

## Records Management Policy

Policy Code:	HR33
Policy Start Date:	March 2018 (reviewed July 2018)
Policy Review Date:	March 2021

Please read this policy in conjunction with the policies listed below:

- Finance Manual
- HR6 Data Protection Policy
- IRMS Information Management Toolkit for Schools – Version 5 – 1<sup>st</sup> February 2016
- HR6A Data Breach Policy
- HR12 Staff Disciplinary Policy
- HR33 Records Managements Policy
- HR36 Complaints Policy
- ICT2 E-Safety Policy
- SW5 Safeguarding and Child Protection (Promoting Students Welfare) Policy

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## **1 Policy Statement**

- 1.1 The aim of this policy is to ensure that The Priory Federation of Academies Trust (hereafter known as the Trust) manages a record through its life cycle from creation or receipt, through maintenance and use to final disposal (for destruction, transfer or permanent retention).

As a public body, the Trust is required by law to manage records appropriately. Legislation such as the Data Protection Act 1998 (to be replaced by the General Data Protection Regulation May 2018), Freedom of Information Act 2000 and Environmental Information Regulations 2004 set out specific requirements in relation to the creation and management of records.

The policy aims to ensure that all Trust staff, governors, trustees, elected members, partners, suppliers and stakeholders are aware of what they must do to manage records in an effective and efficient way.

- 1.2 This policy does not form part of any employee's contract of employment and it may be amended at any time.
- 1.3 Wherever referred to, Academy or Trust throughout this policy includes The Robert De Cheney Boarding House at The Priory Academy LSST, the Keyworth Centre at The Priory City of Lincoln Academy, the Early Years Setting at The Priory Witham Academy, Priory Training and the French Centre

## **2 Roles, Responsibility and Implementation**

- 1.1 The Pay, Performance and HR Committee has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. This committee delegates day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Human Resources Director.
- 1.2 Leaders and Managers have a specific responsibility to ensure the fair application of this policy and all employees are responsible for supporting colleagues and ensuring its success.

## **3 Aims**

- 3.1 Maintaining appropriate and effective records management practices will help the Trust to deliver and meet our statutory duties. By adopting this policy the Trust aims to ensure that the record, in whatever form it takes, is accurate, reliable, ordered, complete, useful, up to date and accessible whenever it is needed.

- 3.2 By adhering to good record management principles, the Trust shall benefit from:
- Records being easily and efficiently located, accessed and retrieved;
  - Information being better protected and securely stored;
  - Records being disposed of safely and at the right time;
  - Reduced corporate risk through compliance with relevant legislation.

## **4 Scope**

- 4.1 This policy shall apply to the management of records in all technical or physical formats or media, created or received by the Trust in the conduct of its business activities.
- 4.2 This policy applies to all Trust employees (both permanent and temporary), contractors, consultants, volunteers, secondees, elected members, governors, trustees, partners, suppliers and stakeholders who have access to records, wherever these records may be located.

## **5 Definitions**

- 5.1 **Record:** A record is recorded information, in any form, including data in systems, produced or received and then kept in order to support and/or give evidence of an activity. Since a record is recorded information, no record may be modified.
- 5.2 **Format:** A record can be in any format including (but not limited to): paper filed, email, audio/visual, electronic documents, systems data, databases, digital images and photographs.
- 5.3 **Records Management:** The control of records during their lifetime, from creation to storage and retention until the eventual archival preservation or destruction.
- 5.4 **Records Creator:** The person that produces and receives and then keeps them in its record-keeping system.
- 5.5 **Record-Keeping System:** System or procedures by which the records are created, captured, secured, maintained and disposed.
- 5.6 **Records Declaration:** The process through which records are identified as such and distinguished by other information that is not to be regarded as recorded information.

