



# MARSH GREEN PRIMARY SCHOOL

## RECORD RETENTION AND DELETION POLICY

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## Controlled Document

|                                           |                                                                                                    |
|-------------------------------------------|----------------------------------------------------------------------------------------------------|
| <b>Title</b>                              | <b>Records Retention and Deletion Policy</b>                                                       |
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| <b>Author</b>                             | Data Protection Enterprise Ltd                                                                     |
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## Version Control

| Version | Date         | Author                                                                                                                       | Description of Change                                      |
|---------|--------------|------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| 1       | 20/01/2022   | Data Protection Enterprise Ltd<br><a href="http://www.dataprotectionenterprise.co.uk">www.dataprotectionenterprise.co.uk</a> | New Policy                                                 |
| 2       | October 2022 | Yvonne Rogers – DPO                                                                                                          | Amendments to schedule                                     |
| 3       | 23/02/2023   | Data Protection Enterprise Ltd<br><a href="http://www.dataprotectionenterprise.co.uk">www.dataprotectionenterprise.co.uk</a> | Policy Review – pupil retention period amended to 31 years |
| 4       | 01/082023    | Data Protection Enterprise Ltd<br><a href="http://www.dataprotectionenterprise.co.uk">www.dataprotectionenterprise.co.uk</a> | Policy Review                                              |

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## **1. THE PURPOSE OF THE RETENTION SCHEDULE**

Under the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018 (DPA 2018) and the Freedom of Information Act 2000 (FOIA), Schools are required to maintain a retention schedule listing the record series which the School creates in the course of its business.

The retention schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use. It also lays down the basis for normal processing under both Data Protection and Freedom of Information legislation.

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

The retention schedule refers to all information, regardless of the media in which they are stored (e.g paper/electronic/microfilm/photographic etc).

## **2. BENEFITS OF A RETENTION SCHEDULE**

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

- a. Managing records in line with best practice guidance fulfils duties under Section 46 Code of Practice on Records Management under the Freedom of Information Act 2000. Retention Guidelines are published so there is clear communication to customers over what information should still be available to them if they wish to make a subject access request. To retain information for too long or to destroy it too soon leaves us open to criticisms on openness and transparency, and in some cases, compliance with the law.
- b. Members of staff can be confident about the safe disposal of information at the appropriate time.
- c. Information which is subject to Freedom of Information and Data Protection legislation will be available when required.
- d. The School is not maintaining and storing information unnecessarily.

Members of staff should be aware that once a Freedom of Information request is received, or a legal hold imposed, then records disposal relating to the request or legal hold must be stopped.

Records which may be required by IICSA (Independent Inquiry into Child Sexual Abuse) should be treated as though they are subject to a legal hold.

## **3. MAINTAINING AND AMENDING THE RETENTION SCHEDULE**

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

Some of the retention periods are governed by statute and if record series are to be kept for longer or shorter periods than laid out in this document then the reason(s) for this need to be documented.

Where there is a recommendation to archive the information, this may be in an electronic format. There is no requirement to convert the information into a hard copy. Such records should be kept in separate electronic folder suitably marked as holding archival material.

#### **4. WHAT TO DO WITH RECORDS ONCE THEY HAVE REACHED THE END OF THEIR ADMINISTRATIVE LIFE**

##### **4a. Destruction of records**

Where records have been identified for destruction, they should be disposed of in an appropriate way. All records containing personal information, or sensitive policy information should be shredded before disposal (if possible). Any other records should be bundled up and disposed of to a wastepaper merchant or disposed of in other appropriate ways.

The Freedom of Information Act 2000 requires the School to maintain a list of records which have been destroyed and who authorised their destruction. Members of staff should record at least:

- File reference (or another unique identifier);
- File title (or brief description);
- Number of files
- The name of the authorising officer

This could be kept in an Excel spreadsheet or other database format.

##### **4b. Transfer of records to the Local Authority**

Where records have been identified as being worthy of permanent preservation, arrangements should be made to transfer the records to the Local Authority.

