

Data Retention Policy

November 2023

Bushmead Primary School



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1. Aims

The school needs to create and maintain accurate records in order for it to function. The policy for managing records at Bushmead Primary School has been drawn up in conformity with legislation, regulations affecting schools and best practice as publicised by the Records Management Society of Great Britain.

This policy sets out guidelines for recording, managing, storing and disposing of data, whether they are held on paper or electronically in order to assist staff, and the School, to comply with the General Data Protection Regulation (2018) and the Freedom of Information Act 2000 (FIA) and associated UK GDPR legislation. It should be read and used in conjunction with the following school policies and documents:

- GDPR Policy
- Privacy Notices
- Information Asset Register

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

2. Legislation and Guidance

Data and records are retained in accordance with the retention Guidelines for schools as prescribed by the Records Management Society of Great Britain. The RGS outlines recommended retention periods for a diverse class of records created by schools in the course of their operations.

3. Definitions

3.1 Personal data

The UK General Data Protection Regulation (UK GDPR) only applies to organisations' use of personal data. This is any information relating to an identified, or identifiable, person.

This may include information such as the person's:

- Name
- Contact details
- Identification number

Online identifier, such as a username. It may also include anything relating to the person's physical and mental health, genetics, finances, or their physiological, cultural, or social identity.

3.2 Special categories of personal data

Personal data which is more sensitive and so needs more protection. It includes information about a person's:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic information

- Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes
- Health – physical or mental
- Sex life or sexual orientation

It also includes information that reveals any of the above characteristics of an individual, according to Forbes Solicitors. For example:

- The name and gender of a person's spouse would reveal the person's sexual orientation
- A photograph could reveal some of the above characteristics of a person

3.3 Processing

Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying.

Processing can be automated or manual.

3.4 Data subject

The person whose personal data is held or processed (e.g. all your pupils and staff will be data subjects).

3.5 Data controller

A person or organisation that determines how and why personal data is processed (e.g your school).

3.6 Data processor

An external person or organisation, who is not employed by your school, who processes the personal data on your school's behalf (e.g. your payroll provider, an external careers advice service, or your parental communications provider).

3.7 Data protection officer

The person in your school, or an external data protection adviser, who takes responsibility for monitoring data protection compliance.

3.8 Data breach

A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

3.9 Lawful bases

There are 6 'lawful bases' (or reasons) that you can use to justify why you need to process person data. You only need to meet one of the conditions.

4. Roles and Responsibilities

4.1 The head teacher will:

Work with staff and governors to determine the strategic development of this policy and provision in the school.

4.2 The Governor/s

They will:

Work with the head teacher to determine the strategic development of this policy and provision in the school. The Governing Body will review this policy in line with the Policy review schedule at the FGB committee meetings

4.3 Data protection officer (DPO)

A DPO will be appointed in order to:

- Inform and advise the school and its employees about their obligations to comply with the UK GDPR and other data protection laws.
- Monitor the school's compliance with the UK GDPR and other laws, including managing internal data protection activities, advising on data protection impact assessments, conducting internal audits, and providing the required training to staff members.
- The role of DPO will be carried out by Donna Flynn, dpo@theictservice.org.uk
- The DPO will operate independently. Sufficient resources will be provided to the DPO to enable them to meet their UK GDPR obligations.

5. Benefits of the Retention Policy

There are a number of benefits which arise from the use of a complete Retention Policy:

- Managing records against the Retention Policy is deemed to be "normal processing" under the GDPR (2018) and the Freedom of Information Act 2000. Provided members of staff are managing record series using the Retention Policy they cannot be found guilty of unauthorised tampering with files once a freedom of information request or a subject access request (SAR) has been made.
- Members of staff can be confident about destroying information at the appropriate time and in a secure manner.
- Information which is subject to Freedom of Information and UK GDPR legislation will be available when required.
- The school is not maintaining and storing information unnecessarily.