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- 5.7 **Official Copy:** The official copy of a record is the copy intended to give evidence of the activity supported by the record and therefore, if need be, is the one to be submitted to public authorities and other stakeholders and partners.
- 5.8 **Convenience Copy:** A convenience copy of a record is a copy of a record created for the convenience of the records creator or of someone working for the records creator e.g. to give him/her quicker access to the information contained in the record.
- 5.9 **Primary Responsibility:** The primary responsibility over a record identifies which organisational unit/person is in charge of keeping the official copy of a record and deciding about specific issues concerning its management.
- 5.10 **Vital Records:** Records without which an organisation would be unable to function, or to prove that a key activity has taken place.
- 5.11 **EDRMS:** The Trust's Electronic Documents and Record Management System. The EDRMS may be made up of one or more IT platforms.

## 6 Official Copies of Records

- 6.1 There shall be only one official copy of each corporate record.
- 6.2 If there are two records identical to each other to be kept by the Trust in order to give evidence of two different corporate processes, they shall be considered as two separate records, each one associated with its specific features i.e. retention and disposal schedule, file plan code etc. For example, an employee performance report kept both in the personal staff member file of the employee and in a litigation file involving the same employee.

## 7 Modifying Records

- 7.1 Records shall not be modified.
- 7.2 A new record shall be produced if the information contained in a record is to be corrected, amended or added.
- 7.3 This former record is to be kept in compliance with the relevant retention and disposal schedule.

## 8 Access to Records

- 8.1 Records shall only be accessed by staff for a business purpose.

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- 8.2 Records shall only be disseminated to members of the public in line with the relevant legislation framework and with any other relevant Trust policy and procedure.
- 8.3 Access to the Trust records which contain personal data shall be granted (exemptions apply) in accordance with The Trust's Subject Access Request procedure (see section 15).

## **9 Storing Records**

- 9.1 Records shall be kept in a condition so as to ensure continuing authenticity, accessibility, retrievability, intelligibility and usability throughout their whole life-cycle (including, for those selected for long-term or permanent retention, the period when they are kept in the archives).

## **10 Retention and Disposal**

- 10.1 The retention and disposal schedules are taken from the Information Management Toolkit for Schools. Records shall be associated with their relevant retention and disposal schedule, (refer to appendix 1 for the retention and disposal schedules).
- 10.2 The Trust's retention and disposal schedules shall comply with all relevant UK statutory (including all HMRC) provisions currently in force and must be modified as appropriate.
- 10.3 The Trust's retention and disposal schedules shall identify the type of record held; the length of time each record is retained; and the way each record is to be disposed of (in some cases records are to be retained permanently).
- 10.4 The retention and disposal schedules shall be associated with the Trust corporate file plan in order to better identify the series, groups and types of records which each retention and disposal schedule applies to.
- 10.5 A Head of Service, who has primary responsibility over the record, shall be required to authorise a change to the retention or disposal schedule following the expiration of a record. If it is in contrast with the original schedule, the reason for the change needs to be documented.
- 10.6 Legal provisions shall take precedent over proposed modifications.
- 10.7 The Trust shall ensure that retention and disposal schedules are available to all staff and those managing access to the Trust records.

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## **11 Destruction of Records**

- 11.1 If provided by the relevant retention and disposal schedules, corporate records are to be destroyed when their retention periods expire.
- 11.2 Before destroying any record, it is necessary to verify that there are no specific circumstances that may prevent the destruction, such as legal holds (issued by a Court) or new business needs e.g. the record might be useful to support either legal defence or another corporate activity.
- 11.3 Destruction of corporate records shall be authorised in writing by the relevant manager, or authorised deputy, of the service area which has primary responsibility over them.
- 11.4 The service area which has primary responsibility over the records shall ensure all existing copies of the records are destroyed, regardless of format and location.
- 11.5 Destruction of records shall be recorded on a Disposal Register (a template is available from HR). The register is to be kept in digital format by the service and a copy sent to the Human Resources Department.
- 11.6 Paper records are to be destroyed by using the corporately provided lockable confidential disposal bins or confidential waste bags or by shredding the record using a cross cut shredder.
- 11.7 Confidential waste bags and lockable bins must be kept in a location not accessible to the public. Confidential waste bags are to be held and secured at all times to prevent unauthorised access.
- 11.8 Microforms, microfiches, microfilms and non-digital photos must be kept separate from paper records and placed in confidential waste bags reserved just for them.
- 11.9 Electronic records kept in a corporate application shall be deleted using the functionality within the application.
- 11.10 Sanitisation procedures for ICT storage media holding electronic records which includes optical, magnetic and solid state storage media vary with the media type, but typical methods include overwriting, degaussing and physical destruction. Advice shall be sought from the Information Governance Team when considering the destruction of such media.