##### **4c. Transfer of information to other media**

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

#### **5. ALL STAFF**

Everyone is responsible for:

- Following procedures and guidance for managing, retaining and disposing of records.
- Only disposing of records in accordance with the requirements outlined in this policy (if authorised to do so).

- Ensuring that any proposed divergence from the records retention and disposal policies is authorised by the Head Teacher.

## **6. LINKS WITH OTHER POLICIES**

This Records Retention and Deletion Policy is linked to the School:

- Data Protection Policy
- Freedom of Information Policy
- CCTV Policy
- Data Sharing Policy
- Safe-guarding Policy
- GDPR Privacy Notices

## **7. REFERENCES**

- UK General Data Protection Regulation
- Data Protection Act 2018
- Article 8, The Human Rights Act 1998
- Freedom of Information Act 2000
- Code of Practice on Records Management (under Section 46 of the FOIA)

## 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 the end of the administrative life of the record | Personal Information |
| 1.1.1                            | Instruments of government                                                                     |                      | For the life of the School                                                                                                                                                                                                                                                               | Consult local authority before disposal                    |                      |
| 1.1.2                            | Trusts and endowments                                                                         |                      | For the life of the School                                                                                                                                                                                                                                                               | Consult local authority 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 young persons). In this case retain for 31 years | SECURE DISPOSAL                                            | Yes                  |

|               |                                                                                               |  |                                                                                                                                                                                                 |                                                              |           |
|---------------|-----------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-----------|
| <b>1.1.5</b>  | 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       |
| <b>1.1.6</b>  | Scheme of delegation and terms of reference for committees                                    |  | Until superseded or whilst relevant. [If retained for reference purposes in case decisions which need to be justified.]                                                                         | These could be offered to the Local Authority if appropriate |           |
| <b>1.1.7</b>  | Minutes and Agendas                                                                           |  | Paper copies to be retained for 6 years, Governors retain electronic copies for 10 years                                                                                                        |                                                              | Potential |
| <b>1.1.8</b>  | Reports made to the governors' meeting which are referred to in the minutes                   |  | 10 years from the date of the meeting                                                                                                                                                           |                                                              | Potential |
| <b>1.1.9</b>  | Register of attendance at Full governing board meetings                                       |  | 10 years from the date of the meeting (included in minutes)                                                                                                                                     | SECURE DISPOSAL                                              | Yes       |
| <b>1.1.10</b> | Records relating to Governor Monitoring Visits                                                |  | Date of the visit + 3 years                                                                                                                                                                     | SECURE DISPOSAL                                              | Yes       |
| <b>1.1.11</b> | Records relating to complaints made to and investigated by the governing body or head teacher |  | Major complaints: current year + 6 years.<br>If negligence involved, then: current year + 15 years.<br>If student protection or safeguarding issues are involved, then: current year + 15 years | SECURE DISPOSAL                                              | Yes       |
| <b>1.1.12</b> | Correspondence sent and received by the governing body or head teacher                        |  | General correspondence should be retained for current year + 3 years                                                                                                                            | SECURE DISPOSAL                                              | Potential |

