Christ Church C E Primary School

& Early Years Unit

***Christ Church CE Primary School is a Christian community founded on the core values of Friendship, Thankfulness, Peace, Trust, Forgiveness, Compassion and Hope***

**Accepted and agreed by the governing body**

# Records Management and Retention Policy

Reviewed every two years

## Contents:


Statement of intent

1. Legal framework
2. Responsibilities
3. Management of pupil records
4. Retention of pupil records and other pupil-related information
5. Retention of staff records
6. Retention of senior leadership and management records
7. Retention of health and safety records
8. Retention of financial records
9. Retention of other school records
10. Storing and protecting information
11. Accessing information
12. Information audit
13. Disposal of data
14. Monitoring and review

## Statement of intent

**Christ Church CE Primary School** is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible by the appropriate individuals. In line with the requirements of the **General Data Protection Regulations** (**GDPR**) and the **Data Protection Act 2018** (**DPA 2018**), the school also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The school has created this policy to outline how records are stored, accessed, monitored, retained and disposed of, in order to meet the school's statutory requirements.

This document complies with the requirements set out in the **GDPR** and the **DPA 2018**, which came into effect on 25th May 2018. The UK has left the EU and the **UK GDPR** came into force on 1st January 2021. There is no material difference between the two sets of regulations.

The retention periods outlined in this policy are good practice guidelines only, and schools should ensure that they consider requirements specific to their school when implementing these timeframes. The tables for retention periods are based on information provided by the **Information Records Management Society** (IRMS) and are not an exhaustive list of records that may be kept by schools. Where the IRMS has not provided guidance for disposal methods or retention periods, good practice recommendations have been provided in **yellow and bold**.

Signed by:

Miss L Gregory Headteacher Date: March 2025

Mr D Brand

_____ Governor Responsible Date: March 2025

## 1. Legal framework

1.1. This policy has due regard to legislation including, but not limited to, the following:

- Data Protection Act (2018)
- General Data Protection Regulation (2016)
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)

1.2. This policy also has due regard to the following guidance:

- Information Records Management Society 'Information Management Toolkit for Schools' 2019

1.3. This policy will be implemented in accordance with the following school policies and procedures:

- Data Protection Policy
- Freedom of Information Policy
- E-security Policy
- Security Breach Management Plan

## 2. Responsibilities

2.1. The school as a whole has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.

2.2. The **Headteacher** holds overall responsibility for this policy and for ensuring it is implemented correctly.

2.3. The **Data Lead** is responsible for the management of records within school.

2.4. The **DPO** is responsible for promoting compliance with this policy and reviewing the policy on a bi-annual basis, in conjunction with the **Headteacher**.

2.5. The **Data Lead** is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy and are disposed of correctly.

2.6. All staff members are responsible for ensuring that any records for which they are responsible are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

## 3. Management of pupil records

3.1. Pupil records are specific documents that are used throughout a pupil's time in the education system – they are passed to each school that a pupil attends and include all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.

3.2. The following information should be stored on the front of a pupil record, and be easily accessible:

- Forename, surname, gender and date of birth
- Unique Pupil Number (UPN)
- Note of the date when the file was opened
- Note of the date when the file was closed, if appropriate

3.3. It may be useful for the following information to be stored inside the front cover of a pupil record so that it will be easily accessible to authorised staff:

- Names and contact details of adults who have parental responsibility/care for the pupil
- Ethnic origin, religion and first language (if not English)
- Any preferred names
- Position in their family, e.g. eldest sibling
- Emergency contact details and the name of the pupil's doctor
- Any allergies or other medical conditions that are important to be aware of
- Name of the school, admission number, the date of admission and the date of leaving, where appropriate
- Any other agency involvement, e.g. speech and language therapist

3.4. The following information should be stored in a pupil record, and be easily accessible:

- Admission form
- Data Collection/Checking Form – regularly updated to ensure details are accurate
- Record of transfer from Early Years setting (if applicable)
- Details of any SEND: statements, plans, reports etc. (store in separate area of record or in a linked file)

