Record Retention and Deletion Policy

Repton Primary School

Version 2

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Job Role	School Business Officer
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Next Review Date	
Version produced Spring 2023	Introductory information at 4.2 about IICSA removed as the Inquiry closed in Oct 2022. New section inserted at 4.8 relating to child sexual abuse and 4.9 regarding staff records. Recommendations from the Inquiry have been incorporated into the tables throughout in section 4.11 (subsections 1 , 6, 7, 8, 18, 10 and 24)- please see green text. Some further minor amends and additions throughout retention table- please see green text.

This document will be reviewed annually and sooner when significant changes are made to the law

Guidance from the Department for Education about school policies can be found here: https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts

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4.1 How to use this document

This is a very big document. It can be read from front to back, but this will take time. Therefore, you can use the drop-down boxes below to select your role in school – this will then suggest the most relevant sections, alternatively you can select from an A-Z of relevant provisions.

My Role: (please choose from the dropdown and press tab)	Suggested sections:
Please select	

A-Z

Admissions
Attendance
Central Government
Child Protection (CP) / Safeguarding Records
Curriculum (Implementation)
Curriculum Management
Extra Curriculum Management
Family Liaison / Early Help / Alternative Provision
Financial Management – Accounts and Statements including Budget Management
Financial Management – Contract Management
Financial Management – Risk & Insurance, Asset Management
Financial Management – School Fund
Financial Management – School Meals
Governing Body
Headteacher & Senior Management/Leadership Team
Health and Safety
HR - Management of Disciplinary and Grievance Processes
HR – Operational Staff Management
HR – Payroll & Pensions
HR – Recruitment
Local Authority Returns
Medication (Administration Records)
Operational Administration
Parent / Alumni Associations
Property Management
Pupil Education Record inc SEN, Ed Psych reports
Recording Meetings, calls, online lessons, training
School Communications inc email & social media
Special Educational Needs (SEN)
Work Experience / Placement (pupil)

4.2 Introduction

This record retention and deletion policy contains recommended retention periods for the different record series created and maintained by Repton Primary School. The schedule refers to all information whether it is held in hard copy or electronic format including cloud and web based or on third party platforms.

Some of the retention periods are governed by statute. Others are guidelines, following best practice, employed by schools throughout the United Kingdom. Every effort has been made to ensure that these retention periods are

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compliant with the requirements of the UK General Data Protection Regulation 2018 (GDPR), the Data Protection Act 2018 (DPA), Article 8, the Human Rights Act 1998, the Freedom of Information Act 2000 (FOI) and the Code of Practice on Records Management (under Section 46 of the FOI).

Managing records series using these retention guidelines will be deemed to be 'normal processing' under the terms of the legislation noted above. If those record series are to be kept for longer or shorter periods than the time scales held in this document, the reasons for any deviation must be recorded.

4.3 Purpose

This policy, for managing records at Repton Primary School has been drawn up in conformity with legislation, regulations affecting schools and best practice as promoted by the Information and Records Management Society of Great Britain.

This policy sets out guidelines for recording, managing, storing and the disposal of data, whether they are held on paper or electronically (including online), in order to assist staff, and the school, to comply with the General Data Protection Regulation (EU) 2016/679 (GDPR) including as adopted by the United Kingdom as a result of its exit from the European Union ("UK GDPR"), Data Protection Act 2018 and the Freedom of Information Act 2000. It should be read and used in conjunction with all of our related policies.

It is expected that;

- All information held by schools needs to be justifiable, by reference, to its purpose.
- Schools must be transparent and accountable as to what data they hold.
- Schools must understand and explain the reasons why they hold data.
- Schools must be able to respond to Subject Access Requests.
- Schools must be able to amend, delete or transfer data promptly upon any justified request.
- Schools must be able to audit how personal data was collected and when and why.
- Schools must hold sensitive data securely, accessed only by those with reason to view it and possess a policy as to why it is needed.
- Schools must have retention policies that reflect the importance of records relating to child sexual abuse to victims and survivors, and that they may take decades to seek access to such records.

4.4 Disposal of Data

Article 5(e) of the GDPR states that personal data should be 'kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes... in order to safeguard the rights and freedoms of the data subject ('storage limitation')'.

Not all data needs to be destroyed. The school should determine whether records are to be selected for permanent preservation, or for destruction or to be transferred into a different format.

When information is no longer required, it should 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, 'regular' waste disposal and ribbon shredders are not secure.

Paper records should be cross-shredded, incinerated, or pulped.

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CDs/DVDs/discs should be cut into pieces. Hard copy images, AV recordings and hard disks should be dismantled and destroyed. Where third party disposal companies are employed, a certificate of destruction must be obtained. Staff working for external provider should have been trained in the handling and destruction of confidential data.

If the school receives a request for records that have not yet been destroyed, even if they should have been destroyed, that record must still be made available to the requestor.

The Freedom of Information Act 2000 requires the school to maintain a list of all records that have been destroyed and who authorised their destruction. This record should be retained for 15 years. The appropriate members of staff (Data Lead) should record:

- File reference and/or unique identifier
- File title or brief description of contents
- Number of files
- Name of the authorising officer

An example is contained in Appendix A.

4.5 Transfer of Records to Archives

A school archive is different from official school records. A school archive preserves data where there is a legitimate interest in holding that information e.g. to commemorate a significant event in the life of the school. It can take on many characteristics and serve many purposes--but it neither compliments nor replaces the official record-keeping systems.

Where records have been identified as being worthy of permanent preservation, due to their historical or social value, they may be retained on site or offered to the Local Authority Record Office (see local guidance Find an archive | The National Archives).

