



Data Retention Policy

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Introduction

Old Park Primary School recognise that by efficiently managing it's records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the school. Records provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

Scope of the Policy

This policy applies to all records created, received or maintained by staff of the school in the course of carrying out the day to day operations of the school.

Records are defined as documents which facilitate the business carried out by the school and which, where required are thereafter retained (for a set period) to provide evidence of its transactions and activities. These records may be created, received or maintained in hard copy or electronically.

A small percentage of the school records will be selected for permanent preservation as part of the institutions archives and for historical research. This should be done in conjunction with Sandwell MBC Archives Service.

Responsibilities

The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility to this policy is the Headteacher.

The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are securely stored and can be appropriately accessed.

Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines.

Relationship with existing policies

This policy has been drawn up within the context of:

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

Pupil Records

These guidelines are intended to help provide consistency of practice in the way in which pupil records are managed. These will assist schools about how pupil records should be managed and what kind of information should be included in the file. It is hoped that the guidelines will develop further following suggestions and comments from those members of staff in schools who have the most contact with pupil records.

These guidelines apply to information created and stored in both physical and electronic format. These are only guidelines and have no legal status, if you are in doubt about whether a piece of information should be included on the file please contact the Local Authority.

Managing Pupil Records

The pupil record should be seen as the core record charting an individual pupil's progress through the Education System. The pupil record should accompany the pupil to every school they attend and should contain information that is accurate, objective and easy to access. These guidelines are based on the assumption that the pupil record is a principal record and that all information relating to the pupil will be found on their file/profile.

File covers for pupil records

Where the file is a paper file, it is strongly recommended that schools use a consistent file cover for the pupil record. This assists secondary schools to ensure consistency of practice when receiving records from a number of different primary schools. If, for example, primary schools have many different file covers for their files, the secondary school that the pupil files are transferred to will then be holding different levels of information for pupils coming from different primary schools.

Using pre-printed file ensures all the necessary information is collated and the record looks tidy, and reflects the fact that it is the principal record containing all the information about an individual child.

Recording Information

Pupils have a right of access to their educational record and so do their parents under the Education (Pupil Information) (England) Regulations 2005. Under the General Data Protection Regulation a pupil or their nominated representative has a right to see information held about them. This right exists until the point that the file is destroyed. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

Opening a file

These guidelines apply to information created and stored in both physical and electronic format.

The pupil record starts its life when a file is opened for each new pupil as they begin school. This is the file which will follow the pupil for the rest of his/her school career. If pre-printed file covers are not being used then the following information should appear on the front of a paper file:

- Surname
- Forename
- DOB
- Unique Pupil Number

The file cover should also contain a note of the date when the file was opened and the date when the file is closed if it is felt to be appropriate.

Inside the front cover the following information should be easily accessible:

- The name of the pupil's doctor
- Emergency contact details
- Gender
- Preferred name
- Position in family
- Ethnic origin
- Language of home (if other than English)
- Religion
- Any allergies or other medical conditions that it is important to be aware of
- Names of adults who hold parental responsibility with home address and telephone number (and any additional relevant carers and their relationship to the child)
- Name of the school, admission number and the date of admission and the date of leaving.
- Any other agency involvement e.g. speech and language therapist, paediatrician

It is essential that these files, which contain personal information, are managed against the information security guidelines also contained in this policy.

Items which should be included on a pupil record

- If the pupil has attended an early years setting, then the record of transfer should be included on the pupil file
- Admission form (application form)
- Privacy Notice [if these are issued annually only the most recent need be on the file]
- Photography Consents
- Years Record
- Annual Written Report to Parents
- National Curriculum and Religious Education Locally Agreed Syllabus Record Sheets
- Any information relating to a major incident involving the child (either an accident or other incident)
- Any reports written about the child
- Any information about a statement and support offered in relation to the statement
- Any relevant medical information (should be stored in the file in a sealed envelope clearly marked as such)
- Child protection reports/disclosures (should be stored in the file in a sealed envelope clearly marked as such)
- Any information relating to exclusions (fixed or permanent)
- Any correspondence with parents or outside agencies relating to major issues
- Details of any complaints made by the parents or the pupil

The following records should be stored separately to the pupil record as they are subject to shorter retention periods and if they are placed on the file then it will involve a lot of unnecessary weeding of the files before they are transferred on to another school.