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11.11 In all instances where ICT storage media is destroyed, a certificate of destruction shall be provided and held as a permanent record by the relevant service area.

## **12 Convenience Copies of Records**

Corporate retention and disposal schedules do not apply to convenience copies, which are to be destroyed as soon as they are no longer needed to facilitate the work of the person who has produced them.

## **13 Corporate Record-Keeping System (RKS)**

13.1 There shall be an adequate and appropriate allocation of resources by The Trust to maintain its corporate records.

13.2 The Trust shall ensure that corporate records are arranged and identified through the use of a corporate file plan, which also associates them with the relevant retention and disposal schedules.

13.3 The Trust shall ensure records kept are protected from damaging elements such as water, light, temperature, fire, humidity, infestation, digital viruses, power failures, information leakages and security breaches.

13.4 Any Trust off-site storage system shall be considered to be part of the global RKS. Records kept in off-site storage systems shall be managed in compliance with the provisions of this policy.

13.5 The inclusion of a document or a dataset inside the RKS shall amount to declaring it as a record.

13.6 The RKS shall identify and properly keep the official copy of any record.

13.7 Convenience copies of a record are not part of RKS, but shall be managed in compliance with relevant legislation e.g. Data Protection Act 1998 (replaced by GDPR in May 2018), Freedom of Information Act 2000, and provisions concerning legal holds.

13.8 The Trust's Electronic Documents and Record Management System (EDRMS) shall be the primary resource of The Trust's RKS.

13.9 It shall be used to store, manage and keep The Trust's digital records. If the EDRMS consists of more than one IT platform relationships between groups of records shall be highlighted and described through appropriate elements of information.

13.10 It shall be used as the reference point for The Trust's corporate analogue records by indicating in the EDRMS any other record or aggregation of records existing in analogue format. Document Reference: V2.4 Records Management Policy Page 9.

13.11 It shall be used as a reference point for any other digital record not kept in the EDRMS by indicating in the EDRMS any other digital record or aggregation of record existing outside the EDRMS.

13.12 It shall be used as a reference point for corporate records kept in off-site storage systems (including archives records), in the same way as specified at point 13.8 and 13.9.

## **14 Data Protection**

14.1 The Trust shall ensure all records which contain personal data are processed in accordance with the Data Protection Act 1998 and the Data Protection Act 2018.

14.2 The Trust shall ensure a Data Protection Policy is available to all Staff.

## **15 Subject Access Requests (SARs)**

15.1 The Trust shall ensure that it complies with its obligations under GDPR in regards to any SARs.

15.3 The Trust shall ensure that it maintains a framework for the administration of requests under the GDPR and subsequent responses.

15.4 For further information or to submit an SAR, please email [SAR@prioryacademies.co.uk](mailto:SAR@prioryacademies.co.uk). For further details of the process please refer to HR6 Data Protection Policy.