|               |                                                                 |  |                                                                                                                                                                                                     |                 |  |
|---------------|-----------------------------------------------------------------|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--|
| <b>1.1.13</b> | Action plans created and administered by the governing body     |  | Until superseded or whilst relevant                                                                                                                                                                 | SECURE DISPOSAL |  |
| <b>1.1.14</b> | Policy documents created and administered by the governing body |  | Until superseded [Consider keeping all policies relating to safeguarding, young person protection or other student 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 the end of the administrative life of the record | Personal Information |
|--------------|-------------------------------------------------------------------------------------------------|----------------------|--------------------------------------------------------------------|------------------------------------------------------------|----------------------|
| <b>1.2.1</b> | Records relating to the appointment of a clerk to the governing body                            |                      | Date on which clerk appointment ceases + 6 years                   | SECURE DISPOSAL                                            | Yes                  |
| <b>1.2.2</b> | Records relating to the terms of office of serving governors, including evidence of appointment |                      | Date appointment ceases + 6 years                                  |                                                            | Yes                  |
| <b>1.2.3</b> | Records relating to governor declaration against disqualification criteria                      |                      | Date appointment ceases + 6 years                                  | SECURE DISPOSAL                                            | Yes                  |
| <b>1.2.4</b> | Register of business interests                                                                  |                      | Date appointment ceases + 6 years                                  | SECURE DISPOSAL                                            | Yes                  |
| <b>1.2.5</b> | Governors Code of Conduct                                                                       |                      | Until Superseded                                                   |                                                            |                      |
| <b>1.2.6</b> | Records relating to the training required and received by Governors                             |                      | Date Governor resigns + 6 years                                    | SECURE DISPOSAL                                            | Yes                  |
| <b>1.2.7</b> | Records relating to the induction programme for new governors                                   |                      | Date appointment ceases + 6 years                                  | SECURE DISPOSAL                                            | Yes                  |
| <b>1.2.8</b> | Records relating to DBS checks carried out on clerk and members of the governing body – DBS     |                      | Held on single central record for term of appointment plus 2 years | SECURE DISPOSAL                                            | Yes                  |

|              |                                          |  |                                   |                 |     |
|--------------|------------------------------------------|--|-----------------------------------|-----------------|-----|
|              | number and date of issue only to be kept |  |                                   |                 |     |
| <b>1.2.9</b> | 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.

| <b>2.1 HEAD TEACHER AND SENIOR MANAGEMENT TEAM</b> |                                                                                                     |                             |                                                                                                             |                                                                                                          |                             |
|----------------------------------------------------|-----------------------------------------------------------------------------------------------------|-----------------------------|-------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------|
|                                                    | <b>Basic file description</b>                                                                       | <b>Statutory Provisions</b> | <b>Retention Period [Operational]</b>                                                                       | <b>Action at the end of the administrative life of the record</b>                                        | <b>Personal Information</b> |
| <b>2.1.1</b>                                       | Logbooks of activity in the School                                                                  |                             | Historical logbooks only kept                                                                               | These could be of permanent historical value and should be offered to the Local Authority if appropriate | Potential                   |
| <b>2.1.2</b>                                       | 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                   |
| <b>2.1.3</b>                                       | Professional development plans                                                                      |                             | These should be held on the individual's personnel record. If not, then termination of employment + 6 years | SECURE DISPOSAL                                                                                          | Potential                   |
| <b>2.1.4</b>                                       | 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 the 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 archive otherwise STANDARD DISPOSAL |                      |
| 2.2.3 | Consents relating to mailings, photographs, social media etc as part of GDPR compliance |                      | Consent will last whilst the student attends the School, it can therefore be destroyed when the student leaves + 12 months | SECURE DISPOSAL                                                          | Yes                  |
| 2.2.4 | Visitor/staff google form                                                               |                      | 6 months                                                                                                                   | SECURE DISPOSAL                                                          | Yes                  |
| 2.2.5 | All School emails                                                                       |                      | 24 months                                                                                                                  | SECURE DELETION – automatic deletion after 2 years.                      | Yes                  |

## 2.3 HUMAN RESOURCES

|                    | Basic file description                                                                   | Statutory Provisions | Retention Period [Operational]                                                                                                                                                                                              | Action at the end of the administrative life of the record | Personal Information |
|--------------------|------------------------------------------------------------------------------------------|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|----------------------|
| <b>RECRUITMENT</b> |                                                                                          |                      |                                                                                                                                                                                                                             |                                                            |                      |
| 2.3.1              | All records leading up to the appointment of a headteacher                               |                      | Unsuccessful -Date of interview plus 6 months.<br>Successful –<br>Add to personnel file and retain until end of appointment + 6 years, except in cases of negligence or claims of young person abuse then at least 15 years | SECURE DISPOSAL                                            | Yes                  |
| 2.3.2              | All records leading up to the appointment of a member of staff – unsuccessful candidates |                      | Date of interview/ application of unsuccessful candidate + 6 months                                                                                                                                                         | SECURE DISPOSAL                                            | Yes                  |

|       |                                                                                                                       |                                                                                                                                         |                                                                                                                                                                                        |                 |     |
|-------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-----|
| 2.3.3 | Pre-employment vetting information – DBS Checks – successful candidates                                               | DBS Update Service Employer Guide June 2014; Keeping Young persons 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 |
| 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]                                                                     | Kept on staff file for term of appointment plus 6 years.                                                                                                                               | SECURE DISPOSAL | Yes |

