



4.0 Record Retention and Deletion Policy

Flagg Nursery School

Version 1.0

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|---------------------------------------|------------------------------|
| Last Reviewed | 3 rd October 2022 |
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| Job Role | School Business Officer |
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This document will be reviewed annually and sooner when significant changes are made to the law

Guidance from the Department for Education about school policies can be found here:

<https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts>

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4.1 How to use this document

This is a very big document. It can be read from front to back, but this will take time. Therefore, you can use the drop-down boxes below to select your role in school – this will then suggest the most relevant sections, alternatively you can select from an A-Z of relevant provisions.

| | |
|--|--|
| My Role: (please choose from the dropdown and press tab) | Suggested sections: |
| DSL | Child Protection (CP) / Safeguarding Records Family Liaison / Early Help / Alternative Provision Pupil Education Record Special Educational Needs |

A-Z

[Admissions](#)
[Attendance](#)
[Central Government](#)
[Child Protection \(CP\) / Safeguarding Records](#)
[Curriculum \(Implementation\)](#)
[Curriculum Management](#)
[Extra Curriculum Management](#)
[Family Liaison / Early Help / Alternative Provision](#)
[Financial Management – Accounts and Statements including Budget Management](#)
[Financial Management – Contract Management](#)
[Financial Management – Risk & Insurance, Asset Management](#)
[Financial Management – School Fund](#)
[Financial Management – School Meals](#)
[Governing Body](#)
[Headteacher & Senior Management/Leadership Team](#)
[Health and Safety](#)
[HR - Management of Disciplinary and Grievance Processes](#)
[HR – Operational Staff Management](#)
[HR – Payroll & Pensions](#)
[HR – Recruitment](#)
[Local Authority Returns](#)
[Medication \(Administration Records\)](#)
[Operational Administration](#)
[Parent / Alumni Associations](#)
[Property Management](#)
[Pupil Education Record inc SEN, Ed Psych reports](#)
[Recording Meetings, calls, online lessons, training](#)
[School Communications inc email & social media](#)
[Special Educational Needs \(SEN\)](#)
[Work Experience / Placement \(pupil\)](#)

4.2 Introduction

The Independent Inquiry into Child Sexual Abuse (IICSA) states: “Institutions have an obligation to preserve records for the Inquiry for as long as necessary to assist the Inquiry. Prolonged retention of personal data by an organisation at the request of the Inquiry would not therefore contravene data protection legislation, provided **such information is restricted to that necessary to fulfil any potential legal duties that organisation may have in relation to the Inquiry.** An institution may have to account for its previous activities to the Inquiry so retention of the data will be regarded as necessary for this purpose.”

Therefore, any records that may be in scope of the inquiry because they pertain to matters relating to the care or abuse of children should be retained until further notice and the periods specified in this guidance, in relation to those records only, are suspended until further notice.

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

Some of the retention periods are governed by statute. Others are guidelines, following best practice, employed by schools throughout the United Kingdom. Every effort has been made to ensure that these retention periods are compliant with the requirements of the UK General Data Protection Regulation 2018 (GDPR), the Data Protection Act 2018 (DPA), Article 8, the Human Rights Act 1998, the Freedom of Information Act 2000 (FOI) and the Code of Practice on Records Management (under Section 46 of the FOI).

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

4.3 Purpose

This policy, for managing records at Flagg Nursery School has been drawn up in conformity with legislation, regulations affecting schools and best practice as promoted by the Information and Records Management Society of Great Britain.

This policy sets out guidelines for recording, managing, storing and the disposal of data, whether they are held on paper or electronically (including online), in order to assist staff, and the school, to comply with the General Data Protection Regulation (EU) 2016/679 (GDPR) including as adopted by the United Kingdom as a result of its exit from the European Union (“UK GDPR”), Data Protection Act 2018 and the Freedom of Information Act 2000. It should be read and used in conjunction with all of our related policies.

It is expected that;

- All information held by schools needs to be justifiable, by reference, to its purpose.
- Schools must be transparent and accountable as to what data they hold.
- Schools must understand and explain the reasons why they hold data.
- Schools must be able to respond to Subject Access Requests.
- Schools must be able to amend, delete or transfer data promptly upon any justified request.
- Schools must be able to audit how personal data was collected and when and why.
- Schools must hold sensitive data securely, accessed only by those with reason to view it and possess a policy as to why it is needed.

4.4 Disposal of Data

Article 5(e) of the GDPR states that personal data should be 'kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes... in order to safeguard the rights and freedoms of the data subject ('storage limitation').

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

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

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

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

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

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

The Freedom of Information Act 2000 requires the school to maintain a list of all records that have been destroyed and who authorised their destruction. This record should be retained for 15 years. The appropriate members of staff (Data Lead) should record:

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

An example is contained in Annex A.

4.5 Transfer of Records to Archives

A school archive is different from official school records. A school archive preserves data where there is a legitimate interest in holding that information e.g. to commemorate a significant event in the life of the school. It can take on many characteristics and serve many purposes--but it neither compliments nor replaces the official record-keeping systems.

Where records have been identified as being worthy of permanent preservation, due to their historical or social value, they may be retained on site or transferred to the Local Authority Record Office (see local guidance [Find an archive | The National Archives](#)).

Where the school decides to maintain an onsite archive, the school should consult with their Data Protection Officer to implement the following steps:

- Establish what information needs to be archived

- Select someone to serve as the archivist. This may be an additional function within an established role, to work alongside both the Data Protection Officer and Data Lead officer (where applicable).
- Select a physical location to house the collection, and determine what equipment and supplies are needed to accomplish the project for the first year and on a continuing basis e.g. safe storage, shelving
- Remember that archives can include electronic data e.g. schools may have digital photographs which are no longer displayed on their website or social media pages. Consider not only holding and cataloguing this data in a secure driver, but making potential requestors aware of its presence, through a dedicated website.
- Come to an agreement with the Local Authority Record Office, in order for the collected materials could be turned over if the school archives should be discontinued.

4.6 Transfer of Records to other Media

Where lengthy retention periods have been allocated to records, schools should consider converting paper records to other media (e.g. digital or virtual, 'cloud' based). The lifespan of the media, and the ability to migrate data, should be documented in a Digital Continuity Policy. A scanning risk assessment is recommended to ensure the procedure is adequate.

