<i>Information, data or record</i>	<i>Period for retaining record & accompanying notes</i>		<i>Storage, Destruction, archive, review etc</i>	
Agendas for Governing Body Meetings	One copy should be retained with the master set of minutes.	<i>There may be DP issues if confidential staff issues are discussed.</i>	Secure locked cupboard Secure Disposal	
Minutes of Governing Body meetings <ul style="list-style-type: none"> Principal Set (Signed) Inspection Copies 	PERMANENT Date of meeting + 3 years (kept by Clerk to the Governors)	<i>There may be DP issues if confidential staff issues are discussed</i>	Secure locked cupboard. ARCHIVE: If the school is unable to store these they should be sent to the relevant Archiving Authority	Note: Inspection copies cannot be kept if there is personal information about a member of staff in them.
Reports presented to the Governing Body	Reports should be kept for a minimum of 6	<i>There may be DP issues</i>	Secure locked	

	years. However if a report is referred to in the minutes it must be kept permanently	<i>if confidential staff issues are discussed</i>	cupboard. Secure Disposal or Archived with minutes	
Meeting papers relating to an annual parent's meeting if held under section 33 of the Education Act 2002	Date of the meeting + 6 years (Minimum)		Secure locked cupboard Secure Disposal	
Instruments of Government including Articles of Association	PERMANENT		Retain in school in a locked cupboard. If school closes then pass to Local Authority for archiving	
Trusts and Endowments managed by the Governing Body	PERMANENT		Retain in school in a locked cupboard. If school closes then pass to Local Authority for archiving	
Action plans created and administered by the Governing Body	Life of action plan + 3 years		Storage in a locked cupboard. Secure Disposal	

Policy documents created and administered by the Governing Body	Life of the policy + 3 years		Storage in a locked cupboard. Secure Disposal	
Records relating to complaints dealt with by the Governing Body	Date of Resolution + 6 years (minimum) -review for further retention in cases of contentious disputes	<i>Yes, review contents</i>	Storage in a locked cupboard. Secure Disposal	
Annual Reports created under the requirements of the Education Regulations 2002	Date of report + 10 years		Storage in a locked cupboard. Secure Disposal	
Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	Date proposal accepted or declined + 3 years		Storage in a locked cupboard. Secure Disposal	

Head Teacher and Senior Management Team

RECORD	RETENTION PERIOD/ STATUTORY PROVISIONS	Data Protection Issues	ACTION	Notes
Log Books of Activity in the School maintained by the Head Teacher including but not restricted to	Date of last entry in the book + a minimum of 6 years and then review.	<i>There may be data protection issues if individual students or staff are named in the</i>	Storage in a locked cupboard. Secure Disposal	- may want to offer to Local Authority Archives as the content could be of historical value.

		<i>log book</i>		
Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	Date of the meeting + 3 years then review	<i>There may be data protection issues if individual students or staff are named in the minutes</i>	Storage in a locked cupboard. Secure Disposal	
Reports created by the Head Teacher or the Management Team	Date of the report + a minimum of 3 years then review	<i>There may be data protection issues if the report refers to individual pupils or members of staff</i>	Storage in a locked cupboard. Secure Disposal	Review only required if there is an ongoing complaint or case to which these documents relate.
Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Current academic year + 6 years then review	<i>There may be data protection issues if the record refers to individual pupils or members of staff</i>	Storage in a locked cupboard. Secure Disposal	
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Date of correspondence + 3 years then review	<i>There may be data protection issues if the correspondence refers to individual pupils or members of staff</i>	Storage in a locked cupboard. Secure Disposal	
Professional Development Plans	Life of the plan + 6 years	<i>Yes, will be named within the document</i>	Storage in a locked cupboard. Secure Disposal	

