



## **St John's Catholic Primary School**

### **Records Management Policy**

<b>Approving Body</b>	St John's Governing body
<b>Approval Date</b>	September 2018
<b>Review Date</b>	September 2019

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## **1. Policy statement**

1.1 The Kent Catholic Schools' Partnership (KCSP) recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the Multi Academy Trust. This document provides the policy framework through which this effective management can be achieved and audited. It covers scope, responsibilities and relationships with existing policies.

1.2 Records Management is the process by which KCSP manages all aspects of any type of record, whether internally or externally generated and in any format or media type and throughout the lifecycle of a record.

## **2. Scope of the policy**

2.1 This policy applies to all records created, received or maintained by staff in the course of carrying out its functions.

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

2.3 A small percentage of the Trust's and academy's records may be selected for permanent preservation as part of our archives and for historical research.

## **3. Status of the policy**

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

## **4. Relationship with existing policies**

4.1 This policy has been drawn up within the context of:

- Freedom of Information Publication Scheme
- Data Protection policy
- Other legislation or regulations (including audit, equal opportunities and ethics) affecting the Trust.

## 5. Responsibilities

5.1 The Trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy at Trust level is the **Data Protection Officer**. This post is held by Michelle Boniface, Company Secretary – [dpo@kcsp.org.uk](mailto:dpo@kcsp.org.uk). The Trust will also appoint a Deputy DPO, who is Rachel Bushell, Policy & Projects Manager – [rbushell@kcsp.org.uk](mailto:rbushell@kcsp.org.uk). In addition, a 'link' person will be appointed at each academy

within the Trust and will report to the DPO on matters relating to data protection compliance, to be known as the Academy Data Protection Lead. The link person at St John's Catholic Primary School is Jon Gambell (Assistant Headteacher) – [Jgambell@stjohnsprimary.kent.sch.uk](mailto:Jgambell@stjohnsprimary.kent.sch.uk). Any questions or concerns about the operation of this policy should be referred in the first instance to the DPO.

5.2 The DPO and Academy Data Protection Leads will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and timely.

5.3 Individual staff and employees must ensure that records for which they are responsible are accurate, maintained and disposed of in accordance with this policy.

## 6. Definition of terms

6.1 **Data** is information which is stored electronically, on a computer, or in certain paperbased filing systems or other media such as CCTV;

6.2 **Data Subjects** for the purpose of this policy include all living individuals about whom we hold Personal Data. A Data Subject need not be a UK national or resident. All Data Subjects have legal rights in relation to their Personal Data.

6.3 **Data Controllers** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

6.4 **Data Processors** means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller;

6.5 **Parent** has the meaning given in the Education Act 1996 and includes any person having parental responsibility or care of a child;

6.6 **Personal Data** means any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors

specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

## **7. Relevant Data protection principles**

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

7.1.1 adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (Article 5(1)(c) of the GDPR);

7.1.2 accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that Personal Data that is inaccurate, having regard to the purposes for which they are processed; are erased or rectified without delay (Article 5(1)(d) of the GDPR);

7.1.3 be kept in a form which permits identification of the Data Subjects for no longer than is necessary for the purposes of which the Personal Data is processed (Article 5(1)(e) of the GDPR);

7.1.4 be processed in a manner which ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (Articles 5(1)(f) of the GDPR).

## **8. Data Retention**

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

## **9. Retention Periods**

9.1 In line with Article 5(1)(e) of the GDPR, each Academy and the Trust will not retain Data in an identifiable form for any longer than is necessary for the purpose for which it was obtained and in determining an appropriate retention period will take into account the following;

9.1.1 the current and future value of the Data;

9.1.2 the costs, risks and liabilities associated with retaining the Data in an identifiable format;

9.1.3 the ease of difficulty in ensuring the Data remains accurate and up to date;

9.1.4 any applicable statutory limitation periods;

9.1.5 any relevant guidance documents

## **10. Default Retention Periods**

10.1 The 'default period' is the minimum period for which the Academy or Trust will retain Data. At the conclusion of the default period, the Academy or Trust will review the Data being held and determine whether it can be destroyed.