4.7 Transfer of Records to other Settings & 'Last Known School'

When a child leaves the school, all pupil records should be transferred in a secure manner, to the child's new school. If the records contain sensitive information (e.g. Child Protection records), proof of receipt must be obtained and logged by the school's Data Lead. All data held by the school should then be deleted, including all paper records and data stored electronically. A record should be kept for tracking and auditing purposes only.

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

The school is the final or last known school if:

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

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

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

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

4.8 Responsibility and Monitoring

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

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

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

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

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

4.9 Retention tables

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|--------------------------|---|---|--------------------------------|-----------|------------------------|-----------------|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| 1. Governing Body | | | | | | | |
| 1.1 | Instruments of Government including Articles of Association | Current paper document held with the relevant meeting pack in a secure cupboard. The previous versions in paper form are in archived onsite. Electronic versions held on the school server. | School Business Officer/ Clerk | Permanent | Closure of school | Common practice | These should be retained in the schools whilst the school is open and then to the Local Authority Record Office, when the school closes |
| 1.2 | Trusts and Endowments managed by the Governing Body | n/a | n/a | Permanent | End of operational use | Common practice | These should be retained by the school, whilst the school is open and then to the Local Authority Record |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|--|--|--------------------------------|--|---------------------|-----------------|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | | | | Office, should the school close |
| 1.3 | Scheme of delegation and terms of reference for committees | Current paper document held with the relevant meeting pack in a secure cupboard. The previous versions in paper form are archived onsite. Electronic versions held on the school server. | School Business Officer/ Clerk | Until superseded or whilst relevant (schools may wish to retain these records for reference purposes in case decisions need to be justified) | Expiration of terms | Common practice | If the school is unable to store these, they should be offered to the Local Authority Office |
| 1.4 | Governor's Code of Conduct | Current paper document held with the relevant meeting pack in a secure cupboard. The previous versions in paper form are archive on site. Electronic versions held | School Business Officer/ Clerk | One copy of each version should be kept for the life of the school. | | Common practice | |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|---|---|--------------------------------|--|---------------------|-----------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | on the school server. | | | | | |
| 1.5 | Records relating to the election of chair and vice chair | Paper copies held in secure cupboard | School Business Officer/ Clerk | Once the designation has been recorded in the minutes, the records relating to the election can be destroyed | Date of appointment | Common practice | Secure disposal |
| 1.6 | Appointment of a clerk to the governing body | Paper copy – secure cupboard in individual personnel file | School Business Officer/ Clerk | Date of appointment + 6 years | Date of appointment | Common practice | Secure disposal |
| 1.7 | Records relating to the appointment of parent and staff governors, not appointed by the governors | Paper copies held in secure cupboard | School Business Officer/ Clerk | Date of election + 6 months | Date of election | Common practice | Secure disposal |
| 1.8 | Records relating to the appointment of co-opted governors | Recorded in the minutes of the meeting – paper copy held in secure cupboard. Electronic version also held on the school server. | School Business Officer/ Clerk | Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children – | Date of appointment | Common practice | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|---|--|--------------------------------|------------------------------------|---|--|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | in this case, retain for 25 years) | | | |
| 1.9 | Application forms – successful candidates | Paper records – secure cupboard | School Business Officer/Clerk | End of year in office + 1year | End of period of office | Common practice | Secure disposal |
| 1.10 | <p>Appointment documentation:</p> <ul style="list-style-type: none"> • Terms of office of serving governors, including evidence of appointment • Governor declaration against disqualification criteria • Register of business interests • Training required, and received, by governors • Induction programme for new governors • DBS checks carried out on the clerk and members of the governing body • Governor personnel files. | Paper records – secure cupboard. Some records are also held in electronic versions on the server. | School Business Officer/ Clerk | Date of appointment + 6 years | Date of appointment | Common practice | Secure disposal |
| 1.11 | Annual Reports | Current paper document held with the relevant meeting pack in a secure cupboard. The previous versions in paper form are archive on site. Electronic | School Business Officer/ Clerk | Date of the report + 10 years | End of the calendar year that the record was created in | Education (Governor’s Annual Reports) (England) (Amendment) Regulations 2002 | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|--|---|-------------------------------|--|-----------------------|-----------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | versions held on the school server. The current document is also published on the website. | | | | | |
| 1.12 | Annual reports required by the Department of Education | Paper record held in the relevant meeting document pack in secure cupboard. Electronic version held on the server | School Business Officer/Clerk | Date of report + 10 years | Date of report | Common practice | Secure disposal |
| 1.13 | Meetings schedule | Recorded and retained in the minutes of FGB and committee meetings. | School Business Officer | Current year | Date of meeting | Common practice | Secure disposal |
| 1.14 | Agendas for Governing Body meetings | Current paper document held with the relevant meeting pack in a secure cupboard. The previous versions in | School Business Officer | One copy to be retained with the master set of minutes - all other copies can be disposed of | Conclusion of meeting | Common practice | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|---|---|-------------------------|--------------------------------|-----------------|-----------------|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | paper form are archive on site. Electronic versions held on the school server. | | | | | |
| 1.15 | Register of attendance at Full Governing Board meetings | Paper document held with the relevant meeting pack in a secure cupboard or archived onsite | School Business Officer | Date of meeting + 6 years | Date of meeting | Common practice | Secure disposal |
| 1.16 | Minutes of Governing Body meetings (Principal Set signed) | Current paper document held with the relevant meeting pack in a secure cupboard. The previous versions in paper form are archived on site. Electronic versions held on the school server. | School Business Officer | Permanent to be held at school | Date of meeting | Common practice | If the school is unable to store these, they should be offered to the Local Authority Record Office |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|---|---|-------------------------|---|---------------------------|-----------------|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| 1.17 | Action plans created and administered by the Governing Body | Current paper document held with the relevant meeting pack in a secure cupboard. The previous versions in paper form are archived onsite. Electronic versions held on the school server. | School Business Officer | Until superseded or whilst relevant | Expiration of action plan | Common practice | Secure disposal |