## **16 Information Security**

16.1 The Trust shall ensure appropriate security controls are applied to records.

16.2 The Trust shall ensure an HR5 ICT Acceptable Use Policy is available to all staff.

## **17 Policy Changes**

17.1 This policy may only be amended or withdrawn by The Priory Federation of Academies Trust.





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## **The Priory Federation of Academies Trust Records Management Policy**

This Policy has been approved by the Priory Federation of Academies Pay, Performance and HR Committee:

Signed..... Name..... Date:

Trustee

Signed..... Name..... Date:

Chief Executive Officer

Signed..... Name..... Date:

Designated Member of Staff

Please note that a signed copy of this agreement is available via Human Resources.

**Appendix 1 – Retention Periods** (Adapted from Information Management Toolkit for Schools).

Please note, all files relate to any documents/records saved electronically and in paper format. At present, child protection records must not be destroyed. The retention of such records will be subject to any future instruction given by the national Independent Inquiry into Child Sexual Abuse (IICSA).

<b>1.1 Governing Body</b>					
	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative Life of the record</b>
1.1.1	Agendas for Governing Body Meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of.	Secure Disposal (1)
1.1.2	Minutes of Governing Body Meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff			
	Principle Set (Signed)			PERMANENT	
	Inspection Copies (2)			Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the report deals with confidential issues relating staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to the individual reports then the report should be kept permanent	Secure disposal or retain with the signed set of the minutes
1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	Secure Disposal

1. In this context secure disposal should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using cross cut shredder.
2. These are the copies which the clerk to the Governor may wish to retain so that requestors can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

<b>1.1 Governing Body</b>					
	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative Life of the record</b>
1.1.5	Instruments of Government including Articles of Association	No		Permanent	These should be retained in the school whilst the school is open
1.1.6	Trusts and Endowments managed by the Governing Body	No		Permanent	These should be retained in the school whilst the school is open
1.1.7	Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years	Secure disposal
1.1.8	Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years	Secure disposal
1.1.9	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	Secure disposal
1.1.10	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amended) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of the report + 10 years	Secure disposal
1.1.11	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date of the proposal accepted or declined + 3 years	Secure disposal
1.1.12	Governor Personnel Records	Yes		Term of office plus 6 years	Secure disposal

<b>1.2 Head Teacher and Senior Management Team</b>					
	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative Life of the record</b>
1.2.1	Log books of activity in the school maintained by the head teacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be a permanent historical value and should be offered to the country Archives Service of appropriate.
1.2.2	Minutes of Senior management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then review	Secure Disposal
1.2.3	Reports created by the Head teacher or the management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then review	Secure Disposal
1.2.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be date protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then review	Secure Disposal
1.2.5	Correspondence created by head teachers, deputy head teacher, heads of year and other members of staff with administrative responsibilities.	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of Correspondence + 3 Years the review	Secure Disposal
1.2.6	Professional Development plans	Yes		Life of plan + 6 years	Secure disposal
1.2.7	School Development Plans	No		Life of plan + 3 years	Secure Disposal

<b>1.3 Admissions Process</b>					
	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative Life of the record</b>
1.3.1	All records relating to the creation and implementations of the School Admissions' Policy	No	School admission code statutory guidance for admission authorities, governing bodies, local authorities, schools and adjudicators and admission appeals December 2014	Life of the policy + 3 years then review	Secure disposal
1.3.2	Admissions – if the admission is successful	Yes	School Admission Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Date of admission + 1 year	Secure disposal
1.3.3	Admissions – if the admission if unsuccessful	Yes	School Admissions code statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeal panels December 2014	Resolution of case + 1 year	Secure Disposal
1.3.4	Register of admissions	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of three years after the date on which the	Review Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended school.

				entry was made (3)	
1.3.5	Admissions- Secondary Schools- Casual	Yes		Current year + 1 Year	Secure Disposal
<b>1.3 Admissions Process</b>					
	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative Life of the record</b>
1.3.6	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Current year + 1 year	Secure Disposal
1.3.7	Supplementary Information form including additional information such as religion, medical conditions etc.	Yes			
	For successful admissions			This information should be added to the pupil file	Secure Disposal
	For Unsuccessful Admissions			Until appeals process completed	Secure Disposal