- Medical information relevant to the pupil's on-going education/behaviour (store in separate area of record or in a linked file)
- Any information about an Education, Health and Care (EHC) plan and support offered in relation to the EHC plan (store in separate area of record or in a linked file)
- Annual written report to parents
- National curriculum and agreed syllabus record sheets
- Any notes relating to major incidents or accidents involving the pupil
- Any notes indicating child protection disclosures and reports are held in a separate file
- Any information relating to exclusions fixed or permanent)
- Any correspondence with parents or external agencies relating to major issues, e.g. mental health
- Notes indicating that records of complaints made by parents or the pupil are held separately
- SATS Results, a note of the result should be recorded
- Exam Results – Pupil copy any uncollected certificates should be sent back to the exam board after all reasonable efforts to contact pupil have failed

3.5. The following information is usually subject to shorter retention periods and, therefore, should be stored separately in a personal file for the pupil, they should not be forwarded to the pupil's next school:

- Attendance information
- Absence notes and correspondence
- Medicine consent and administering records
- Copies of birth certificates, passports etc.
- Previous data collection forms which have been superseded (there is no need to retain these)
- Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
- Correspondence with parents about minor issues, e.g. behaviour

3.6. Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in a securely locked filing cabinet **only accessible by the person with responsibility for Safeguarding** – a note indicating this is marked on the pupil's file.

3.7. Hard copies of complaints made by parents or pupils are stored in a secure file only accessible to the **Clerk to the Governors** – a note indicating this is marked on the pupil's file.

3.8. Actual copies of accident and incident information are stored separately on the school's management information system and held in line with the retention periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.

3.9. The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend. Any duplicates or records with a short retention period which may have been included can be removed and securely destroyed.

3.10. Electronic records relating to a pupil's record will also be transferred to the pupils' next school. Section 10 of this policy outlines how electronic records will be transferred.

3.11. The school will not keep any copies of information stored within a pupil's record, unless there is ongoing legal action at the time during which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.

3.12. If any pupil attends the school until statutory school leaving age, the school will keep the pupil's records until the pupil reaches the age of **25 years**.

3.13. Schools must ensure the information is kept secure and traceable during transfer. Records should be delivered or collected in person, with signed confirmation for tracking purposes

3.14. The school will, wherever possible, **avoid** sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by **registered post** or via a reputable and secure courier, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and securely return it to this school.

3.15. If held electronically, records may be sent to a named contact via secure encrypted e-mail, or other secure transfer method.

## 4. Retention of pupil records and other pupil-related information

4.1. The table below outlines the school's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.

4.2. Electronic copies of any information and files will be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|---|---|---|
| **Admissions** | | |
| All records relating to the creation and implementation of the School Admissions Policy | Life of policy plus 3 years then review | Securely disposed of |
| Admissions – if the admission is successful | Date of admission plus 1 year | Securely disposed of |
| Admissions – if the appeal is unsuccessful | Resolution of case plus 1 year | Securely disposed of |
| Register of admissions | Three years after the date on which the entry was made | Information is reviewed and the register may be kept permanently as an archive record |
| **Primary** and **Secondary** school admissions | Current academic year plus 1 year | Securely disposed of |
| Proof of address (supplied as part of the admissions process) | Current academic year plus 1 year | Securely disposed of |
| Supplementary information submitted, including religious and medical information etc. (where the admission was successful) | Added to the pupil file | Securely disposed of |
| Supplementary information submitted, including religious and medical information etc. (where the admission was not successful) | Until the appeals process has been completed | Securely disposed of |