| 1.18 | Reports presented to the Governing Body | Current paper documents held with the relevant meeting pack in a secure cupboard. The previous versions in paper form are archived onsite. Electronic versions held on the school server. | School Business Officer | Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently | Date of report | Common practice | Secure disposal or retain with the signed set of minutes |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|--|--|-------------------------|---|--------------------------|-----------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 1.19 | Policy documents created and/or administered by the Governing Body | Current paper policy documents held in the relevant meeting pack in a secure cupboard. Paper records are also held in Policy folder in the office. The previous versions in paper form are archived on site. Electronic versions held on the school server. Some policies are published on the school website. | School Business Officer | A copy of each policy should create a time line of policy development OR a robust version control which allows a snapshot of a policy at any given date. Keep all policies relating to safeguarding and child protection or other pupil related issues, such as exclusion, until the IICSA has issued its recommendations. | Expiration of the policy | Common practice | Secure disposal |
| 1.20 | Records relating to complaints made to, and investigated by the Governing Body and/or Head Teacher | Paper records – secure cupboard in complaints file or with the relevant meeting document pack. | School Business Officer | Date of the resolution of the complaint + a minimum of 6 years. If negligence is involved then current year + 5 years. | Resolution of complaint | | |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|---|-------------------------|--|------------------------------------|-----------------|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | Some records may be saved electronically on the school server. | | If child protection or safeguarding issues are involved then current year + 40 years | | | |
| 1.21 | Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies | n/a | n/a | For the life of the organisation | Date proposal accepted or declined | Common practice | Secure Disposal |
| 1.22 | Records relating to Governor Monitoring Visits | Current paper document held with the relevant meeting pack in a secure cupboard. The previous versions in paper form are archive onsite. Electronic versions held on the school server. | School Business Officer | Date of visit + 3 years | Date of visit | Common practice | Secure disposal |
| | | | | | | | |
| 2. Headteacher & Senior Management/Leadership Team | | | | | | | |
| 2.1 | Log books of activity in the school maintained by the Head Teacher (Legislation no longer requires the completion of a school log book) | Paper copies – school archive | Headteacher | Date of the last entry in the log book + a minimum of 6 years and then review | Date of last entry in the log book | Common practice | These could be of permanent historical value and should be |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|--|---|--------------------------------------|--|------------------------|-----------------|---------------------------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | | | | offered to the Local Authority Office |
| 2.2 | Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies | Paper records held in secure cupboard | Headteacher | Date of the meeting + 3 years | Date of the meeting | Common practice | Secure disposal |
| 2.3 | Records created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities | Paper records held in secure cupboard | Headteacher | Current academic year + 6 years then review | Date of record | Common practice | Secure disposal |
| 2.4 | Correspondence created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities – not principally concerning pupils, staff or complaints . In those cases, correspondence should be immediately transferred to the relevant file. | Paper copies of correspondence held in appropriate filing systems. Electronic copies of letters held on the school service. Emails – may be retained on Office 365. | Headteacher/ School Business Officer | Date of correspondence + 3 years and then review | Date of correspondence | Common practice | Secure disposal |
| 2.5 | Professional Development Plans | Electronic versions stored on school server | Headteacher | Life of plan + 6 years | Date plan commences | Common practice | Secure disposal |
| 2.6 | School Development Plans | Electronic versions stored | Headteacher | Life of plan + 3 years | Date plan commences | Common practice | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|----------------------|--|--|------------------|---|-------------------------------|---|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | on school server | | | | | |
| 3. Admissions | | | | | | | |
| 3.1 | All records relating to the creation and implementation of the School's Admission's Policy | n/a | n/a | Life of the policy + 7 years then review | | The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012 | Secure disposal |
| 3.2 | Admission requests Pupil information, include name, DOB, address and parents contact details as supplied by parents, as part of the admissions process Supplementary information forms to include; religion, medical conditions etc. | Paper records held in secure cupboard. | | Date of admission + 1 year Added to the pupil file | Date of admission | and School Admissions Code Statutory Guidance 2021 | Secure disposal |
| 3.3 | Admissions – if the admission is unsuccessful (where no appeal is made) | n/a | n/a | Date of applied for admission + 1 year | Date of applied for admission | | Secure disposal |
| 3.4 | Admissions – if the admission is unsuccessful (where an appeal is made) | n/a | n/a | Resolution of case + 1 year | Resolution of case | | Secure disposal |
| 3.5 | Register of Admissions | n/a | n/a | 3 years after the date on which the last entry was made | Last entry in register | The School Admissions (Admission Arrangements and Co-ordination of Admission | Transfer to the Local Authority Record Office |
| 3.6 | Proofs of address, supplied by parents, as part of the admissions process | n/a | n/a | Current year + 1 year | Date of admission | Arrangements and Co-ordination of Admission | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|--------------------------------------|---|---|-------------------------|--|-------------------------------------|---|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | | | Arrangements) (England) Regulations 2012 and School Admissions Code Statutory Guidance 2021 | |
| 3.7 | Admissions (Secondary School – Casual) | n/a | n/a | Current year + 1 year | Date of admission | The Limitation Act 1980 | Secure |
| 3.8 | Supplementary information forms to include; religion, medical conditions etc. For successful admissions | Held in secure filing cabinet with pupil file. Electronic records are also held on MIS. | School Business Officer | This information should be added to the pupil file | Date of admission/annual data check | The Limitation Act 1980 | Secure disposal |
| 3.9 | Supplementary information forms to include; religion, medical conditions etc. For unsuccessful admissions | n/a | n/a | Until the appeal process is completed | Date of admission | | Secure disposal |
| 4. Operational Administration | | | | | | | |
| 4.1 | Records relating to the creation and publication of the school brochures or prospectus | Electronic versions held on the school server. | School Business Officer | Current year + 3 years | Expiration of current publication | Common practice | Transfer to the Local Authority Record Office |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|--|--|-------------------------|------------------------------------|----------------------|-----------------|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| 4.2 | Records relating to the creation and distribution of circulars to staff, parents or pupils | Electronic versions held on the school server | School Business Officer | Current year + 1 year | Date of record | Common practice | Transfer to the Local Authority Record Office |
| 4.3 | Newsletters and other items with short operational use | Electronic versions held on the school server. Copies of newsletters are published on the school website for 1 year. | School Business Officer | Current year + 1 year | Date of record | Common practice | Transfer to the Local Authority Record Office |
| 4.4 | Visitor management systems (including electronic systems, visitors' books and signing in sheets) | Paper records for the current academic year are held in a file in nursery. Other paper records are archived onsite. | School Business Officer | Current year + 6 years then review | End of calendar year | Common practice | Secure disposal |