Where the school decides to maintain an onsite archive, the school should consult with their Data Protection Officer to implement the following steps:

- Establish what information needs to be archived
- Select someone to serve as the archivist. This may be an additional function within an established role, to work alongside both the Data Protection Officer and Data Lead officer (where applicable).
- Select a physical location to house the collection, and determine what equipment and supplies are needed to accomplish the project for the first year and on a continuing basis e.g. safe storage, shelving
- Remember that archives can include electronic data e.g. schools may have digital photographs which are no longer displayed on their website or social media pages. Consider not only holding and cataloguing this data in a secure driver, but making potential requestors aware of its presence, through a dedicated website.
- Come to an agreement with the Local Authority Record Office, in order that the collected materials could be turned over to them if the school archives should be discontinued.

4.6 Transfer of Records to other Media

Where lengthy retention periods have been allocated to records, schools should consider converting paper records to other media (e.g. digital or virtual, 'cloud' based). The lifespan of the media, and the ability to migrate data, should be documented in a Digital Continuity Policy. A scanning risk assessment is recommended to ensure the procedure is adequate. Further information about digital continuity can be found on the National Archives website who also provide guidance on assessing and managing digital continuity risks and a digital continuity checklist. Schools that believe that they need to retain digital records over a long period on devices, software systems or in

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formats that may become inaccessible due to developments in technology should seek further advice from the Data Protection Officer and their IT support staff.

4.7 Transfer of Records to other Settings & 'Last Known School'

When a child leaves the school, all pupil records, including safeguarding/child protection records should be transferred in a secure manner, to the child's new school. If the records contain sensitive information (e.g. Child Protection records), proof of receipt must be obtained and logged by the school's Data Lead. Keeping Children Safe in Education 2022 (KCSiE) states that "where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file." All copies of data held by the school that the child has departed should then be deleted or retained in line with the retention schedule below, including all paper records and data stored electronically. Generally, a record should be kept for tracking and auditing purposes only.

Schools may wish to retain some minimal 'skeleton' data about pupils' admission, departure and next destination (where known) in order to respond to any requests for information about these pupils and for the school's historical archive. If schools intend to create and maintain these records, this should be noted on the retention policy. In some instances, schools may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If the school does retain pupil records, then they should be prepared to justify this retention and will need to consider if a Data Protection Impact Assessment should be completed for any extended retention of records once a pupil has left the school. See section 17.5 below.

Responsibility for maintaining the pupil record passes to the 'last known school'.

The school is the final or last known school if:

- secondary phase and the pupil left at 16 years old or for post-16 or independent education, or;
- at any point the pupil left for elective home education, they are missing from education, or have left the UK, or have died.

Schools should note that tertiary colleges are not included in the definition above. This means that for pupils that leave your setting for a tertiary college, the college may not want the pupil file to be forwarded to them. If this applies to your school, you should discuss with the college what pupil records they wish to receive. They must receive the child protection file, as per the requirements of KCSiE above.

The Pupil Record should be retained as a whole for 25 years from the date of birth of the pupil, after which time, if no longer required, it can be deleted or destroyed.

SEN and other support service records can be retained for a longer period of 31 years to enable defence in a "failure to provide a sufficient education" case.

If a school wishes to retain data for analysis or statistical purposes, it should be done in an anonymised fashion.

4.8 Records relating to Child Sexual Abuse

Records relating to child sexual abuse should be retained for 75 years, in line with the recommendations arising from the outcome of the Independent Inquiry into Child Sexual Abuse (IICSA). The Inquiry stated that these records should be retained for such a long period in recognition of the importance of these records to victims, but that they should be regularly reviewed during that extended retention period. Where records are held digitally, schools will

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particularly need to consider digital continuity if they hold records for staff or governors where there are relevant records or are the 'last known school' responsible for this long retention period for any relevant pupil records.

Where there is evidence, or allegations of child sexual abuse, then it will almost certainly be appropriate to retain the entire pupil, staff or other record as a whole, not just the parts of the record that pertain to the abuse. Staff whose duties include reviewing or digitising records should be trained to understand the importance of any evidence or allegations of child sexual abuse that they may happen to uncover, whether that was what they were looking for and the importance of them bringing these to the attention of school leadership and/or preserving these records.

The Inquiry report also recommends that the UK government directs the Information Commissioner's Office (ICO) to introduce a Code of Practice on retention of and access to records known to relate to child sexual abuse. This Policy will be updated in line with any Code of Practice from the ICO. The report states that such a code should set out that institutions should have:

- retention policies that reflect the importance of such records to victims and survivors, and that they may take decades to seek to access such records;
- clear and accessible procedures for victims and survivors of child sexual abuse to access such records;
- policies, procedures and training for staff responding to requests to ensure that they recognise the long-term impact of child sexual abuse and engage with the applicant with empathy.

4.9 Retention of Records relating to Staff

As stated above regarding the long-term retention of minimal pupil records, schools may wish to retain very basic 'skeleton' records about staff that have worked in the school beyond the normal retention of the whole personnel/HR file. This information may include the staff name, role, contract start and end dates. This may be useful for schools who may need to respond to requests for information from/regarding staff, in the event of it being needed for litigation or other legal purpose and as part of their historical archive. If schools intend to create and maintain these records, this should be noted on the retention policy (at section 7.11 below)

4.10 Responsibility and Monitoring

The Head Teacher holds primary and day to day responsibility, for implementing this policy. The Data Protection Officer, in conjunction with the school, is responsible for monitoring its use and effectiveness and resolving any queries with regards the interpretation of the policy.