| Pupil's Educational Record | | |
|---|---|---|
| **Please note:** 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**. | | |
| **Primary** Pupil educational record | Whilst the pupil remains at the school | Transferred to the next destination: another Primary school, Secondary school or Pupil Referral Unit (PRU)<br>If to an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period |
| **Secondary** Pupil educational record | 25 years after the pupil's date of birth | Review then securely disposed of |
| Public examination results – pupil copy | Added to the pupil's record | Any uncollected certificates should be returned to the examination board after reasonable attempts to contact the pupil have failed |
| Internal examination results – pupil copy | Added to the pupil's record | Securely disposed of |
| Child protection information held on a pupil's record | Stored in a sealed envelope for the same length of time as the pupil's record.<br>**Note:** These records will be subject to any instruction given by IICSA | Transferred to next school. Any records not transferred should be securely disposed of – must be shredded |
| Child protection records held in a separate file | 25 years after the pupil's date of birth then review. This is provided a principal copy can be found on the LA Social Services record.<br>**Note:** These records will be subject to any instruction given by IICSA | Transferred to next school. If copies are retained, review in line with retention period then securely dispose of – must be shredded |
| **Attendance** | | |

| | | |
|---|---|---|
| Attendance registers | Last date of entry on to the register plus 3 years | Securely disposed of |
| Letters authorising absence | Current academic year plus 2 years | Securely disposed of |
| **SEND** | | |
| SEND files, reviews and Education, Health and Care plans, including advice and information provided to parents regarding educational needs and accessibility strategy | 31 years after the pupil's date of birth (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) | Information is reviewed and the file may be kept for no longer than necessary if it is required for the school to defend themselves in a 'failure to provide sufficient education' case |
| **Curriculum management** | | |
| Curriculum returns | Current year plus 3 years | Securely disposed of |
| Examination Results (school's copy) | Current year plus 6 years | Securely disposed of |
| SATs results | SATS results should be recorded on the pupil's 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 the whole year's SATs results. These could be kept for current year plus 6 years to allow suitable comparison | Securely disposed of |
| Examination papers | Until the appeals/validation process has been completed | Securely disposed of |
| Published Admission Number (PAN) reports | Current academic year plus 6 years | Securely disposed of |
| Valued Added and Contextual data | Current academic year plus 6 years | Securely disposed of |

| | | |
|---|---|---|
| Self-evaluation forms | Current academic year plus 6 years | Securely disposed of |
| Internal moderation | Current academic year plus 1 year | Securely disposed of |
| External moderation | Until superseded | Securely disposed of |
| Schemes of work | Current year plus 1 year | It may be appropriate to review these records at the end of each year and allocate a further retention period then securely dispose of |
| Timetable | Current year plus 1 year | |
| Class record books | Current year plus 1 year | |
| Mark books | Current year plus 1 year | |
| Record of homework set | Current year plus 1 year | |
| Pupils' work | Returned to pupils at the end of the academic year or retained for the current academic year plus 1 year | Securely disposed of |
| **Extra-curricular activities** | | |
| Parental consent forms for school trips where no major incident occurred | Until the conclusion of the trip or end of the academic year depending on school policy | Securely disposed of |
| Parental consent forms for school trips where a major incident occurred | 25 years after the date of birth of the pupil involved in the incident (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils) | Securely disposed of |
| Walking bus registers | Three years from the date of the register being taken | Securely disposed of |

| Family Liaison Officers and Home-school Liaison Assistants | | |
|---|---|---|
| Day books | Current academic year, plus two years | Reviewed and securely disposed of if no longer required |
| Reports for outside agencies (- where the report has been included on the case file created by the outside agency) | Duration of the pupil's time at school | Securely disposed of |
| Referral forms | Whilst the referral is current | Securely disposed of |
| Contact data sheets | Current academic year | Reviewed and securely disposed of if no longer active |
| Contact database entries | Current academic year | Reviewed and securely disposed of if no longer required |
| Group registers | Current academic year plus two years | Securely disposed of |

## 5. Retention of staff records

5.1. The table below outlines the school's retention period for staff records and the action that will be taken after the retention period, in line with any requirements.

5.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|---|---|---|
| **Operational** | | |
| Staff personnel file | Termination of employment, plus six years unless staff member 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 | Securely disposed of |
| Timesheets | Current academic year, plus six years | Securely disposed of |
| Annual appraisal and assessment records | Current academic year, plus six years | Securely disposed of |
| Sickness absence monitoring<br><br>**Note:** Sickness records are categorised as sensitive data | Current academic year, plus six years.<br>There is a legal obligation under statutory sickness pay | Securely disposed of |

| | | |
|---|---|---|
| | to keep records for sickness monitoring. Sickness records should be kept separate from accident records. | |
| Staff training – where the training leads to continuing professional development | This should be retained on the personnel file | Securely disposed of |
| Staff training – except where dealing with children, e.g. first aid or health and safety | This should be retained on the personnel file | Securely disposed of |
| Staff training – where the training relates to children (e.g., safeguarding or other child related training) | Date of the training plus 40 years [This retention period reflects that the IICSA may wish to see training records as part of an investigation] | Securely disposed of |
| **Recruitment** | | |
| Records relating to the appointment of a new Headteacher (unsuccessful candidates) | Date of appointment plus 6 months. | Securely disposed of |
| Records relating to the appointment of a new Headteacher (successful candidate) | Add to personnel file and retain until end of appointment plus six years, except in cases of negligence or claims of child abuse then at least 15 years | Reviewed and securely disposed of |
| Records relating to the appointment of new members of staff (unsuccessful candidates) | Date of appointment of successful candidate, plus six months | Securely disposed of |
| Records relating to the appointment of new members of staff (successful candidates) | Relevant information added to the member of staff's personnel file retain for duration of employment plus 6 years (other information retained for six months) | Securely disposed of |
| DBS certificates | Up to six months | Securely disposed of |
| Proof of identify as part of the enhanced DBS check | After identity has been proven | Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy this will be placed on the staff member's personnel file, if not, securely disposed of |

| | | |
|---|---|---|
| Evidence of right to work in the UK | Added to staff personnel file or, if kept separately, termination of employment, plus at least two years | Securely disposed of |

| **Disciplinary and grievance procedures**<br>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. | | |
|---|---|---|
| Child protection allegations, including where the allegation is unproven<br>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 | Added to staff personnel file, and until the individual's normal retirement age, or 10 years from the date of the allegation (whichever is longer)<br>If allegations are malicious, they should be removed from personnel files | Reviewed and securely disposed of – must be shredded |
| **Note:**<br>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.<br><br>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.<br><br>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 warnings | Date of warning, plus 6 months | Securely disposed of – if placed on staff personnel file, removed from file |

| | | |
|---|---|---|
| Written warning – level 1 | Date of warning, plus 6 months | Securely disposed of – if placed on staff personnel file, removed from file |
| Written warning – level 2 | Date of warning, plus 12 months | Securely disposed of – if placed on staff personnel file, removed from file |
| Final warning | Date of warning, plus 18 months | Securely disposed of – if placed on staff personnel file, removed from file |
| Records relating to unproven incidents | Conclusion of the case, unless the incident is child protection related and is then disposed of as above | Securely disposed of |

## 6. Retention of senior leadership and management records

6.1. The table below outlines the school's retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|---|---|---|
| **Governing Body** | | |
| Agendas for governing board meetings | One copy alongside the original set of minutes – all others disposed of without retention | Securely disposed of |
| Register of attendance at Full governing board meetings | Date of last meeting in the book plus 6 years | Securely disposed of |
| Original, signed copies of the minutes of governing board meetings | Permanent | If unable to store, these will be provided to the **local authority archive service** |
| Inspection copies of the minutes of governing board meetings | Date of meeting, plus three years | Shredded if they contain any sensitive and/or personal information |
| Reports presented to the governing board | Minimum of six years, unless they refer to individual reports – these are kept permanently | Securely disposed of or, if they refer to individual reports, retained with the signed, original copy of minutes |

| | | |
|---|---|---|
| Meeting papers relating to the annual parents' meeting | Date of meeting, plus a minimum of six years | Securely disposed of |
| Instruments of government, including articles of association | Permanent | If unable to store, these will be provided to the **local authority archive service** |
| Trusts and endowments managed by the governing board | Permanent | Retained in the school whilst it remains open, then provided to the **local authority archive service** when the school closes |
| Records relating to the election of parent and staff governors not appointed by the governors | Date of election plus 6 months | Securely disposed of |
| Records relating to the appointment of co-opted governors | If decision has been recorded in the minutes, records relating to the appointment can be destroyed once the co-opted governor has finished their term (except if there have been allegations concerning children). In this case retain for 25 years | Securely disposed of |
| Records relating to the terms of office of serving governors, including evidence of appointment | Date appointment ceases plus 6 years | Securely disposed of |
| Records relating to the appointment of a clerk to the governing body | Date on which clerk appointment ceases plus 6 years | Securely disposed of |
| Records relating to governor declaration against disqualification criteria | Date appointment ceases plus 6 years | Securely disposed of |
| Register of business interests | Date appointment ceases plus 6 years | Securely disposed of |
| Records relating to the training required and received by Governors | Date appointment ceases plus 6 years | Securely disposed of |
| Records relating to the induction programme for new governors | Date appointment ceases plus 6 years | Securely disposed of |
| Governor personnel files | Date appointment ceases plus 6 years | Securely disposed of |

| | | |
|---|---|---|
| Action plans created and administered by the governing board | Duration of the action plan plus three years | Securely disposed of |
| Policy documents created and administered by the governing board | Duration of the policy, plus three years | Securely disposed of |
| Correspondence sent and received by the governing body or head teacher | General correspondence should be retained for current year plus 3 years | Securely disposed of |
| Records relating to Governor Monitoring Visits | Date of the visit plus 3 years | Securely disposed of |
| Records relating to complaints dealt with by the governing board or Headteacher | Date of the resolution of the complaint, plus a minimum of 6 years, for negligence plus 15 years, if child protection or safeguarding issues involved then plus 40 years | Reviewed for further retention in case of contentious disputes, then securely disposed of |
| Annual reports created under the requirements of The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002 | Date of report, plus 10 years | Securely disposed of |
| Proposals concerning changing the status of the school | Date proposal accepted or declined, plus three years | Securely disposed of |
| All records relating to the conversion of schools to Academy status | Permanent | If unable to store, these will be provided to the **local authority archive service** |
| **Headteacher and Senior Leadership Team (SLT)** | | |
| Logbooks of activity in the school maintained by the Headteacher | Date of last entry, plus a minimum of six years | Reviewed and offered to the **local authority archive service** if appropriate |
| Minutes of SLT meetings and the meetings of other internal administrative bodies | Date of the meeting, plus three years | Reviewed annually or as required and securely disposed of |
| Reports created by the Headteacher or SLT | Date of the report, plus a minimum of three years | Reviewed annually or as required and securely disposed of |
| Records created by the Headteacher, deputy Headteacher, heads of year and other members of staff with administrative responsibilities | Current academic year, plus six years | Reviewed annually or as required and securely disposed of |

| | | |
|---|---|---|
| Correspondence created by the Headteacher, deputy Headteacher, heads of year and other members of staff with administrative responsibilities | Date of correspondence, plus three years | Reviewed and securely disposed of |
| Professional development plan | Duration of the plan, plus six years | Securely disposed of |
| School development plan | Duration of the plan, plus three years | Securely disposed of |

## 7. Retention of health and safety records

7.1. The table below outlines the school's retention periods for health and safety records, and the action that will be taken after the retention period, in line with any requirements.

7.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|---|---|---|
| **Health and Safety** | | |
| Health and safety policy statements | Duration of policy, plus three years | Securely disposed of |
| Health and safety risk assessments | Duration of risk assessment, plus three years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred | Securely disposed of |
| Records relating to accidents and injuries at work | Date of incident, plus 12 years. In the case of serious accidents, a retention period of 15 years is applied | Securely disposed of |
| Accident reporting – adults | Date of the incident, plus six years | Securely disposed of |
| Accident reporting – pupils | 25 years after the pupil's date of birth, on the pupil's record | Securely disposed of |
| Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). | Date of incident plus 3 years provided that all records relating to the incident are held on personnel file (see | Securely disposed of |

| | | |
|---|---|---|
| | Health and Safety risk assessments above) | |
| Control of substances hazardous to health (COSHH) | Date of incident, plus 40 years | Securely disposed of |
| Information relating to areas where employees and persons are likely to come into contact with asbestos | Date of last action, plus 40 years | Securely disposed of |
| Information relating to areas where employees and persons are likely to come into contact with radiation | Date of last action, plus 50 years | Securely disposed of |
| Fire precautions log books | Current academic year, plus 3 years | Securely disposed of |

## 8. Retention of financial records

8.1. The table below outlines the school's retention periods for financial records and the action that will be taken after the retention period, in line with any requirements.

8.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|---|---|---|
| **Payroll and Pensions** | | |
| Payroll – gross/net weekly or monthly, Payroll reports, Pay slips (copies). Pension payroll. | Current year plus 6 years | Securely disposed of |
| Payroll awards | Current year plus 6 years | Securely disposed of |
| Absence records | Current year plus 6 years | Securely disposed of |
| Maternity pay records | Current year plus 3 years | Securely disposed of |
| Staff returns | Current year plus 3 years | Securely disposed of |
| Time sheets/clock cards/flexitime | Current year plus 3 years | Securely disposed of |

| | | |
|---|---|---|
| Overtime | Current year plus 3 years | Securely disposed of |
| Part time fee claims | Current year plus 6 years | Securely disposed of |
| Superannuation adjustments and reports | Current year plus 6 years | Securely disposed of |
| National Insurance - schedule of payments | Current year plus 6 years | Securely disposed of |
| Income tax form P60 | Current year plus 6 years | Securely disposed of |
| Tax forms: P6, P11, P11D, P35, P45, P46, P48 | Minimum = current year plus 3 years, recommended = current plus 6. Employees should retain for current year plus 2 years. | Securely disposed of |
| Personal bank details | Until superseded plus 3 years or if employment ceases, end of employment plus 6 years | Securely disposed of |
| Insurance | Current year plus 6 years | Securely disposed of |
| Members allowance register | Current year plus 6 years | Securely disposed of |
| **Risk management and insurance** | | |
| Employer's liability insurance certificate | Closure of the school, plus 40 years (can be kept electronically) | Securely disposed of, passed to LA if school closes |
| **Asset management** | | |
| Inventories of furniture and equipment | Current academic year, plus six years | Securely disposed of |
| Burglary, theft and vandalism report forms | Current academic year, plus six years | Securely disposed of |
| **Accounts and statements including budget management** | | |
| Annual accounts | Current academic year, plus six years | Disposed of against common standards |
| Loans and grants managed by the school | Date of last payment, plus 12 years | Information is reviewed then securely disposed of |
| All records relating to the creation and management of budgets, including the annual budget statement and back- ground papers | Duration of the budget, plus three years | Securely disposed of |

| | | |
|---|---|---|
| Invoices, receipts, order books, requisitions and delivery notices | Current financial year, plus six years | Securely disposed of |
| Records relating to the collection and banking of monies | Current financial year, plus six years | Securely disposed of |
| Records relating to the identification and collection of debt | Current financial year, plus six years | Securely disposed of |
| **Pupil Finance** | | |
| Student Grant applications | Current year plus 3 years | Securely disposed of |
| Pupil Premium Fund records | Date pupil leaves the provision plus 6 years | Securely disposed of |
| **Contract management** | | |
| All records relating to the management of contracts under seal | Last payment on the contract, plus 12 years | Securely disposed of |
| All records relating to the management of contracts under signature | Last payment on the contract, plus six years | Securely disposed of |
| All records relating to the monitoring of contracts | Life of contract plus 6 or 12 years | Securely disposed of |
| **School fund** | | |
| Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books | Current academic year, plus six years | Securely disposed of |
| **School meals** | | |
| Free school meals registers | Current academic year, plus six years | Securely disposed of |
| School meals registers | Current academic year, plus three years | Securely disposed of |
| School meals summary sheets | Current academic year, plus three years | Securely disposed of |

## 9. Retention of other school records

9.1. The table below outlines the school's retention periods for any other records held by the school, and the action that will be taken after the retention period, in line with any requirements.

9.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|---|---|---|
| **Property management** | | |
| Title deeds of properties belonging to the school | Permanent | Transferred to new owners if the building is leased or sold |
| Plans of property belonging to the school | For as long as the building belongs to the school | Transferred to new owners if the building is leased or sold |
| Leases of property leased by or to the school | Expiry of lease, plus six years | Securely disposed of |
| Records relating to the letting of school premises | Current financial year, plus six years | Securely disposed of |
| **Maintenance** | | |
| 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. | Securely disposed of |
| All records relating to the maintenance of the school carried out by school employees, including maintenance logbooks | 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. | Securely disposed of |
| **Operational administration** | | |
| General file series which do not fit under any other category | Current academic year, plus five years | Reviewed then securely disposed of |
| Records relating to the creation and publication of the school brochure and/or prospectus | Current academic year, plus three years | Disposed of against common standards, a copy could be archived |
| Records relating to the creation and distribution of circulars to staff, parents or pupils | Current academic year, plus one year | Disposed of against common standards |

| | | |
|---|---|---|
| Newsletters and other items with short operational use | Current academic year plus one year | Disposed of against common standards |
| Visitor management systems (including electronic systems, visitors' books and signing-in sheets) | Last entry in visitors' book plus six years or current academic year plus six years whichever is greater | Reviewed then securely disposed of |
| Records relating to the creation and management of Parent Teacher Associations and/or Old Pupil Associations | Current academic year, plus six years | Reviewed then securely disposed of |
| Walking bus registers | Date of register plus 6 years | Securely disposed of |
| Subject Access Request | Date of request plus one year | Reviewed then securely disposed of |
| **Local Authority** | | |
| Secondary Transfer Sheets (primary) | Current year + 2 years | Securely disposed of |
| Attendance returns | Current year + 1 year | Securely disposed of |
| School census returns | Current year + 5 years | Securely disposed of |
| Circulars and other information sent from the local authority | Whilst current and relevant | Securely disposed of |
| **Central Government** | | |
| OFSTED reports and papers where a physical copy is held | Life of the report then review | Securely disposed of |
| Returns made to central government | Current year plus 6 years | Securely disposed of |
| Circulars and other information sent from central government | Whilst current and relevant | Securely disposed of |

## 10. Storing and protecting information

10.1. The **DPO** will undertake a risk analysis to identify which records are vital to school management and these records will be stored in the most secure manner.

10.2. The **Data Lead** will ensure a back-up of information on at least a **half termly** basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and to prevent any loss or theft of data.

10.3. Where possible, backed-up information will be stored off the school premises, using a central back-up service.

10.4. Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.

10.5. Confidential paper records are not left unattended or in clear view when held in a location with general access.

10.6. Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site.

10.7. Where data is saved on removable storage or a portable device, the device is kept in a locked and fireproof filing cabinet, drawer or safe when not in use.

10.8. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.

10.9. All electronic devices are password-protected to protect the information on the device in case of theft.

10.10. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.

10.11. Staff and governors do not use their personal laptops or computers for school purposes.

10.12. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

10.13. Emails containing sensitive or confidential information are at least password-protected to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email.

10.14. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

10.15. When sending confidential information by fax, members of staff always check that the recipient is correct before sending.

10.16. Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the GDPR and DPA 2018, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.

10.17. Before sharing data, staff always ensure that:

- They have consent from data subjects to share it.
- Adequate security is in place to protect it.
- The data recipient has been outlined in a privacy notice.

10.18. All staff members will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer, cupboard or safe with restricted access.

10.19. Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.

10.20. The physical security of the school's buildings and storage systems, and access to them, is reviewed **termly** by the **Site Manager** in conjunction with **the Data Lead**. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the **Headteacher** and extra measures to secure data storage will be put in place.

10.21. The school takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.

10.22. The **Data Lead** is responsible for continuity and recovery of data and measures are in place to ensure the security of protected data.

10.23. Any damage to or theft of data will be managed in accordance with the school's **Security Breach Management Plan**.

10.24. The following should be transferred to the next school within 15 school days of receipt of confirmation that a pupil is registered at another school:

- Common Transfer File (CTF) from the School Information Management System via the **school2school** system when used.
- Any elements of the Pupil Record, held in any format, not transferred as part of the CTF.
- SEN or other support service information, including behaviour, as only limited information may be included in the CTF.
- Child Protection information; this must be sent as soon as possible by the Designated Safeguarding Lead (DSL) or a member of their team to their equivalent at the new school.

## 11. Accessing information

11.1. The school is transparent with its data subjects, the information we hold and how it can be accessed.

11.2. All members of staff, parents of registered pupils and other users of the school, e.g. visitors and third-party clubs, are entitled to:

- Know what information the school holds and processes about them or their child and why.
- Understand how to gain access to it.
- Understand how to provide and withdraw consent to information being held.
- Understand what the school is doing to comply with its obligations under the GDPR and DPA 2018.

11.3. All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the GDPR and DPA 2018, to access certain personal data being held about them or their child.

11.4. Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents.

11.5. Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

11.6. The school will adhere to the provisions outlined in the school's **Data Protection Policy** when responding to requests seeking access to personal information.

## 12. Information audit

12.1. **The DPO** will support the school in conducting an information audit on an **annual** basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the GDPR and DPA 2018. This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Microfilm or microfiche
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information

12.2. The information audit may be completed in a number of ways, including, but not limited to:

- Interviews with staff members with key responsibilities – to identify information and information flows, etc.
- Questionnaires to key staff members to identify information and information flows, etc.

- A mixture of the above

12.3. The **DPO** is responsible for validation of the information audit. The information audit will include the following:

- The school's data needs
- The information needed to meet those needs
- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

12.4. The **DPO** will consult with staff members involved in the information audit process to ensure that the information is accurate.

## 13. Disposal of data

13.1. Where disposal of information is outlined as **standard disposal**, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.

13.2. Where disposal of information is outlined as **secure disposal**, this will be shredded or pulped, and electronic information will be scrubbed clean and, where possible, the media used to store the data, physically destroyed. The **Data Lead** will keep a record of all files that have been destroyed.

13.3. Where the disposal action is indicated as **reviewed then securely disposed of**, the **Data Lead** will review the information against its administrative value – if the information should be kept for administrative purposes, the **Data Lead** will keep a record of this.

13.4. If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

13.5. Where information has been kept for administrative purposes, the **Data Lead** will review the information again after a maximum of **three** years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every **three** subsequent years.

13.6. Where information must be kept permanently, this information is exempt from the normal review procedures

## 14. Monitoring and review

14.1. This policy will be reviewed on a **bi-annual** basis by the **DPO** in conjunction with the **Headteacher** – the next scheduled review date for this policy is **March 2027**

14.2. Any changes made to this policy will be communicated to all members of staff and the governing board.