School Development Plans	Life of the plan + 3 years	None	Storage in a locked cupboard. Secure Disposal	
Admissions Process				
RECORD	RETENTION PERIOD/ STATUTORY PROVISIONS	Data Protection Issues	ACTION	Notes
All records relating to the creation and implementation of the Schools Admissions' Policy	Life of policy + 3years Schools Admissions Code: Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels. December 2014	None	Secure Disposal	A review may be required prior to destruction of some admission documents (Register of Admissions) as often schools receive enquiries from past pupils to confirm the dates that they attended.
Admissions : if the admission is successful	Date of admission + 1 year Schools Admissions Code: Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels. December 2014	Yes	Secure storage and disposal	
Admissions : if the appeal is unsuccessful	Resolution of case + 1 year Schools Admissions Code: Statutory guidance for admission authorities,	Yes	Secure storage and disposal	

	governing bodies, local authorities, schools adjudicators and admission appeals panels. December 2014			
Register of Admissions	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made. School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities. October 2014	Yes	Secure storage and disposal	
Proofs of address supplied by parents as part of the admissions process	Current year + 1 year Schools Admissions Code: Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels. December 2014	Yes	Secure storage and disposal	
Supplementary Information Form including additional information such as religion, medical conditions etc – for successful admissions	This information should be added to the pupil file. Referred to later in this document.	Yes	Secure storage and disposal	
Supplementary Information Form including additional information such as religion,	Until the appeals process is completed	Yes	Secure storage and disposal	

medical conditions etc – for unsuccessful admissions				
Operational Administration				
RECORD	RETENTION PERIOD/ STATUTORY PROVISIONS	Data Protection Issues	ACTION	Notes
Records relating to the creation and publication of the school brochure or prospectus	Current year + 3 years	<i>No</i>	Standard Disposal	
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current year + 1 year	<i>No</i>	Standard Disposal	
Newsletters and other items with a short operational use	Current year + 1 year	<i>No</i>	Standard Disposal	If student details are included in the newsletter, including photographs etc secure disposal may be the better option
Visitors' Books and Signing in Sheets	Current Year + 6 years	<i>Yes</i>	Secure Disposal	
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupil Associations	Current year + 6 years	<i>Yes, if Association Officers or Members are named</i>	Secure Disposal	
Accident books, accident records	3 years after the date of the last entry (except for accidents involving chemicals)	<i>Yes</i>	Secure Disposal	Statutory provision: The Reporting of injuries,

	or asbestos – 40 years) Accident involving a young person, until that person reaches 25			Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)
Recruitment				
RECORD	RETENTION PERIOD/ STATUTORY PROVISIONS	Data Protection Issues	ACTION	Notes
Application forms and interview notes : <i>Unsuccessful Applicants</i>	Minimum 6 months, up to 1 year	Yes	Secure Disposal	Because of the time limits in discrimination legislation, it is generally recommended that documents are retained for at least 6 months. The time limit for claims can be extended in certain cases so some employers choose to retain for up to 1 year.
Application forms and interview notes : <i>Successful Applicants</i>	6 years after employment has ended.	Yes	Secure Disposal	Documents should be transferred to the personnel file as they will be relevant to the ongoing employment relationship.
Right to Work in the UK: checks made in accordance with the Border Agency’s List A and B.	2 Years after employment has ended	Yes	Secure Disposal	This is a requirement of the UK Border Agency to establish statutory defence.

Proof of identity for DBS check purposes.	Until the results of the DBS check has been received.	Yes	Secure Disposal	Personal information collated for the purposes of vetting checks should only be retained until the checks have been completed. (ICO Employment Practice Codes)
Details about criminal convictions supplied during the recruitment process.	Until recruitment decision has been made. <i>A summary of the risk assessment decision should be retained on the personnel file of successful candidates.</i>	Yes	Secure Disposal	All information about criminal convictions should be deleted unless the information is clearly relevant to the ongoing employment relationship. (ICO Employment Practice Codes)
DBS check certificates	Until recruitment decision has been made and/or no later than 6 months of the date of disclosure.	Yes	Secure Disposal	Only evidence of the fact that a disclosure was sought, the issue date of disclosure, the level of disclosure, who obtained it and the disclosure number should be retained once the recruitment decision has been made.