All permissions to access data are granted by the Head Teacher and recorded in the member of staff's personnel file.

All teaching and office staff are given training and guidance on accessing and managing school records, to ensure compliance with the time scales laid out under the retention schedule. All members of staff, with access to records, are expected to;

- Manage their current record keeping systems using the Retention Policy.
- Only dispose of records in accordance with the requirements outlined in this policy, if authorised to do so.
- Ensure that any proposed divergence from the records retention schedule and disposal policies is authorised and documented by the Head Teacher.

This policy does not form part of any employee's contract of employment and is not intended to have a contractual effect. However, it does reflect the school's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the school but any changes will be notified to employees within one month of the date on which the change is intended to take effect. The school may also vary any parts of the procedure, including time limits, as appropriate.

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4.11 Retention tables

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
1. Governing Body							
1.1	Instruments of Government including Articles of Association	Paper- In Governor Induction Pack in SBO Office	Clerk / SBO	Permanent	Closure of school	Common practice	These should be retained in the schools whilst the school is open and then to the Local Authority Record Office, when the school closes
1.2	Trusts and Endowments managed by the Governing Body	N/A	N/A	Permanent	End of operational use	Common practice	These should be retained by the school, whilst the school is open and then to the Local Authority Record Office, should the school close
1.3	Scheme of delegation and terms of reference for committees	Paper as part of Governor minutes/Electronic on website & server	Clerk / SBO	Until superseded or whilst relevant (schools may wish to retain these records for reference purposes in case decisions need to be justified)	Expiration of terms	Common practice	If the school is unable to store these, they should be offered to the Local Authority Office
1.4	Governor's Code of Conduct	Paper as part of Governor	Clerk / SBO	One copy of each version should be kept	Date of new version	Common practice	

		minutes/Electronic on website & server		for the life of the school.			
1.5	Records relating to the election of chair and vice chair	Paper as part of Governor minutes/Electronic & server	Clerk / SBO	Once the designation has been recorded in the minutes, the records relating to the election can be destroyed	Date of appointment	Common practice	Secure disposal
1.6	Appointment of a clerk to the governing body	Paper as part of Governor minutes/Electronic on server	Clerk / SBO	Date of end of appointment + 6 years (note HR records may require different retention)	Date of appointment	Common practice	Secure disposal
1.7	Records relating to the appointment of parent and staff governors, not appointed by the governors	Paper in HT Cabinets	Clerk / SBO	Date of election + 6 months	Date of election	Common practice	Secure disposal
1.8	Records relating to the appointment of co-opted governors	Paper in HT Cabinets	Clerk / SBO	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, or for allegations	Date of appointment	Common practice	Secure disposal

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				involving child sexual abuse for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.			
1.9	Application forms – successful candidates	Paper in HT Cabinets	Clerk / SBO	End of year in office + 1year	End of period of office	Common practice	Secure disposal
1.10	Appointment documentation: • Terms of office of serving governors, including evidence of appointment • Governor declaration against disqualification criteria • Register of business interests • Training required, and received, by governors • Induction programme for new governors • DBS checks carried out on the clerk and members of the governing body • Governor personnel files.	Paper in HT Cabinets	Clerk / SBO	Date of appointment + 6 years	Date of appointment	Common practice	Secure disposal
1.11	Annual Reports	Electronic on website	Clerk / SBO	Date of the report + 10 years	End of the calendar year that the record was created in	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	Secure disposal

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1.12	Annual reports required by the Department of Education	n/a	n/a	Date of report + 10 years	Date of report	Common practice	Secure disposal
1.13	Meetings schedule	Electronic on website	Clerk / SBO	Current year	Date of meeting	Common practice	Secure disposal
1.14	Agendas for Governing Body meetings	Electronic on website	Clerk / SBO	One copy to be retained with the master set of minutes - all other copies can be disposed of	Conclusion of meeting	Common practice	Secure disposal
1.15	Register of attendance at Full Governing Board meetings	Electronic on website & server	Clerk/SBO	Date of meeting + 6 years	Date of meeting	Common practice	Secure disposal
1.16	Minutes of Governing Body meetings (Principal Set signed)	Electronic on website & server/Paper Governor meeting files	Clerk/SBO	Permanent to be held at school	Date of meeting	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office
1.17	Action plans created and administered by the Governing Body	Electronic on website & server/Paper Governor meeting files	Clerk/SBO	Until superseded or whilst relevant	Expiration of action plan	Common practice	Secure disposal
1.18	Reports presented to the Governing Body	Electronic on website & server/Paper Governor meeting files	Clerk/SBO	Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently	Date of report	Common practice	Secure disposal or retain with the signed set of minutes
1.19	Policy documents created and/or administered by the Governing Body	Electronic on website &	Clerk/SBO	A copy of each policy should create a time	Expiration of the policy	Common practice	Secure disposal

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		server/Paper Governor meeting files		line of policy development OR a robust version control which allows a snapshot of a policy at any given date. Keep all policies relating to safeguarding and child protection for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.			
1.20	Records relating to complaints made to, and investigated by the Governing Body and/or Head Teacher	Electronic on email & server/Paper Governor meeting files	Clerk/SBO	Date of the resolution of the complaint + a minimum of 6 years. If negligence or child protection/safeguarding is involved then current year + 15 years. If child sexual abuse issues are involved then for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Resolution of complaint	Common practice	Secure disposal