| 4.5 | Records relating to the creation and management of Parent Teacher Associations and/or Old Pupil Associations | Electronic records of meetings held on the school server. Paper records in onsite archive. | Headteacher | Current year + 6 years then review | Date of record | Common practice | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---------------------------------|--|--|---|---|--|-----------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 4.6 | Pupil & Family Privacy Notice which is made available via the school website as part of UK GDPR compliance | Electronic version held on school server and published on the school website. Paper copies are held in the new starter packs | School Business Officer | Date of issue + 6 years | When policy is superseded | Common practice | Secure disposal |
| 4.7 | Consents relating to school activities as part of UK GDPR compliance (e.g. consent to be sent circulars or mailings) | Paper copies held in pupil files with admission records | School Business Officer | This information should be added to the pupil file | Date of admission | Common practice | Secure disposal |
| 4.8 | Security breach logs | Electronic version on GDPRiS. Previous logs recorded on paper form and held in secure cupboard. | School Business Officer | Date of issue + 25 years (pupils) and 6 years (staff) | Date of implementation | Common practice | Secure disposal |
| 4.9 | Digital Continuity Plans | n/a | n/a | Date of issue + 6 years | Expiration of current plan | Common practice | Secure disposal |
| 5. School Communications | | | | | | | |
| 5.1 | School emails containing personal data – inbox, sent items, deleted items | Office 365 | Individual staff responsible for own e- | 3-6 months | In line with guidance in Acceptable use policy | Common practice | Full deletion |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|--|---|---|---------------------------------------|--|----------------------|---|------------------------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | mail accounts and retention | | | | |
| 5.2 | Social media platforms | Facebook | Lead Teacher | +1 year after the child has left school | End of academic year | Common practice | Posts deleted |
| 5.3 | Website – pictures / news stories | Weebly website | School Business Officer | +1 year after the child has left school | End of academic year | Common practice | Posts deleted |
| 6. HR – Recruitment Information containing allegations of sexual abuse must be preserved – IICSA. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2021 para399) | | | | | | | |
| 6.1 | All records leading up to the appointment of a new Head Teacher | Unsuccessful applicants – held at DCC HR for the appropriate timeframe. Successful candidate – paper copies in secure filing cabinet | DCC HR School Business Officer | Unsuccessful attempts - date of appointment + 6 months. Successful attempts - add to the staff personnel file and retain until the end of the appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years | Date of appointment | Common practice. Right to work - Immigration, Asylum and Nationality Act 2006 | Secure disposal (subject to IICSA) |
| 6.2 | All records leading up to the appointment of a new member of staff (successful candidate) | Paper copies in personnel file in secure cupboard | School Business Officer | Date of appointment + 6 years. This information should be added to the staff personnel file | Date of appointment | Common practice. Right to work - Immigration, Asylum and Nationality Act 2006 | Secure disposal (subject to IICSA) |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|---|---|-------------------------|---|-------------------|---|------------------------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 6.3 | All records leading up to the appointment of a new member of staff (unsuccessful candidate) | Paper copies in secure cupboard | School Business Officer | Date of interview + 12 months | Date of interview | Common practice | Secure disposal |
| 6.4 | Pre-employment vetting information of successful candidates | Paper copies in personnel file in secure cupboard | School Business Officer | Application forms, references and other documents – for the duration of their employment + 6 years. Note there is no requirement to keep a copy of DBS once the details have been entered into the Single Central Record | Date of receipt | Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2021 | Secure disposal (subject to IICSA) |
| 6.5 | Proofs of identity | Paper copies in personnel file in secure cupboard | School Business Officer | To be kept only as proof of right to work. Not kept for any other purpose. These documents should be added to the personal folder. Home Office requires that the documents are kept until termination of employment plus not less than 2 years. | Date of receipt | Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2021 | Secure disposal (subject to IICSA) |
| 6.6 | Pre-employment vetting information of successful candidates – for the purposes of | Paper copies in personnel file in | School Business Officer | To be added to the member of staff's personal folder | Date of receipt | KCSIE 2021 | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|--|---|-------------------------|---|---|---|------------------------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | ensuring school staff are adequately qualified | secure cupboard | | | | | (subject to IICSA) |
| 7. HR – Operational Staff Management Information containing allegations of sexual abuse must be preserved – IICSA. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2021 para399) | | | | | | | |
| 7.1 | Staff Personnel File | Paper copies held in secure cupboard | School Business Officer | Termination of employment + 6 years | Date of appointment | Limitation Act 1980 | Secure disposal (subject to IICSA) |
| 7.2 | Timesheets | Paper copies held in secure cupboard. Electronic copies held on school server | School Business Officer | Current year + 6 years | Date of appointment | Common practice | Secure disposal (subject to IICSA) |
| 7.3 | Annual appraisal/assessment records | Paper copies – secure filing cabinet Electronic copies – stored on secure server | School Business Officer | Current year + 6 years | End of calendar year that the record was created in | Common practice | Secure disposal (subject to IICSA) |
| 7.4 | Sickness absence monitoring | Paper copies of held in personnel file in secure cupboard. | School Business Officer | Sickness records are categorised as ‘sensitive data’. There is a legal obligation under | Date of absence | Common practice & Statutory Sick Pay Act 1994 | Secure disposal (subject to IICSA) |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
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| | | | | Period | Trigger | Basis | Action at end of use |
| | | Electronic copies – stored on secure server | | Statutory Sickness Pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records. Current practice recommends that sickness records should be held for the current year + 3 years. | | | |
| 7.5 | Staff training records | Paper copies held in individual personnel files in secure cupboard. Electronic copies – stored on secure server | School Business Officer | Keep on personnel file | Date of appointment | Common practice (unless dictated by a professional body) | Secure disposal (subject to IICSA) |
| 7.6 | Annual leave records | n/a | n/a | 6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year | End of relevant tax year | Common practice | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
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| | | | | Period | Trigger | Basis | Action at end of use |
| 7.7 | Working Time Regulations: · Opt out forms · Records of compliance with WTR | n/a | n/a | 2 years from the date on which they were entered into 2 years after the relevant period | End of relevant tax year | Common practice | Secure disposal |
| 7.8 | Maternity/Adoption/Paternity Leave records | Paper copies – held in a secure filing cabinet | School Business Officer | Current year + 3 years | End of relevant tax year | Common practice | Secure disposal |
| 7.9 | Consents for the processing of personal and sensitive data | Paper copies – secure filing cabinet Also referred to in workforce privacy notice | School Business Officer | For as long as the data is being processed and up to 6 years afterwards | End of employment | Common practice | Secure disposal |
| 7.10 | Staff policy acknowledgement | Paper copies held in secure cupboard – policy archive | School Business Officer | Life of the policy + 3 years | Implementation of the policy | Common practice (unless otherwise dictated eg KCSIE, H&SWA) | Secure disposal (subject to IICSA) |
| | | | | | | | |

8. HR - Management of Disciplinary and Grievance Processes

Information containing allegations of sexual abuse must be preserved – IICSA. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. ([KCSIE 2021](#) para399)

| | | | | | | | |
|-----|---|--------------------------------|-------------|---|------------------|------------|------------------------------------|
| 8.1 | Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded | Paper copies – secure cupboard | Headteacher | Until the person's normal retirement age or 10 years from the date of | Date of referral | KCSIE 2021 | Secure disposal (subject to IICSA) |
|-----|---|--------------------------------|-------------|---|------------------|------------|------------------------------------|

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|--|--|------------------|--|--------------------|------------|------------------------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | allegation, whichever is longer, then review. NB – allegations that are found to be malicious should be removed from personnel files, from the date they are proven to be unfounded. | | | |
| 8.2 | Disciplinary proceedings: Verbal warning | Paper copies – secure cupboard | Headteacher | Date of warning + 6 months | Date of warning | KCSIE 2021 | Secure disposal (subject to IICSA) |
| 8.3 | Disciplinary proceedings: Written warning (level 1) | Paper copies – secure cupboard | Headteacher | Date of warning + 6 months | Date of warning | KCSIE 2021 | Secure disposal (subject to IICSA) |
| 8.3 | Disciplinary proceedings: Written warning (level 2) | Paper copies – secure cupboard | Headteacher | Date of warning + 12 months | Date of warning | KCSIE 2021 | Secure disposal (subject to IICSA) |
| 8.4 | Disciplinary proceedings: Final Warning | Paper copies – secure cupboard | Headteacher | Date of warning + 18 months | Date of warning | KCSIE 2021 | Secure disposal (subject to IICSA) |
| 8.5 | Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings) | Paper copies – secure cupboard | Headteacher | If the incident is child protection related then see above; otherwise dispose | Date of resolution | KCSIE 2021 | Secure disposal (subject to IICSA) |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
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| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | following the conclusion of the case | | | |
| <p>N.B. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.</p> <p>Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct at a later date, and then defend themselves by denying they would undertake such an action, reference to the earlier proceedings may show that they should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that they had e.g. "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim.</p> <p>Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.</p> | | | | | | | |
| 9. HR – Payroll & Pensions | | | | | | | |
| 9.1 | Maternity Pay Records | n/a | n/a | Current year + 3 years | End of the financial year in which the maternity pay period ends | Statutory Maternity Pay (General) Regulations 1986 | Secure disposal |
| 9.2 | Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity | n/a | n/a | Current year + 6 years | End of the financial year | Retirement Benefits Schemes (Information Powers) Regulations 1995 | Secure disposal |
| 9.3 | Batches, Bonus Sheets, Car Loans, Car Mileage Output, Insurance, Members Allowance Register, National Insurance (Schedule of payments), Part Time Fee | n/a | n/a | Current year + 6 years | End of the financial year | Taxes and Management Act 1970, Income and | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|---|--|-------------------------|------------------------|---------------------------|--|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | claims, Payroll (gross/net, weekly or monthly), Payroll Reports, Payslips (copies), Pension Payroll, Superannuation adjustments and reports | | | | | Corporation Taxes Act 1988 | |
| 9.4 | Bonus sheets, Car Allowance claims, Overtime | n/a | n/a | Current year + 3 years | End of the financial year | Taxes and Management Act 1970, Income and Corporation Taxes Act 1988 | Secure disposal |
| 9.5 | Income Tax P60, Personal bank details. Tax Forms P6/P11/P11D/P35/P45/P46/P48 | Paper copies held in individual personnel files in secure cupboard. | School Business Officer | Current year + 6 years | End of the financial year | Common practice | Secure disposal |
| 9.6 | Absence records, Sickness records, Staff returns, Time Sheets/Clock Cards/Flexitime | Paper copies held in individual personnel files in secure cupboard. Electronic copies – stored on secure server | School Business Officer | Current year + 3 years | End of the financial year | Common practice | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------------------------------|---|---|------------------|----------------------------------|--|-------------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 9.7 | Statutory Sick Pay | n/a | n/a | Current year + 3 years | End of the financial year | Common practice | Secure disposal |
| 10. Health and Safety | | | | | | | |
| 10.1 | Accessibility Plans | Paper copies in policy folder and in policy archive. Electronic copies – secure server and secure on website | Headteacher | Current year + 6 years | End of the calendar year that the records was created in | Equality Act 2010 | Secure disposal |
| 10.2 | Health and Safety Policy Statements | n/a | n/a | Life of the policy + 3 years | Implementation of the policy | Common practice | Secure disposal |
| 10.3 | Health and Safety Risk Assessments | Paper copies held in secure cupboard Electronic copies – secure server and secure on website | Headteacher | Life of the assessment + 3 years | Implementation of the assessment | Common practice | Secure disposal |
| 10.4 | Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm): Adults | Submitted electronically on RIDDOR. | Headteacher | Retain for 7 years | Date of incident | Common practice | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|---|---|------------------|-------------------------|----------------------|--|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | Paper copies retained in secure cupboard. | | | | | |
| 10.5 | Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm): Children | Submitted electronically on RIDDOR. Paper copies retained in secure cupboard. | Headteacher | Retain for 25 years | Date of birth | Common practice | Secure disposal |
| 10.6 | Minor incidents (non-reportable) accident book | Paper copies – file in link. Previous accident books held securely in archive. | Headteacher | Retain for 3 years | End of academic year | Common practice | Secure disposal |
| 10.7 | Control of Substances Hazardous to Health (COSHH) | Paper copies – caretaker cupboard | Caretaker | Current year + 40 years | Last action on file | The Control of Substances Hazardous to Health Regulations 2002 | Secure disposal |
| 10.8 | Process of monitoring areas where employees/pupils are likely to come into contact with asbestos | Paper copies held in Link | Headteacher | Last action + 40 years | Last action on file | The Control of Asbestos at Work Health Regulations 2012 | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|--|-------------------------|----------------------------|-----------------------|---|---------------------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 10.9 | Process of monitoring areas where employees/pupils are likely to come into contact with radiation | n/a | n/a | Last action + 50 years | Last action on file | The Ionising Radiations Regulation 2017 | Secure disposal |
| 10.10 | Fire Precautions log books | Red box | Headteacher | Current year + 3 years | End of calendar year | Common practice | Secure disposal |
| 11. Financial Management – Risk & Insurance, Asset Management | | | | | | | |
| 11.1 | Employer’s Liability Insurance Certificate | Paper copy – secure filing cabinet. Copies also held electronically on server | School Business officer | Date of closure + 40 years | Closure of school | Common practice | Transfer to Local Record Office |
| 11.2 | Inventories of furniture and equipment | Paper copy – secure filing cabinet. Copies also held electronically on server | School Business Officer | Current year + 6 years | End of calendar year | Common practice | Secure disposal |
| 11.3 | Burglary, theft and vandalism report forms | Paper copies held in secure cupboard | School Business Officer | Current year + 6 years | End of calendar year | Common practice | Secure disposal |
| 12. Financial Management – Accounts and Statements including Budget Management | | | | | | | |
| 12.1 | Annual accounts | Current financial year paper copies | School Business Officer | Current year + 6 years | End of financial year | Common practice | Transfer to Local Record Office |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|---|--|-------------------------|---|-----------------------|--------------------------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | held in a secure cupboard. Other copies in the school archive. Electronic copies also held on the server | | | | | |
| 12.2 | Loans and grants managed by the school | n/a | n/a | Date of last payment on the loan + 12 years then review | End of financial year | Standard financial regulations | Secure disposal |
| 12.3 | Student Grant applications | n/a | n/a | Current year + 3 years | End of financial year | Standard financial regulations | Secure disposal |
| 12.4 | All records relating to the creation and managements of budgets, including the Annual Budget statement, and background papers | Paper copies held in a secure cupboard. Electronic copies also held on the server | School Business Officer | Current financial year + 3 years | End of financial year | Common practice | Secure disposal |
