Great Torrington School

Data Retention Policy

Approving Committee:	**Resources**
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INTRODUCTION

The School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

PURPOSE AND SCOPE

- This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.
- Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.
- A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives and for historical research.

RESPONSIBILITIES

- The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Head of the School, this is delegated to the Data Protection Officer (DPO) for operational purposes.
- The DPO will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by carrying out surveys to check that records are stored securely and can be accessed appropriately.
- Individual staff and employees must ensure that records for which they are responsible are accurate, maintained and disposed of in accordance with the school's records management guidelines.

RELATIONSHIP WITH EXISTING POLICIES

This policy has been drawn up within the context of:

- Freedom of Information policy (11)
- Data Protection Policy (10)
- Information Assurance Policy (60)
- and other legislation or regulations (including audit, equal opportunities, and ethics) effecting the school

This policy is based on the IRMS Toolkit for Schools, 2019. Any changes to these recommendations have been highlighted accordingly.

RETENTION SCHEDULE

1. Governing Body

This section contains retention periods connected to the work and responsibilities of the governing body.

For further information about governing body records please see: "The constitution of governing bodies of maintained schools Statutory guidance for governing bodies of maintained schools and local authorities in England August 2017"

1.1 Management of Governing Body					
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
1.1.1	Instruments of government		For the life of the school	Consult local archives before disposal	
1.1.2	Trusts and endowments		For the life of the school	Consult local archives before disposal	
1.1.3	Records relating to the election of parent and staff governors not appointed by the governors		Date of election + 6 months	SECURE DISPOSAL	Yes
1.1.4	Records relating to the appointment of co-opted governors		Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children). In this case retain for 25 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
1.1.5	Records relating to the election of chair and vice chair		Once the decision has been recorded in the minutes, the records relating to the election can be destroyed	SECURE DISPOSAL	Yes
1.1.6	Scheme of delegation and terms of reference for committees		Until superseded or whilst relevant [Schools may wish to retain these records for reference purposes in case decisions need to be justified]	These could be offered to the archives if appropriate	
1.1.7	Meetings schedule		Current year	STANDARD DISPOSAL	
1.1.8	Agendas - principal copy		Where possible the agenda should be stored with the principal set of the minutes	Consult local archives before disposal	Potential
1.1.9	Minutes - principal set (signed)		Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting	Consult local archives before disposal	Potential

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
1.1.10	Reports made to the governors' meeting which are referred to in the minutes		Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting	Consult local archives before disposal	Potential
1.1.11	Register of attendance at Full governing board meetings		Date of last meeting in the book + 6 years	SECURE DISPOSAL	Yes
1.1.12	Papers relating to the management of the annual parents' meeting		Date of meeting + 6 years	SECURE DISPOSAL	Yes
1.1.13	Agendas - additional copies		Date of meeting	STANDARD DISPOSAL	
1.1.14	Records relating to Governor Monitoring Visits		Date of the visit + 3 years	SECURE DISPOSAL	Yes
1.1.15	Annual Reports re-quired by the DoE		Date of report + 10 years	SECURE DISPOSAL	
1.1.16	All records relating to the conversion of schools to Academy status		For the life of the organisation	Consult local archives before disposal	

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
1.1.17	Records relating to complaints made to and investigated by the governing body or head teacher		Major complaints: current year + 6 years. If negligence involved then: current year + 15 years If child protection or safeguarding issues are involved then: current year + 40 years	SECURE DISPOSAL	Yes
1.1.18	Correspondence sent and received by the governing body or head teacher		General correspondence should be retained for current year + 3 years	SECURE DISPOSAL	Potential
1.1.19	Action plans created and administered by the governing body		Until superseded or whilst relevant	SECURE DISPOSAL	
1.1.20	Policy documents created and administered by the governing body		Until superseded [The school should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the IICSA has issued its recommendations.]		

1.2	Governor Management				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
1.2.1	Records relating to the appointment of a clerk to the governing body		Date on which clerk appointment ceases + 6 years	SECURE DISPOSAL	Yes
1.2.2	Records relating to the terms of office of serving governors, including evidence of appointment		Date appointment ceases + 6 years		Yes
1.2.3	Records relating to governor declaration against disqualification criteria		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes
1.2.4	Register of business interests		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes
1.2.5	Governors Code of Conduct		This is expected to be a dynamic document; one copy of each version should be kept for the life of the organisation		
1.2.6	Records relating to the training required and received by Governors		Date Governor steps down + 6 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
1.2.7	Records relating to the induction programme for new governors		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes
1.2.8	Records relating to DBS checks carried out on clerk and members of the governing body		Date of DBS check + 6 months	SECURE DISPOSAL	Yes
1.2.9	Governor personnel files		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes

2. Management of the School

This section contains retention periods connected to the processes involved in managing the school, including Human Resources, Financial Management, Payroll and Property Management.

2.1	Head Teacher and Senior Management Team				
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.1.1	Log books of activity in the school maintained by the Head Teacher		Date of last entry in the book + minimum of 6 years, then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate	Potential
2.1.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies		Date of the meeting + 3 years then review annually, or as required if not destroyed	SECURE DISPOSAL	Potential
2.1.3	Reports created by the Head Teacher or the Management Team		Date of the report + a minimum of 3 years then review annually or as required if not destroyed	SECURE DISPOSAL	Potential

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.1.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities which do not fall under any other category		Current academic year + 6 years then review annually, or as required if not destroyed	SECURE DISPOSAL	Potential
2.1.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities		Current year + 3 years	SECURE DISPOSAL	Potential
2.1.6	Professional development plans		These should be held on the individual's personnel record. If not then termination of employment + 6 years	SECURE DISPOSAL	Potential
2.1.7	School development plans		Life of the plan + 3 years	SECURE DISPOSAL	

2.2	Operational Administration				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
2.2.1	General file series which do not fit under any other category		Current year + 5 years, then review	SECURE DISPOSAL	Potential
2.2.2	Records relating to the creation and publication of the school brochure or prospectus		Current academic year + 3 years	The school could preserve a copy for their archive otherwise STANDARD DISPOSAL	
2.2.3	Records relating to the creation and distribution of circulars to staff, parents or pupils		Current academic year + 1 year	STANDARD DISPOSAL	
2.2.4	School Privacy Notice which is sent to parents as part of GDPR compliance		Until superseded + 6 years		
2.2.5	Consents relating to school activities as part of GDPR compliance (for example, consent to be sent circulars or mailings)		Consent will last whilst the pupil attends the school, it can therefore be destroyed when the pupil leaves	SECURE DISPOSAL	Yes
2.2.6	Newsletters and other items with a short operational use		Current academic year + 1 year [Schools may decide to archive one copy]	STANDARD DISPOSAL	
2.2.7	Visitor management systems (including electronic systems, visitors books and signing-in sheets)		Last entry in the visitors book + 6 years (in case of claims by parents or pupils about various actions).	SECURE DISPOSAL	Yes
2.2.8	Walking bus registers		Date of register + 6 years	SECURE DISPOSAL	Yes

2.3 Human Resources					
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Recruitment					
2.3.1	All records leading up to the appointment of a headteacher		Unsuccessful attempts. Date of appointment plus 6 months. Add to personnel file and retain until end of appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years	SECURE DISPOSAL	Yes
2.3.2	All records leading up to the appointment of a member of staff / governor – unsuccessful candidates		Date of appointment of successful candidate + 12 months ***Note – changed from IRMS recommended 6 months due to Safer Recruitment Guidance***	SECURE DISPOSAL	Yes
2.3.3	Pre-employment vetting information – DBS Checks – successful candidates	DBS Update Service Employ-er Guide Keeping Children Safe in Education. 2018 (Statutory Guidance from DoE Sections 73, 74)	Application forms, references and other documents – for the duration of the employee's employment + 6 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Recruitment					
2.3.4	Forms of proof of identity collected as part of the process of checking "portable" enhanced DBS disclosure		Where possible this process should be carried out using the on-line system. If it is necessary to take a copy of documentation then it should be retained on the staff personal file.	SECURE DISPOSAL	Yes
2.3.5	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom – successful candidates	An Employer's Guide to Right to Work Checks [Home Office, May 2015]	Where possible these documents should be added to the staff personnel file [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of employment + not less than 2 years	SECURE DISPOSAL	Yes
Operational Staff Management					
2.3.6	Staff personnel file	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years, unless the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete	SECURE DISPOSAL	Yes
2.3.7	Annual appraisal / assessment records		Current year + 6 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Operational Staff Management					
2.3.8	Sickness absence monitoring		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. It could be argued that where sickness pay is not paid then current year + 3 years is acceptable, whilst if sickness pay is made then it becomes a financial record and current year + 6 years applies. The actual retention may depend on the internal auditors. Most seem to accept current year + 3 years as being acceptable as this gives them, 'benefits' and Inland Revenue have time to investigate if they need to	SECURE DISPOSAL	Yes
2.3.9	Staff training – where the training leads to continuing professional development		Length of time required by the professional body	SECURE DISPOSAL	Yes
2.3.10	Staff training – except where dealing with children, e.g. first aid or health and safety		This should be retained on the personnel file [see 2.3.1 above]	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Operational Staff Management					
2.3.11	Staff training – where the training relates to children (e.g. safeguard-ing or other child related training)		Date of the training + 40 years [This retention period reflects that the IICSA may wish to see training records as part of an investigation]	SECURE DISPOSAL	Yes
Disciplinary and Grievance Processes					
Where schools are in any doubt as to which categories disciplinary records fall under, then HR or legal advice should be sought from the Local Authority.					
2.3.12	Records relating to any allegation of a child protection nature against a member of staff	"Keeping children safe in education Statutory guidance for schools and colleges September 2018"; "Working together to safeguard children. A guide to inter-agency working to safe-guard and promote the welfare of children 2018"	Until the person's normal retirement age or 10 years from the date of the allegation (whichever is the longer) then REVIEW. Note: allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned UNLESS the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete	SECURE DISPOSAL These records must be shredded	Yes
2.3.13	Disciplinary proceedings				Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Disciplinary and Grievance Processes					
Note: 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 five years down the line, and them defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "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.					
	Oral warning		Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file	
	Written warning – level 1		Date of warning + 6 months		
	Written warning – level 2		Date of warning + 12 months		
	Final warning		Date of warning + 18 months		
	Case not found		If the incident is related to child protection then see above, otherwise dispose of at the conclusion of the case	SECURE DISPOSAL	

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Payroll and Pensions					
2.3.14	Absence record		Current year + 3 years	SECURE DISPOSAL	Yes
2.3.15	Batches	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.16	Bonus sheets	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL	Yes
2.3.17	Car allowance claims	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL	Yes
2.3.18	Car loans	Taxes Management Act 1970 Income and Corporation Taxes 1988	Completion of loan + 6 years	SECURE DISPOSAL	Yes
2.3.19	Car mileage output	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.20	Elements		Current year + 2 years	SECURE DISPOSAL	Yes
2.3.21	Income tax form P60		Current year + 6 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Payroll and Pensions					
2.3.22	Insurance	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.23	Maternity payment		Current year + 3 years	SECURE DISPOSAL	Yes
2.3.24	Members allowance register	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.25	National Insurance – schedule of payments	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.26	Overtime	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL	Yes
2.3.27	Part time fee claims	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.28	Pay packet receipt by employee		Current year + 2 years	SECURE DISPOSAL	Yes
2.3.29	Payroll awards		Current year + 6 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Payroll and Pensions					
2.3.30	Payroll – gross/net weekly or monthly	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.31	Payroll reports	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.32	Payslips – copies	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.33	Pension payroll	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.34	Personal bank details	If employment ceases then end of employment + 6 years	Until superseded + 3 years	SECURE DISPOSAL	Yes
2.3.35	Sickness records		Current year + 3 years	SECURE DISPOSAL	Yes
2.3.36	Staff returns		Current year + 3 years	SECURE DISPOSAL	Yes
2.3.37	Superannuation adjustments	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Payroll and Pensions					
	Superannuation reports	Taxes Management Act 1970 Income and Corporation Taxes1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.38	Tax forms P6/P11/ P11D/P35/P45/P46/ P48	The minimum requirement - as stated in Inland Revenue Booklet 490 - is for at least 3 years after the end of the tax year to which they apply. Originals must be retained in paper/ electronic format. It is a corporate decision to retain for current year + 6 years. Employees should retain records for 22 months after current tax year	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.39	Time sheets/clock cards/flexitime		Current year + 3 years	SECURE DISPOSAL	Yes

2.4 Health and Safety					
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
2.4.1	Health and safety policy statements		Life of policy + 3 years	SECURE DISPOSAL	
2.4.2	Health and safety risk assessments		Life of risk assessment + 3 years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred	SECURE DISPOSAL	
2.4.3	Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628 Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628 Social Security Administration Act 1992 Section 8. Social Security (Claims and Payments) Amendment (No 30 Regulations 1993 SI 1993 No 2113 Allows the information to be kept electronically	The Accident Book – BI 510 - 3 years after last entry in the book This includes the new format to be used from 1/1/04 This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR	SECURE DISPOSAL	Yes

2.4	Health and Safety				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
2.4.4	Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628 Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628 Social Security Administration Act 1992 Section 8. Social Security (Claims and Payments) Amendment (No 30 Regulations 1993 SI 1993 No 2113 Allows the information to be kept electronically	The Accident Book – BI 510 - 3 years after last entry in the book This includes the new format to be used from 1/1/04 This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR	SECURE DISPOSAL	Yes
2.4.5	Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see http://www.hse.gov.uk/RIDDOR/	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2)	Date of incident + 3 years provided that all records relating to the incident are held on personnel file [see 2.4.2 above]	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.4.6	Control of Substances Hazardous to Health (COSHH)	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept un- der the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	Date of incident + 40 years	SECURE DISPOSAL	
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into con- tact with asbestos	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL	
2.4.8	Process of monitor- ing of areas where employees and persons are likely to have come into con- tact with radiation. Maintenance records or controls, safety features and PPE ---------- Dose assessment and recording	The Ionising Radiation Regulations 2017. SI 2017 No 1075 Regulation 11 As amended by SI 2018 No 390 Personal Protective Equipment (Enforcement) Regulations 2018	2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. ---------- To keep the records made and maintained (or a copy of these records) until the person to whom the record relates has or would have attained the age of 75 years, but in any event for at least 30 years from when the record was made	SECURE DISPOSAL	
2.4.9	Fire Precautions log books		Current year + 3 years	SECURE DISPOSAL	

2.4	Health and Safety				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
2.4.10	Health and safety file to show current state of building, including all alterations (wiring, plumbing, building works, etc.), to be passed on in the case of change of ownership		Pass to new owner on sale or transfer of building		

2.5	Financial Management				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Risk Management and Insurance					
2.5.1	Employer's Liability Insurance Certificate		Closure of the school + 40 years [May be kept electronically]	SECURE DISPOSAL To be passed to the Local Authority if the school closes	
Asset Management					
2.5.2	Inventories of furniture and equipment		Current year + 6 years	SECURE DISPOSAL	
2.5.3	Burglary, theft and vandalism report forms		Current year + 6 years	SECURE DISPOSAL	
Accounts and Statements (including budget management)					
2.5.4	Annual accounts		Current year + 6 years	STANDARD DIS-POSAL	
2.5.5	Loans and grants managed by the school		Date of last payment on the loan + 12 years then review	SECURE DISPOSAL	

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Accounts and Statements (including budget management)					
2.5.6	All records relating to the creation and management of budgets, including the annual budget statement and back-ground papers		Life of the budget + 3 years	SECURE DISPOSAL	
2.5.7	Invoices, receipts, order books and requisitions, delivery notices		Current financial year + 6 years	SECURE DISPOSAL	
2.5.8	Records relating to the collection and banking of monies		Current financial year + 6 years	SECURE DISPOSAL	
2.5.9	Records relating to the identification and collection of debt		Final payment of debt + 6 years	SECURE DISPOSAL	
Pupil Finance					
2.5.10	Student Grant applications		Current year + 3 years	SECURE DISPOSAL	Yes
2.5.11	Pupil Premium Fund records		Date pupil leaves the provision + 6 years	SECURE DISPOSAL	Yes
Contract Management					
2.5.12	All records relating to the management of contracts under seal	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL	
2.5.13	All records relating to the management of contracts under signature	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL	
2.5.14	Records relating to the monitoring of contracts		Life of contract + 6 or 12 years	SECURE DISPOSAL	

2.5	Financial Management				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
School Fund					
2.5.15	School Fund - Cheque books		Current year + 6 years	SECURE DISPOSAL	
2.5.16	School Fund - Paying in books		Current year + 6 years	SECURE DISPOSAL	
2.5.17	School Fund – Ledger		Current year + 6 years	SECURE DISPOSAL	
2.5.18	School Fund – Invoices		Current year + 6 years	SECURE DISPOSAL	
2.5.19	School Fund – Receipts		Current year + 6 years	SECURE DISPOSAL	
2.5.20	School Fund - Bank statements		Current year + 6 years	SECURE DISPOSAL	
2.5.21	School Fund – Journey Books		Current year + 6 years	SECURE DISPOSAL	
School Meals Management					
2.5.22	Free school meals registers (where the register is used as a basis for funding)		Current year + 6 years	SECURE DISPOSAL	Yes
2.5.23	School meals registers		Current year + 3 years	SECURE DISPOSAL	Yes
2.5.24	School meals summary sheets		Current year + 3 years	SECURE DISPOSAL	Yes

2.6 Property Management					
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Property Management					
2.6.1	Title deeds of properties belonging to the school		These should follow the property unless the property has been registered with the Land Registry		
2.6.2	Plans of property belonging to the school		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10		
2.6.3	Leases of property leased by or to the school		Expiry of lease + 6 years	SECURE DISPOSAL	
2.6.4	Records relating to the letting of school premises		Current financial year + 6 years	SECURE DISPOSAL	
Maintenance					
2.6.5	All records relating to the maintenance of the school carried out by contractors		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10	SECURE DISPOSAL	
2.6.6	All records relating to the maintenance of the school carried out by school employees, including maintenance log books		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10	SECURE DISPOSAL	

3. Pupil Management

This section contains retention periods connected to the processes involved in managing a pupil's journey through school, including the admissions process.

3.1 Admissions Process					
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
3.1.1	All records relating to the creation and implementation of the School Admissions Policy	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL	
3.1.2	Admissions – if the admission is successful	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Add to pupil file ***(Note – IRMS states date of admission + 1 year. Decision to add to pupil file due to data checking)***	SECURE DISPOSAL	Yes
3.1.3	Admissions – if the appeal is unsuccessful	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL	Yes
3.1.4	Register of Admissions	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	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 Schools may wish to consider keeping the admission register permanent-ly as an archive record as often schools receive enquiries from past pupils to confirm the dates they at-tended the school or to transfer these records to the appropriate County Archives Service	

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
3.1.5	Admissions – Secondary Schools – Casual		Current year + 1 year	SECURE DISPOSAL	Yes
3.1.6	Proofs of address supplied by parents as part of the admissions process	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL	Yes
3.1.7	Supplementary information form including additional information such as religion, medical conditions etc.				Yes
3.1.7.1	For successful admissions		This information should be added to the pupil file	SECURE DISPOSAL	
3.1.7.2	For unsuccessful admissions		Until appeals process completed (GDPR)	SECURE DISPOSAL	

3.2	Pupil's Educational Record				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.					
3.2.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 As amended by SI 2018 No 688			Yes
3.2.1.1	Primary		Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit	
3.2.1.2	Secondary	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	REVIEW	
3.2.2	Examination Results – pupil copies				Yes
3.2.2.1	Public		This information should be added to the pupil file	All uncollected certificates should be returned to the examination board after reasonable attempts to contact the pupil have failed	
3.2.2.2	Internal		This information should be added to the pupil file		

	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
3.2.3	Child protection information held on pupil file	"Keeping children safe in education Statutory guidance for schools and colleges 2018"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018"	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file. Note: These records will be subject to any instruction given by IICSA	SECURE DISPOSAL These records must be shredded	Yes
3.2.4	Child protection information held in separate files	"Keeping children safe in education Statutory guidance for schools and colleges 2018"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018"	DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record Note: These records will be subject to any instruction given by IICSA	SECURE DISPOSAL These records must be shredded	Yes

3.3	Attendance				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.					
3.3.1	Attendance Registers	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Retain on Pupil File ***(Note – IRMS states date of three years after last entry. Decision to retain on to pupil file to ensure full records retained)***	SECURE DISPOSAL	Yes
3.3.2	Correspondence relating to any absence (authorised or unauthorised)	Education Act 1996 Section 7	Retain on Pupil File ***(Note – IRMS states date of two years after absence. Decision to retain on to pupil file to ensure full records retained)***	SECURE DISPOSAL	Potential

3.3	Attendance				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.					

3.4.1	Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Children and Family's Act 2014; Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 31 years [Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act]	SECURE DISPOSAL	Yes

4. Curriculum and Extra-Curricular Activities

This section contains retention periods connected to the processes involved in managing the curriculum and extra-curricular activities.

4.1 Statistics and Management Information					
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
4.1.1	Curriculum returns		Current year + 3 years	SECURE DISPOSAL	No
4.1.2	Examination Results (school's copy)		Current year + 6 years	SECURE DISPOSAL	Yes
4.1.2.1	SATS records				Yes
4.1.2.2	Results		The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all of the whole year's SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL	
4.1.2.3	Examination Papers		The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL	
4.1.3	Published Admission Number (PAN) Reports		Current year + 6 years	SECURE DISPOSAL	Yes

4.1	Statistics and Management Information				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
4.1.4	Value Added and Contextual Data		Current year + 6 years	SECURE DISPOSAL	Yes
4.1.5	Self-Evaluation Forms			SECURE DISPOSAL	Yes
4.1.5.1	Internal moderation		Academic year plus 1 academic year	SECURE DISPOSAL	Yes
4.1.5.2	External moderation		Until superseded	SECURE DISPOSAL	Yes

4.2	Implementation of Curriculum				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
4.2.1	Schemes of work		Current year + 3 years	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL	
4.2.2	Timetable		Current year + 3 years		
4.2.3	Class record books		Current year + 3 years		
4.2.4	Mark books		Current year + 3 years		
4.2.5	Record of home-work set		Current year + 3 years		
4.2.6	Pupil's work		Where possible, the pupil's work should be returned to the pupil at the end of the academic year. If this is not the school's policy then current year + 1 year	SECURE DISPOSAL	

**** Note – Changed from IRMS recommendation of 'current year +1 year', to '+3 years' as no Data Protection Issues and required for reference / monitoring purposes***

For information relating to records concerning the running of educational visits outside the classroom please see the guidance provided by https://oeapng.info/

4.3	School Trips				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
4.3.1	Parental consent forms for school trips where there has been no major incident		Although the consent forms could be retained for Date of birth + 22 years, the school may wish to complete a risk assessment to assess whether the forms are likely to be required and could make a decision to dispose of the consent forms at the end of the trip (or at the end of the academic year). This is a pragmatic approach and if in doubt the school should seek legal advice	SECURE DISPOSAL	Yes
4.3.2	Parental permission slips for school trips – where there has been a major incident	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	SECURE DISPOSAL	Yes

4.4 School Support Organisations					
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Family Liaison Officers and Home School Liaison Assistants					
4.4.1	Day books		Current year + 2 years then review	SECURE DISPOSAL	Yes
4.4.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency		Whilst child is attending school and then destroy	SECURE DISPOSAL	Yes
4.4.3	Referral forms		While the referral is current	SECURE DISPOSAL	Yes
4.4.4	Contact data sheets		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL	Yes
4.4.5	Contact database entries		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL	Yes
4.4.6	Group registers		Current year + 2 years	SECURE DISPOSAL	Yes
Parent Teacher Associations and Old Pupils Associations					
4.4.7	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations		Current year + 6 years then review	SECURE DISPOSAL	

5. Central Government and Local Authority

This section covers records created in the course of interaction between the school and local authority

5.1	Local Authority				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
5.1.1	Secondary Transfer Sheets (primary)		Current year + 2 years	SECURE DISPOSAL	Yes
5.1.2	Attendance returns		Current year + 1 year	SECURE DISPOSAL	Yes
5.1.3	School census returns		Current year + 5 years	SECURE DISPOSAL	
5.1.4	Circulars and other information sent from the local authority		Operational use	SECURE DISPOSAL	

5.2	Central Government				
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
5.2.1	OFSTED reports and papers where a physical copy is held		Life of the report then review	SECURE DISPOSAL	
5.2.2	Returns made to central government		Current year + 6 years	SECURE DISPOSAL	
5.2.3	Circulars and other information sent from central government		Operational use	SECURE DISPOSAL	

DISPOSAL PROCESS

This applies to all types of record, whether they are in paper or digital format.

Records which are identified as no longer required for business use should be reviewed under the criteria set out within the retention schedule to ensure only the appropriate records are destroyed. This review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained by the organisation for research or litigation purposes.

All paper records identified as SECURE DISPOSAL should be placed within the schools white secure recycling bags for internal collection and secure shredding using a cross-cut shredder. Alternatively, if a local cross-cut shredded is available they can be shredded accordingly before being placed in the standard green paper recycling bags.

Paper records identified as STANDARD DISPOSAL (which do not contain personal, or sensitive personal, data) can be placed with this schools green recycling bags for internal collection and recycling.

CDs / DVDs / Floppy Disks should be cut into pieces. Audio / Video Tapes and Fax Rolls should be dismantled and shredded. Hard Disks should be dismantled and destroyed or disposed of using a secure and certified data disposal firm.

TRANSFER OF RECORDS TO THE ARCHIVES

Where records have been identified as worthy of permanent preservation, they should be transferred to the school's secure archive file with an appropriate entry placed in the archive log

The records will continue to be managed via the Data Protection Act 2018 and the Freedom of Information Act 2000.

DISPOSAL / TRANSFER LOG

The school will maintain a list of records which have been destroyed, or archived, along with details of the authorising officer. The following details should be recorded:

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