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1.21	Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies	Electronic/Paper	Clerk/SBO	For the life of the organisation	Date proposal accepted or declined	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office
1.22	Records relating to Governor Monitoring Visits	Electronic on email & server/Paper Governor meeting files	Clerk/SBO	Date of visit + 3 years	Date of visit	Common practice	Secure disposal
2. Headteacher & Senior Management/Leadership Team							
2.1	Log books of activity in the school maintained by the Head Teacher (Legislation no longer requires the completion of a school log book)	N/A	N/A	Date of the last entry in the log book + a minimum of 6 years and then review	Date of last entry in the log book	Common practice	These could be of permanent historical value and should be offered to the Local Authority Office
2.2	Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies	Electronic Emails or on Server/Paper in HT Office	HT	Date of the meeting + 3 years	Date of the meeting	Common practice	Secure disposal
2.3	Records created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities	Electronic Emails or on Server/Paper in HT Office	HT	Current academic year + 6 years then review	Date of record	Common practice	Secure disposal
2.4	Correspondence created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities – **not**	Email (see email retention period in section 5)	**All staff**	Date of correspondence + 3 years and then review	Date of correspondence	Common practice	Secure disposal

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	principally concerning pupils, staff or complaints. In those cases, correspondence should be immediately transferred to the relevant file.						
2.5	Professional Development Plans	Electronic Emails or on Server/Paper in HT Office	HT	Life of plan + 6 years	Date plan commences	Common practice	Secure disposal
2.6	School Development Plans	Electronic Emails or on Server/Paper in HT Office	HT	Life of plan + 3 years	Date plan commences	Common practice	Secure disposal
3. Admissions							
3.1	All records relating to the creation and implementation of the School's Admission's Policy	**N/A**	**N/A**	Life of the policy + 7 years then review		The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012 and School Admissions Code	Secure disposal
3.2	Admissions – if the admission is successful Proofs of address, supplied by parents, as part of the admissions process Supplementary information forms to include; religion, medical conditions etc.	Electronic Emails or on Server/Paper in HT Office	SBO	Date of admission + 1 year Added to the pupil file	Date of admission		Secure disposal
3.3	Admissions – if the admission is unsuccessful (where no appeal is made)	Electronic emails or on Server/Paper in HT Office	SBO	Date of applied for admission + 1 year	Date of applied for admission		Secure disposal

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3.4	Admissions – if the admission is unsuccessful (where an appeal is made)	Electronic Emails or on Server/Paper in HT Office	HT	Resolution of case + 1 year	Resolution of case	Statutory Guidance 2021	Secure disposal
3.5	Register of Admissions	Electronic on Integris/Paper in HT Office	HT	3 years after the date on which the last entry was made	Last entry in register	The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012 and School Admissions Code Statutory Guidance 2021	Offer to the Local Authority Record Office
3.6	Proofs of address, supplied by parents, as part of the admissions process	Paper in HT Office	SBO	Current year + 1 year	Date of admission		Secure disposal
4. Operational Administration							
4.1	Records relating to the creation and publication of the school brochures or prospectus	Electronic on Server/Paper in HT Office	HT	Current year + 3 years	Expiration of current publication	Common practice	Offer to the Local Authority Record Office
4.2	Records relating to the creation and distribution of circulars to staff, parents or pupils	Electronic on Server/Paper in HT Office	HT	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office

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4.3	Newsletters and other items with short operational use	Electronic on Server/Paper in HT Office	HT	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office
4.4	Visitor management systems (including electronic systems, visitors' books and signing in sheets)	**Electronic on Inventry Visitors log**	HT/SBO	Current year + 6 years then review	End of calendar year	Common practice	Secure disposal
4.5	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupil Associations	Electronic on server/Paper (if applicable)	HT	Current year + 6 years then review	Date of record	Common practice	Secure disposal
4.6	Pupil & Family Privacy Notice which is made available via the school website as part of UK GDPR compliance	Electronic on Server and website	HT/SBO	Date of issue + 6 years	When policy is superseded	Common practice	Secure disposal
4.7	Consents relating to school activities as part of UK GDPR compliance (e.g. consent to be sent circulars or mailings)	Electronic on Server/Paper in HT Office	SBO	This information should be added to the pupil file	Date of admission	Common practice	Secure disposal
4.8	Security breach logs	Electronic on GDPRis	HT/SBO	Date of issue + 25 years (pupils) and 6 years (staff)	Date of implementation	Common practice	Secure disposal
4.9	Digital Continuity Plans	Electronic on Server/Paper in HT Office	HT/SBO	Date of issue + 6 years	Expiration of current plan	Common practice	Secure disposal
4.10	Call Recordings (including VOIP messages and recordings)	Voice Messages-answer machine	HT/SBO	Date of receipt + 5 school days	Date of call recording	Common practice	Secure disposal
4.11	CCTV Recordings (retention for all 'ordinary' footage- any footage retained for specific purposes e.g. accident will need to be considered individually regarding how long it should be retained- please see CCTV policy)	**N/A**	**N/A**	N/A	Date of footage recording	Common practice	Secure disposal
5. School Communications							

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5.1	School emails containing personal data – inbox, sent items, deleted items	**Electronic**	**All staff**	Date if issue/receipt + 18 months	In line with guidance in Acceptable use policy	Common practice	Full deletion
5.2	Social media platforms	Twitter	**All staff**	Date of post + one academic year	End of academic yr	Common practice	Posts deleted
5.3	Website – pictures / news stories	Electronic	**All staff**	Date of post + one academic year	End of academic yr	Common practice	Posts deleted
6. HR – Recruitment Information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2022 para 417)							
6.1	All records leading up to the appointment of a new Head Teacher	Paper file in locked file in HT Office	**SBO**	Unsuccessful attempts - date of appointment + 6 months. Successful attempts - add to the staff personnel file and retain until the end of the appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years or information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for	Date of appointment	Common practice. Right to work - Immigration, Asylum and Nationality Act 2006	Secure disposal ~~(subject to IICSA)~~