(3)School attendance: departmental advice from maintained schools, academies, independent schools and local authorities October 2014 p6

<b>1.4 Operational Administration</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
1.4.1	General file series	No		Current year +	Secure Disposal

				5 years the review	
1.4.2	Records relating to the creation and publication of the school brochure and prospectus	No		Current year + 3 years	Standard disposal
1.4.3	Record relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	Standard disposal
1.4.4	Newsletters and other items with a short operational use	No		Current year + 1 year	Standard disposal
1.4.5	Visitors' books and signing in sheets	Yes		Current year + 2 years then Review	Secure Disposal
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then Review	Secure Disposal
1.4.7	Contractor Administration – names, contact details and addresses are held	Yes		Length of the contract + 5 years	Secure Disposal

## 2. Human Resources

This section deals with all matters of Human Resources management with the school.

2.1 Recruitment					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
2.1.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years	Secure Disposal
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment + 6 months	Secure Disposal
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All relevant information should be added to the	Secure Disposal

				staff personal file (see below) and all other information retained for 6 months.	
2.1.4	Pre-employment vetting information-DBS checks	No		The Academy should not keep a copy of DBS certificates, they should be checked and the disclosure number recorded on the SCR.	
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure.	Yes		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file.	
2.1.7	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	An employer’s guide to right to work checks [Home Office May 2015]	Where possible these documents should be added to the staff Personal File [see below], but if they are kept separately then the Home	



				office requires that the documents are kept for termination of Employment plus not less than two years.	
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2.2 Operational Staff Management					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
2.2.1	Staff personal files	Yes	Limitation Act 1980 (section 2)	Termination of Employment + 6 years	Secure Disposal
2.2.2	Timesheets	Yes		Current year + 6 years	Secure Disposal
2.2.3	Annual appraisals/assessment records	Yes		Current year + 6 years	Secure Disposal

2.3 Management of Disciplinary and Grievance processes					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	“Keeping children safe in Education statutory guidance for schools and colleges March 2015”; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children Mark	Until the person’s normal retirement age or 10 years from the date of the allegation whichever is the longer then Review. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy	These records must be shredded

				provided to the person concerned.	
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2.3.2	Disciplinary proceedings	Yes			
	Oral warning			Date of warning(6) + 6 months	Secure Disposal [if warnings are placed on personal files then they must be weeded from the file]
	Written warning – level 1			Date of warning + 6 months	
	Written warning – level 2			Date of warning + 12 months	
	Final warning			Date of warning + 18 months	
	Case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	Secure Disposal

<b>2.4 Health and Safety</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
2.4.1	Health and Safety Policy Statements	No		Life of policy + 3 years	Secure disposal
2.4.2	Health and Safety risk Assessments	No		Life of risk assessment + 3 years	Secure disposal
2.4.3	Records relating to accident/injury at work	Yes		Date of incident + 12 years. In the case of serious accidents a further retention period will need to be applied	Secure disposal
2.4.4	Accident reporting	Yes	Social Security (Claims and payments) regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
	Adults			Date of the incident + 6 years	Secure Disposal

	Children			DOB of child + 25 years	Secure disposal
2.4.5	Control of substances hazardous to Health (COSHH)	No	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)	Last action + 40 years	Secure disposal
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work regulations 2012 SI1012 No 632 19	Last action +40 years	Secure disposal

4. Employers are required to take a clear copy of the document which they are shown as part of this process

2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	Secure disposal
2.4.8	Fire precautions log books	No		Current year + 6 years	Secure disposal

<b>2.5 Payroll and Pensions</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
2.5.1	Maternity pay records	Yes	Statutory maternity pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 6 years	Secure disposal
2.5.2	Records held under Retirement Benefits Schemes (Information powers) Regulations 1995	Yes		Current year + 12 years	Secure disposal

### 3. Financial Management of the School

This section deals with all aspects of the financial management of the school including the administration of school meals

3.1 Risk Management and Insurance					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
3.1.1	Employer's liability Insurance certificate	No		Closure of the school + 40 years	Secure disposal

3.2 Asset Management					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	Secure Disposal
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years	Secure Disposal

5. This review took place as the independent inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the inquiry completed. This section will be then reviewed again to take into account any recommendations the inquiry might make concerning record retention. 6. Where the warning relates to child protection issues see above, if the disciplinary proceeding relate to a child protection matter please contact your Safeguarding Children Officer for further advice.