#### OPERATIONAL STAFF MANAGEMENT

|       | Basic file description | Statutory Provisions            | Retention Period [Operational]                                                                                                                                                                                                        | Action at the end of the administrative life of the record | Personal Information |
|-------|------------------------|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|----------------------|
| 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 |  | Retain on personnel file until termination of employment +6 years | SECURE DISPOSAL | Yes |
| 2.3.8 | Sickness absence monitoring          |  | Retain on personnel file until termination of employment +6 years | SECURE DISPOSAL | Yes |
| 2.3.9 | Staff training record                |  | Retain on personnel file until termination of employment +6 years | SECURE DISPOSAL | Yes |

## DISCIPLINARY AND GRIEVANCE PROCESS

If in any doubt as to which categories disciplinary records fall under, please seek advice from the local authority HR or Legal.

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 then defend him/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.

Care should be taken 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.

## DISCIPLINARY AND GRIEVANCE PROCESSES

|        | Basic file description                                                                           | Statutory Provisions                                                                                                                                                                                                                               | Retention Period [Operational]                                                                                              | Action at the end of the administrative life of the record | Personal Information |
|--------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|----------------------|
| 2.3.10 | Records relating to any allegation of a young person protection nature against a member of staff | 'Keeping young persons safe in education Statutory guidance for Schools and colleges September 2018'<br>'Working together to safeguard young persons. A guide to inter -agency working to safeguard and promote the welfare of young persons 2018' | Until the person's normal retirement age or 10 years from the date of the allegation (whichever is the longer) then REVIEW. | SECURE DISPOSAL These records must be shredded             | Yes                  |
| 2.3.11 | Disciplinary proceedings                                                                         |                                                                                                                                                                                                                                                    |                                                                                                                             |                                                            | Yes                  |
|        | Oral and written first warning                                                                   |                                                                                                                                                                                                                                                    | Valid from date of warning + 6 months. Retain on personnel file                                                             | SECURE DISPOSAL                                            |                      |
|        | Written second warning                                                                           |                                                                                                                                                                                                                                                    |                                                                                                                             |                                                            |                      |
|        | Final warning                                                                                    |                                                                                                                                                                                                                                                    | Valid from date of warning + 18 months. Retain on Personnel file                                                            |                                                            |                      |
|        | Case not found                                                                                   |                                                                                                                                                                                                                                                    | If the incident is related to young person protection see above (2.3.12) Retain on Personnel File                           | SECURE DISPOSAL                                            |                      |

## PAYROLL AND PENSIONS

|        | Basic file description                                                                                                                                           | Statutory Provisions                                                                                                                                                                                                                                                                                                                  | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|--------------------------------------------------------|----------------------|
| 2.3.12 | Car Mileage Output, Income tax form P60, Car Insurance, Maternity Payment, National Insurance, Overtime, Payroll Awards, Payroll, reports, pension, bank details | Taxes Management Act 1970 Income and Corporation Taxes 1988                                                                                                                                                                                                                                                                           | Current year + 6 years         | SECURE DISPOSAL                                        | Yes                  |
| 2.3.13 | Tax Forms P6/P11/ P11D/P35/P45/P46/ P48                                                                                                                          | The minimum requirement as stated in Inland Revenue Booklet 490 – 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                  |