| 12.5 | Invoices, receipts, order books and requisitions, delivery notices | Paper copies held in a secure cupboard | School Business Officer | Current financial year + 6 years | End of financial year | Standard financial regulations | Secure disposal |
| 12.6 | Records relating to the collection and banking of monies | Paper copies held in a secure cupboard | School Business Officer | Current financial year + 6 years | End of financial year | Standard financial regulations | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|---|-------------------------|---|-----------------------|--------------------------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 12.7 | Records relating to the identification and collection of debt | Paper copies held in a secure cupboard | School Business Officer | Current financial year + 6 years | End of financial year | Standard financial regulations | Secure disposal |
| 12.8 | Early Years Pupil Premium Fund records | Paper copies – secure cupboard Electronic version – secure server & Perspective Lite | School Business Officer | Date pupil leaves the provision + 6 years | End of financial year | Common practice | Secure disposal |
| 13. Financial Management – Contract Management | | | | | | | |
| 13.1 | All records relating to the management of contracts under seal | n/a | n/a | Current year + 12 years | End of contract | The Limitation Act 1980 | Secure disposal |
| 13.2 | All records relating to the management of contracts under signature | n/a | n/a | Current year + 6 years | End of contract | The Limitation Act 1980 | Secure disposal |
| 13.3 | Records relating to the monitoring of contracts | Paper copies – secure cupboard Electronic version – secure server | n/a | Current year + 6 or 12 years | End of calendar year | The Limitation Act 1980 | Secure disposal |
| | | | | | | | |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
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| | | | | Period | Trigger | Basis | Action at end of use |
| 14. Financial Management – School Fund | | | | | | | |
| 14.1 | School Fund: <ul style="list-style-type: none"> • cheque books and paying in books • ledger • invoices • receipts • bank statements • journey books | Paper copies – secure cupboard/filing cabinet Electronic version – secure server | School Business Officer | Current year + 6 years | End of use | Financial Services Act 2012, HMRC regulations Companies Act 2006 | Secure disposal |
| 15. Financial Management – School Meals | | | | | | | |
| 15.1 | Free School Meals Register | Paper copies – secure filing cabinet Electronic version – secure server and Perspective Lite | School Business Officer | Current year + 6 years | End of calendar year | Common practice | Secure disposal |
| 15.2 | School Meals Register | Paper copies – secure filing cabinet | School Business Officer | Current year + 3 years | End of calendar year | Common practice | Secure disposal |
| 153 | School Meals Summary Sheets | Paper copies – secure filing cabinet | School Business Officer | Current year + 3 years | End of calendar year | Common practice | Secure disposal |
| 16. Property Management | | | | | | | |
| 16.1 | Title deeds of properties belonging to the school | n/a | n/a | Permanent. These should follow the property unless the property has been | Archive upon closure | Common practice | Transfer to Local Authority |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
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| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | registered with the Land Registry | | | Record Office |
| 16.2 | All records relating to the maintenance of the school, carried out by contractors | Paper copies – secure office | Headteacher & school Business Officer | Current financial year + 6 years | End of financial year that the record was created in | Common practice | Secure disposal |
| 16.3 | All records relating to the maintenance of the school, carried out by school employees, including maintenance log book | n/a | n/a | Current calendar year + 6 years | End of calendar year that the record was created in | Common practice | Secure disposal |
| 16.4 | Plans of property belonging to the school | Paper copies – secure office | Headteacher & school Business Officer | 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. | Transfer of asset | Common practice | Transfer to Local Authority Record Office |
| 16.5 | Leases of property leased by, or to, the school | n/a | n/a | Expiry of lease + 6 years | Commencement of lease | Common practice | Secure disposal |
| 16.6 | Records relating to the letting of school premises | n/a | n/a | Current financial year + 6 years | End of financial year that the record was created in | Common practice | Secure disposal |
| | | | | | | | |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
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| | | | | Period | Trigger | Basis | Action at end of use |
| 17. Pupil Education Record (see s2 Education Record (Pupil Information) Regulations 2005). SEN is dealt with in section 20 | | | | | | | |
| 17.1 | Nursery | Pupil records in paper form held in a secure filing cabinet. Electronic data held securely in MIS - RM Integris. | Headteacher & school Business Officer | Retain whilst the child remains at the nursery school | Date pupil changes school | Education (Pupil Information) (England) Regulations 2005 | The file should follow the pupil when they leave the primary school (see 4.7 Last School) |
| 17.2 | Secondary | n/a | n/a | Date of birth of the pupil + 25 years | Pupil's date of birth | The Limitation Act 1980 | Secure disposal (subject to IICSA) |
| 17.3 | Examination Results - Pupil Copies Public | n/a | n/a | This information should be added to the pupil file | Date of examination | Common practice | All uncollected certificates to be returned to the examination board, after reasonable attempts to contact the pupil have failed |
| 17.4 | Examination Results - Pupil Copies Internal | n/a | n/a | This information should be added to the pupil file | Date of examination | Common practice | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|---|-------------------------------|---|--|--|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| 18. Child Protection (CP) / Safeguarding Records | | | | | | | |
| 18.1 | Child Protection Information - Nursery | <p>Paper files held in secure filing cabinet.</p> <p>Electronic data held securely in My Concern (The Safeguarding Company)</p> | Headteacher/Safeguarding Lead | <p>CP files must be transferred to the new school as soon as possible (5 days), to maintain continuity. Ensure secure transit, and a confirmation of receipt should be obtained. The CP file should be transferred separately from the main pupil file.</p> | Date pupil changes school (Where a child is removed from the roll to be educated at home/missing from education, see below) | KCSIE para 112 & Annex C | Transferred to new or primary school. Duplicates must be securely disposed of. |
| 18.2 | Child Protection (CP) Information – Secondary | n/a | n/a | <p>Where a pupil moves between secondary schools – treat as primary above. Otherwise, retain for 25 years from the child’s date of birth, then review. LA Safeguarding Services advise that the principal copy of this information will be held by the LA</p> | Pupil’s date of birth (Where a child is removed from the roll to be educated at home/missing from education, see below) | KCSIE para 112 & Annex C Common Practice | Secure disposal (subject to IICSA) |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------------------|--|---|-------------------------|---|------------------------|---|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| 18.3 | Child Protection (CP) Information – Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths. | n/a | n/a | Retain for 25 years from the child’s date of birth, then review. LA Safeguarding Services advise that the principal copy of this information will be held by the LA | Date removed from roll | Common Practice (there is guidance in KCSIE, but not as to retention period) | Transfer to LA Coordinator for Missing Children and Secure disposal (subject to IICSA) |
| 18.4 | Child Protection (CP) Information – Child is removed from the roll and is Elective Home Educated | n/a | n/a | Retain for 25 years from the child’s date of birth, then review. LA Safeguarding Services advise that the principal copy of this information will be held by the LA | Date removed from roll | Common Practice (there is guidance in KCSIE, but not as to retention period) | Transfer to LA Elective Home Education Coordinator and Secure disposal (subject to IICSA) |
| 19. Attendance | | | | | | | |
| 19.1 | Attendance Registers | Current paper copies securely held in the classrooms. Older registers are archived. Electronic copies held | School Business Officer | Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made | Last entry in register | DfE School attendance Guidance for maintained schools, academies, independent schools and | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|--|---|---|-------------------------|--|---------------------------|---|------------------------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | securely on MIS – RM Integris | | | | local authorities August 2020 para 19 | |
| 19.2 | Correspondence relating to authorized absence | Paper copies – locked office. Retained in the archive for previous academic years. | School Business Officer | Date of absence + 2 years | Date of absence | DfE School attendance Guidance for maintained schools, academies, independent schools and local authorities August 2020 | Secure disposal |
| 20. Special Educational Needs (SEN) | | | | | | | |
| 20.1 | SEN files, reviews and Individual Education Plans – Nursery | Paper copies – held in a secure cupboard in a locked office. Electronic copies – secure server | SENCO | Retain for duration of attendance at school | Date pupil changes school | The Limitation Act 1980 | Transfer to new or Primary School |