6. Current Pupil Records

A manilla file is kept on each pupil in a locked filing cupboard outside the Headteacher's office. The file holds hard copies of information about that pupil e.g. school reports, reports from external agencies and copies of letters.

The information held on the school's electronic database, SIMS, is provided by parents on admission. Information includes: the pupil's name, address, house, emergency contact details, free school meals status, statutory test results and daily attendance. Confidentiality of personal information is protected in accordance with the Bushmead Primary School Management Information Systems and Data Protection Policy.

7. Pupils with Special Educational Needs

The names of pupils with special educational needs are recorded in SIMS and information regarding these individual pupils are made available to those staff with a need to know that information. Electronic copies

of documents are stored, securely, on the staff server. Paper copies of documents are stored, securely, in a locked filing cabinet in the SENCO office and also, if necessary within pupils' manilla folders.

8. Pupils receiving Pupil Premium (PP) funding / Looked After Children (LAC) / Military funding

The names of pupils in receipt of additional funding due to their PP, LAC, post-LAC or military family status are recorded in SIMS. Information regarding these individual pupils are made available to staff with a need to know that information. Electronic copies of PP review / LAC review documents are stored on the school server or the Local Authority centrally hosted system. Paper copies of review documents are stored within pupils' manilla folders.

9. Medical Records

Information regarding medical needs is provided by parents / carers on admission. Information provided includes any significant known drug reactions, major allergies and notable medical conditions. This information is available to staff likely to administer medication or treatment. This information is shared with external providers (trips) or external bodies (caterers) only with parental permission.

All students who have a more serious level of medical need (e.g. diabetes, anaphylaxis) have an individual Health Care Plan (HCP) which is put together by the parents/guardian with the GP's/consultant's instructions for care within school should the event arise. The HCPs are then checked by our SENCO and stored securely on the school server or the Local Authority centrally hosted system. A copy is retained in the classroom and the face page is displayed on the medical board in the staffroom. Parental consent is obtained to display this information.

These records will be shared with school staff to ensure pupil safety. The photographs of children (for whom parents have given permission) will be displayed in the staff room to help identification. The original copies are stored in the child's individual manila folder in a locked cabinet in their office. These records are shared with the medical services in case of emergency.

10. Financial Records

The finance and office staff have access to information regarding school dinner payments and school trip payments.

11. Access by Staff

All teaching and office staff are able to access the school's password protected database (SIMS). Access to SIMS is restricted by type and only relevant information is available to view. Teaching staff may consult the pupil records including emergency contact phone numbers. Other data e.g. discretionary absence request letters / attendance letters etc. are stored securely and only available to the necessary staff on request.

12. UK GDPR Policy

Parents accept a place for their child at Bushmead Community Primary School in the knowledge that data about pupils and their parents will be collected on admission to allow for the efficient operation of the school. This data will be updated regularly and stored/processed in order with the GDPR (2018) rules for good information handling.

13. Staff Induction

All new teaching and office staff will be given training on accessing and managing school records to ensure compliance with these retention time scales. As a guiding principle, UK GDPR requires that personal data is only retained for as long as necessary - that is, necessary for the specific lawful purpose (or purposes) it was acquired. Any information which is held is to be kept in accordance with Bushmead Primary School's Management Information System and UK GDPR Policy.

14. Retention Periods

Appendix 1, the table at the end of this policy provides guidance on retention periods for different records held by Bushmead Community Primary School. Unless there is a specific statutory obligation to hold or destroy records, the retention periods are established by the school for guidance purposes.

15. Disposal of Data

When information is no longer required, it can be disposed of. For confidential, sensitive or personal information to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed. Skips and 'regular' waste disposal are not considered to be secure.

Paper records should be shredded using a cross-cutting shredder; CDs / DVDs / diskettes should be cut into pieces. Hard-copy images, AV recordings and hard disks should be dismantled and destroyed. Where third party disposal experts are used they should ideally be supervised but, in any event, under adequate contractual obligations to the school to process and dispose of the information securely.