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				extended retention of records relating to child sexual abuse.			
6.2	All records leading up to the appointment of a new member of staff (successful candidate)	Paper in HT locked Office cabinets	HT/SBO	Date of appointment + 6 years. This information should be added to the staff personnel file	Date of appointment	Common practice. Right to work - Immigration, Asylum and Nationality Act 2006	Secure disposal ~~(subject to IICSA)~~
6.3	All records leading up to the appointment of a new member of staff (unsuccessful candidate)	Paper in HT locked Office cabinets	HT/SBO	Date of interview + 12 months	Date of interview	Common practice	Secure disposal
6.4	Pre-employment vetting information of successful candidates	Paper in HT locked Office cabinets	HT/SBO	Application forms, references and other documents – for the duration of their employment + 6 years. Note there is no requirement to keep a copy of DBS once the details have been entered into the Single Central Record. At the end of employment, information contained in the Single Central Record should be transferred to the personnel file.	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2022	Secure disposal ~~(subject to IICSA)~~

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6.5	Proofs of identity	Paper in HT locked Office cabinets	HT/SBO	To be kept only as proof of right to work. Not kept for any other purpose. These documents should be added to the personal folder. Home Office requires that the documents are kept until termination of employment plus not less than 2 years.	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2022	Secure disposal (subject to IICSA)
6.6	Pre-employment vetting information of successful candidates – for the purposes of ensuring school staff are adequately qualified	Paper in HT locked Office cabinets	HT/SBO	To be added to the member of staff's personal folder	Date of receipt	KCSIE 2022	Secure disposal (subject to IICSA)
7. HR – Operational Staff Management Information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2022 para 417)							
7.1	Staff Personnel File	Paper in HT locked Office cabinets	HT/SBO	Termination of employment + 6 years	Date of appointment	Limitation Act 1980	Secure disposal ~~(subject to IICSA)~~
7.2	Timesheets	Paper – locked cupboards in SBO Office	HT/SBO	Current year + 6 years	Date of appointment	Common practice	Secure disposal ~~(subject to IICSA)~~
7.3	Annual appraisal/assessment records	Paper in HT locked Office cabinets	HT/SBO	Current year + 6 years	End of calendar year that the record was created in	Common practice	Secure disposal ~~(subject to IICSA)~~

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7.4	Sickness absence monitoring	Paper – locked cupboards in SBO Office	HT/SBO	Sickness records are categorised as 'sensitive data'. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records. Current practice recommends that sickness records should be held for the current year + 3 years.	Date of absence	Common practice & Statutory Sick Pay Act 1994	Secure disposal ~~(subject to IICSA)~~
7.5	Staff training records	Paper in HT locked Office cabinets	HT	Keep on personnel file	Date of appointment	Common practice (unless dictated by a professional body)	Secure disposal ~~(subject to IICSA)~~
7.6	Annual leave records	Electronic, Paper, Email with Derbyshire County Council	Held & actioned by Derbyshire County Council	6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year	End of relevant tax year	Common practice	Secure disposal
7.7	Working Time Regulations: · Opt out forms · Records of compliance with WTR	Electronic, Paper, Email with Derbyshire County Council	Held & actioned by Derbyshire County Council	2 years from the date on which they were entered into 2 years after the relevant period	End of relevant tax year	Common practice	Secure disposal

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7.8	Maternity/Adoption/Paternity Leave records	Electronic, Paper, Email with Derbyshire County Council	Held & actioned by Derbyshire County Council	Current year + 3 years	End of relevant tax year	Common practice	Secure disposal
7.9	Consents for the processing of personal and sensitive data	Electronic, Paper, Email with Derbyshire County Council	Held & actioned by Derbyshire County Council	For as long as the data is being processed and up to 6 years afterwards	End of employment	Common practice	Secure disposal
7.10	Staff policy acknowledgement	Electronic on server/Paper in HT Office	**HT**	Life of the policy + 3 years	Implementation of the policy	Common practice (unless otherwise dictated eg KCSIE, H&SWA)	Secure disposal ~~(subject to IICSA)~~
7.11	[see para 4.9 above regarding this] Staff 'skeleton' record (which would include a brief record of name, job role, contract start and end dates (and any information that would be needed to be included in a reference))	Electronic on Integris since 2016	**SBO**	Permanent. These form part of the historical archives of the school.	Archive on closure of the school.	Common Practice.	Offer to the Local Authority Record Office
7.12	Register of business interests	Paper in Gov files in SBO Office	**HT/SBO**	Date of appointment + 6 years	Date of appointment	Common practice	Secure disposal
8. HR - Management of Disciplinary and Grievance Processes Information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2022 para 417)							
8.1	Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded	Paper, Electronic or Email held in HT Office Files	**HT**	Until the person's normal retirement age or 10 years from the	Date of referral	KCSIE 2022	Secure disposal ~~(subject to IICSA)~~

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				date of allegation, whichever is longer, then review. Information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse NB – allegations that are found to be malicious should be removed from personnel files, from the date they are proven to be unfounded.			
8.2	Disciplinary proceedings: Verbal warning	Paper, Electronic or Email held in HT Office Files	**HT**	Date of warning + 6 months	Date of warning	KCSIE 2022	Secure disposal ~~(subject to IICSA)~~
8.3	Disciplinary proceedings: Written warning (level 1)	Paper, Electronic or Email held in HT Office Files	**HT**	Date of warning + 6 months	Date of warning	KCSIE 2022	Secure disposal ~~(subject to IICSA)~~
8.3	Disciplinary proceedings: Written warning (level 2)	Paper, Electronic or Email held in HT Office Files	**HT**	Date of warning + 12 months	Date of warning	KCSIE 2022	Secure disposal ~~(subject to IICSA)~~
8.4	Disciplinary proceedings: Final Warning	Paper, Electronic or Email held in HT Office Files	**HT**	Date of warning + 18 months	Date of warning	KCSIE 2022	Secure disposal ~~(subject to IICSA)~~