| 20.2 | SEN files, reviews and Individual Education Plans – Secondary | n/a | n/a | Date of birth of pupil + 35 years (This period is recommended by LA) | Pupil's date of birth | Special Educational Needs and Disability Act 2001 & | Secure disposal (subject to IICSA) |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|----------------------------------|---|---|------------------|---|---|---|------------------------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | | | Children and Families Act 2014 | |
| 20.3 | Statement / Education Health Care Plan (EHCP) under Section 324 of the Education Act 1996 and any amendments made to the plan | Paper copies – held in a secure cupboard in a locked office. Electronic copies – secure server | SENCO | Date of birth of pupil + 25 years | Pupil’s date of birth | Special Educational Needs and Disability Act 2001, Children and Families Act 2014 & The Limitation Act 1980 | Secure disposal (subject to IICSA) |
| 21. Curriculum Management | | | | | | | |
| 21.1 | Curriculum returns | n/a | n/a | Current year + 3 years | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 21.2 | Curriculum development | Paper copies – held planning file. Older versions held in archive. Electronic copies – secure server | Headteacher | Current year + 6 years | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 21.5 | SATs Examination papers | n/a | n/a | The examination papers should be kept until any | Date of examination | Common practice | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---------------------------------|---|------------------|--|---|-----------------|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | appeals/validation process is complete | | | |
| 21.7 | Value Added and Contextual Data | n/a | n/a | Current year + 6 years | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 21.8 | Self-Evaluation Forms | Paper copies – held in a secure cupboard Electronic copies – secure Server | Headteacher | Current year + 6 years | Date of completion | Common practice | Secure disposal |
| 21.9 | Internal Moderation | n/a | n/a | Academic year + 1 academic year | Date of commencement | Common practice | Secure disposal |
| 21.10 | External Moderation | Paper copies – held in a secure cupboard Electronic copies – secure Server | Headteacher | Until superseded | Date of commencement | Common practice | Secure disposal |
| | | | | | | | |
| 22. Implementation of Curriculum | | | | | | | |
| 22.1 | Schemes of Work | n/a | n/a | Current year + 1 year | End of the academic year that the record was created in | Common practice | Review these records at the end of each year |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----------|--|---|------------------|---|---|-----------------|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | | | | and allocate a further retention period or secure disposal |
| 22.2 | Timetable | n/a | n/a | Current year + 1 year | End of the academic year that the record was created in | Common practice | Secure disposal |
| 22.3 | Class Record books, mark books, homework records (eg teacher spreadsheets etc) | n/a | n/a | Current year + 1 year | End of the academic year that the record was created in | Common practice | Secure disposal |
| 22.4 | Pupil work | Paper copies of children's work is kept in main nursery | Lead Teacher | Where possible, pupils' work should be returned to the pupil at the end of the academic year. If this is not, currently, the school's policy then it should be retained for the current year +1 | End of the academic year that the record was created in | Common practice | Secure disposal |
| 22.5 | Online learning platforms | n/a | n/a | As above. Work should be cleared from platforms at the end of the following academic year | End of the academic year that the record was created in | Common practice | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|--|--|---|----------------------------|--|---|--|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 22.6 | Teacher diaries & Notebooks | Held by individual members of staff. | Headteacher & Lead Teacher | Contents should be transferred to appropriate record keeping (e.g. staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. Destroyed within 3 months. | Expiration of diary. Completion of notebook | Common practice | Secure disposal |
| 23. Extra Curriculum Management | | | | | | | |
| 23.1 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Primary schools) where there has not been a Major Incident <i>(Records created might include risk assessments)</i> | Electronic copies can be found on Evolve Paper copies held in locked office. | Headteacher | Date of visit + 14 years | Date of visit | The Health and Safety at Work Act 1974 | Secure disposal |
| 23.2 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Secondary schools) where there has not been a Major Incident | n/a | n/a | Date of visit + 10 years | Date of visit | The Health and Safety at Work Act 1974 | Secure disposal |
| 23.3 | Parental consent forms for school trips where there has been no Major Incident | Paper copies held in a secure cupboard | Headteacher | No retention is required | | Common practice | Secure disposal |
| 23.4 | Records created by schools to obtain approval for to run an Educational Visit outside the Classroom, where there has been a Major Incident <i>(Records created might include risk assessments)</i> | Paper copies held in a secure cupboard | Headteacher | Retain for 25 years from the date of birth of the pupil/s involved in the incident | Pupil's DOB | The Limitation Act 1980 | Secure disposal |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|--|---|---|--------------------------------|--|---|-------------------------|------------------------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 23.5 | Parental consent forms for school trips, where there has been a Major Incident | If an event occurred, paper copies would be locked in a secure cupboard | Headteacher | Retain for 25 years from the date of birth of the pupil/s involved in the incident. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils | Pupil's DOB | The Limitation Act 1980 | Secure disposal |
| 24. Family Liaison / Early Help / Alternative Provision | | | | | | | |
| 24.1 | Day books | n/a | n/a | Current year + 2 years then review | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 24.2 | Reports for outside agencies – where the report has been included on the agency case file | Electronic information is held on My Concern | Headteacher/ Safeguarding Lead | Whilst the child is attending school and then destroy | Date of completion of report | Common practice | Secure disposal (subject to IICSA) |
| 24.3 | Referral forms | Electronic information is held on My Concern | Headteacher/ Safeguarding Lead | While the referral is current | Date of completion of form | Common practice | Secure disposal (subject to IICSA) |
| 24.5 | Contact data sheets and database entries | n/a | n/a | Current year then review – if contact is no longer active then destroy | End of the calendar year that the record was created in | Common practice | Secure disposal (subject to IICSA) |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|----------------------------|---|---|---------------------------------------|------------------------|---|-----------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 24.6 | Group registers | n/a | n/a | Current year + 2 years | Last entry in register | Common practice | Secure disposal |
| 25. Local Authority | | | | | | | |
| 25.1 | Secondary Transfer sheets | n/a | n/a | Current year + 2 years | Year of transfer | Common practice | Secure disposal |
| 25.2 | Attendance Returns | Electronic copies on RM Integris. Reports may also be held on the school server | School Business Officer | Current year + 1 year | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 25.3 | School Census Returns | Paper copies – secure filing cabinet Electronic copies on RM Integris | School Business Officer | Current year + 5 years | Completion of return | Common practice | Secure disposal |
| 25.4 | Circulars and other information sent from the Local Authority | Maybe held in paper or electronic form. Where is was held would depend upon the nature of the information | Headteacher & school Business officer | Operational use | Date of issue | Common practice | Secure disposal |
| | | | | | | | |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|---|---------------------------------------|------------------------|---|-----------------|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| 26. Central Government | | | | | | | |
| 26.1 | OFSTED reports and papers | Paper copies – secure filing cabinet | Headteacher | Retain whilst current | Date new report is issued | Common practice | Transfer to Local Authority Record Office |
| 26.2 | Returns made to central government, including Schools financial value standard (SFVS) and assurance statement | Paper copies – secure filing cabinet. SFVS stored with Governor document pack. Electronic copies held on secure server | School Business Officer | Current year + 6 years | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 26.3 | Circulars and other information sent from central government | Maybe held in paper or electronic form. Where is was held would depend upon the nature of the information | Headteacher & school Business officer | Operational use | Date of issue | Common practice | Secure disposal |
| | | | | | | | |
| 27. Parent / Alumni Associations | | | | | | | |
| 27.1 | Records relating to the creation and management of PTA and Old Pupil Associations | Paper copies held in locked office | Headteacher | Current year + 6 years | Date of foundation | Common practice | Secure disposal |
| | | | | | | | |