16. Monitoring arrangements

This policy and information report will be reviewed by the governing body every 3 years. It will also be updated if any changes to the information are made during the year.

It will be approved by the governing board.

17. Links with other policies and documents

This policy links to our policies on:

UK GDPR, Freedom of Information policy, Pupil Privacy Notices, Privacy Notice for Parents and Carers, Publication Scheme and our CCTV policy.

Version:	2	
Written by:	Ann Coffey	Date: 15 th November 2023
Last reviewed by staff:	Spring 2024	
Last reviewed by governors:	Spring 2024	
Next review due by:	Spring 1 2027	

Table of Data/Document Retention Periods (to be regularly updated)

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 archives before disposal	
1.1.2	Trusts and endowments		For the life of the school	Consult local archives before disposal	
1.1.3	Records relating to the election of parent and staff governors not appointed by the governors		Date of election + 6 months	SECURE DISPOSAL	Yes
1.1.4	Records relating to the appointment of co-opted governors		Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children). In this case retain for 25 years	SECURE DISPOSAL	Yes

1.1.5	Records relating to the election of chair and vice chair		Once the decision has been recorded in the minutes, the records relating to the election can be destroyed	SECURE DISPOSAL	Yes
	Basic file description	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record	Personal Information
1.1.6	Scheme of delegation and terms of reference for committees		Until superseded or whilst relevant [schools may wish to retain these records for reference purposes in case decisions need to be justified]	These could be offered to the archives if appropriate	
1.1.7	Meetings schedule		Current year	STANDARD DISPOSAL	
1.1.8	Agendas – principal copy		Where possible the agenda should be stored with the principal set of the minutes	Consult local archives before disposal	Potential
1.1.9	Minutes – principal set (signed)		Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting	Consult local archives before disposal	Potential
1.1.10	Reports made to the governors' meeting which are referred to in the minutes		Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting	Consult local archives before disposal	Potential
1.1.11	Register of attendance at Full governing board meetings		Date of last meeting in the book + 6 years	SECURE DISPOSAL	Yes
1.1.12	Papers relating to the management of the annual parents' meeting		Date of meeting + 6 years	SECURE DISPOSAL	Yes
1.1.13	Agendas – additional copies		Date of meeting	STANDARD DISPOSAL	

1.1.14	Records relating to Governor Monitoring Visits		Date of the visit + 3 years	SECURE DISPOSAL	Yes
1.1.15	Annual Reports required by the DoE		Date of report +10 years	SECURE DISPOSAL	
1.1.16	All records relating to the conversion of schools to Academy status		For the life of the organisation	Consult local archives before disposal	
	Basic file description	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record	Personal Information
1.1.17	Records relating to complaints made and investigated by the governing body or head teacher		Major complaints: Current year + 6 years. If negligence involved, then: Current year + 15 years If child protection or safeguarding issues are involved, then: Current year + 40 years	SECURE DISPOSAL	Yes
1.1.18	Correspondence sent and received by the governing body or head teacher		General correspondence should be retained for current year + 3 years	SECURE DISPOSAL	Potential
1.1.19	Action plans created and administered by the governing body		Until superseded or whilst relevant	SECURE DISPOSAL	
1.1.20	Policy documents created and administered by the governing body		Until superseded [The school should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the IICSA has issued its recommendations.]		