- Absence notes
- Parental consent forms for trips/outings [in the event of a major incident all the parental consent forms should be retained with the incident report not in the pupil record]
- Correspondence with parents about minor issues
- Accident forms (these should be stored separately and retained on the school premises until their statutory retention period is reached. A copy could be placed on the pupil file in the event of a major incident)

Transferring the pupil record to secondary school

The pupil record should not be weeded before transfer to the secondary school unless any records with a short retention period have been placed in the file. It is important to remember that the information which may seem unnecessary to the person weeding the file may be a vital piece of information required at a later stage.

Primary schools do not need to keep copies of any records in the pupil record except if there is an ongoing legal action when the pupil leaves the school. Custody of and responsibility for the records passes to the school the pupil transfers to.

Files should not be sent by post unless absolutely necessary. If files are sent by post, they should be sent by registered post with an accompanying list of the files. The secondary school should sign a copy of the list to say that they have received the files and return that to the primary school. Where appropriate, records can be delivered by hand with signed confirmation for tracking and auditing purposes.

Electronic documents that relate to the pupil file also need to be transferred, or, if duplicated in a master paper file, destroyed.

Responsibility for the pupil record once the pupil leaves the school

The school which the pupil attended until statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25 years. [See the retention schedule for further information].

Safe destruction of the pupil record

The pupil record should be disposed of in accordance with the safe disposal of records guidelines.

Transfer of a pupil record outside the EU area

If you are requested to transfer a pupil file outside the EU area because a pupil has moved into that area, please contact the Local Authority for further advice.

Storage of pupil records

All pupil records should be kept securely at all times. Paper records, for example, should be kept in lockable storage areas with restricted access, and the contents should be secure within the file. Equally, electronic records should have appropriate security. Access arrangements for pupil records should ensure that confidentiality is maintained whilst equally enabling information to be shared lawfully and appropriately, and to be accessible for those authorised to see it.

Safe disposal of records which have reached the end of their administrative life

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

Article 5e of the General Data Protection Regulation principles states that 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;

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 this policy.

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

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.

The school provides confidential waste bins and third-party service to ensure that records are disposed of in an appropriate way. The third-party service provides records that waste documents have been destroyed using a Certificate 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 recorded and authorised to be destroyed by a Senior Manager and the destruction recorded. Records should be shredded as soon as the record has been documented as being destroyed.

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 General Data Protection Regulations 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 Council 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 GDPR 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

These records could be kept in a spreadsheet or other database format.

Digital Continuity

Statement of business purpose and statutory requirements for keeping records

Information assets collected and maintained by Old Park Primary School are done so for the day to day running and functioning of the School. Some of the data is statutory under the legislation mentioned in the Data Retention Schedule under the header “Statutory Provisions”. Under the General Data Protection Regulation the loss of personal data must be reported to the Information Commissioner’s Office within 72 hours of breach being discovered, and a record of the breach must be kept.

The statement should contain a description of the business purpose for the information assets and any statutory requirements including the retention period for the records. This should also include a brief description of the consequences of any loss of data.

By doing this the records owner will be able to show why and for how long the information assets needs to be kept. As digital continuity can be resource intensive, it is important that the resources are allocated to the information assets which require them.

Names of the people/functions responsible for long term data preservation

The Headteacher is responsible for long term data preservation and information assets, with the eLearning Manager taking day to day responsibility for making sure backups of the data are completed.

Description of when the record needs to be captured into the approved file formats

Any records kept may not need to be captured in to the approved file format at its creation. For example, a word processed document need not be converted to portable document format until it becomes semi-current. Once a document becomes semi-permanent, it is recommended that it be turned into a portal document format file. This format is the most supported format on all computing systems, and as such allows the document to be preserved longer than in a proprietary format.