Proof of qualifications	6 years after employment has ended.	Yes	Secure Disposal	<p>Where a qualification is a legal requirement to perform a role it is strongly recommended that evidence of the qualification is retained on the employee's personnel file. For teachers this will usually include verification of QTS/QTLS.</p> <p>Schools may also wish to retain copies of qualifications which were defined as essential in the job specification of the role in question.</p>
Personnel and Employment Records				
RECORD	RETENTION PERIOD/ STATUTORY PROVISIONS	Data Protection Issues	ACTION	Notes
Staff Personal File	6 years after employment has ended	Yes	Secure Disposal	Statutory
Contracts of employment, contract amendment letters, change of pay forms	6 years after employment has ended	Yes	Secure Disposal	May be relevant to a contractual claim within the 6 year limitation period
Parental leave records	Until the relevant child is 18	Yes	Secure Disposal	Retention period ties in with

				the time period during which the parent may claim leave.
Time Sheets	Current year + 6 years	Yes	Secure Disposal	
Redundancy details and calculations	6 years from date of redundancy	Yes	Secure Disposal	May be relevant to a contractual claim within the 6 year limitation period
Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned	Yes	Secure Disposal	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
Disciplinary Proceeding: <ul style="list-style-type: none"> • Oral warning • Written warning – level 1 • Written warning – level 2 • Final warning • Case not found 	Date of warning + 6 months Date of warning + 6 months Date of warning +12 months Date of warning + 18 months If the incident is child protection related then see above otherwise dispose of at the conclusion of the case.	Yes	Secure Disposal	If warnings are placed on personal files then they must be removed.

Annual appraisal/ assessment records	Current year + 5 years	Yes	Secure Disposal	
Payroll, Pensions and Tax Documentation				
RECORD	RETENTION PERIOD/ STATUTORY PROVISIONS	Data Protection Issues	ACTION	Notes
Income tax and NI returns, records and HMRC correspondence	Not less than 3 years after the end of the financial year to which they relate	Yes	Secure Disposal	The Income Tax (Employments) Regulations 1993 as amended.
Statutory Maternity Pay, Paternity Pay and Adoption Pay records, calculations, certificates (e.g. MAT B1s) or other medical evidence	3 years after the end of the tax year in which the payments were made	Yes	Secure Disposal	The Statutory Maternity Pay (General) Regulations 1986, Statutory Paternity Pay and Statutory Adoption Pay (Administration) Regulations 2002 (SI 2002/2820) and Additional Statutory Paternity Pay (Birth, Adoption and Adoption from Overseas) (Administration) Regulations 2010 (SI 2010/154)
Statutory Sick Pay records, calculations, certificates and self-certificates	3 years after the end of the tax year to which they relate	Yes	Secure Disposal	Not statutory but HMRC has power to impose penalties where employers fail to keep records.

Wage/salary records (including records of overtime, bonuses and expenses)	6 years	Yes	Secure Disposal	Taxes Management Act 1970
Retirement Benefit Schemes – records of notifiable events, e.g. relating to incapacity retirements	6 years from the end of the scheme year in which the event took place	Yes	Secure Disposal	The Retirement Benefits Schemes (Information Powers) Regulations 1995
National Minimum Wage records	3 years after the end of the pay reference period following the one that the records cover	Yes	Secure Disposal	National Minimum Wage Act 1998
Records relating to working time	2 years from the date on which they were made	Yes	Secure Disposal	The Working Time Regulations 1998

Management of the School (Asset, Financial and Risk)

RECORD	RETENTION PERIOD/ STATUTORY PROVISIONS	Data Protection Issues	ACTION	Notes
Health and Safety:				
Employer’s Liability Insurance Certificate	Closure of the school + 40 years	No	Secure Disposal	
Health and Safety Policy Statements	Life of policy + 3 years	No	Secure Disposal	
Health and Safety Risk Assessments	Life of risk assessment + 3 years	No	Secure Disposal	
3 Records relating to accident/ injury at work	Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	Yes	Secure Disposal	
Accident Reporting: Adults	Date of the incident + 6 years	Yes	Secure Disposal	Social Security (Claims and