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

2. Management of the School

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

2.1 Headteacher and Senior Management Team					
	Basic file description	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record	Personal Information
2.1.1	Log-books of activity in the school maintained by the Head Teacher		Date of last entry in the book + a minimum of 6 years, then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate	Potential
2.1.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies		Date of the meeting + 3 years then review annually, or as required if not destroyed	SECURE DISPOSAL	Potential
2.1.3	Reports created by the Head Teacher or the Management Team		Date of the report + a minimum of 3 years then review annually, or as required if not destroyed	SECURE DISPOSAL	Potential
2.1.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities which do not fall any other category		Current academic year + 6 years then review annually, or as required if not destroyed	SECURE DISPOSAL	Potential
2.1.5	Correspondence created by head teachers, deputy head teachers, heads		Current year + 3 years	SECURE DISPOSAL	Potential

	of year and other members of staff with administrative responsibilities				
2.1.6	Professional Development Plans		Theses should be held on the individual's personnel record. If not, then termination of employment + 6 years	SECURE DISPOSAL	Potential
2.1.7	School Development Plans		Life of the plan + 3 years	SECURE DISPOSAL	

2.2 Operational Administration					
	Basic file description	Statutory Provisions	Retention period [Operational]	Action at 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 their archive otherwise STANDARD DISPOSAL	
2.2.3	Records relating to the creation and distribution of circulars to staff, parents or pupils		Current academic year + 1 year	STANDARD DISPOSAL	
2.2.4	School Privacy Notice which is sent to parents as part of GDPR compliance		Until superseded + 6 years		
2.2.5	Consents relating to school activities as part of GDPR compliance (for example, consent to be sent for circulars or mailings)		Consent will last whilst the pupil attends the school, it can therefore be destroyed when the pupil leaves	SECURE DISPOSAL	Yes
2.2.6	Newsletters and other items with a short operational use		Current academic year + 1 year [Schools may decide to archive one copy]	STANDARD DISPOSAL	
2.2.7	Visitor management systems (including electronic systems, visitors books and signing-in sheets)		Last entry in the visitors book + 6 years (in case of claims by parents or pupils about various actions).	SECURE DISPOSAL	Yes
2.2.8	Walking bus registers		Date of register + 6 years	SECURE DISPOSAL	Yes

2.3 Human resources					
	Basic file description	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record	Personal Information
Recruitment					
2.3.1	All records leading up to the appointment of a headteacher		Unsuccessful attempts. Date of appointment plus 6 months. Add to personnel file and retain until end of appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years	SECURE DISPOSAL	Yes
2.3.2	All records leading up to the appointment of a member of staff / governor – unsuccessful candidates		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL	Yes
2.3.3	Pre-employment vetting information – DBS Checks – successful candidates	DBS Update Service Employer Guide June 2014; Keeping Children Safe in Education 2018 (Statutory Guidance from DoE) Sections 73, 74	Application forms, references and other documents – for the duration of the employee's employment + 6 years	SECURE DISPOSAL	Yes
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 personnel file.	SECURE DISPOSAL	Yes

2.3.5	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom – successful candidates	An Employer's Guide to Right to Work Checks [Home Office, May 2015]	Where possible these documents should be added to the staff personnel file [see below], but if they are kept separately then the Home Office requires that the documents are kept for the termination of employment + not less than 2 years	SECURE DISPOSAL	Yes
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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 the IICSA enquiries are complete	SECURE DISPOSAL	Yes
2.3.7	Annual appraisal / assessment records		Current year + 6 years	SECURE DISPOSAL	Yes
2.3.8	Sickness absence monitoring		<p>Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring. Sickness records should be kept separate from your accident records</p> <p>It could be argued that where sickness pay is not paid then current year + 3 years is acceptable, whilst if sickness pay is made then it becomes a financial record and current year + 6 years applies. The actual retention may depend on the internal auditors. Most seem to accept current year + 3 years as being acceptable as this gives them, 'benefits' and Inland</p>	SECURE DISPOSAL	Yes