Description of the appropriate supported file formats for long term preservation

Formats to be considered for long term preservation include the Open Document Format, as described by ISO/IEC 26300. These formats are the widest supported documentation formats across a variety of Office Suites. Office Open XML format, as described by ISO/IEC 29500 may also be used.

Retention of all software specification information and licence information

Where it is not possible for the data created by a bespoke computer system to be converted to the supported file formats, the system itself will need to be mothballed.

If this information is not retained it is possible that the data contained within the system may become inaccessible with the result that the data is unusable with all the ensuing consequences.

Description of how access to the information asset is to be managed within the data security protocols

Data held for long term preservation must be accessible when required but also must be protected against the school's standard information security requirements.. Records should only be accessible by those who are authorised to see it.

Appropriate Storage for Physical Records

Records must be stored in a way that does not cause a health and safety hazard. Records must not be stored in corridors or gangways and must not impede or block fire exits. There should be where appropriate, heat/smoke detectors connected to fire alarms, a sprinkler system and the required number of fire extinguishers. The area should be secured against intruders and have controlled access as far as possible to the working space.

Storage areas should be regularly monitored and checked for any damage or emerging risks, especially during holiday periods.

The following are hazards which need to be considered before approving areas where physical records can be stored.

Environmental Damage - Fire

Records can be damaged beyond repair by fire. Smoke and water damage will also occur to records which have been in a fire, although generally records damaged by smoke or water can be repaired.

Core records should be kept in cabinets or cupboards. Metal filing cabinets will usually suffice, but for important core records, fire proof cabinets may need to be considered. However, fireproof cabinets are expensive and very heavy so they should only be used in special circumstances.

Records which are stored on desks or in cupboards which do not have doors will suffer more damage than those which are stored in cupboards/cabinets which have close fitting doors.

Environmental Damage - Water

Records damaged by water can usually be repaired by a specialist document salvage company. The salvage process is expensive, therefore, records need to be protected against water damage where possible. Where flooding is involved the water may not always be clean and records could become contaminated as well as damaged.

Records should not be stored directly under water pipes or in places which are liable to flooding (either from excess rainfall or from the overflow of toilet cisterns). Records should be stored in cabinets/cupboards with tight fitting doors which provide protection from water ingress. Records stored on desks or in cabinets/cupboards without close fitting doors will suffer serious water damage.

Records should be stored at least 2 inches off the ground. Most office furniture stands 2 inches off the ground. Portable storage containers (i.e. boxes or individual filing drawers) should be raised off the ground by at least 2 inches. This is to ensure that in the case of a flood that records are protected against immediate flood damage.

Storage areas should be checked for possible damage after extreme weather to ensure no water ingress has occurred.

Environmental Damage - Sunlight

Records should not be stored in direct sunlight (e.g. in front of a window). Direct sunlight will cause records to fade and the direct heat causes paper to dry out and become brittle.

Environmental Damage – High Levels of Humidity

Records should not be stored in areas which are subject to high levels of humidity. Excess moisture in the air can result in mould forming on the records. Mould can be a hazard to human health and will damage records often beyond repair.

The temperature in record storage areas should not exceed 18oC and the relative humidity should be between 45% and 65%. Temperature and humidity should be regularly monitored and recorded. Storage areas should be checked for damage after extreme weather conditions to reduce the risk of mould growth.

Environmental Damage – Insect/Rodent Infestation

Records should not be stored in areas which are subject to insect infestation or which have a rodent problem (rats or mice).

Retention Guidelines

Purpose

Under the Freedom of Information Act 2000, schools are required to maintain a retention schedule listing the record series which the school creates in the course of its business. The retention schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use.

The retention schedule lays down the basis for normal processing under both the General Data Protection Regulation and the Freedom of Information Act 2000. Members of staff are expected to manage their current record keeping systems using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems.

The retention schedule refers to record series regardless of the media in which they are stored.