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8.5	Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings)	Paper, Electronic or Email held in HT Office Files	**HT**	If the incident is child protection related then see above; otherwise dispose following the conclusion of the case	Date of resolution	KCSIE 2022	Secure disposal ~~(subject to IICSA)~~
N.B. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct at a later date, and then defend themselves by denying they would undertake such an action, reference to the earlier proceedings may show that they should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that they had e.g. "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim. Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.							
9. HR – Payroll & Pensions							
9.1	Maternity Pay Records	Electronic, Paper, Email with Derbyshire County Council	Held & actioned by Derbyshire County Council, **see DCC Retention Policy**	Current year + 3 years	End of the financial year in which the maternity pay period ends	Statutory Maternity Pay (General) Regulations 1986	Secure disposal
9.2	Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity	Electronic, Paper, Email with Derbyshire County Council	Held & actioned by Derbyshire County Council, **see DCC**	Current year + 6 years	End of the financial year	Retirement Benefits Schemes (Information Powers)	Secure disposal

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			Retention Policy			Regulations 1995	
9.3	Batches, Bonus Sheets, Car Loans, Car Mileage Output, Insurance, Members Allowance Register, National Insurance (Schedule of payments), Part Time Fee claims, Payroll (gross/net, weekly or monthly), Payroll Reports, Payslips (copies), Pension Payroll, Superannuation adjustments and reports	Electronic, Paper, Email with Derbyshire County Council	Held & actioned by Derbyshire County Council, **see DCC Retention Policy**	Current year + 6 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal
9.4	Bonus sheets, Car Allowance claims, Overtime	Electronic, Paper, Email with Derbyshire County Council	Held & actioned by Derbyshire County Council, **see DCC Retention Policy**	Current year + 3 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal
9.5	Income Tax P60, Personal bank details. Tax Forms P6/P11/P11D/P35/P45/P46/P48	Electronic, Paper, Email with Derbyshire County Council	Held & actioned by Derbyshire County Council, **see DCC Retention Policy**	Current year + 6 years	End of the financial year	Common practice	Secure disposal
9.6	Absence records, Sickness records, Staff returns, Time Sheets/Clock Cards/Flexitime	Electronic, Paper, Email with Derbyshire County Council	Held & actioned by Derbyshire County Council,	Current year + 3 years	End of the financial year	Common practice	Secure disposal

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			see DCC Retention Policy				
9.7	Statutory Sick Pay	Electronic, Paper, Email with Derbyshire County Council	Held & actioned by Derbyshire County Council, **see DCC Retention Policy**	Current year + 3 years	End of the financial year	Common practice	Secure disposal
10. Health and Safety							
10.1	Accessibility Plans	Electronic on server	**HT**	Current year + 6 years	End of the calendar year that the records was created in	Equality Act 2010	Secure disposal
10.2	Health and Safety Policy Statements	Electronic on server & paper with HT	**HT**	Life of the policy + 3 years	Implementation of the policy	Common practice	Secure disposal
10.3	Health and Safety Risk Assessments	Electronic on server & paper with HT	**HT**	Life of the assessment + 3 years	Implementation of the assessment	Common practice	Secure disposal
10.4	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm) and https://www.hse.gov.uk/pubns/edis1.htm Adults	Paper in SBO Office	**HT**	Retain for 7 years	Date of incident	Common practice	Secure disposal

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10.5	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm) and https://www.hse.gov.uk/pubns/edis1.htm Children	Paper in SBO Office	**HT**	Retain for 25 years	Date of birth	Common practice	Secure disposal
10.6	Minor incidents (non reportable) accident book	Paper in SBO Office	**HT**	Retain for 3 years	End of academic year	Common practice	Secure disposal
10.7	Control of Substances Hazardous to Health (COSHH)	Controlled by Cleaning and/or Catering Contractor	Controlled by Cleaning and/or Catering Contractor	Current year + 40 years	Last action on file	The Control of Substances Hazardous to Health Regulations 2002	Secure disposal
10.8	Process of monitoring areas where employees/pupils are likely to come into contact with asbestos	Paper in Asbestos record book	**HT**	Last action + 40 years	Last action on file	The Control of Asbestos at Work Health Regulations 2012	Secure disposal
10.9	Process of monitoring areas where employees/pupils are likely to come into contact with radiation	N/A	**N/A**	Last action + 50 years	Last action on file	The Ionising Radiations Regulation 2017	Secure disposal
10.10	Fire Precautions log books	Paper in Fire Safety Book	**HT**	Current year + 3 years	End of calendar year	Common practice	Secure disposal
11. Financial Management – Risk & Insurance, Asset Management							
11.1	Employer's Liability Insurance Certificate	Electronic held by Derbyshire County Council	**see DCC Retention Policy**	Date of closure + 40 years	Closure of school	Common practice	Offer to Local Record Office