			Revenue have time to investigate if they need to		
	Basic file description	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record	Personal Information
2.3.9	Staff training – where the training leads to continuing professional development		Length of time required by the professional body	SECURE DISPOSAL	Yes
2.3.10	Staff training – except where dealing with children, e.g. first aid or health and safety		This should be retained of the personnel file [see 2.3.1 above]	SECURE DISPOSAL	Yes
2.3.11	Staff training – where the training relates to children (e.g. safeguarding or other child related training)		Date of the training + 40 years [This retention period reflects that the IICSA may wish to see training records as part of an investigation]	SECURE DISPOSAL	Yes
Disciplinary and Grievance Processes					
Where schools are in any doubt as to which categories disciplinary records fall under, then HR or legal advice should be sought from the Local Authority					
2.3.12	Records relating to any allegation of a child protection nature against a member of staff	“Keeping children safe in education Statutory guidance for schools and colleges September 2018”; “Working together to safeguard children. A guide to inter-agency working to safe-guard and promote the	Until the person’s normal retirement age or 10 years from the date of the allegation (whichever is the longer) then REVIEW. Note: allegations that are found to be malicious should be removed from personnel files. If found, they are to be kept on the file and a copy provided to the person concerned UNLESS the member of staff is part of	SECURE DISPOSAL These records must be shredded	Yes

		welfare of children 2018”	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		
2.3.13	Disciplinary proceedings				Yes

	Basic file description	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record	Personal Information
Disciplinary and Grievance Processes					
<p>Note:</p> <p>The ACAS cod 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.</p> <p>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 or herself by saying "I would never do anything 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.</p> <p>Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.</p>					
	Oral warning		Date of warning +6 months	SECURE DISPOSAL	
	Written warning		Date of warning +6 months	[If warnings are placed on personnel files then they must be weeded from the file]	
	- Level 1				
	Written warning		Date of warning		
	- Level 2		+12 months		
	Final warning		Date of warning		
			+18 months		
	Case not found		If the incident related to child protection then see above, otherwise dispose of at the conclusion of the case	SECURE DISPOSAL	

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

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

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

	Basic file description	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record	Personal Information
Payroll and Pensions					
	Superannuation reports	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.38	Tax forms P6/P11/P11D/P35/P45/P46/P48	The minimum requirement – as stated in Inland Revenue Booklet 490 is for at least 3 years after the end of the tax year to which they apply. Originals must be retained in paper / electronic format. It is a corporate decision to retain for current year + 6 years. Employees should retain records for 22 months after current tax year	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.39	Time sheets / clock / cards / flexitime		Current year + 3 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record	Personal Information
Payroll and Pensions					
	Superannuation reports	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.38	Tax forms P6/P11/P11D/P35/P45/P46/P48	The minimum requirement – as stated in Inland Revenue Booklet 490 is for at least 3 years after the end of the tax year to which they apply. Originals must be retained in paper / electronic format. It is a corporate decision to retain for current year + 6 years. Employees should retain records for 22 months after current tax year	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.39	Time sheets / clock / cards / flexitime		Current year + 3 years	SECURE DISPOSAL	Yes

2.4 Health and Safety					
	Basic file description	Statutory Provisions	Retention period [Operational]	Action at 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 has occurred	SECURE DISPOSAL	
2.4.3	Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	<p>Social Security (Claims and Payments) Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</p> <p>Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628</p> <p>Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628</p> <p>Social Security Administration Act 1992 Section 8 Social Security (Claims and Payments) Amendment (No 30 Regulations 1993 SI 1993 No 2113</p> <p>Allows the information to be kept electronically</p>	<p>The accident Book – BI 510 – 3 years after last entry in the book</p> <p>This includes the new format to be used from 01/01/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR</p>	SECURE DISPOSAL	Yes