Benefits of a Data Retention Schedule

There are a number of benefits which arise from the use of a complete retention schedule:

- Managing records against the retention schedule is deemed to be “normal processing” under the General Data Protection Regulation and the Freedom of Information Act 2000.
- Members of staff should be aware that once a Freedom of Information request is received or a legal hold imposed then records disposal relating to the request or legal hold must be stopped. Members of staff can be confident about safe disposal information at the appropriate time.
- Information which is subject to Freedom of Information and Data Protection legislation will be available when required. The school is not maintaining and storing information unnecessarily

Maintaining and amending the Retention Schedule

Where appropriate the retention schedule should be reviewed and amended to include any new record series created and remove any obsolete record series.

This retention schedule contains recommended retention periods for the different record series created and maintained by Old Park Primary School in the course of business. The schedule refers to all information regardless of the media in which it is stored.

Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the General Data Protection Regulation and the Freedom of Information Act 2000.

Managing record series using these retention guidelines will be deemed to be “normal processing” under the legislation mentioned above. If record series are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented.

This schedule should be reviewed on a regular basis.

Data Retention Schedule

1. Management of the School

1.1 Governing Body

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
1.1.1	Agendas for governing body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL (<i>e.g. confidential waste bin or cross cut shredding</i>)
1.1.2	Minutes of GB Meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff			
	Principal set of minutes (signed)			Permanent	If the school is unable to store these then they should be offered to the council archive service.
	Inspection Copies (held by clerk in case of requests to view minutes)			Date of meeting plus 3 years	If these minutes contain any sensitive, personal information they must be shredded
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		Reports should be kept for a minimum of six years. However, if the minutes refer directly to individual reports then the reports should be kept permanently	SECURE DISPOSAL or retain with the signed set of minutes
1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Education Act 2002 Section 33	Date of meeting plus a minimum of 6 years	SECURE DISPOSAL

1.1.5	Instruments of Government including articles of association	No		Permanent	These should be retained in the school whilst the school is open and only returned to the council if the school closes
1.1.6	Trust and endowments managed by the Governing body	No		Permanent	These should be retained in the school whilst the school is open and only returned to the council if the school closes
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
1.1.7	Action plans created and administered by the governing body	No		Life of action plan plus 3 years	SECURE DISPOSAL
1.1.8	Policy documents created and administered by the governing body	No		Life of the policy plus 3 years	SECURE DISPOSAL
1.1.9	Records relating to complaints dealt with by the governing body	Yes		Date of resolution of the complaint plus a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL
1.1.10	Annual reports created under the requirements of the Education (Governors Annual Reports – England) (Amendment) Regulations 2002	No	Education (Governors Annual Reports – England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report plus 10 years	SECURE DISPOSAL
1.1.11	Proposals concerning the change of status of a maintained school including specialist status schools and academies	No		Date of proposal accepted or declined plus 3 years	SECURE DISPOSAL

1.1.12	Trust Deeds, including Academy Conversion Orders, Commercial Transfer Agreements and Leases/Under-Leases	Commercial Transfer Agreements (CTAs) will most probably contain personal contract information for individual members of staff	School Standards and Framework Act 1998 and Academies Act 2010	Permanent	These should be retained in the school whilst the school is open and then offered to the Borough Archivist when the school closes.
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1.2 Headteacher and Senior Leadership Team

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
1.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		Date of last entry in the book plus a minimum of 6 years then review	These could be of historical value and could be offered to the Council archives service if appropriate
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		Date of the meeting plus 3 years then review	SECURE DISPOSAL
1.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		Date of the report plus a minimum of 3 years then review	SECURE DISPOSAL
1.2.4	Records created by Head Teachers deputy headteachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		Current academic year plus 6 years then review	SECURE DISPOSAL
1.2.5	Correspondence created by Head Teachers deputy headteachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence plus 3 years then review	SECURE DISPOSAL
1.2.6	Professional development plans	Yes		Life of plan plus 6 years	SECURE DISPOSAL
1.2.7	School development plans	No		Life of the plan plus 3 years	SECURE DISPOSAL

1.3 Admissions Process

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
1.3.1	All records to the creation and implementation of the School Admission Policy	No	Schools Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Life of the policy plus 3 years then review	SECURE DISPOSAL
1.3.2	Admissions – if the admission is successful	Yes	Schools Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Date of admission plus 1 year	SECURE DISPOSAL
1.3.3	Admissions – if the appeal is unsuccessful	Yes	Schools Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014 Schools Admission Appeals Code February 2012 Statutory guidance for school leaders, governing bodies and local authorities.	Resolution of case plus 1 year	SECURE DISPOSAL
1.3.4	Register of admissions	Yes	School attendance: Department advice for maintained schools, academies, independent schools and local authorities November 2016	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	Review Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm dates they attended school
1.3.5	Admissions – Secondary Schools - Casual	Yes		Current year plus 1 year	SECURE DISPOSAL

1.3.6	Proof of address supplied by parents as part of the admission process	Yes	Schools Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Current year plus 1 year	SECURE DISPOSAL
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
1.3.7	Supplementary information forms including additional information such as religion, medical conditions etc	Yes	Schools Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	The information should be added to the pupil file	SECURE DISPOSAL
	For successful admissions		Schools Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	The information should be added to the pupil file	SECURE DISPOSAL
	For unsuccessful admissions		Schools Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Until appeals process is complete	SECURE DISPOSAL

1.4 Operational Administration

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
1.4.1	General file series	No		Current year plus 5 years then review	SECURE DISPOSAL
1.4.2	Records relating to the creation and publication of the school brochure or prospectus	No		Current year plus 3 years	Standard disposal
1.4.3	Records relating to the creation and distribution of circulars to staff parents or pupils	No		Current year plus 1 year	Standard disposal
1.4.4	Newsletters and other items with short operational use	No		Current year plus 1 year	Standard disposal
1.4.5	Visitors books and signing in sheets	Yes		Current year plus 6 years then review	SECURE DISPOSAL
1.4.6	Records relating to the creation and management of parent/teacher associations and or old pupil's associations	No		Current year plus 6 years then review	SECURE DISPOSAL
1.4.7	Email The school does not use email as a filing or record-keeping system.	Yes		Current year plus 2 years when deleted from user's inbox. This is applicable to emails that need to be kept on file.	SECURE DISPOSAL
1.4.8	Instant messages The school does not use instant messaging as a filing or record-keeping system.	Yes		Current year plus 2 years from when message was sent. This is applicable to messages that need to be kept on file.	SECURE DISPOSAL
1.4.9	Digitally stored general files	Yes		Current year plus 5 years from when the document	SECURE DISPOSAL

				was created, if deleted by a user from their storage area, else kept for useful life.	
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2. Human Resources

2.1 Recruitment

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
2.1.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment plus 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate plus 6 months	SECURE DISPOSAL
2.1.3	All records leading up the appointment of a new member of staff – successful candidates	Yes		All the relevant information should be added to the staff personal file and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre employment vetting information	No	DBS Update Service Guide June 2014: Keeping children safe in education Sept 2017	The school does not have to keep copies of DBS certificates. If the school does so the copy must not be retained more than 6 months.	
2.1.5	Proofs of identity collected as part of the process of checking portable enhanced DBS disclosure	Yes		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the staff personal file	Documents that are not required to support staff's current DBS - SECURE DISPOSAL
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the UK	Yes	An employer's right to work checks (Home Office May 2015)	Where possible these documents should be added to the staff personal file but if they are kept separately then the Home Office requires that the documents are kept for termination of employment plus not less than two years	

2.2 Operation staff management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
2.2.1	Staff personal file	Yes	Limitation Act 1980 (section 2)	Termination of employment plus 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year plus 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal/assessment records	Yes		Current year plus 5 years	SECURE DISPOSAL

2.3 Management of disciplinary and grievance processes

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
2.3.1	Allegation of a child protection nature against a member of staff including where an allegation is unfounded	Yes	Keeping children safe in education statutory guidance for schools and colleges Sept 2016	Until the person's normal retirement age or 10 years from the date of 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 file and a copy provided to the person concerned.	SECURE DISPOSAL. These records must be shredded.
2.3.2	Disciplinary hearings	Yes			
	Oral warning			Date of warning plus 6 months	
	Written warning – Level 1			Date of warning plus 6 months	SECURE DISPOSAL
	Written warning – Level 2			Date of warning plus 12 months	SECURE DISPOSAL
	Final warning			Date of warning plus 18 months	SECURE DISPOSAL