Accident Reporting: Children	DOB of the child + 25 years	<i>Yes</i>	Secure Disposal	Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980
Control of Substances Hazardous to Health (COSHH)	Current year + 40 years	<i>No</i>	Secure Disposal	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)
Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	Last action + 40 years	<i>No</i>	Secure Disposal	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19
Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	Last action + 50 years	<i>No</i>	Secure Disposal	
Fire Precautions log books	Current year + 6 years	<i>No</i>	Secure Disposal	
Inventories of furniture and equipment	Current year + 6 years	<i>No</i>	Secure Disposal	
Burglary, theft and vandalism report forms	Current year + 6 years	<i>No</i>	Secure Disposal	
Accounts and Statements including Budget Management:				

Annual Accounts	Current year + 6 years	<i>No</i>	Secure Disposal	
Loans and grants managed by the school	Date of last payment on the loan + 12 years then REVIEW	<i>No</i>	Secure Disposal	
Student Grant applications	Current year + 3 years	<i>Yes</i>	Secure Disposal	
All records relating to the creation and management of budgets including the Annual Budget statement and background papers	Life of the budget + 3 years	<i>No</i>	Secure Disposal	
Invoices, receipts, order books and requisitions, delivery notices	Current financial year + 6 years	<i>No</i>	Secure Disposal	
Records relating to the collection and banking of monies	Current financial year + 6 years	<i>No</i>	Secure Disposal	
Records relating to the identification and collection of debt	Current financial year + 6 years	<i>No</i>	Secure Disposal	
Contract Management:				
All records relating to the management of contracts under seal	Last payment on the contract + 12 years	<i>No</i>	Secure Disposal	Limitation Act 1980
All records relating to the management of contracts under signature	Last payment on the contract + 6 years	<i>No</i>	Secure Disposal	Limitation Act 1980
Records relating to the monitoring of contracts	Current year + 2 years	<i>No</i>	Secure Disposal	

Supplier, business relationship documents, contracts, SLA's, audits, reviews etc	Current year + 6 years	<i>No</i>	Secure Disposal	
School Fund:				
School Fund - Cheque books	Current year + 6 years	<i>No</i>	Secure Disposal	
School Fund - Paying in books	Current year + 6 years	<i>No</i>	Secure Disposal	
School Fund – Ledger	Current year + 6 years	<i>No</i>	Secure Disposal	
School Fund – Invoices	Current year + 6 years	<i>No</i>	Secure Disposal	
School Fund – Receipts	Current year + 6 years	<i>No</i>	Secure Disposal	
School Fund - Bank Statements	Current year + 6 years	<i>No</i>	Secure Disposal	
School Fund – Journey Books	Current year + 6 years	<i>No</i>	Secure Disposal	
School Meals Management:				
Free School Meals Registers	Current year + 6 years	<i>Yes</i>	Secure Disposal	
School Meals Registers	Current year + 3 years	<i>Yes</i>	Secure Disposal	
School Meals Summary Sheets	Current year + 3 years	<i>No</i>	Secure Disposal	
Property Management and Maintenance:				
Title deeds of properties belonging to the school	PERMANENT. These should follow the property unless the property has been	<i>No</i>		

	registered with the Land Registry			
Plans of property belonging to the school	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.	No		
Leases of property leased by or to the school	Expiry of lease + 6 years	No		Secure Disposal
Records relating to the letting of school premises	Current financial year + 6 years	No		Secure Disposal
All records relating to the maintenance of the school carried out by contractors	Current year + 6 years	No		Secure Disposal
All records relating to the maintenance of the school carried out by school employees including maintenance log books	Current year + 6 years	No		Secure Disposal
Pupil Management:				
RECORD	RETENTION PERIOD/ STATUTORY PROVISIONS	Data Protection Issues	ACTION	Notes
Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005: Primary	Retain whilst the child remains at the primary school	Yes	The file should follow the pupil when he/she leaves the primary school. This will include: <ul style="list-style-type: none"> • to another primary school • to a secondary school • to a pupil referral unit 	

			<ul style="list-style-type: none"> • If the pupil dies whilst at primary school the file should be returned to the Local Authority 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 Local Authority 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 Local Authority as it is more likely that the pupil will request the record from the Local Authority 	
Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005: Secondary	Date of Birth of the pupil + 25 years	Yes	Secure Disposal	
Examination Results: Public	This information should be added to the pupil file and kept for the same length of time as the pupil file	Yes	All uncollected certificate should be returned to the examination board.	
Examination Results: Internal	This information should be added to the pupil file and kept for the same length of time as the pupil file.	Yes		