2.4 Health and Safety					
	Basic file description	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record	Personal Information
2.4.4	Accident reporting records relating to the individuals who are under 18 years of age at the time of the incident	<p>Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</p> <p>Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628</p> <p>Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628</p> <p>Social Security Administration Act 1992 Section 8.</p> <p>Social Security (Claims and Payments) Amendment (No 30) Regulations 1993 SI1993 No 2113</p> <p>Allows the information to be kept electronically</p>	<p>The Accident Book – BI 510 – 3 years after last entry in the book</p> <p>This includes the new format to be used from 01/01/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for a further 3 years since the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR</p>	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record	Personal Information
2.4.5	Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see http://www.hse.gov.uk/RIDDOR	Reporting of injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2)	Date of incident + 3 years provided that all records relating to the incident are held on personnel file [see 2.4.2 above]	SECURE DISPOSAL	Yes
2.4.6	Control of Substances Hazardous to Health (COSHH)	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations had not been made. Regulation 18(2)	Date of incident + 40 years	SECURE DISPOSAL	
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL	
2.4.8	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation. Maintenance records or controls, safety features and PPE -----	The Ionising Radiation Regulations 2017. SI 2017 No 1075 Regulation 11 As amended by SI 2018 No 390 Personal Protective Equipment (Enforcement) Regulations 2018	2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination To keep records made and maintained (or a copy of these records) until the person to whom the record relates has or would have attained the age of 75 years, but in any event for at least 30 years from when the record was made	SECURE DISPOSAL	

	Basic file description	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record	Personal Information
2.4.9	Fire Precautions log-books		Current year + 3 years	SECURE DISPOSAL	
2.4.10	Health and safety file to show current state of building including all alterations (wiring, plumbing, building works etc.), to be passed on in the case of change of ownership		Pass to new owner on sale or transfer of building		
2.5 Financial Management					
Risk Management and Insurance					
2.5.1	Employer's Liability Insurance Certificate		Closure of the school + 40 years (May be kept electronically)	SECURE DISPOSAL To be passed to the Local Authority if the school closes	
Asset Management					
2.5.2	Inventories of furniture and equipment		Current year + 6 years	SECURE DISPOSAL	
2.5.3	Burglary, theft and vandalism report forms		Current year + 6 years	SECURE DISPOSAL	
Accounts and Statements (including budget management)					
2.5.4	Annual accounts		Current year + 6 years	STANDARD DISPOSAL	
2.5.5	Loans and grants managed by the school		Date of last payment of the loan + 12 years, then review	SECURE DISPOSAL	
2.5.6	All records relating to the creation and management of budgets, including the annual budget statement and background papers		Life of the budget + 3 years	SECURE DISPOSAL	
2.5.7	Invoices, receipts, order books and requisitions, delivery notices		Current financial year + 6 years	SECURE DISPOSAL	
2.5.8	Records relating to the collection and banking of monies		Current financial year + 6 years	SECURE DISPOSAL	
2.5.9	Records relating to the identification and collection of debt		Final payment of debt + 6 years	SECURE DISPOSAL	
Pupil Finance					
2.5.10	Student Grant applications		Current year + 3 years	SECURE DISPOSAL	Yes
2.5.11	Pupil Premium Fund records		Date pupil leaves the provision + 6 years	SECURE DISPOSAL	Yes

	Basic file description	Statutory Provisions	Retention period [Operational]	Action at the end of the administrative life of the record	Personal Information
Contract Management					
2.5.12	All records relating to the management of contracts under seal	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL	
2.5.13	All records relating to the management of contracts under signature	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL	
2.5.14	Records relating to the monitoring of contracts		Life of contract + 6 or 12 years	SECURE DISPOSAL	
School Fund					
2.5.15	School Fund – Cheque books		Current year + 6 years	SECURE DISPOSAL	
2.5.16	School Fund – Paying in books		Current year + 6 years	SECURE DISPOSAL	
2.5.17	School Fund - Ledger		Current year + 6 years	SECURE DISPOSAL	
2.5.18	School Fund - Invoices		Current year + 6 years	SECURE DISPOSAL	
2.5.19	School Fund - Receipts		Current year + 6 years	SECURE DISPOSAL	
2.5.20	School Fund – Bank Statements		Current year + 6 years	SECURE DISPOSAL	
2.5.21	School Fund – Journey Books		Current year + 6 years	SECURE DISPOSAL	
School Meals Management					
2.5.22	Free school meals registers (where the register is used as a basis for funding)		Current year + 6 years	SECURE DISPOSAL	Yes
2.5.23	School meals registers		Current year + 3 years	SECURE DISPOSAL	Yes
2.5.24	School meals summary sheets		Current year + 3 years	SECURE DISPOSAL	Yes