## 2.4 HEALTH AND SAFETY

|       | Basic file description                                                                                       | Statutory Provisions                                                                                                                                                                                | Retention Period                                                                                                                         | Action at the 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 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 Reg 25.<br>Social Security Administration Act 1992 Section 8.<br>Limitation Act 1980<br><br>Allows the information to be kept electronically | All accidents are reported on CPOMS and retained as per 3.2.4                                                                            | SECURE DISPOSAL                                            | Yes                  |
| 2.4.4 | Accident reporting records relating to individuals who are under 18 years of age at the time of the incident | As 2.4.3                                                                                                                                                                                            | As 2.4.3                                                                                                                                 | SECURE DISPOSAL                                            | Yes                  |

|              |                                                                                                                                                                                                                            |                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                 |                 |     |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-----|
| <b>2.4.5</b> | Records relating to any reportable death, injury, disease or dangerous occurrence [RIDDOR]. For more information see <a href="http://www.hse.gov.uk/RIDDOR">www.hse.gov.uk/RIDDOR</a>                                      | Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 S1 2013 No 1471 Regulation 12(2)                                                                                                           | Date of incident + 25 years provided that all records relating to the incident are held on personnel file [see 2.4.2 above]                                                                                                                                                     | SECURE DISPOSAL | Yes |
| <b>2.4.6</b> | Control of Substances Hazardous to Health [COSHH]                                                                                                                                                                          | Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made Regulation 18(2). | Date of incident + 40 years                                                                                                                                                                                                                                                     | SECURE DISPOSAL |     |
| <b>2.4.7</b> | Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos                                                                                                              | Control of Asbestos at Work Regulations 2012 S1012 No 632 Regulation 19                                                                                                                                               | Last action + 40 years                                                                                                                                                                                                                                                          | SECURE DISPOSAL |     |
| <b>2.4.8</b> | <p>Process of monitoring of areas where employees and persons are likely to have come into contact with radiation. Maintenance records or controls, safety features and PPE</p> <hr/> <p>Dose assessment and recording</p> | <p>The Ionising Radiation Regulations 2017. S1 2017 No 1075 Regulation 11</p> <p>As amended by S1 2018 No 390 Personal Protective Equipment [Enforcement] Regulations 2018</p>                                        | <p>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.</p> <hr/> <p>To keep the records made and maintained [or a copy of these records] until the person to who the record</p> | SECURE DISPOSAL |     |

|               |                                                                                                                                                                                |  |                                                                                                                               |                 |  |
|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------|-----------------|--|
|               |                                                                                                                                                                                |  | 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. |                 |  |
| <b>2.4.9</b>  | Fire Precautions Log Books                                                                                                                                                     |  | Current year + 3 years                                                                                                        | SECURE DISPOSAL |  |
| <b>2.4.10</b> | 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 |
|--------------------------------------------------------------|----------------------------------------------------------------------------------|----------------------|---------------------------------------------------------|--------------------------------------------------------|----------------------|
| <b>ACCOUNTS AND STATEMENTS [INCLUDING BUDGET MANAGEMENT]</b> |                                                                                  |                      |                                                         |                                                        |                      |
| <b>2.5.1</b>                                                 | Loans and grants managed by the School                                           |                      | Date of last payment on the loan + 12 years then REVIEW | SECURE DISPOSAL                                        |                      |
| <b>2.5.2</b>                                                 | Records relating to the identification and collection of debt                    |                      | Final payment of debt + 6 years                         | SECURE DISPOSAL                                        |                      |
| <b>STUDENT FINANCE</b>                                       |                                                                                  |                      |                                                         |                                                        |                      |
| <b>2.5.3</b>                                                 | Student Premium Fund records                                                     |                      | Date student leaves the provision + 12 months           | SECURE DISPOSAL                                        | Yes                  |
| <b>CONTRACT MANAGEMENT</b>                                   |                                                                                  |                      |                                                         |                                                        |                      |
| <b>2.5.4</b>                                                 | All records relating to the management of contracts                              | Limitation Act 1980  | Last payment on the contract + 6 years                  | SECURE DISPOSAL                                        |                      |
| <b>SCHOOL FUND</b>                                           |                                                                                  |                      |                                                         |                                                        |                      |
| <b>2.5.5</b>                                                 | Cheque books, paying in books, ledger, invoices, receipts, bank statement, trips |                      | Current year + 6 years                                  | SECURE DISPOSAL                                        |                      |