10.2 The standard default period for retaining Data will be as set out in the Information Management System for Schools produced by the Records Management Society and is listed in Schedule I.

10.3 Each Academy and the Trust will take in account the matters set out in paragraph 8 in determining whether Data will be retained beyond the default period.

### **Exceptions to the Default Period**

10.4 In most cases, Data will be securely disposed of when it reaches the end of the retention period. When assessing whether Data should be retained beyond the retention period, the Academy or the Trust will consider whether;

10.4.1 the data is subject to a current request pursuant to the GDPR;

10.4.2 the Academy or the Trust is subject of, or involved in ongoing legal action to which the Data is or may be relevant;

10.4.3 the Data is or could be needed in connection with an ongoing investigation;

10.4.4 the Data is processed solely for archiving purposes in the public interest, scientific or historical research purposes of statistical purposes, and the Academy has put in place appropriate and technical and organisational measures;

10.4.5 there are changes to the regulatory or statutory framework which require the Data to be retained for a longer period;

10.4.6 the Data Subject has exercised their right to restrict the processing of the Data in accordance with Articles 18 of the GDPR

## **11. Storage of Data**

11.1 Data will be stored in accordance with the Information Security Policy in place at the Academy from time to time.

## **12. Disposal of Data**

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

## **13. Manual Records**

- 13.1 Where Data is held in paper or other manual form, the default period for retaining Data has expired and none of the exceptions for retaining Data beyond the default period as set out in section 9 is satisfied, the Academy or Trust will ensure that the Data is shredded or otherwise confidentially disposed of by the Academy or Trust or by a person duly authorised by the Academy or Trust to confidentially destroy the Data.

## **14. Electronic Records**

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

## 15. Policy Review

15.1 It is the responsibility of the directors to facilitate the review of this policy on a regular basis. Recommendations for any amendments should be reported to the DPO.

15.2 We will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives.

## 16. Enquiries

Further information about this Data Protection Policy is available from the DPO.

General information about the Act can be obtained from the Information Commissioner's Office: [www.ico.gov.uk](http://www.ico.gov.uk)

## 17. Document Control

Date modified	Description of modification	Modified by

## SCHEDULE I – Retention Period for Records

In this Policy;

- File description includes all types of files and records including hard copy, paper and online, e-format records;
- The statutory provision or guidance is included where relevant;
- The retention period means the required length of time that a School or the Trust is required to keep the information before it reviews and considers whether the information needs to be retained or disposed; and
- Secure disposal should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross cut shredder. **A: MANAGEMENT OF THE SCHOOL**

A1. GOVERNING BODY (includes Trust Board and Governing Bodies, or equivalent)				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
1.1	Agendas for Governing Body / Meetings		One copy should be retained with the master set of minutes. All other copies to be disposed of.	Secure disposal
1.2	Minutes of Governing Body Meetings - Principal Set (Signed)	Chartered Institute of Personal Development (CIPD)	Permanent	If Academy is unable to store, they should be sent to Archive.

	Minutes of Governing Body Meetings - Inspection Copies		Date of meeting, plus 3 years	If Minutes contain sensitive, personal information they must be shredded.
	Minutes of the Trust Board	Charitable Incorporated Organisations (General) Regulation 2012	Date of the meeting plus 6 years	Secure disposal
1.3	Reports presented to the Governing Body		Reports should be kept for a minimum of 6 years. If the Minutes refer to the reports then they should be kept permanently.	Secure disposal or retain with the signed set of Minutes.
1.4	Meeting papers related to any Annual Parents meeting held under S.33 of the Education Act 2002	Education Act 2002	Date of meeting, plus 6 years minimum	Secure disposal
1.5	Articles of Association for the Trust		Permanent	Secure disposal.
1.6	Action plans created and administered by the Governing Body		Life of the action plan, plus 3 years	Secure disposal
1.7	Policy documents created and administered by the Governing Body	Information and Records Management Society (IRMS)	Life of the policy, plus 3 years	Secure disposal
1.8	Records relating to complaints dealt with by Governing Body		Date of the resolution of the complaint plus a minimum of 6 years then review for further retention in case of contentious disputes	Secure disposal
1.9	Annual Reports of the Trust		Date of report plus 10 years	Secure disposal
1.10	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies		Date proposal accepted or declined, plus 3 years	Secure disposal