<b>3.3 Accounts and Statements including Budget management</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
3.3.1	Annual Statements	No		Current year + 6 years	Standard Disposal
3.3.2	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then review	Secure disposal
3.3.3	Student Grant applications	Yes		Current year + 6 years	Secure Disposal
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of budget + 6 years	Secure Disposal
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	Secure Disposal
3.3.6	Records relating to the collection and banking of monies	No		Current financial year + 6 years	Secure Disposal
3.3.7	Records relating to the identification and collection of debt	No		Current financial year + 6 years	Secure Disposal

<b>3.4 Contract Management</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	Secure disposal
3.4.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	Secure Disposal
3.4.3	Records relating to the monitoring of contracts	No		Current year + 6 years	Secure Disposal

<b>3.5 School Fund</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
3.5.1	School Fund – Cheque books	No		Current year + 6 years	Secure Disposal
3.5.2	School Fund – paying in books	No		Current year + 6 years	Secure Disposal
3.5.3	School Fund – ledger	No		Current year + 6 years	Secure Disposal

3.5.4	School Fund – invoices	No		Current year + 6 years	Secure Disposal
3.5.5	School Fund – receipts	No		Current year + 6 years	Secure Disposal
3.5.6	School Fund – Bank Statements	No		Current year + 6 years	Secure Disposal
3.5.7	School Fund – Journey Books	No		Current year + 6 years	Secure Disposal

<b>3.6 School Meals Management</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
3.6.1	Free School Meals Registers	Yes		Current year + 6 years	Secure Disposal
3.6.2	School Meal Registers	Yes		Current year + 6 years	Secure Disposal
3.6.3	School Meal Summary Sheets	No		Current year + 6 years	Secure Disposal

#### **4. Property Management**

This section covers the management of buildings and property.

<b>4.1 Property Management</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
4.1.1	Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry	
4.1.2	Plans of property belong to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	Secure disposal
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	Secure disposal

4.2 Maintenance					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	Secure Disposal
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No		Current year + 6 years	Secure Disposal

## 5. Pupil Management

This section includes all records which are created during the time a pupil spends at the school. For information about accident reporting see under Health and Safety above.

5.1 Pupil's Educational Record					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education(Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	Primary			Retain whilst the child remains at the primary school	<p>The file should follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> <li>To another primary school</li> <li>To a secondary school</li> <li>To pupil referral unit</li> <li>If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period.</li> </ul> <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the</p>



					statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It make more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority.
	Secondary		Limitation Act 19080 (Section 2)	Date of birth of the pupil + 25 years	Secure Disposal
5.1.2	Examination Results – Pupil copies	Yes			
	Pupil			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	Internal			This information should be added to the pupil file	
<b>This review took place as the Independent Inquiry on child Sexual abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the inquiry is completed. This section will then be reviewed again to take into account any recommendations the inquiry might make concerning record retention.</b>					
5.1.3	Child protection information held on pupil file	Yes	“Keeping Children safe in Education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency work to safeguard and promote the welfare of children March 2015”	If any record relating to the child protection issues are placed on the pupil file, it should be in sealed envelope and the retained for the same period of time as the pupil file.	Secure disposal – these MUST be shredded.
5.1.4	Child protection information held in separate files	Yes	“Keeping Children Safe in Education Statutory guidance for schools and colleges March 2015”; Working together to a safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”.	DOB of the child + 25 years then review. This retention period was agreed in consultation with the safeguarding Children Group on the understanding that the principle copy of this information will be found on the Local Authority Social Services record.	Secure Disposal – these records MUST be shredded

Retention periods relating to allegation made against adults can be found in the Human Resources section of this retention schedule.