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

3. Pupil Management

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

3.10 Admissions process					
	Basic file description	Statutory Provisions Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	Personal Information
3.1.1	All records relating to the creation and implementation of the School Admissions' Policy	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL	
3.1.2	Admissions – if the admission is successful	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL	Yes
3.1.3	Admissions – if the appeal is unsuccessful	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL	Yes
3.1.4	Register of Admissions	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made	REVIEW Schools may wish to consider keeping the admission register permanently as an archive record as often schools receive enquiries from past pupils to confirm the dates they attended the school or to transfer these records to the appropriate County Archives Service	
3.1.5	Admissions – Secondary Schools – Casual		Current year + 1 year	SECURE DISPOSAL	Yes
3.1.6	Proofs of address supplied by parents as part of the admissions process	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL	Yes
3.1.7	Supplementary Information form including additional information				Yes

	such as religion, medical conditions etc				
3.1.7.1	For successful admissions		This information should be added to the pupil file	SECURE DISPOSAL	
3.1.7.2	For unsuccessful admissions		Until appeals process completed (GDPR)	SECURE DISPOSAL	

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

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

3.3 Attendance					
Basic file description		Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	Personal Information
Please note that any record containing pupil information may be subject to requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in the Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.					
3.3.1	Attendance Registers	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	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	Yes
3.3.2	Correspondence relating to any absence (authorised or unauthorised)	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL	Potential
3.4.1	Special Educational Needs files, reviews and Education, Health and Care plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Children and Family's Act 2014; Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil +31 years [Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act]	SECURE DISPOSAL	Yes

4. Curriculum and Extra Curricular Activities

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

4.1 Statistics and Management Information					
Basic file description		Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	Personal Information
4.1.1	Curriculum Returns		Current year + 3 years	SECURE DISPOSAL	No
4.1.2	Examinations Results (Schools Copy)		Current year + 6 years	SECURE DISPOSAL	Yes
4.1.2.1	SATS records -			SECURE DISPOSAL	Yes
4.1.2.2	Results		The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL	
4.1.2.3	Examination Papers		The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL	
4.1.3	Published Admission Number (PAN) Reports		Current year + 6 years	SECURE DISPOSAL	Yes
4.1.4	Value Added and Contextual Data		Current year + 6 years	SECURE DISPOSAL	Yes
4.1.5	Self-Evaluation Forms			SECURE DISPOSAL	Yes
4.1.5.1	Internal moderation		Academic year plus 1 academic year	SECURE DISPOSAL	Yes
4.1.5.2	External moderation		Until superseded	SECURE DISPOSAL	Yes

4.2 Implementation of Curriculum					
Basic file description		Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	Personal Information
4.2.1	Schemes of Work		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	
4.2.2	Timetable		Current year + 1 year		
4.2.3	Class Record Books		Current year + 1 year		
4.2.4	Mark Books		Current year + 1 year		
4.2.5	Record of homework set		Current year + 1 year		
4.2.6	Pupil's Work		Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year	SECURE DISPOSAL	

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

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

5. Central Government and Local Authority

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

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

5.2 Central Government						
	Basic file description	Data Protection Issues Statutory Provisions		Retention Period [Operational]	Action at the end of the administrative life of the record	Personal Information
5.2.1	OFSTED reports and papers	No		Life of the report then review	SECURE DISPOSAL	
5.2.2	Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL	
5.2.3	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL	