



Education Data Hub

"Caring & sharing as part of God's family" "Loving our neighbour as we love ourselves" - Luke 10:27

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Record Retention and Deletion Policy

Hartington C of E Primary School

[Version 2.2]

Last Reviewed	May 2024
Reviewed By	Tracy Blackwell & SBO
(Name)	
Job Role	Headteacher
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Spring 2024	Policy & section numbering changed
	KCSIE references updated
	8 added – details of MIS
	11 added – retaining records following academisation
	18.5 added – filtering & monitoring logs
	Updates arising from the School Attendance (Pupil Registration) (England) Regulations 2024 which requires that admissions and attendance registers are now retained for six years (previously three years).

This document will be reviewed annually and sooner when significant changes are made to the law Guidance from the Department for Education about school policies can be found here: <a href="https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts/statutory-poli

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Schools, please delete this section prior to publication of your finalised version. <u>You will need to attend or view the</u> <u>"Contextualising Policies" training session to be able to work on this document</u>. This document is a template. You will need to complete the boxes indicated in yellow, and other rows that are not relevant to your school. You may also add to it. If there are matters that you come across that are not specifically dealt with – find the nearest equivalent and let us know so we can fine tune the next version for you.

1. How to use this document

This is a very big document. It can be read from front to back, but this will take time, alternatively you can select from an A-Z of relevant provisions.

A-Z

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

2. Introduction

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

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

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

3. Purpose

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

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

It is expected that;

- All information held by schools needs to be justifiable, by reference, to its purpose.
- Schools must be transparent and accountable as to what data they hold.
- Schools must understand and explain the reasons why they hold data.
- Schools must be able to respond to Subject Access Requests.
- Schools must be able to amend, delete or transfer data promptly upon any justified request.
- Schools must be able to audit how personal data was collected and when and why.
- Schools must hold sensitive data securely, accessed only by those with reason to view it and possess a policy as to why it is needed.
- Schools must have retention policies that reflect the importance of records relating to child sexual abuse to victims and survivors, and that they may take decades to seek access to such records.

4. Disposal of Data

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

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

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

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

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

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

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

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

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

An example is contained in Annex A.

5. Transfer of Records to Archives

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

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

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

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

6. Transfer of Records to other Media

Where lengthy retention periods have been allocated to records, schools should consider converting paper records to other media (e.g. digital or virtual, 'cloud' based). The lifespan of the media, and the ability to migrate data, should be documented in a Digital Continuity Policy. A scanning risk assessment is recommended to ensure the procedure is adequate. Further information about digital continuity can be found on the <u>National Archives</u> website who also provide guidance on assessing and managing <u>digital continuity risks</u> and a digital continuity <u>checklist</u>. Schools that believe that they need to retain digital records over a long period on devices, software systems or in formats that may become inaccessible due to developments in technology should seek further advice from the Data Protection Officer and their IT support staff.

7. Transfer of Records to other Settings & 'Last Known School'

When a child leaves the school, all pupil records, including safeguarding/child protection records should be transferred in a secure manner, to the child's new school. If the records contain sensitive information (e.g. Child Protection records), proof of receipt must be obtained and logged by the school's Data Lead. Keeping Children Safe in Education 2023 (KCSiE) states that "where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file." All copies of data held by the school that the child has departed should then be deleted or retained in line with the retention schedule below, including all paper records and data stored electronically. Generally, a record should be kept for tracking and auditing purposes only. Schools should be aware that where electronic systems are used, sending a pupil file to the next setting does not mean that their own copy of the file is deleted, so action should be taken to delete or archive copies retained where they are no longer required by the school that the pupil has left.

There are four main categories of pupil records that need to be transferred to other settings:

• Management Information System (MIS) data

Data held on the MIS is extracted by the school using the Common Transfer File mechanism as specified in The Education (Pupil Information) (England) Regulations 2006 Statutory Instrument (SI) and in subsequent amendments (2005, 2008, 2016, 2018, 2019). The Department for Education specifies what data is to be included in the CTF file in technical specification documentation. This should mean that the majority of information held on the MIS is transferred using the CTF method. However, it is important to note that **not all personal data is transferred, only the data sets specified in the CTF schema.** If the MIS has been used to store additional information (documents such as copies of end of year reports or letters) schools must take proactive action to ensure these are sent separately and securely. Traditionally, this sort of documentation was held in a pupil 'buff' file, but as schools have turned to digital ways of working, these are frequently stored by attaching them to the digital MIS record.

• Safeguarding/Child Protection records

Schools frequently use vendor edtech products to hold and transfer these records. Many of these products include the functionality to electronically transfer a copy of (and obtain receipt for) pupil records directly to the next school, where the same product is also used by the receiving school. Where this is not possible, these products should have the functionality to download a pupil record for it to then be transferred electronically or printed out and delivered to the new school. Paper records should be dealt with carefully to ensure that these are safely received by the new school.

Some safeguarding edtech products enable schools to use the same system to record behavioural and other information in the same log. Schools should ensure that safeguarding/child protection records are clearly identified as such so that the receiving school can quickly identify this information. The school should consider if information such as behaviour notes needs to be transferred to the next setting, or whether it should be deleted if no longer required or relevant (e.g. a child's toileting routine may be very relevant when younger, or merits/demerits re but does not need to be part of a permanent safeguarding record).

• Special Educational Needs records

It is becoming more common for schools to use vendor edtech products to manage these records. Whether stored in such edtech products, on school IT systems/cloud storage or on paper, the SEND co-ordinator must ensure that a complete record is compiled and passed securely to the next school.

• Pupil 'buff' files

For many schools, in recent years, the traditional pupil buff files have dwindled in relevance and importance as schools have increasingly moved to digital storage. Schools are left with either sending or receiving folders which are very light and seemingly irrelevant. However, there will be documentation, whether on paper or electronic (on the server, in emails, in the MIS) that should be sent to the next setting that the pupil will attend. The Education (Pupil Information) (England) Regulations 2005 state that this "Educational Record" should be transferred to the next setting within 15 school days of confirmation that a pupil is registered at another school. There may be a significant amount of material that is not contained in the CTF file, safeguarding or SEND records that should be transferred to the next setting. Schools may have inadvertently not adapted their records transfer practices as management of these records have moved from a paper 'buff' file to digital format and so this should be noted where relevant on the retention schedule below.

Schools may wish to retain some minimal 'skeleton' data about pupils' admission, departure and next destination (where known) in order to respond to any requests for information about these pupils and for the school's historical archive. They may also wish to retain records relating to safeguarding/child protection or SEND records, even though there is no legislative requirement to do so (i.e. to have their own copy of evidence in case of any later legal action). If schools intend to create and maintain skeleton records or retain copies of records, this should be noted on the retention policy. In some instances, schools may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If the school does retain pupil records, then they should be prepared to justify this retention and will need to consider if a Data Protection Impact Assessment should be completed for any extended retention of records once a pupil has left the school. See section 17.5 below.

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

The school is the final or last known school if:

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

Tertiary colleges are not included in this definition, therefore the school will retain the record. However, the college must receive a copy of the child protection file, as per the requirements of KCSiE above.

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

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

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

8. Management Information System (MIS)

The majority of pupil records and some staff records are held on the school MIS. Managing data retention on the MIS can be complex because different data sets held on the MIS have different retention requirements. For example, information relating to emergency contacts is only required when a pupil or staff is a member of the school, and this information can be deleted quickly once they have left, whereas information relating to school meal and other financial transactions will need to be retained for six years (plus current) in line with financial retention requirements. Until 18 August 2024, legislation states that pupil admissions records and attendance records needed to be retained for three years from the date of entry, but from 19 August 2024, this information must be retained for six years. School staff have limited time and resources to manage these differing retention periods and should work with their MIS provider to request support on how to efficiently delete data sets from a record without deleting the entire record (or deleting all data sets except those that are required as part of the 'skeleton' record for long term retention). Where this is not possible, schools may make a policy decision to retain the entirety of a record for the longest applicable retention period for a data set within the MIS (usually current plus six years). The school should set out how records will be retained in the MIS in the relevant section of the Retention Table below.

9. Records relating to Child Sexual Abuse

Records relating to child sexual abuse should be retained for 75 years, in line with the recommendations arising from the outcome of the <u>Independent Inquiry into Child Sexual Abuse</u> (IICSA). The Inquiry stated that these records should be retained for such a long period in recognition of the importance of these records to victims, but that they should be regularly reviewed during that extended retention period. Where records are held digitally, schools will particularly need to consider digital continuity where:

- they hold relevant records for staff or governors, or
- they are the 'last known school' responsible for this long retention period for any relevant pupil records.

Where there is evidence, or allegations of child sexual abuse, then it will almost certainly be appropriate to retain the entire pupil, staff or other record as a whole, not just the parts of the record that pertain to the abuse. Staff whose duties include reviewing or digitising records should be trained to understand the importance of any evidence or allegations of child sexual abuse that they may happen to uncover, whether that was what they were looking for and the importance of them bringing these to the attention of school leadership and/or preserving these records.

The Inquiry report also recommends that the UK government directs the Information Commissioner's Office (ICO) to introduce a Code of Practice on retention of and access to records known to relate to child sexual abuse. This Policy will be updated in line with any Code of Practice from the ICO. The report states that such a code should set out that institutions should have:

- retention policies that reflect the importance of such records to victims and survivors, and that they may take decades to seek to access such records;
- clear and accessible procedures for victims and survivors of child sexual abuse to access such records;
- policies, procedures and training for staff responding to requests to ensure that they recognise the long-term impact of child sexual abuse and engage with the applicant with empathy.

10. Retention of Records relating to Staff

As stated above regarding the long-term retention of minimal pupil records, schools may wish to retain very basic 'skeleton' records about staff that have worked in the school beyond the normal retention of the whole personnel/HR file. This information may include the staff name, role, contract start and end dates. This may be

useful for schools who may need to respond to requests for information from/regarding staff, in the event of it being needed for litigation or other legal purpose and as part of their historical archive. If schools intend to create and maintain these records, this should be noted on the retention policy (at section 7.11 below)

11. Academisation

Where maintained schools academise during periods specified in this document, the Academy shall hold all School Records (including those relating to former pupil and employees), on trust for the Council from the Transfer Date [schools and academies not based in Derbyshire should check local arrangements and the Commercial Transfer Agreement, the legal agreement between a Local Authority, predecessor school governing body and academy trust]

12. Responsibility and Monitoring

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

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

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

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

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

13. Retention tables

	File description	Format /			Retention	-	
Referenc e		How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
1. Govern	ning Body						
1.1	Instruments of Government including Articles of Association	Word document held on OneDrive Paper copy in Governors file	Clerk	Permanent	Closure of school	Common practice	These should be retained in the schools whilst the school is open and then to the Local Authority Record Office, when the school closes
1.2	Trusts and Endowments managed by the Governing Body	N/A		Permanent	End of operational use	Common practice	These should be retained by the school, whilst the school is open and then to the Local Authority

						Record Office, should the school close
1.3	Scheme of delegation and terms of reference for committees	Paper copy in Governors file	Until superseded or whilst relevant (schools may wish to retain these records for reference purposes in case decisions need to be justified)	Expiration of terms	Common practice	If the school is unable to store these, they should be offered to the Local Authority Office
1.4	Governor's Code of Conduct	OneDrive/ website	One copy of each version should be kept for the life of the school.		Common practice	
1.5	Records relating to the election of chair and vice chair	Governors file	Once the designation has been recorded in the minutes, the records relating to the election can be destroyed	Date of appointment	Common practice	Secure disposal
1.6	Appointment of a clerk to the governing body	Governors file	Date of end of appointment + 6 years (note HR records may require different retention)	Date of appointment	Common practice	Secure disposal
1.7	Records relating to the appointment of parent and staff governors, not appointed by the governors	Governors file	Date of election + 6 months	Date of election	Common practice	Secure disposal
1.8	Records relating to the appointment of co-opted governors	Governors file	Provided that the decision has been recorded in the minutes, the records	Date of appointment	Common practice	Secure disposal

1.9 1.10	Application forms – successful candidates Appointment documentation: • Terms of office of serving governors,	Governors file Staff Training	Clerk SBO	relating to the appointment can be destroyed once the co- opted governor has finished their term of office (except where there have been allegations concerning children – in this case, retain for 25 years, or for allegations involving child sexual abuse for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. End of term in office + 1year End of term of office + 6 years (note HR	End of period of office Date of appointment	Common practice Common practice	Secure disposal Secure disposal
	 including evidence of appointment Governor declaration against disqualification criteria Register of business interests Training required, and received, by governors Induction programme for new governors DBS checks carried out on the clerk and members of the governing body Governor personnel files. 	log – OneDrive SCR HR Files		records may require different retention)			
1.11	Annual Reports	Governors file	Clerk	Date of the report + 10 years	End of the calendar year	Education (Governor's	Secure disposal

				that the record was created in	Annual Reports) (England) (Amendment) Regulations 2002	
1.12	Annual reports required by the	OneDrive	Date of report + 10	Date of report	Common	Secure
	Department of Education	HT file	years		practice	disposal
1.13	Meetings schedule	Governors file / website	Current year	Date of meeting	Common practice	Secure disposal
1.14	Agendas for Governing Body meetings	Governors file	One copy to be retained with the master set of minutes - all other copies can be disposed of	Conclusion of meeting	Common practice	Secure disposal
1.15	Register of attendance at Full Governing Board meetings	Governors file / website	Date of meeting + 6 years	Date of meeting	Common practice	Secure disposal
1.16	Minutes of Governing Body meetings (Principal Set signed)	Governors file	Permanent to be held at school	Date of meeting	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office
1.17	Action plans created and administered by the Governing Body	Governors file	Until superseded or whilst relevant	Expiration of action plan	Common practice	Secure disposal
1.18	Reports presented to the Governing Body	Governors file	Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports	Date of report	Common practice	Secure disposal or retain with the signed set of minutes

			then the reports should			
			be kept permanently			
1.19	Policy documents created and/or	Governors file	A copy of each policy	Expiration of the	Common	Secure
	administered by the Governing Body	OneDrive file	should create a time	policy	practice	disposal
		Website	line of policy			
			development OR a			
			robust version control			
			which allows a			
			snapshot of a policy at			
			any given date.			
			Keep all policies			
			relating to safeguarding			
			and child protection for			
			75 years in line with the			
			IICSA recommendations			
			for extended retention			
			of records relating to			
			child sexual abuse.			
1.20	Records relating to complaints made to,	Governors file	Date of the resolution	Resolution of		
	and investigated by the Governing Body		of the complaint + a	complaint		
	and/or Head Teacher		minimum of 6 years.			
			If negligence or child			
			protection/safeguardin			
			g is involved then			
			current year + 15 years.			
			If child sexual abuse			
			issues are involved then			
			for 75 years in line with			
			the IICSA			
			recommendations for			
			extended retention of			
			records relating to child			
			sexual abuse.			

1.21	Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies	Governors file		For the life of the organisation	Date proposal accepted or declined	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office
1.22	Records relating to Governor Monitoring Visits	Governors file		Date of visit + 3 years	Date of visit	Common practice	Secure disposal
1.23	Meeting papers relating to the annual parents' meeting	Governors file / OneDrive		Date of the meeting + a minimum of 6 years	Date of meeting	Common practice	Secure disposal
2. Head	dteacher & Senior Management/Leadership	o Team					
2.1	Log books of activity in the school maintained by the Head Teacher (Legislation no longer requires the completion of a school log book)	N/A		Date of the last entry in the log book + a minimum of 6 years and then review	Date of last entry in the log book	Common practice	These could be of permanent historical value and should be offered to the Local Authority Office
2.2	Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies	HT File	HT	Date of the meeting + 3 years	Date of the meeting	Common practice	Secure disposal
2.3	Correspondence created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities – <u>not</u> principally concerning pupils, staff or	Email (see email retention period in section 5)	HT	Date of correspondence + 3 years and then review	Date of correspondence	Common practice	Secure disposal

	complaints. In those cases, correspondence should be immediately transferred to the relevant file.						
2.4	Professional Development Plans	HT	HT	Life of plan + 6 years	Date plan commences	Common practice	Secure disposal
2.5	School Development Plans	HT	HT	Life of plan + 3 years	Date plan commences	Common practice	Secure disposal
2.6	Other records created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities outside of Business as Usual tasks	OneDrive HT file		Current academic year + 6 years then review	Date of record	Common practice	Secure disposal
3. Adn	nissions						
3.1	All records relating to the creation and implementation of the School's Admission's Policy	DCC admissions followed	GB HT	Life of the policy + 7 years then review		The School Admissions (Admission	Secure disposal
3.2	Admissions – if the admission is successful Proofs of address, supplied by parents, as part of the admissions process Supplementary information forms to include; religion, medical conditions etc.	Buff file RM Integris	HT SBO	Added to the pupil file	Date of admission	Arrangements and Co- ordination of Admission Arrangements) (England) Regulations	
3.3	Admissions – if the admission is unsuccessful (where no appeal is made)	RM Integris	RM Integris	Date of applied for admission + 1 year	Date of applied for admission	2012 and	Secure disposal
3.4	Admissions – if the admission is unsuccessful (where an appeal is made)	RM Integris	RM Integris	Resolution of case + 1 year	Resolution of case	School Admissions Code Statutory Guidance 2021	Secure disposal

3.5	Register of Admissions	RM Integris	HT SBO	Every entry in the School admission and attendance register is to be preserved for 6 years beginning with the day on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates.	Last entry in register	School Attendance (Pupil Registration) (England) Regulations 2024 Regulations 5, 7 (which comes into force on 19 August 2024) and	Offer to the Local Authority Record Office
3.6	Proofs of address, supplied by parents, as part of the admissions process	Buff file	SBO HT	Current year + 1 year	Date of admission	School Admissions Code Statutory Guidance 2021	Secure disposal
3.8	Supplementary information forms to include; religion, medical conditions etc. For successful admissions	Buff file RM Integris	SBO HT	This information should be added to the pupil file	Date of admission/annua I data check	The Limitation Act 1980	Secure disposal
3.9	Supplementary information forms to include; religion, medical conditions etc. For unsuccessful admissions	Buff file RM Integris	SBO HT	Until the appeal process is completed	Date of admission		Secure disposal
4. Ope	rational Administration	•					1
4.1	Records relating to the creation and publication of the school brochures or prospectus	OneDrive	HTO SLT	Current year + 3 years	Expiration of current publication	Common practice	Offer to the Local Authority Record Office

4.2	Records relating to the creation and distribution of circulars to staff, parents or pupils	OneDrive	SBO	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office
4.3	Newsletters and other items with short operational use	OneDrive	SBO	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office
4.4	Visitor management systems (including electronic systems, visitors' books and signing in sheets)	Hard copy in office	SBO	Current year + 6 years then review	End of calendar year	Common practice	Secure disposal
4.5	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupil Associations	PTA file	PTA Secretary	Current year + 6 years then review	Date of record	Common practice	Secure disposal
4.6	Pupil & Family Privacy Notice which is made available via the school website as part of UK GDPR compliance	OneDrive	GB	Date of issue + 6 years	When policy is superseded	Common practice	Secure disposal
4.7	Consents relating to school activities as part of UK GDPR compliance (e.g. consent for photographs to be published, social media / website etc as well as for mailings)	Buff file Office	SBO	This information should be added to the pupil file	Date of admission	Common practice	
4.8	Security breach logs	GDPRiS	HT SBO	Date of issue + 25 years (pupils) and 6 years (staff)	Date of implementation	Common practice	Secure disposal
4.9	Digital Continuity Plans (IT Disaster Recovery Procedure and Plan)	OneDrive Website	HT/ SBO/ GB/ ITJD	Date of issue + 6 years	Expiration of current plan	Common practice	Secure disposal
5. Scho	ool Communications						
5.1	School emails and other platforms such as Microsoft Teams containing personal data – inbox, sent items, deleted items	O365 email platform	ITJD	3 Years	Acceptable use policy	Common practice	Full deletion

5.3	Website – pictures / news stories	Website	SBO	2 years	End of second	Common	Posts
		OneDrive			academic year	practice	deleted
. HR –	Recruitment						
formati	ion containing allegations of sexual abuse must l	pe preserved for	75 years in line	with the IICSA recommendat	ions for extended r	etention of records	s relating to
hild sexu	ual abuse. Unless allegations are found to be ma	licious or false,	other records pe	ertaining to an accused persor	n should be retained	d at least until the a	accused has
eached i	normal pension age or for a period of 10 years fr	om the date of	the allegation if	that is longer. (KCSIE 2023 part	ra 41 <mark>8</mark>).		
.1	All records leading up to the appointment	HR File	DCC	Unsuccessful attempts -	Date of	Common	Secure
	of a new Head Teacher	OneDrive		date of appointment +	appointment	practice. Right	disposal
		SCR		6 months. Successful		to work -	
				attempts - add to the		Immigration,	
				staff personnel file and		Asylum and	
				retain until the end of		Nationality Act	
				the appointment + 6		2006	
				years, except in cases of			
				negligence or claims of			
				child abuse then at			
				least 15 years or			
				information containing			
				allegations of sexual			
				abuse must be			
				preserved for 75 years			
				in line with the IICSA			
				recommendations for			
				extended retention of			
				records relating to child			
				sexual abuse.			
.2	All records leading up to the appointment	HR Files	SBO	This information should	Date of	Common	Secure
	of a new member of staff (successful	OneDrive		be added to the staff	appointment	practice. Right	disposal
	candidate)	SCR		personnel file		to work -	
						Immigration,	
						Asylum and	
						Nationality Act	
						2006	

6.3	All records leading up to the appointment of a new member of staff (unsuccessful candidate)	HR File OneDrive	SBO	Date of appointment + 6 months	Date of appointment	Common practice	Secure disposal
6.4	Pre-employment vetting information of successful candidates	HR File OneDrive SCR	DCC HT SBO	Application forms, references and other documents – for the duration of their employment + 6 years. Note there is no requirement to keep a copy of DBS once the details have been entered into the Single Central Record. At the end of employment, information contained in the Single Central Record should be transferred to the personnel file.	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2023	Secure disposal
6.5	Proofs of identity	HR File	HT SBO	To be kept only as proof of right to work. Not kept for any other purpose. These documents should be added to the personal folder. Home Office requires that the documents are kept until termination of employment plus not less than 2 years.	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2023	Secure disposal
6.6	Pre-employment vetting information of successful candidates – for the purposes	HR File	SBO HT	To be added to the member of staff's personal folder	Date of receipt	KCSIE 2023	Secure disposal

	of ensuring school staff are adequately qualified						
7. HR -	- Operational Staff Management						
child sex	tion containing allegations of sexual abuse mus rual abuse. Unless allegations are found to be n	nalicious or false, ot	her records perta	ining to an accused person	n should be retained		
7.1	normal pension age or for a period of 10 years Staff Personnel File	Office	SBO HT	Termination of	Date of	Limitation Act	Secure
7.2	Timesheets	SBO Payroll	SBO	employment + 6 years Current year + 6 years	appointment Date of	1980 Common	disposal Secure
7.3	Annual appraisal/assessment records	file Office Staff file Office HT file	HT HT SBO	Current year + 6 years	appointment End of calendar year that the record was created in	practice Common practice	disposal Secure disposal
7.4	Sickness absence monitoring	Staff file Office	SBO HT	Sickness records are categorised as 'sensitive data'. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records. Current practice recommends that sickness records should be held for the current year + 3 years.	Date of absence	Common practice & Statutory Sick Pay Act 1994	Secure disposal
7.5	Staff training records	Training file OneDrive Training Log	SBO HT	Keep on personnel file (see above).	Date of appointment	Common practice (unless dictated by a	Secure disposal

						professional body)	
7.6	Annual leave records	Staff file Office	SBO HT	6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year	End of relevant tax year	Common practice	Secure disposal
7.7	 Working Time Regulations: Opt out forms Records of compliance with WTR 	N/A		2 years from the date on which they were entered into 2 years after the relevant period	End of relevant tax year	Common practice	Secure disposal
7.8	Maternity/Adoption/Paternity Leave records	Staff file Office	HT SBO DCC	Current year + 3 years	End of relevant tax year	Common practice	Secure disposal
7.9	Consents for the processing of personal and sensitive data	Staff file Office	DCC HT SBO	For as long as the data is being processed and up to 6 years afterwards	End of employment	Common practice	Secure disposal
7.12	Register of business interests	Office Governors file	Clerk to Govs	Date of appointment + 6 years	Date of appointment	Common practice	Secure disposal
Informat child sex reached	Management of Disciplinary and Grievanc ion containing allegations of sexual abuse must ual abuse. Unless allegations are found to be m normal pension age or for a period of 10 years f	be preserved for 7 alicious or false, ot rom the date of th	her records perta e allegation if tha	ining to an accused person t is longer. (<u>KCSIE 2023</u> pai	should be retained ra 418)	l at least until the	accused has
8.1	Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded	HR file OneDrive MyConcern	HT GB External App provider DCC	Until the person's normal retirement age or 10 years from the date of allegation, whichever is longer, then review. Information containing allegations of sexual abuse must be	Date of referral	KCSIE 2023	Secure disposal

				preserved for 75 years			
				in line with the IICSA			
				recommendations for			
				extended retention of			
				records relating to child			
				sexual abuse NB –			
				allegations that are			
				found to be malicious			
				should be removed			
				from personnel files,			
				from the date they are			
				proven to be			
				unfounded.			
8.2	Disciplinary proceedings:	HR File	HT	Date of warning + 6	Date of warning	KCSIE 2023	Secure
	Verbal warning		Chair of Gov	months			disposal
8.3	Disciplinary proceedings:	HR File	НТ	Date of warning + 6	Date of warning	KCSIE 2023	Secure
	Written warning (level 1)		Chair of Gov	months			disposal
8.3	Disciplinary proceedings:	HR File	НТ	Date of warning + 12	Date of warning	KCSIE 2023	Secure
	Written warning (level 2)		Chair of Gov	months			disposal
			DCC				
8.4	Disciplinary proceedings:	HR File	HT	Date of warning + 18	Date of warning	KCSIE 2023	Secure
	Final Warning		Chair of Gov	months			disposal
			DCC				
8.5	Warnings subsequently found to be based	HR File	HT	If the incident is child	Date of	KCSIE 2023	Secure
	on an unfounded case (excluding child		Chair of Gov	protection related then	resolution		disposal
	protection related warnings)		DCC	see above; otherwise			
				dispose following the			
				conclusion of the case			

N.B. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.

Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct at a later date, and then defend themselves by denying they would undertake such an action, reference to the earlier proceedings may show that they should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that they had e.g. "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim.

Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.

	- Payroll & Pensions				1	•	
9.1	Maternity Pay Records	HR DCC	DCC	Current year + 3 years	End of the financial year in which the maternity pay period ends	Statutory Maternity Pay (General) Regulations 1986	Secure disposal
9.2	Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity	SBO payroll file HR DCC	DCC	Current year + 6 years	End of the financial year	Retirement Benefits Schemes (Information Powers) Regulations 1995	Secure disposal
9.3	Batches, Bonus Sheets, Car Loans, Car Mileage Output, Insurance, Members Allowance Register, National Insurance (Schedule of payments), Part Time Fee claims, Payroll (gross/net, weekly or monthly), Payroll Reports, Payslips (copies), Pension Payroll, Superannuation adjustments and reports	SBO payroll file HR DCC	SBO HT DCC	Current year + 6 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal
9.4	Bonus sheets, Car Allowance claims, Overtime	SBO payroll file HR DCC	SBO HT DCC	Current year + 3 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal

9.5	Income Tax P60, Personal bank details. Tax Forms P6/P11/P11D/P35/P45/P46/P48	DCC	DCC	Current year + 6 years	End of the financial year	Common practice	Secure disposal
9.6	Absence records, Sickness records, Staff returns, Time Sheets/Clock Cards/Flexitime	DCC	SBO HT DCC	Current year + 3 years	End of the financial year	Common practice	Secure disposal
9.7	Statutory Sick Pay	DCC	SBO HT DCC	Current year + 3 years	End of the financial year	Common practice	Secure disposal
10. Hea	th and Safety						
10.1	Accessibility Plans	Office	HT SBO GB	Current year + 6 years	End of the calendar year that the records was created in	Equality Act 2010	Secure disposal
10.2	Health and Safety Policy Statements	OneDrive Website	HT SBO GB	Life of the policy + 3 years	Implementation of the policy	Common practice	Secure disposal
10.3	Health and Safety Risk Assessments	RA File Office	HT SBO GB	Life of the assessment + 3 years	Implementation of the assessment	Common practice	Secure disposal
10.4	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportabl <u>e-incidents.htm</u>) and https://www.hse.gov.uk/pubns/edis1.htm Adults	Office DCC	HT SBO GB DCC	Retain for 7 years	Date of incident	Common practice	Secure disposal
10.5	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportabl <u>e-incidents.htm</u>) and <u>https://www.hse.gov.uk/pubns/edis1.htm</u> Children	Office DCC	HT SBO GB	Retain for 25 years	Date of birth	Common practice	Secure disposal
10.6	Minor incidents (non reportable) accident book	Office	All staff	Retain for 3 years	End of academic year	Common practice	Secure disposal

10.7	Control of Substances Hazardous to Health (COSHH)	DCC	HT SBO Caretaker	Current year + 40 years	Last action on file	The Control of Substances Hazardous to Health Regulations 2002	Secure disposal
10.8	Process of monitoring areas where employees/pupils are likely to come into contact with asbestos	DCC	HT SBO DCC	Last action + 40 years	Last action on file	The Control of Asbestos at Work Health Regulations 2012	Secure disposal
10.9	Process of monitoring areas where employees/pupils are likely to come into contact with radiation	N/A		Last action + 50 years	Last action on file	The Ionising Radiations Regulation 2017	Secure disposal
10.10	Fire Precautions log books	Red Box	HT SBO Caretaker DCC	Current year + 3 years	End of calendar year	Common practice	Secure disposal
11. Finar	 ncial Management – Risk & Insurance, Ass	et Management	<u> </u> t				
11.1	Employer's Liability Insurance Certificate	Office	DCC	Date of closure + 40 years	Closure of school	Common practice	Offer to Local Record Office
11.2	Inventories of furniture and equipment	Fiori system	HT SBO	Current year + 6 years	End of calendar year	Common practice	Secure disposal
11.3	Burglary, theft and vandalism report forms	DCC	HT DCC GB	Current year + 6 years	End of calendar year	Common practice	Secure disposal
12 Einar	ncial Management – Accounts and Statem	 onto including P	udgot Managor	mont			
12.1	Annual accounts	DCC OneDrive	DCC HT	Current year + 6 years	End of financial year	Common practice	Offer to Local

		Governors file HT File	SBO GB				Record Office
12.2	Loans and grants managed by the school	Office	HT SBO GB DCC	Date of last payment on the loan + 12 years then review	End of financial year	Standard financial regulations	Secure disposal
12.3	Student Grant applications	Office	HT SBO GB DCC	Current year + 3 years	End of financial year	Standard financial regulations	Secure disposal
12.4	All records relating to the creation and managements of budgets, including the Annual Budget statement, and background papers	DCC OneDrive Governors file HT File	HT SBO GB DCC	Current financial year + 3 years	End of financial year	Common practice	Secure disposal
12.5	Invoices, receipts, order books and requisitions, delivery notices	Office	HT SBO	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.6	Records relating to the collection and banking of monies	Office ParentPay Santander DCC	HT SBO	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.7	Records relating to the identification and collection of debt	ParentPay OneDrive Office	HT SBO DCC	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.8	Pupil Premium Fund records, including evidence of successful FSM eligibility checks	Office ParentPay OneDrive	HT SBO	Date pupil leaves the provision + 6 years	End of financial year	Common practice	Secure disposal
13. Fina	ncial Management – Contract Management	 :		1			1
13.1	All records relating to the management of contracts under seal	DCC	DCC	Current year + 12 years	End of contract	The Limitation Act 1980	Secure disposal
13.2	All records relating to the management of contracts under signature	DCC	DCC	Current year + 6 years	End of contract	The Limitation Act 1980	Secure disposal

13.3	Records relating to the monitoring of	DCC	DCC	Current year + 6 or 12	End of calendar	The Limitation	Secure
	contracts			years	year	Act 1980	disposal
14. Fina	ncial Management – School Fund [where or	ne exists, or has	done in the pre	vious 7yrs]			
14.1	School Fund:	Office	НТ	Current year + 6 years	End of use	Financial	Secure
	 cheque books and paying in books 	Santander	SBO			Services Act	disposal
	ledger	Lloyds				2012, HMRC	
	invoices					regulations	
	receipts					Companies	
	bank statements					Act 2006	
	journey books						
15. Fina	ncial Management – School Meals						
15.1	Free School Meals Register, including	RM Integris	HT	Current year + 6 years	End of calendar	Common	Secure
	evidence of successful SFM eligibility		SBO		year	practice	disposal
	checks		DCC				
15.2	School Meals Register	RM Integris	HT	Current year + 3 years	End of calendar	Common	Secure
			SBO		year	practice	disposal
15.3	School Meals Summary Sheets	RM Integris	HT	Current year + 3 years	End of calendar	Common	Secure
			SBO		year	practice	disposal
			DCC				
16							
	perty Management	D CC	DCC			C	
16.1	Title deeds of properties belonging to the	DCC	DCC	Permanent. These	Archive upon	Common	Offer to
	school	Thomas Determine Truck	Thomas	should follow the	closure	practice	Local
		Bateman Trust	Bateman Trust	property unless the			Authority
				property has been			Record Office
				registered with the			Office
16.2	All records relating to the maintenance of	Office	SBO	Land Registry	End of financial	Common	
10.2	All records relating to the maintenance of	DCC	DCC	Current financial year +		Common	Secure
	the school, carried out by contractors			6 years Records relating to	year that the record was	practice	disposal
				•			
				rewiring, major	created in		

16.3	All records relating to the maintenance of	Office	HT	alterations etc must be retained in the health and safety file whilst the building belongs to the school and must be passed onto any new owners if the building is leased or sold. Current calendar year +	End of calendar	Common	Secure
	the school, carried out by school employees, including maintenance log book		SBO Caretaker GB DCC	6 years Records relating to rewiring, major alterations etc must be retained in the health and safety file whilst the building belongs to the school and must be passed onto any new owners if the building is leased or sold.	year that the record was created in	practice	disposal
16.4	Plans of property belonging to the school	Red Box DCC	HT GB DCC	These should be retained whilst the building belongs to the school and should be passed onto any new owners, if the building is leased or sold.	Transfer of asset	Common practice	Offer to Local Authority Record Office
16.5	Leases of property leased by, or to, the school	N/A		Expiry of lease + 6 years	Commencement of lease	Common practice	Secure disposal
16.6	Records relating to the letting of school premises	N/A		Current financial year + 6 years	End of financial year that the record was created in	Common practice	Secure disposal

17.1	alt with in <u>section 20.</u> Primary	RM Integris	HT	Retain whilst the child	Date pupil	Education	The file
		_	SBO	remains at the primary	changes school	(Pupil	should
			DCC	school. Records may be		Information)	follow the
				kept on the MIS in an		(England)	pupil when
				archive or 'former roll'		Regulations	they leave
				area) after a pupil has		2005	the primary
				left the school – see <u>1.7</u>			school (see
				Last School and 1.8			<u>1.7 Last</u>
				<u>Management</u>			<u>School.</u> If
				Information System			pupil does
							not attend
							a secondary
							school, or
							the child
							dies, then
							records
							should be
							retained as
							per 17.2
							below_)
17.3	Examination Results - Pupil Copies	RM Integris	HT	This information should	Date of	Common	Contact the
	Public		SBO	be added to the pupil	examination	practice	relevant
			DfE	file and any certificates			exam board
				should be safely			to obtain
				handed over to pupils.			instructions
							regarding
							whether
							uncollected
							certificates
							to be
							returned to

							the examinatio n board or destroyed after reasonable attempts to contact the pupil have failed.
17.4	Examination Results - Pupil Copies Internal	RM Integris	HT SBO	This information should be added to the pupil file	Date of examination	Common practice	Secure disposal
17.5	Pupil 'skeleton' record (which would include a brief record of pupil names, UPNs, date of birth, address, parent details, date of admission, date of departure and destination (if known))	RM Integris Buff file office	HT SBO	Permanent. These form part of the historical archives of the school.	Archive on closure of the school.	Common Practice.	Offer to the Local Authority Record Office
18.1	I Protection (CP) / Safeguarding Records Child Protection Information - Primary	MyConcern	All teaching staff	CP files must be transferred to the new school as soon as possible (5 days), to maintain continuity. Ensure secure transit, and a confirmation of receipt should be obtained. The CP file should be transferred separately from the main pupil file.	Date pupil changes school (Where a child is removed from the roll to be educated at home/missing from education, see below)	KCSIE 2023 & Annex C	Transferred to new or Secondary school. Duplicates must be securely disposed of.

18.3	Child Protection (CP) Information – Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths.	MyConcern	All teaching staff	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Coordinator for Missing Children and Secure disposal
18.4	Child Protection (CP) Information – Child is removed from the roll and is Elective Home Educated	MyConcern	All teaching staff	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Elective Home Education Coordinator and Secure disposal
18.5	Filtering & Monitoring Logs. Where these indicate a child protection/safeguarding concern, the log will be added to the pupil CP Information and retained in line with the periods in 18.1-18.4.	DNS Filter	ITJD Ltd	Any filtering breach is emailed directly to Safeguarding team. DNS filter logs kept for 12 months.	Date of log	Common Practice	Deletion
19. Atte	ndance		1		1		
19.1	Attendance Registers	RM Integris	Teaching staff SBO	Every entry in the School admission and attendance register is to be preserved for 6 years beginning with	Last entry in register	School Attendance (Pupil Registration) (England)	Secure disposal

				the day on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates.		Regulations 2024 Regulations 5, 7 (which comes into force on 19 August 2024).	
19.2	Correspondence relating to authorized absence	OneDrive Governors File	SBO HT	Date of absence + 2 years	Date of absence	DfE School attendance Guidance for maintained schools, academies, independent schools and local authorities May 2022	Secure disposal
20.0							
20. Special 20.1	Educational Needs (SEN) SEN files, reviews and Individual Education Plans – Primary	Pupil file OneDrive	HT SENCO SENTA	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School
20.3	Statement / Education Health Care Plan (EHCP) under <u>Section 324 of the Education</u> <u>Act 1996</u> and any amendments made to the plan	Pupil file OneDrive	HT SENCO SENTA DCC	Date of birth of pupil + 25 years	Pupil's date of birth	Special Educational Needs and Disability Act 2001, Children and Families Act 2014 & The Limitation Act 1980	Secure disposal

	iculum Management		1	1	-	Т	
21.2	Curriculum development	Office SLT Website GB DCC		Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.3	Examination Results (School's copy)	HT File	HT Teaching Staff GB	Current year + 6 years	Date of examination	Common practice	Secure disposal
21.4	SATs Results	Pupil file HT file Governors file	HT	The SATS result should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the ages of 25 years. The school may wish to keep a composite record of all the whole year SATS results. These could be kept for the current year + 6 years to allow suitable comparison	Date that results are released	Common practice	Secure disposal
21.5	SATs Examination papers	Locked cupboard	HT Class Teacher	The examination papers should be kept until any appeals/validation process is complete	Date of examination	Common practice	Secure disposal
21.6	Published Admission Number (PAN) Reports	Website Admissions Policy	DCC HT GB	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.7	Value Added and Contextual Data	Website Governor file	Gov.uk	Current year + 6 years	End of the calendar year	Common practice	Secure disposal

		HT file			that the record was created in		
21.8	Self-Evaluation Forms	HT file Governors file OneDrive	HT SLT	Current year + 6 years	Date of completion	Common practice	Secure disposal
21.9	Internal Moderation	DCC	DCC	Academic year + 1 academic year	Date of commencement	Common practice	Secure disposal
21.10	External Moderation	DCC Ofsted SIAMS	DCC Ofsted SIAMS	Until superseded	Date of commencement	Common practice	Secure disposal
22. Impl	ementation of Curriculum						I
22.1	Schemes of Work	Office Website OneDrive Grammarsaur us	HT Teaching Staff DCC Link Advisor Curriculum Hubs	Current year + 1 year	End of the academic year that the record was created in	Common practice	Review these records at the end of each year and allocate a further retention period or secure disposal
22.2	Timetable	Office Website	HT Teaching Staff	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.3	Class Record books, mark books, homework records (eg teacher spreadsheets etc)	Classrooms	Teaching Staff	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.4	Pupil work	Classrooms	Teaching Staff	Where possible, pupils' work should be returned to the pupil at	End of the academic year	Common practice	Secure disposal

				the end of the	that the record		
				academic year. If this is	was created in		
				not, currently, the			
				school's policy then it			
				should be retained for			
				the current year +1			
22.5	Online learning platforms	TT Rock Stars,	SBO	As above. Work will be	End of the	Common	Secure
		Espresso,	HT	cleared from platforms	academic year	practice	disposal
		Accelerated		at the end of the	the child leaves		
		Reader,		academic year the child	or the platform is		
		Grammarsaur		leaves or the platform	no longer		
		us, Little		is no longer accessed	accessed		
		Wandle		-			
22.6	Teacher and diaries & Notebooks	Teaching Staff	Teaching Staff	Contents should be	Expiration of	Common	Secure
		SBO	SBO	transferred to	diary.	practice	disposal
		НТ	НТ	appropriate record	Completion of		
				keeping (eg staff file,	notebook		
				pupil record, MIS			
				safeguarding /			
				behaviour log) as soon			
				as possible. Destroyed			
				within 3 months.			
23. Extra	a Curriculum Management						
23.1	Records created by schools to obtain	Office	SBO	Date of visit + 14 years	Date of visit	The Health	Secure
	approval to run an Educational Visit	OneDrive	НТ			and Safety at	disposal
	outside the Classroom (Primary schools)	Evolve				Work Act 1974	
	where there has not been a Major						
	Incident						
	(Records created might include risk assessments)						
23.3	Parental consent forms for school trips	Office	SBO	No retention is required		Common	Secure
	where there has been no Major Incident					practice	disposal
23.4	Records created by schools to obtain	Office	SBO/HT	Retain for 25 years	Pupil's DOB	The Limitation	Secure
	approval for to run an Educational Visit	OneDrive		from the date of birth		Act 1980	disposal
		Evolve					

	outside the Classroom, where there has been a Major Incident (Records created might include risk assessments)	DCC		of the pupil/s involved in the incident			
23.5	Parental consent forms for school trips, where there has been a Major Incident	Office OneDrive	SBO HT	Retain for 25 years from the date of birth of the pupil/s involved in the incident. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	Pupil's DOB	The Limitation Act 1980	Secure disposal
24. Fami	ily Liaison / Early Help / Alternative Provisi	on	L		I		
24.1	Day books	Pupil book bag	Teaching Staff Parents	Current year + 2 years then review	End of the calendar year that the record was created in	Common practice	Secure disposal
24.2	Reports for outside agencies – where the report has been included on the agency case file	Pupil file	HT	Whilst the child is attending school and then destroy	Date of completion of report	Common practice	Secure disposal
24.3	Referral forms	Pupil file	HT SENCO	While the referral is current	Date of completion of form	Common practice	Secure disposal
24.5	Contact data sheets and database entries	Pupil file	HT SENCO SENTA	Current year then review – if contact is no longer active then destroy	End of the calendar year that the record was created in	Common practice	Secure disposal
24.6	Group registers	N/A	Class Teachers	Current year + 2 years	Last entry in register	Common practice	Secure disposal
25. Loca	Authority						

Secondary Transfer sheets	OneDrive	SBO HT Secondary School	Current year + 2 years	Year of transfer	Common practice	Secure disposal
Attendance Returns	RM Integris DfE	HT SBO	Current year + 1 year	End of the calendar year that the record was created in	Common practice	Secure disposal
School Census Returns	OneDrive RM Integris	HT SBO	Current year + 5 years	Completion of return	Common practice	Secure disposal
Circulars and other information sent from the Local Authority	Office / school	HT/SBO	Operational use	Date of issue	Common practice	Secure disposal
al Government						
OFSTED reports and papers	Office Governors file	HT SBO	Retain whilst current	Date new report is issued	Common practice	Offer to Local Authority Record Office
Returns made to central government, including Schools financial value standard (SFVS) and assurance statement	HT file Governors file OneDrive	HT SBO GB	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
Circulars and other information sent from central government	Office/school	HT SBO	Operational use	Date of issue	Common practice	Secure disposal
nt / Alumni Associations						
Records relating to the creation and management of PTA and Old Pupil Associations	PTA files	PTA Secretary	Current year + 6 years	Date of foundation	Common practice	Secure disposal
	School Census Returns Circulars and other information sent from the Local Authority ral Government OFSTED reports and papers Returns made to central government, including Schools financial value standard (SFVS) and assurance statement Circulars and other information sent from central government Director of the creation and	DfE DfE School Census Returns OneDrive RM Integris Circulars and other information sent from the Local Authority Office / school ral Government Office OFSTED reports and papers Office Governors file Returns made to central government, including Schools financial value standard (SFVS) and assurance statement HT file Governors file Circulars and other information sent from central government Office/school t Alumni Associations PTA files	Attendance ReturnsRM Integris DfEHT SBOSchool Census ReturnsOneDrive RM IntegrisHT SBOSchool Census ReturnsOneDrive RM IntegrisHT SBOCirculars and other information sent from the Local AuthorityOffice / school HT/SBOHT/SBOrai GovernmentOffice SBOHT SBOOFSTED reports and papersOffice Governors file OneDrive Governors fileHT SBOReturns made to central government, including Schools financial value standard (SFVS) and assurance statementHT file Governors file OneDriveHT SBO SBOCirculars and other information sent from central governmentOffice/school SBOHT SBOCirculars and other information sent from central governmentOffice/school SBOHT SBOImage: Condition sent from central governmentOffice/school SBOHT SBOImage: Condition sent from central governmentOffice/school SBOHT SBOImage: Condition sent from central governmentPTA filesPTA Secretary	Attendance ReturnsRM Integris DFEHT SBOCurrent year + 1 year SBOSchool Census ReturnsOneDrive RM IntegrisHT SBOCurrent year + 5 years SBOCirculars and other information sent from the Local AuthorityOffice / school Image of the Local AuthorityHT SBOOperational useImage of the Local AuthorityImage of the Local AuthorityOffice / school Image of the Local AuthorityHT SBOOperational useImage of the Local AuthorityImage of the Local AuthorityOffice Image of the Local AuthorityAttendanceImage of the Local AuthorityImage of the Local AuthorityOffice Image of the Local AuthorityOperational useImage of the Local AuthorityImage of the Local AuthorityOffice Image of the Local AuthorityOperational useImage of the Local AuthorityImage of the Local AuthorityImage of the Local AuthorityOperational useImage of the Local AuthorityImage of the Local Autho	Attendance ReturnsRM Integris DfEHT SBOCurrent year + 1 yearEnd of the calendar year that the record was created inSchool Census ReturnsOneDrive RM IntegrisHT SBOCurrent year + 5 yearsCompletion of returnCirculars and other information sent from the Local AuthorityOneDrive RM IntegrisHT SBOOperational useDate of issueCirculars and other information sent from the Local AuthorityOffice / schoolHT/SBOOperational useDate of issueal GovernmentOffice Governors file (SFVS) and assurance statementOffice Governors file 	Attendance ReturnsRM Integris DFEHT SBOCurrent year + 1 year SBOEnd of the calendar year that the record was created inCommon practiceSchool Census ReturnsOneDrive RM Integris SBOHT SBOCurrent year + 5 yearsCompletion of return practiceCommon practiceCirculars and other information sent from the Local AuthorityOffice / schoolHT/SBOOperational useDate of issueCommon practiceImage: Common the Local AuthorityOffice / schoolHT/SBOOperational useDate of issueCommon practiceImage: Common the Local AuthorityOffice / schoolHT SBORetain whilst currentDate new report is issuedCommon practiceImage: Common the Local AuthorityOffice / schoolHT SBOSBOCurrent year + 6 yearsEnd of the calendar year that the record was created inCommon practiceImage: Common the information sent from including Schools financial value standard (SFVS) and assurance statementHT file Governors fileHT SBOCurrent year + 6 yearsEnd of the calendar year that the record was created inCommon practiceCirculars and other information sent from central governmentOffice/schoolHT SBOOperational useDate of issueCommon practiceCirculars and other information sent from central governmentOffice/schoolHT SBOOperational useDate of issueCommon practiceImage: Circulars and other information sent from central governmentOffice/s

28.1	Incoming & Outgoing calls	Office	All Staff	Answerphone – call		Common	
				deleted upon listening		practice	
28.2	Meetings	N/A				Common	
						practice	
28.3	Online lessons	N/A				Common	
						practice	
28.4	Staff training	Office	SBO	Attendance logged		Common	
						practice	
29. Adm	inistration of Medication						
30.1	Non-prescription medicines and remedies	Locked First	All Staff	Current year + 1 year	Date of	Limitation Act	Secure
	inc painkillers, or very commonly	Aid cabinet in			administration	1980	disposal
	prescribed drugs such as antibiotics or	Office					
	asthma inhalers	Fridge					
30.2	All other administration of medication not	Locked First	All Staff	Date of birth of the	Date of	Limitation Act	Secure
	covered by 30.1 including, but not limited	Aid cabinet in		pupil + 25 years	administration	1980	disposal
	to: peg feeding, injections, treatments for	Office					
	serious conditions such as diabetes, ADHD						
	or depression						

Appendix A – List of School Records and Data safely destroyed

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

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

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