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11.2	Inventories of furniture and equipment	Paper and Electronic on DCC SAP system	**DCC see DCC Retention Policy & HT**	Current year + 6 years	End of calendar year	Common practice	Secure disposal
11.3	Burglary, theft and vandalism report forms	N/A	**N/A**	Current year + 6 years	End of calendar year	Common practice	Secure disposal
12. Financial Management – Accounts and Statements including Budget Management							
12.1	Annual accounts	Budget held by Derbyshire County Council electronically, paper "snapshot" copies held in school	**see DCC Retention Policy**	Current year + 6 years	End of financial year	Common practice	Offer to Local Record Office
12.2	Loans and grants managed by the school	N/A	**N/A**	Date of last payment on the loan + 12 years then review	End of financial year	Standard financial regulations	Secure disposal
12.3	Student Grant applications	N/A	**N/A**	Current year + 3 years	End of financial year	Standard financial regulations	Secure disposal
12.4	All records relating to the creation and managements of budgets, including the Annual Budget statement, and background papers	Budget held by Derbyshire County Council electronically, paper snapshot copies held in HT & Governor folders on the server and secure portal of the	**see DCC Retention Policy**	Current financial year + 3 years	End of financial year	Common practice	Secure disposal

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		website, paper copies in SBO or HT office					
12.5	Invoices, receipts, order books and requisitions, delivery notices	Paper order book and delivery notes held in school, all other accounting records held in Derbyshire County Council	**SBO/HT & see DCC Retention Policy**	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.6	Records relating to the collection and banking of monies	Electronic held by Derbyshire County Council	**see DCC Retention Policy**	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.7	Records relating to the identification and collection of debt	Electronic held by Derbyshire County Council	**see DCC Retention Policy**	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.8	Pupil Premium Fund records	Electronic held by Derbyshire County Council, paper copies held by school	**HT/SBO**	Date pupil leaves the provision + 6 years	End of financial year	Common practice	Secure disposal
13. Financial Management – Contract Management							
13.1	All records relating to the management of contracts under seal	N/A	**N/A**	Current year + 12 years	End of contract	The Limitation Act 1980	Secure disposal
13.2	All records relating to the management of contracts under signature	N/A	N/A	Current year + 6 years	End of contract	The Limitation Act 1980	Secure disposal

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13.3	Records relating to the monitoring of contracts	N/A	N/A	Current year + 6 or 12 years	End of calendar year	The Limitation Act 1980	Secure disposal
14. Financial Management – School Fund							
14.1	School Fund: • cheque books and paying in books • ledger • invoices • receipts • bank statements • journey books	Held in school safe/locked area of SBO office	**HT/SBO**	Current year + 6 years	End of use	Financial Services Act 2012, HMRC regulations Companies Act 2006	Secure disposal
15. Financial Management – School Meals							
15.1	Free School Meals Register	Electronic on SAMS via DCC. Paper in school with SLT/SBO	**SLT/SBO**	Current year + 6 years	End of calendar year	Common practice	Secure disposal
15.2	School Meals Register	Electronic on Integris MIS	**SBO**	Current year + 3 years	End of calendar year	Common practice	Secure disposal
153	School Meals Summary Sheets	Electronic on Integris MIS	**SBO**	Current year + 3 years	End of calendar year	Common practice	Secure disposal
16. Property Management							
16.1	Title deeds of properties belonging to the school	N/A	**N/A**	Permanent. These should follow the property unless the property has been registered with the Land Registry	Archive upon closure	Common practice	Offer to Local Authority Record Office

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16.2	All records relating to the maintenance of the school, carried out by contractors	Work carried out by or on behalf of DCC – held electronically by DCC. All other works paperwork held in school	**Caretaker SBO/HT**	Current financial year + 6 years Records relating to rewiring, major alterations etc must be retained in the health and safety file whilst the building belongs to the school and must be passed onto any new owners if the building is leased or sold.	End of financial year that the record was created in	Common practice	Secure disposal
16.3	All records relating to the maintenance of the school, carried out by school employees, including maintenance log book	n/a	**n/a**	Current calendar year + 6 years Records relating to rewiring, major alterations etc must be retained in the health and safety file whilst the building belongs to the school and must be passed onto any new owners if the building is leased or sold.	End of calendar year that the record was created in	Common practice	Secure disposal
16.4	Plans of property belonging to the school	n/a	**n/a**	These should be retained whilst the building belongs to the school and should be passed onto any new owners, if the	Transfer of asset	Common practice	Offer to Local Authority Record Office

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				building is leased or sold.			
16.5	Leases of property leased by, or to, the school	n/a	**n/a**	Expiry of lease + 6 years	Commencement of lease	Common practice	Secure disposal
16.6	Records relating to the letting of school premises	Electronic on DCC SAP	**Inv input by SBO**	Current financial year + 6 years	End of financial year that the record was created in	Common practice	Secure disposal
17. Pupil Education Record (see s2 Education Record (Pupil Information) Regulations 2005). SEN is dealt with in section 20							
17.1	Primary	Paper (SEN with SENDCO, pupil & child protection files in HT cabinet) and electronic (on Integris MIS files or MyConcern)		Retain whilst the child remains at the primary school	Date pupil changes school	Education (Pupil Information) (England) Regulations 2005	The file should follow the pupil when they leave the primary school (see 4.7 Last School. If pupil does not attend a secondary school, or the child dies, then records should be retained as per 17.2 below)
17.2	Secondary (or where the school is the 'last known school')	Paper only in school archive cabinet	**SBO**	Date of birth of the pupil + 25 years	Pupil's date of birth	The Limitation Act 1980	Secure disposal (subject to IICSA)
17.3	Examination Results - Pupil Copies Public	Paper copy goes with e/o/y report to parents, copy in pupil file	**SBO**	This information should be added to the pupil file	Date of examination	Common practice	Contact the relevant exam board to obtain instructions regarding whether