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|--|------------------|---|-------------------------------------|---------------------|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| 28. Recordings (meetings, calls, online lessons) – schools, please adapt this section to suit ensuring it is consistent with the Acceptable Use policy section 7.8 | | | | | | | |
| 28.1 | Incoming & Outgoing calls | n/a calls are not recorded | | | | | |
| 28.2 | Meetings | n/a calls are not recorded | | | | | |
| 28.3 | Online lessons | n/a calls are not recorded | | | | | |
| 28.4 | Staff training | Secure via Microsoft Teams | Headteacher | Recordings will be securely destroyed when training is no longer appropriate/ out of date | When new training material is used. | Common practice | Recording deleted from recording platform. |
| | | | | | | | |
| 29. Administration of Medication | | | | | | | |
| 29.1 | Non-prescription medicines and remedies inc. painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers | File in a locked cupboard | Lead Teacher | Current year + 1 year | Date of administration | Limitation Act 1980 | Secure disposal |
| 29.2 | All other administration of medication not covered by 30.1 including, but not limited to: peg feeding, injections, treatments for serious conditions such as diabetes, ADHD or depression | File in locked cupboard | Lead Teacher | Date of birth of the pupil + 25 years | Date of administration | Limitation Act 1980 | Secure disposal |

Appendix A – List of School Records and Data safely destroyed

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

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

| Reference Number | File/Record Title | Description | Reference or Cataloguing Information | Number of Files Destroyed | Method of Destruction | Confirm; (i) Safely Destroyed (ii) In accordance with Data Retention Guidelines Yes/No | Name of Authorising Officer |
|------------------|-------------------|---|--|---------------------------|-----------------------|---|-----------------------------|
| 1. | School invoices | Copies of purchase invoices dated 2011/12 | Folders marked 'Purchase Invoices 2011/13' 1-3 | 3 Folders | Cross shredded | Yes | J Smith (Head) |

[School Name]

Data Protection Framework: 4. Record Retention and Deletion Policy