Child Protection information held on pupil file	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.	Yes	Secure Disposal	Statutory: “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”
Child protection information held in separate files	DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	Yes	Secure Disposal	
Attendance Registers	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made	Yes	Secure Disposal	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014
Correspondence relating to authorized absence	Current academic year + 2 years	Yes	Secure Disposal	Education Act 1996, Section 7
Special Educational Needs files, reviews and Individual Education Plans	Date of Birth of the pupil + 25 years	Yes	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a “failure to provide a sufficient education” case. There is an	

			element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented	
Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	Yes	SECURE DISPOSAL unless the document is subject to a legal hold	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1
Advice and information provided to parents regarding educational needs	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	Yes	SECURE DISPOSAL unless the document is subject to a legal hold	Special Educational Needs and Disability Act 2001 Section 2
Accessibility Strategy	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	Yes	SECURE DISPOSAL unless the document is subject to a legal hold	Special Educational Needs and Disability Act 2001 Section 14

RECORD	RETENTION PERIOD/ STATUTORY PROVISIONS	Data Protection Issues	ACTION	Notes
Curriculum returns	Current year + 3 years	No	Secure Disposal	
Examination Results (Schools Copy)	Current year + 6 years	Yes	Secure Disposal	
SATS records: Results	The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	Yes	Secure Disposal	
SATS records: Examination Papers	The examination papers should be kept until any appeals/validation process is complete	Yes	Secure Disposal	
Published Admission Number (PAN) Reports	Current year + 6 years	Yes	Secure Disposal	
Value Added and Contextual Data	Current year + 6 years	Yes	Secure Disposal	
Self Evaluation Forms	Current year + 6 years	Yes	Secure Disposal	
Schemes of Work	Current year + 1 year	Yes	Secure Disposal	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL

Timetable	Current year + 1 year	Yes	Secure Disposal	
Class Record Books	Current year + 1 year	Yes	Secure Disposal	
Mark Books	Current year + 1 year	Yes	Secure Disposal	
Record of homework set	Current year + 1 year	Yes	Secure Disposal	
Pupils' Work	Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year	Yes	Secure Disposal	
Educational Visits Outside the Classroom				
Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	Date of visit + 14 years	No	Secure Disposal	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice"
Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	Date of visit + 10 years	No	Secure Disposal	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and

				Employer Systems” and Section 4 - “Good Practice”
Parental consent forms for school trips where there has been no major incident	Conclusion of the trip	Yes	Secure Disposal	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time
Parental permission slips for school trips – where there has been a major incident	DOB of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	Yes	Secure Disposal	
Walking Bus Registers	Date of register + 3 years This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting	Yes	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]	

Family Liaison Officers and Home School Liaison Assistants				
Day Books	Current year + 2 years then review	Yes	Secure Disposal	
Reports for outside agencies - where the report has been included on the case file created by the outside agency	Whilst child is attending school and then destroy	Yes	Secure Disposal	
Referral forms	While the referral is current	Yes	Secure Disposal	
Contact data sheets	Current year then review, if contact is no longer active then destroy	Yes	Secure Disposal	
Contact database entries	Current year then review, if contact is no longer active then destroy	Yes	Secure Disposal	
Group Registers	Current year + 2 years	Yes	Secure Disposal	
Central Government and Local Authority				
Local Authority: Secondary Transfer Sheets (Primary)	Current year + 2 years	Yes	Secure Disposal	
Local Authority: Attendance Returns	Current year + 1 year	Yes	Secure Disposal	

Local Authority: School Census Returns	Current year + 5 years	No	Secure Disposal	
Local Authority: Circulars and other information sent from the Local Authority	Operational use	No	Secure Disposal	
Central Government: OFSTED reports and papers	Life of the report then REVIEW	No	Secure Disposal	
Central Government: Returns made to central government	Current year + 6 years	No	Secure Disposal	
Central Government: Circulars and other information sent from central government	Operational use	No	Secure Disposal	

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