	Case not found			If the incident is child protection related then see above otherwise dispose at the conclusion of the case	SECURE DISPOSAL
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2.4 Health and Safety

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
2.4.1	Health and safety policy statement	No		Life of policy plus 3 years	SECURE DISPOSAL
2.4.2	Health and safety risk assessment	No		Life of risk assessment plus 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/injury at work	Yes		Date of incident plus 12 years. In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
2.4.4	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social security administration Act 1992 Section 8. Limitation Act 1980		
	Adults			Date of incident plus 6 years	SECURE DISPOSAL
	Children			DOB of the child plus 25 years	SECURE DISPOSAL
2.4.5	Control of substances hazardous to health (COSHH)	No	COSHH 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	Current year plus 40 years	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of asbestos at work regulations 2012 SI 1012 No632 Regulation 19	Last action plus 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action plus 50 years	SECURE DISPOSAL

2.4.8	Fire precautions log books	No		Current year plus 6 years	SECURE DISPOSAL
2.4.9	Hazard / Near Miss Evaluation form	No		Current year plus 6 years	SECURE DISPOSAL

2.5 Payroll and pensions

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
2.5.1	Maternity pay records	Yes	Statutory maternity pay (general) Regulation 1986 (SI1986/1960); revised 1999 (SI1999/567)	Current year plus 3 years	SECURE DISPOSAL
2.5.2	Records held under retirement benefits schemes (information powers) regulations 1995	Yes	Retirements Benefits Schemes (Information Powers) Regulations 1995	Current year plus 6 years	SECURE DISPOSAL

3. Financial Management of the School

3.1 Risk management and insurance

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
3.1.1	Employers liability insurance certificate	No		Closure of the school plus 40 years	SECURE DISPOSAL

3.2 Asset Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
3.2.1	Inventories of furniture and equipment	No		Current year plus 6 years	SECURE DISPOSAL
3.2.2	Burglary, theft and vandalism forms	No		Current year plus 6 years	SECURE DISPOSAL

3.3 Accounts and statements including building management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
3.3.1	Annual Accounts	No		Current year plus 6 years	Standard disposal
3.3.2	Loans and grants managed by the school	No		Date of last payment on loan plus 12 years then review	SECURE DISPOSAL
3.3.3	Student grant applications	Yes		Current year plus 3 years	SECURE DISPOSAL
3.3.4	All records relating to the creation and management of budgets including Annual Budget statement and background papers	No		Life of budget plus 3 years	SECURE DISPOSAL

3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year plus 6 years	SECURE DISPOSAL
3.3.6	Records relating to the collection and banking of monies	No		Current financial years plus 6 years	SECURE DISPOSAL
3.3.7	Records relating to the identification and collection of debt	No		Current financial year plus 6 years	SECURE DISPOSAL

3.4 Contract Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract plus 12 years	SECURE DISPOSAL
3.4.2	All records relating to the management of contract under signature	No	Limitation Act 1980	Last payment on the contract plus 6 years	SECURE DISPOSAL
3.4.3	Records relating to the monitoring of contracts	No		Current year plus two years	SECURE DISPOSAL

3.5 School Fund

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
3.5.1	School fund – Cheque books	No		Current year plus 6 years	SECURE DISPOSAL
3.5.2	School fund – Paying in books	No		Current year plus 6 years	SECURE DISPOSAL
3.5.3	School fund – ledger	No		Current year plus 6 years	SECURE DISPOSAL
3.5.4	School fund – invoices	No		Current year plus 6 years	SECURE DISPOSAL
3.5.5	School fund – receipts	No		Current year plus 6 years	SECURE DISPOSAL
3.5.6	School fund – bank statements	No		Current year plus 6 years	SECURE DISPOSAL
3.5.7	School fund – journey books	No		Current year plus 6 years	SECURE DISPOSAL