### 3. STUDENT MANAGEMENT

This section contains retention periods connected to the processes involved in managing a student'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 appeal panels December 2014 | Life of the policy + 3 years then REVIEW                         | SECURE DISPOSAL                                                                                                                                                                                                              |                      |
| 3.1.2 | Admissions – if the admission is successful                                             | As above                                                                                                                                                                  | To be retained whilst the student attends the School + 12 months | SECURE DISPOSAL                                                                                                                                                                                                              | Yes                  |
| 3.1.3 | Register of Admissions                                                                  | As above                                                                                                                                                                  | To be retained whilst the student attends the School + 12 months | REVIEW<br>The School may wish to consider keeping the admission register permanently as an archive record as often Schools receive enquiries from past students to confirm the dates they attended the School or to transfer |                      |

|       |                                                                        |                                                                                                                                                                           |                                                                                                                                  |                                                   |     |
|-------|------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-----|
|       |                                                                        |                                                                                                                                                                           |                                                                                                                                  | these records to the appropriate Local Authority. |     |
| 3.1.4 | Proof 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 appeal panels December 2014 | 12 months if obtained electronically during COVID-19 otherwise proof of address authenticated but documentation not kept on file | SECURE DISPOSAL                                   | Yes |

## 3.2 STUDENT'S EDUCATIONAL RECORD

**PLEASE NOTE:** Any record containing student information may be subject to the requirements of IICSA. The School should implement any instruction which has been received from the IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If unsure about what records should be retained, please seek advice from the Local Authority or take independent legal advice.

### 3.2.1 Student's Educational Record

The Education [Student Information] [England] Regulations 2005 SI 2005 No. 1437 As amended by SI 2018 No. 688

|         |         |  |                                                                                                                       |                                                                                                                                                                                                                                             |     |
|---------|---------|--|-----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 3.2.1.1 | Primary |  | Retain whilst the young person remains at the primary School and for 12 months after transferring then review/destroy | The file should follow the student when he/she leaves the primary School. This will include: <ul style="list-style-type: none"> <li>To another primary School</li> <li>To a secondary School</li> <li>To a student referral unit</li> </ul> | Yes |
|---------|---------|--|-----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|

|                |                                                                                      |                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                  |     |
|----------------|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|-----|
| <b>3.2.2.2</b> | Examination Results                                                                  |                                                                                                                                                                                                                                       | This information should be added to the student file                                                                                                                                                                                                                                                                                                                                                                                                   |                                                  | Yes |
| <b>3.2.3</b>   | Young person Protection - information held on student file                           | 'Keeping young persons safe in education Statutory guidance for Schools and colleges 2018'; 'Working together to safeguard young persons. A guide to inter-agency working to safeguard and promote the welfare of young persons 2018' | If any records relating to young person protection issues are placed on the student file, it should be in a sealed envelope and then retained for the same period of time as the student file. Note: These records will be subject to any instruction given by IICSA                                                                                                                                                                                   | SECURE DISPOSAL. These records must be shredded. | Yes |
| <b>3.2.4</b>   | Young person Protection – information held in electronic management database (CPOMS) | As above                                                                                                                                                                                                                              | Electronic record is transferred to transition School. Paper record forwarded to transition School. If no transition School then keep from DOB of the young person + 31years then REVIEW. This retention period was agreed in consultation with the Safeguarding Young persons 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 | SECURE DISPOSAL                                  | Yes |

|       |                   |  |                                                                                                                                                                               |                 |  |
|-------|-------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--|
|       |                   |  | to any instruction given by IICSA                                                                                                                                             |                 |  |
| 3.2.5 | Last Known school |  | Retain DOB + 31 years. Other support service records can be retained for a longer period of 31 years to enable defence in a 'failure to provide a sufficient education' case. | SECURE DISPOSAL |  |

### 3.3 Attendance

**Please Note:** Any record containing student information may be subject to the requirements of IICSA. The School should implement any instruction which has been received from the IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If unsure about what records should be retained, please seek advice from the Local Authority or take independent legal advice.