<b>5.2 Attendance</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
5.2.1	Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	Secure Disposal
5.2.2	Correspondence relating to authorized absence		Education Act 1996 Section 7	Current academic year + 2 years	Secure Disposal

<b>5.3 Special Educational Needs</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (section2)	Date of Birth of the pupil + 31 years	REVIEW NOTE: This retention period file should be kept. Some authorities choose to SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement.	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of Birth of the pupil + 25 years (this would normally be retained on the pupil file).	Secure disposal unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years (this would normally be retained on the pupil file)	Secure Disposal unless the document is subject to a legal hold
5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001	Date of birth of the pupil + 25 years (this would	Secure disposal unless the document is subject to a legal hold

			Section 14	normally be retained on the pupil file)	
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## 6. Curriculum Management

6.1 Statistics and Management Information					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
6.1.1	Curriculum returns	No		Current Year + 3 years	Secure Disposal
6.1.2	Examination Results (Schools Copy)	Yes		Current year + 6 years	Secure Disposal
	SATS records	Yes			
	Results			The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years.	Secure Disposal
	Examination Papers			The examination papers should be kept until any appeals/validation process is complete	Secure Disposal
6.1.3	Published Admission Number (PAN) reports	Yes		Current year +6 years	Secure Disposal
6.1.4	Value added and contextual Data	Yes		Current year + 6 years	Secure Disposal
6.1.5	Self Evaluation Forms	Yes		Current year + years	Secure Disposal

6.2 Implementation of Curriculum					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
6.2.1	Schemes of Work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or secure disposal
6.2.2	Timetable	No		Current year + 1 year	
6.2.3	Class Record Books	No		Current year + 1 year	
6.2.4	Mark Books	No		Current year + 1 year	
6.2.5	Record of homework	No		Current year + 1 year	
6.2.6	Pupil's Work	No		Where possible pupil's work should be returned to the pupil at	Secure Disposal

				the end of the academic year if this is not the school's policy then current year + 1 year	
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## 7. Extra Curriculum Activities

7.1 Educational Visits outside the Classroom					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – primary schools	No	Outdoor education Advisers' panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically Section2 – “Legal Framework and Employer Systems” and Section 4 – “Good Practice”.	Date of visit + 14 years	Secure Disposal
7.1.2.	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Outdoor Education Advisers' Panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 – “Legal Framework and Employer Systems” and Section4 – “Good Practice”.	Date of visit + 10 years	Secure Disposal
7.1.3	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB _ 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years. The permission slips for all	

				the pupils on the trip need to be retained to show the rules had been followed for all pupils	
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<b>7.2 Walking Bus</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
7.2.1	Walking Bus Registers	Yes		Sate of register + 3 years This takes into account the fact that is there is an incident requiring and accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting	Secure Disposal (if these records are retained electronically any back up copies should be destroyed at the same time).

<b>7.3 Family Liaison Officers and Home School Liaison Assistants</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
7.3.1	Day books	Yes		Current year +2 years then review	
7.3.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school then destroy	
7.3.3	Referral forms	Yes		While the referral is current	
7.3.4	Contact data sheets	Yes		Current year the review, if contact is no longer active then destroy	
7.3.5	Contact database entries	Yes		Current year then	

				review, if contact is no longer active then destroy	
7.3.6	Group registers	Yes		Current year + 2 years	