3.6 School Meal management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
3.6.1	Free school meals registers	Yes		Current year plus 6 years	SECURE DISPOSAL
3.6.2	School meal registers	Yes		Current year plus 3 years	SECURE DISPOSAL
3.6.3	School meals summary sheets	No		Current year plus 3 years	SECURE DISPOSAL

4. Property Management

4.1 Property management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
4.1.1	Title deed of properties belong to the school	No		Permanent – these should follow the property unless the property has been registered with the Land Registry	NA
4.1.2	Plans or property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold	NA
4.1.3	Leases of property by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL

4.2 Maintenance

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
4.2.1	All records relating to the maintenance of the school carried out by contactors	No		Current year + 6 years	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No		Current year + 6 years	SECURE DISPOSAL

4.3 Capital Projects

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
4.3.1	Capital Project Contact Directory	Personal contact details, i.e., name, address, email, tel. nos.	None	Year of practical completion of the capital scheme and + 1 year. Review for a further year(s) if outstanding defects to resolve with the new building works.	SECURE DISPOSAL
4.3.2	All correspondence (non-financial)	Personal contact details, i.e., name, address, email, tel. nos.	None	Current year + 1 year	SECURE DISPOSAL
4.3.3	All financial correspondence (inclusive of competitive / successful quotes, LA Loan Agreements)	Personal contact details, i.e., name, address, email, tel. nos.	None	Current financial year + 6 years	SECURE DISPOSAL
4.3.4	DBS checks for contractor staff	Name and registration number held on Single Central Record		Follow schools own retention policy for CSR data	SECURE DISPOSAL

5. Pupil's Educational Record

5.1 Pupil's educational record

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
5.1.1	Pupil's Educational Record required by the Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No 1437		
	Primary			Transfer to receiving schools and retain whilst the child remains at the primary school (Transition Files need to be handed over prior to start date in receiving school)	The file should follow the pupil when he/she leaves the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit • If the pupil dies whilst at primary school the file should be returned to the LA to be retained for the statutory retention period If a pupil transfers to an independent school, elective home education or leaves the country the file should be returned to the LA to be retained for the statutory retention period.
5.1.2	Examination results	Yes			
	SATS Results			This information should be added to the pupils file.	
	Public Examinations e.g GCSE			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board

	Internal			This information should be added to the pupil file	
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	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
5.1.3	Child protection information	Yes	Keeping Children Safe in Education statutory guidance for schools and colleges - Sept 2016 'Working Together to Safeguard Children A guide to interagency working to safeguard children – March 2015	If any records relating to child protection issues are placed on the pupil file it should be in a sealed envelope and then retained for the same period of time as the pupil file	SECURE DISPOSAL – these records must be shredded
5.1.4	Child protection information held in separate files	Yes	Keeping Children Safe in Education statutory guidance for schools and colleges - Sept 2016 'Working Together to Safeguard Children A guide to interagency working to safeguard children – March 2015	DOB of the child plus 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	SECURE DISPOSAL – these records must be shredded

5.2 Attendance

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
5.2.1	Attendance registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and LAs October 2014	Every entry in the attendance register must be preserved for a period of three years after the dates on which the entry was made	SECURE DISPOSAL
5.2.2	Correspondence relating to authorized absence	Yes	Education Act 1996 Section 7	Current academic year plus 2 years	SECURE DISPOSAL

5.3 Special Educational Needs

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
5.3.1	Special Educational Needs files, reviews and individual education plans (IEPs) Education Health and Care Plans (EHC Plans)	Yes	Limitation Act 1980 (Section 2)	Date of Birth of the pupil plus 25 years	REVIEW: Note: his 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. EHC Plans should follow the child through Education.
5.3.2	Education, Health and Care Plans and Statements maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996. Special Educational Needs and Disability Act 2001 Section 1. SEND Reforms 2014	Date of birth of the pupil plus 25 years (This would normal be retained on the pupil file)	SECURE DISPOSAL unless the document is subject to legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Education Act 1996. Special Educational Needs and Disability Act 2001 Section 1. SEND Reforms 2014	Date of birth of the pupil plus 25 years (This would normal be retained on the pupil file)	SECURE DISPOSAL unless the document is subject to legal hold
5.3.4	Accessibility strategy	Yes	Education Act 1996. Special Educational Needs and Disability Act 2001 Section 1. SEND Reforms 2014	Date of birth of the pupil plus 25 years (This would normal be retained on the pupil file)	SECURE DISPOSAL unless the document is subject to legal hold

6. Curriculum Management

6.1 Statistics and Management Information

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination results	Yes		Current years + 6 years	SECURE DISPOSAL
	SATs records	Yes			
	Results			The SATS results should be recorded on the pupils educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATS results. These could be kept for current year +6 years to allow suitable comparison.	SECURE DISPOSAL
	Examination papers/SATS papers			The examination papers should be kept until any appeals/validation process is complete.	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) reports	No	Admission Code 2014	Current year + 6 years	SECURE DISPOSAL
6.1.4	School re-organisation plans/proposals	No		Current year + 3 years	SECURE DISPOSAL
6.1.5	Value added and contextual data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.6	Self Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.7	Internal attainment and progress tracking data	Yes		Current year + 6 years	SECURE DISPOSAL

6.2 Implementation and curriculum

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
6.2.1	Schemes of Work	No		Current year + 1 year	
6.2.2	Timetable	No		Current year + 1 year	
6.2.3	Class Record Books	No		Current year + 1 year	
6.2.4	Mark Books	No		Current year + 1 year	
6.2.5	Record of homework set	No		Current year + 1 year	
6.2.6	Pupils Work	No		Where possible pupils work should be returned to the pupil at the end of the academic year if this is not the schools policy then current year + 1 year	
6.2.7	End of year reports	Yes		Current year + 7 years	SECURE DISPOSAL

7. Extra Curricular Activities

7.1 Education Visits Outside the classroom

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Outdoor Education Advisers Panel National Guidance website http://oeapng.info specifically Section 3 – Legal Framework and Employer Systems and Section 4 – Good Practice	Date of visit + 14 years	SECURE DISPOSAL
7.1.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Outdoor Education Advisers Panel National Guidance website http://oeapng.info specifically Section 3 – Legal Framework and Employer Systems and Section 4 – Good Practice	Date of visit + 10 years	SECURE DISPOSAL
7.1.3	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	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
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	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	

7.2 Walking bus

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
7.2.1	Walking Bus Registers	Yes		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	SECURE DISPOSAL (If these documents are retained electronically any back-up copies should be destroyed at the same time)

7.3 Family Liaison officers and home school liaison workers

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
7.3.1	Day Books	Yes		Current year + 2 years then review	
7.3.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	
7.3.3	Referral forms	Yes		While the referral is current	
7.3.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	
7.3.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	
7.3.6	Group Registers	Yes		Current year + 2 years	

8. Extra-Curricular Activities

Records created in the course of interaction between the school and local authority

8.1 Local Authority

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
8.1.2	Weekly Data Return to the Local Authority (Business to Business (B2B) or a Data Manager File	Yes		Current year + 1 year	SECURE DISPOSAL
8.1.3	School Census Returns	Yes		Current year + 5 years	SECURE DISPOSAL
8.1.4	Circulars and other information send from the Local Authority	No		Operational use	SECURE DISPOSAL
8.1.5	Files created relating to Statutory results data collections (e.g. CTF files for EYFS, Phonics and KS1) – Primary and Infant only	Yes		Current year + 6 years	SECURE DISPOSAL
8.1.6	WellComm speech and language data returns – Primary and Infant only	Yes		Current year + 1 year	SECURE DISPOSAL

8.2 Central Government

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period (operational)	Action at the end of the administrative life of the record
8.2.1	OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
8.2.2	Returns made to central government	Yes		Current year + 6 years	SECURE DISPOSAL
8.2.3	Circulars and other information send from central government	No		Operational use	SECURE DISPOSAL