<b>A2. Head Teacher and Senior Management Team</b>				
<b>File Description</b>		<b>Statutory Provision or Guidance</b>	<b>Retention Period</b>	<b>Action to be taken at end of record life</b>
2.1	Log books of activity in the school maintained by the Head Teacher		Date of entry in the book plus a minimum of 6 years then review	Could have historical value
2.2	Minutes of Senior Management Team Meetings and the meetings of other internal administrative bodies		Date of meeting plus 3 years then review	Secure disposal
2.3	Reports created by the Head Teacher or Senior Management Team		Date of meeting plus 3 years then review	Secure disposal
2.4	Records created by Head teachers, heads of year and other members of staff with administrative responsibilities		Current academic year plus 6 years then review	Secure disposal
2.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities		Date of correspondence plus 3 years then review	Secure disposal
2.6	Professional development plans		Life of the plan plus 6 years	Secure disposal
2.7	School development plans		Life of the plan plus 3 years	Secure disposal

A3. Admissions Process				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
3.1	All records relating to the creation and implementation of the School Admissions' Policy	School Admissions Code Statutory guidance	Life of the Policy plus 3 years then review.	Secure disposal
3.2	Admissions Primary – if successful	School Admissions Code Statutory guidance	Date of admission plus 1 year	Secure disposal
	Admission Primary – if appeal is unsuccessful	School Admissions Code Statutory guidance	Resolution of case plus 1 year	Secure disposal
3.3	Register of Admissions		Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made.	Review before deletion as often schools receive enquiries from past pupils to confirm the dates they attended the school.
3.4	Admissions – Secondary		Current year plus 1 year	Secure disposal
3.5	Proof of address supplied by Parents as part of Admissions process		Current year plus 1 year	Secure disposal
3.6	Supplementary information form including additional information such as religion or medical conditions – for successful admissions		Add to the Pupil File	Secure disposal
	Supplementary information form including additional information such as religion or medical conditions – for unsuccessful admissions		Until appeals process completed	Secure disposal
3.7	Attainment		Whilst pupil is at school plus 1 years Data could be kept after the retention period providing the data is anonymised.	Secure disposal

A4. Operational Administration				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
4.1	Records relating to the creation and publication of the School brochure or prospectus		Current year plus 3 years	Standard disposal
4.2	Records relating to the creation and distribution of circulars to staff, parents or pupils		Current year plus 1 year	Standard disposal
4.3	Newsletters and other items with a short operational use		Current year plus 1 year	Standard disposal
4.4	Visitor Books and Signing in Sheets		Current year plus 6 years and then review	Secure disposal

4.5	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations		Current year plus 6 years and then review	Secure disposal
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## B: HUMAN RESOURCES