|       |                                                                                                                                                                                        |                                                                                                   |                                                                                                                                                                                                                                      |                 |           |
|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-----------|
| 3.3.1 | Attendance Registers                                                                                                                                                                   |                                                                                                   | Kept electronically whilst student attends school plus 12 months.                                                                                                                                                                    | SECURE DISPOSAL | Yes       |
| 3.3.2 | Correspondence relating to any absence [authorised or unauthorised]                                                                                                                    | Education Act 1996 Section 7                                                                      | Kept on student file.                                                                                                                                                                                                                | SECURE DISPOSAL | Potential |
| 3.3.3 | Special Education Needs files, reviews and Education Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy | Young persons and Family's Act 2014; Special Educational Needs and Disability Act 2001 Section 14 | DOB of the student + 31 years [Education, Health and Care Plan is valid until the individual reaches the age of 31 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 process 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 | Assessment Results [School copy] |                      | Current year + 6 years         | SECURE DISPOSAL                                        | Yes                  |

### 4.2 IMPLEMENTATION OF CURRICULUM

|       |                |  |                                                                                                       |                 |  |
|-------|----------------|--|-------------------------------------------------------------------------------------------------------|-----------------|--|
| 4.2.1 | Student's work |  | Where possible, the student's work should be returned to the student at the end of the academic year. | SECURE DISPOSAL |  |
|-------|----------------|--|-------------------------------------------------------------------------------------------------------|-----------------|--|

### 4.3 SCHOOL TRIPS

|       |                                                                                    |                                 |                                                                                                                                                                                             |                 |     |
|-------|------------------------------------------------------------------------------------|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-----|
| 4.3.1 | Parental consent forms for School trips where there has been no major incident     |                                 | Keep for 3 months from date of trip then dispose.                                                                                                                                           | SECURE DISPOSAL | Yes |
| 4.3.2 | Parental permission slips for School trips – where there has been a major incident | Limitation Act 1980 [Section 2] | DOB of the student involved in the incident + 31 years. The permission slips for all the students on the trip need to be retained to show that the rules had been followed for all students | SECURE DISPOSAL | Yes |

## 4.4 SCHOOL SUPPORT ORGANISATIONS

### FAMILY LIAISON OFFICERS AND HOME SCHOOL LIAISON ASSISTANTS

|       |                                                                                                                  |  |                                                                   |                 |     |
|-------|------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------|-----------------|-----|
| 4.4.1 | Reports for outside agencies – where the report has been included on the case file created by the outside agency |  | Whilst young person is attending school then DESTROY              | SECURE DISPOSAL | Yes |
| 4.4.2 | Referral forms                                                                                                   |  | While the referral is current                                     | SECURE DISPOSAL | Yes |
| 4.4.3 | Contact data sheets                                                                                              |  | Current year then REVIEW. If contact is no longer active, DESTROY | SECURE DISPOSAL | Yes |
| 4.4.4 | Contact database entries                                                                                         |  | Current year then REVIEW. If contact is no longer active, DESTROY | SECURE DISPOSAL | Yes |

## 5 CENTRAL GOVERNMENT AND LOCAL AUTHORITY

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

|  | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Information |
|--|------------------------|----------------------|--------------------------------|------------------------------------------------------------|----------------------|
|--|------------------------|----------------------|--------------------------------|------------------------------------------------------------|----------------------|

### 5.1 LOCAL AUTHORITY

|       |                                                               |  |                        |                 |  |
|-------|---------------------------------------------------------------|--|------------------------|-----------------|--|
| 5.1.1 | School census                                                 |  | Current year + 5 years | SECURE DISPOSAL |  |
| 5.1.2 | Circulars and other information sent from the Local Authority |  | Operational Use        | SECURE DISPOSAL |  |

### 5.2 CENTRAL GOVERNMENT

|       |                                                              |  |                                |                 |  |
|-------|--------------------------------------------------------------|--|--------------------------------|-----------------|--|
| 5.2.1 | OFSTED reports and papers if 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 |  |