## 8. Central Government and Local Authority

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

8.1 Local Authority					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
8.1.1	Secondary Transfer Sheets (primary)	Yes		Current year + 2 years	Secure Disposal
8.1.2	Attendance Returns	Yes		Current year + 1 year	Secure Disposal
8.1.3	School Census Returns	No		Current year + 5 years	Secure Disposal
8.1.4	Circulars and other information sent from the Local Authority	NO		Operational Use	Secure Disposal

8.2 Central Government					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
8.2.1	OFSTED reports and papers	No		Life of the report then Review	Secure Disposal
8.2.2	Returns made to central Government	No		Current year + 6 years	Secure Disposal
8.2.3	Circulars and other information send from central government	NO		Operational use	Secure disposal

## 9. Early Years Provision

9.1					
	Basic File Description	Data protection Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record

9.1.1	The name, home address and date of birth of each child who is looked after on the premises	Yes		Closure of setting + 50 years (these could be required to show whether or not an individual child attended the setting in a child protection investigation)	Secure Disposal
9.1.2	The name, home address and telephone number of a parent of each child who is looked after on the premises	Yes		If this information is kept in the same book or on the same form as in 9.1.1 then the same retention period should be used as 9.1.1. If the information is stored separately, then destroy once the child has left the setting (unless the information is collected for anything other than emergency contact)	Secure Disposal
9.1.3	The name, address and telephone number of any person who will be looking after children on the premises	Yes		See 2.2.1	Secure Disposal
9.1.4	A daily record of the names of children looked after on the premises, their hours of attendance and the names of the persons who looked after them	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003	The regulations say that these records should be kept for 2 years. If these records are likely to be needed in a child protection setting (see 9.1.1) then the records should be retained for closure of the setting + 50 years	Secure Disposal
9.1.5	A record of accidents occurring on the premises and the incident books relating to other incidents	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003	DOB of the child involved in the accident or the incident + 25 years. If an adult is injured then the accident book must be kept for 7 years from	Secure Disposal

9.1.6	A record of any medicinal product administered to any child on the premises, including the date and circumstances of its administration, by whom it was administered, including medicinal products which the child is permitted to administer to himself, together with a record of parent's consent	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003	the date of the incident DOB of the child being given/taking the medicine + 25 years	Secure Disposal
9.1.7	Record of transfer	Yes		One copy is to be given to the parents, one copy transferred to the Primary School where the child is going	Secure Disposal
9.1.8	Portfolio of work, observations and so on	Yes		To be sent home with the child	Secure Disposal
9.1.9	Birth certificates	Yes		Once the setting has had sight of the birth certificate and recorded the necessary information the original can be returned to the parents. There is no requirement to keep a copy of the birth certificate	Secure Disposal

<b>9.2</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
9.2.1	The name and address and telephone number of the registered person and every other person living or employed on the premises	Yes		See 2.2	Secure Disposal
9.2.2	A statement of the procedure to be followed in the event of a fire or accident	No		Procedure superseded + 7 years	Secure Disposal
9.2.3	A statement of the procedure to be followed in the event of a child being lost or not collected	No		Procedure superseded + 7 years	Secure disposal



9.2.4	A statement of the procedure to be followed where a parent has a complaint about the service being provided by the registered person	No		Until superseded	Secure disposal
9.2.5	A statement of the arrangements in place for the protection of children, including arrangements to safeguard the children from abuse or neglect and procedures to be followed in the event of allegations of abuse or neglect	No		Closure of settings + 50 years (these could be required to show whether or not an individual child attended the setting in a child protection investigation)	Secure disposal

<b>9.3</b>					
	<b>Basic File Description</b>	<b>Data protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
9.3.1	Emergency contact details for appropriate adult to collect the child if necessary	Yes		Destroy once the child has left the setting (unless the information is collected for anything other than emergency contract)	Secure Disposal
9.3.2	Contract, signed by the parent, stating all the relevant details regarding the child and their care, including the name of the emergency contact and confirmation of their agreement to collect the child during the night.	Yes		Date of birth of the child who is the subject of the contract + 25 years	Secure Disposal