B1. Recruitment				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
1.1	All records (including interview notes and application forms) leading up to the appointment of a new Head Teacher	Chartered Institute of Personal Development (CIPD)	Date of appointment plus 6 years	Secure disposal
1.2	All records (including interview notes and application forms) leading up to the appointment of an individual (employed or volunteer)– successful candidates	Chartered Institute of Personal Development (CIPD)	All the relevant information should be added to the staff personnel file and all other information retained for 6 months	Secure disposal
	All records (including interview notes and application forms) leading up to the appointment of an individual (employed or volunteer) – unsuccessful candidates	Chartered Institute of Personal Development (CIPD)	Date of appointment of successful candidate plus 6 months	Secure disposal
1.3	Pre-employment vetting information – DBS checks	DBS Update Service Employer Guide. Statutory Guidance from Dept. of Education Sections 73 & 74)	The school does not need to retain DBS certificates however if they do, they should NOT be retained for more than 6 months but you are permitted to retain the details of date of certificate, the name of subject and type of certificate, unique reference number and details of the recruitment decision taken.	Secure disposal
1.4	Proofs of identity collected as part of the process of checking 'portable' enhanced DBS disclosure		These should be checked and a note kept of what was seen and what was checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff personnel file.	Secure disposal
1.5	Pre-employment vetting information – evidence proving the right to work in the UK	Employers guide to right to work checks (Home Office)	Where possible these documents should be added to the staff personnel file but if they are kept separately then the Home Office requires that the documents are kept until termination of employment plus 2 years	Secure disposal
1.6	Wage/salary records including overtime, bonus and expenses	Taxes Management Act 1970	6 years	Secure disposal
1.7	Statutory Maternity Pay records (SMP)	The Statutory Maternity Pay (General) Regulations 1986	3 years after the end of the tax year to which they relate	Secure disposal
1.8	Parental leave records	Chartered Institute of Personal Development (CIPD)	5 years from the birth/adoption of the child or 18 years if the child receives a disability allowance.	Secure disposal
1.9	Statutory Sick Pay records (SSP)	Chartered Institute of Personal Development (CIPD)	6 years after employment ends	Secure disposal
1.10	Income Tax and National Insurance returns/records	The Income Tax (Employment) Regulations 1993	At least 3 years after the end of the tax year to which they relate	Secure disposal
1.11	Redundancy details, calculations of payments, refunds and notification to	Chartered Institute of Personal Development (CIPD)	6 years after employment ends	Secure disposal

	the Secretary of State			
1.12	National Minimum Wage Records	National Minimum Wage Act 1998	3 years after the end of the pay reference period following the one that the records cover	Secure disposal
1.13	Pension Scheme and member records	The Pensions Regulator	6 years from the automatic enrolment staging date	Secure disposal
		Chartered Institute of Personal Development (CIPD)	12 years from the ending of any benefit payable under the policy	Secure disposal

## B2. Operational Staff Management

File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
2.1	Staff personnel file	Limitation Act 1980 (S.2)	Termination of employment plus 6 years	Secure disposal
2.2	Timesheets		Current year plus 6 years	Secure disposal
2.3	Annual appraisal/ staff assessment records		Current year plus 5 years	Secure disposal

## B3. Management of disciplinary and grievance processes

File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Keeping children safe in education statutory guidance for schools and colleges. A guide to inter-agency working to safeguard and promote the welfare of children.	Until the persons normal retirement age or 10 years from the date of the allegation whichever is the longer then review. Allegations which 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
3.2	Disciplinary proceedings Oral warning		Date of warning plus 6 months	Secure disposal. If warnings are kept on Personnel files, then they must be weeded from the files.
	Written warning – level 1		Date of warning plus 6 months	
	Written warning – level 2		Date of warning plus 12 months	
	Final warning		Date of warning plus 18 months	
	Case not found		If the incident is child protection related then see 3.1 otherwise dispose of at the conclusion of the case.	

## B4. Health and Safety

File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
4.1	Health and Safety policy statements	Information and Records Management Society (IRMS)	Life of policy plus 3 years	Secure disposal
4.2	Health and Safety risk assessments	Information and Records Management Society (IRMS)	Life of risk assessment plus 3 years	Secure disposal

4.3	Records relating to accident/injury at work		Date of incident plus 12 years. In the case of serious accidents a further retention period will need to be applied.	Secure disposal
4.4	Accident reporting – Adults	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992, Section 8 Limitation Act 1980	Date of the incident plus 6 years	Secure disposal
	Accident reporting – Children	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992, Section 8 Limitation Act 1980	DOB of the child plus 25 years	Secure disposal
4.5	Control of Substances Hazardous to Health (COSHH)	Control of Substances Hazardous to Health Regulations 2002, SI 2002 No 2677 Regulation 11	Current year plus 40 years	Secure disposal
4.6	Records of any reportable death, injury, disease of dangerous occurrence (RIDDOR)	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)	Date of the incident plus 3 years	Secure disposal
4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action plus 40 years	Secure disposal
4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action plus 50 years	Secure disposal
4.8	Fire precautions log books		Current year plus 6 years	Secure disposal
4.9	Medical information and administration - Permission forms from parents		Retained for the period of time that medication is given plus 1 month.	Secure disposal

#### B5. Payroll and Pensions

File Description	Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
5.1	Maternity Pay (General) Regulations 1986 SI (SI1986/1960) revised 1999 (SI1999/567)	Current year plus 3 years	Secure disposal
5.2	Retirement Benefits Schemes (Information Powers) Regulations 1995	Current year plus 6 years	Secure disposal

#### B6. Staff Images

File Description	Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
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6.1	Photographs / video recordings ('Images') of staff		<p>Images are used for different reasons, and the reason should dictate the retention period. Images used purely for identification can be deleted when the staff member leaves the Academy.</p> <p>Images used in displays etc. can be retained for educational purposes at the Academy.</p> <p>Other usages of Images (for example, marketing, events, websites or end of year presentations) should be retained for and used in line with the active informed consent captured by staff member.</p>	Secure disposal
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## C: FINANCIAL MANAGEMENT OF THE SCHOOL

C1. Risk Management and Insurance				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
1.1	Employers Liability Insurance Certificate	Health and Safety Executive / Companies Act 2006	Closure of the School plus 40 years	Secure disposal

C2. Asset Management				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
2.1	Inventories of furniture and equipment		Current year plus 6 years	Secure disposal
2.2	Burglary, theft and vandalism report forms		Current year plus 6 years	Secure disposal

C3. Accounts and Statements including Budget Management				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
3.1	Annual Accounts	Companies Act 2006	Current year plus 6 years	Standard disposal
3.2	Loans and grants maintained by the School		Date of last payment of the loan plus 12 years then review	Secure disposal
3.3	Student grant applications		Current year plus 3 years	Secure disposal
3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers		Life of the budget plus 3 years	Secure disposal

3.5	Invoices, receipts, order books and requisitions, delivery notices	Charities Act 2011	Current financial year plus 6 years	Secure disposal
3.6	Records relating to the collection and banking of monies	Charities Act 2011	Current financial year plus 6 years	Secure disposal
3.7	Records relating to the identification and collection of debt	Charities Act 2011	Current financial year plus 6 years	Secure disposal

<b>C4. Contract Management</b>				
<b>File Description</b>		<b>Statutory Provision or Guidance</b>	<b>Retention Period</b>	<b>Action to be taken at end of record life</b>
4.1	All records relating to the management of contracts under seal	Limitation Act 1980	Last payment on the contract plus 12 years	Secure disposal
4.2	All records relating to the management of contracts under signature	Limitation Act 1980	Last payment on the contract plus 6 years	Secure disposal
4.3	Records relating to the monitoring of contracts		Current year plus 2 years	Secure disposal

<b>C5. School Fund</b>				
<b>File Description</b>		<b>Statutory Provision or Guidance</b>	<b>Retention Period</b>	<b>Action to be taken at end of record life</b>
5.1	School Fund – Cheque Books		Current year plus 6 years	Secure disposal
5.2	School Fund – Paying in Books		Current year plus 6 years	Secure disposal
5.3	School Fund – Ledger		Current year plus 6 years	Secure disposal
5.4	School Fund – Invoices		Current year plus 6 years	Secure disposal
5.5	School Fund – Receipts		Current year plus 6 years	Secure disposal
5.6	School Fund – Bank statements		Current year plus 6 years	Secure disposal
5.7	School Fund – Journey Books		Current year plus 6 years	Secure disposal

<b>C6. School Meals Management</b>				
<b>File Description</b>		<b>Statutory Provision or Guidance</b>	<b>Retention Period</b>	<b>Action to be taken at end of record life</b>
6.1	Free School Meals Register		Current year plus 6 years	Secure disposal
6.2	School Meals Registers		Current year plus 3 years	Secure disposal
6.3	School Meals Summary Sheets		Current year plus 3 years	Secure disposal

## **D: PROPERTY MANAGEMENT**

<b>D1. Property Management</b>				
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File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
1.1	Title deeds of properties belonging to the School/Trust		Permanent These should follow the property unless the property has been registered with the Land Registry	Secure disposal
1.2	Plans of property belonging to the School/Trust		Permanent. These should be retained whilst the building belongs to the School/Trust and be passed onto any new owners if the building is leased or sold.	Secure disposal
1.3	Leases of properties leased by or to the School/ Trust		Expiry of lease plus 6 years	Secure disposal
1.4	Record relating to the leasing of School/Trust property		Current financial year plus 6 years	Secure disposal

D2. Maintenance				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
2.1	All records relating to the maintenance of the School or any Trust property carried out by contractors		Current year plus 6 years	Secure disposal
2.2	All records relating to the maintenance of the School or any Trust property carried out by Trust employees including maintenance log books.		Current year plus 6 years	Secure disposal

## E. PUPIL MANAGEMENT

E1. Pupil's Educational Record				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
1.1	Primary School Pupil's Educational Record required by the Education (Pupil Information) England Regulations 2005	The Education (Pupil Information) Regulations 2005 SI 2005 No.1437	Retain whilst the pupil remains at the Primary School	The file should follow the pupil when he/she leaves the primary school. This will include; <ul style="list-style-type: none"> <li>to another primary school;</li> <li>to a secondary school;</li> <li>to a pupil referral unit;</li> <li>if the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period.</li> </ul> If the pupil transfers to an independent school, transfer to home schooling or leaves the country, the file should be returned to the Local Authority to be retained for the statutory retention period. In the event that a file cannot or doesn't get

				sent to the LA for archiving, then the file should be retained by the Primary School for Pupil DOB plus 25 years, whether that be on-site or in archive. As Primary schools do not always have sufficient retention space it makes more sense to transfer the file to the Local Authority as it is more likely that the pupil will request the record from the Local Authority.
1.2	Secondary School Pupil's Educational Record required by the Education (Pupil Information) England Regulations 2005	Limitation Act 1980	Date of birth of the pupil plus 25 years	Secure disposal
1.3	Examination Results – Pupil copies Public		This should be added to the pupil file	All uncollected certificates should be returned to the examination board.
	Examination Results – Pupil copies Internal		This should be added to the pupil file	
1.4	Child Protection information held on pupil file	Keeping children safe in education statutory guidance for schools and colleges, Working together to safeguard children.	If any records relating to the 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
1.5	Child Protection information held in separate files	Keeping children safe in education statutory guidance for schools and colleges, Working together to safeguard children.	Date of birth of the child plus 25 years then review. This retention period was agreed in consultant 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

## E2. Attendance

File Description	Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
2.1 Attendance registers	School attendance: Department advice for maintained schools, academies, independent schools and local authorities 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date upon which the entry was made.	Secure disposal
2.2 Correspondence relating to authorised absence	Education Act 1996 section 7	Current academic year plus 2 years	Secure disposal
2.3 Exclusions		Whilst pupil is at school plus 1 year	

## E3. Special Educational Needs

File Description	Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
3.1 Special Educational Needs files, reviews and Individual Education plans	Limitation Act 1980	Date of birth of the pupil plus 25 years *NB: Some Local Authorities choose to keep SEN files for longer.	Secure disposal

3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil plus 25 years (normally retained on the pupil file)	Secure disposal unless the document is subject to a legal hold
3.3	Advice and information provided to parents regarding educational needs	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil plus 25 years (normally retained on the pupil file)	Secure disposal unless the document is subject to a legal hold
3.4	Accessibility Strategy	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil plus 25 years (normally retained on the pupil file)	Secure disposal unless the document is subject to a legal hold

E4. Pupil Images				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
4.1	Photographs / video recordings ('Images') of a pupil		<p>Images are used for different reasons, and the reason should dictate the retention period. Images used purely for identification can be deleted when the pupil leaves the Academy.</p> <p>Images used in displays etc. can be retained for educational purposes whilst the pupil is at the Academy.</p> <p>Other usages of Images (for example, marketing, events, websites or end of year presentations) should be retained for and used in line with the active informed consent captured by the pupil or parent at the outset.</p>	Secure disposal

## F. CURRICULUM MANAGEMENT

F1. Statistics and Management information				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
1.1	Curriculum returns		Current year plus 3 years	Secure disposal
1.2	Examination results – Schools copy - Results		<p>SATS should be retained on the pupil file and will be retained until the pupil reaches the age of 25 years.</p> <p>The school may wish to keep a composite record of all the whole year SAT results which could be kept for the current year plus 6 years to allow for comparison purposes.</p>	Secure disposal
1.3	Examination results - Schools copy – Examination Papers		The examination paper should be kept until any appeals/validation process is complete	Secure disposal
1.4	Published Admission Number (PAN) reports		Current year plus 6 years	Secure disposal
1.5	Valued Added and Contextual Data		Current year plus 6 years	Secure disposal

1.6	Self Evaluation Forms		Current year plus 6 years	Secure disposal
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F2. Implementation of Curriculum				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
2.1	Schemes of Work		Current year plus 1 year then review	Secure disposal
2.2	Timetable		Current year plus 1 year then review	Secure disposal
2.3	Class Record Books		Current year plus 1 year then review	Secure disposal
2.4	Record of homework set		Current year plus 1 year then review	Secure disposal
2.5	Pupil's Work		Pupils work should be returned to the pupil at the end of the academic year, where possible. If this is not possible, then current year plus 1 year.	Secure disposal

F3. Extra Curricular Activities				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
3.1	Primary School Records created by Schools to obtain approval to run an Educational Visit outside the Classroom	Outdoor Education Adviser's Panel National Guidance	Date of visit plus 14 years	Secure disposal
3.2	Secondary School Records created by Schools to obtain approval to run an Educational Visit outside the Classroom	Outdoor Education Adviser's Panel National Guidance	Date of visit plus 10 years	Secure disposal
3.3	Parental consent forms for school trips where there has been no major incident <sup>1</sup>		Conclusion of the trip	Consent forms could be retained for date of birth of pupil plus 22 years, the requirement for them being needed is low and most schools do not have the storage facility,
3.4	Parental consent forms for school trips where there has been a major incident	Limitation Act 1980 (Section2)	Date of birth of the pupil involved in the incident plus 25 years. Permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils.	
3.5	Trips and activities – financial information		Current year plus 6 years	Secure disposal

F4. Walking Bus				
File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life

<sup>1</sup> Major incidents include medical incident that included an outside agency. Incidents that are dealt with by staff during an activity in the same way that they would deal with if the incident happened at school are considered minor.

4.1	Walking Bus Registers		Date of Register plus 3 years. This takes into account 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
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#### F5. Family Liaison Officers and Home School Liaison Assistants

File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
5.1	Day Books		Current year plus 2 years then review	Secure disposal
5.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency		Whilst the pupil is attending school	Secure disposal
5.3	Referral forms		While the referral is current	Secure disposal
5.4	Contact data sheets		Current year, then review if contact is no longer active then destroy	Secure disposal
5.5	Contact database entries		Current year, then review if contact is no longer active then destroy	Secure disposal
5.6	Group registers		Current year plus 2 years	Secure disposal

### G. CENTRAL GOVERNMENT AND LOCAL AUTHORITY

#### G1. Local Authority

File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
1.1	Secondary transfer sheets (Primary)		Current year plus 2 years	Secure disposal
1.2	Attendance returns		Current year plus 1 years	Secure disposal
1.3	School census returns		Current year plus 5 years	Secure disposal
1.4	Circulars and other information sent from the Local Authority		Operational use	Secure disposal

#### G2. Central Government

File Description		Statutory Provision or Guidance	Retention Period	Action to be taken at end of record life
2.1	OFSTED Reports and papers		Life of the report then review	Secure disposal
2.2	Returns made to Central Government		Current year plus 6 years	Secure disposal
2.3	Circulars and other information sent from central government		Operational use	Secure disposal