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							uncollected certificates to be returned to the examination board or destroyed after reasonable attempts to contact the pupil have failed.
17.4	Examination Results - Pupil Copies Internal	Paper copy in pupil file	**SBO**	This information should be added to the pupil file	Date of examination	Common practice	Secure disposal
17.5	[see para 4.7 above regarding this] Pupil 'skeleton' record (which would include a brief record of pupil names, UPNs, date of birth, address, parent details, date of admission, date of departure and destination (if known))	Electronic on Integris since 2016, Admissions books prior to this	**SBO**	Permanent. These form part of the historical archives of the school.	Archive on closure of the school.	Common Practice.	Offer to the Local Authority Record Office
18. Child Protection (CP) / Safeguarding Records							
18.1	Child Protection Information - Primary	Electronic files on MyConcern, Paper files in HT cabinet	**HT**	CP files must be transferred to the new school as soon as possible (5 days), to maintain continuity. Ensure secure transit, and a confirmation of receipt should be obtained. The CP file should be transferred separately	Date pupil changes school (Where a child is removed from the roll to be educated at home/missing from education, see below)	KCSIE para 112 & Annex C	Transferred to new or Secondary school. Duplicates must be securely disposed of.

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				from the main pupil file and include the paper version of the MC file. MC Electronic file to be deleted with 18 months, once the ongoing school confirms receipt.			
18.2	Child Protection (CP) Information – Secondary (or where the school is the 'last known school')	n/a	**n/a**	Where a pupil moves between secondary schools – treat as primary above. Otherwise, retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Pupil's date of birth (Where a child is removed from the roll to be educated at home/missing from education, see below)	KCSIE para 112 & Annex C Common Practice	Secure disposal (subject to IICSA)
18.3	Child Protection (CP) Information – Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths.	Electronic on Integris/Paper file in archive lockable cupboard	**HT / SBO**	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse must be preserved for 75 years in line with the IICSA	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Coordinator for Missing Children and Secure disposal ~~(subject to IICSA)~~

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				recommendations for extended retention of records relating to child sexual abuse.			
18.4	Child Protection (CP) Information – Child is removed from the roll and is Elective Home Educated	Electronic on Integris/Paper file in archive lockable cupboard	**HT**	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Elective Home Education Coordinator and Secure disposal ~~(subject to IICSA)~~
19. Attendance							
19.1	Attendance Registers	Electronic on Integris	**SBO & HT**	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	Last entry in register	The Education (Pupil Registration) (England) Regulations 2006	Secure disposal
19.2	Correspondence relating to authorized absence	Paper in Pupil File in HT Office /Electronic on Email & ParentHub	**SBO**	Date of absence + 2 years	Date of absence	DfE School attendance Guidance for maintained schools,	Secure disposal

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						academies, independent schools and local authorities August 2020	
20. Special Educational Needs (SEN)							
20.1	SEN files, reviews and Individual Education Plans – Primary	Paper in lockable cupboard in class or in SEND lockable cabinet / Electronic on Email and on server	**Staff**	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School, secure disposal of emails/copies of electronic files.
20.2	SEN files, reviews and Individual Education Plans – Secondary (or where the school is the 'last known school')	n/a	**n/a**	Date of birth of pupil + 35 years (This period is recommended by LA)	Pupil's date of birth	Special Educational Needs and Disability Act 2001 & Children and Families Act 2014	Secure disposal ~~(subject to IICSA)~~
20.3	Statement / Education Health Care Plan (EHCP) under Section 324 of the Education Act 1996 and any amendments made to the plan	Paper in lockable cupboard in class or in SEND lockable cabinet / Electronic on Email and on server	**Staff**	Date of birth of pupil + 25 years	Pupil's date of birth	Special Educational Needs and Disability Act 2001, Children and Families Act 2014 &	Transfer to ongoing or secondary school Secure disposal of electronic/duplicate files.~~(subject to IICSA)~~

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						The Limitation Act 1980	
21. Curriculum Management							
21.1	Curriculum returns	Electronic on server	**HT**	Current year + 3 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.2	Curriculum development	Electronic on server	**HT**	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.3	Examination Results (School's copy)	Electronic on server	**HT**	Current year + 6 years	Date of examination	Common practice	Secure disposal
21.4	SATs Results	Electronic on server	**HT**	The SATS result should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the ages of 25 years. The school may wish to keep a composite record of all the whole year SATS results. These could be kept for the current year + 6 years to allow suitable comparison	Date that results are released	Common practice	Secure disposal

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21.5	SATs Examination papers	Paper in archive lockable cupboard	**HT**	The examination papers should be kept until any appeals/validation process is complete	Date of examination	Common practice	Secure disposal
21.6	Published Admission Number (PAN) Reports	Electronic on server	**HT**	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.7	Value Added and Contextual Data	Electronic on server	HT	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.8	Self-Evaluation Forms	Electronic on server	HT	Current year + 6 years	Date of completion	Common practice	Secure disposal
21.9	Internal Moderation	Electronic on server	HT	Academic year + 1 academic year	Date of commencement	Common practice	Secure disposal
21.10	External Moderation	Electronic on server	HT	Until superseded	Date of commencement	Common practice	Secure disposal
22. Implementation of Curriculum							
22.1	Schemes of Work	Electronic on server	HT & Staff	Current year + 1 year	End of the academic year that the record was created in	Common practice	Review these records at the end of each year and allocate a further retention period or secure disposal
22.2	Timetable	Electronic on server	HT Staff	Current year + 1 year	End of the academic year	Common practice	Secure disposal

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					that the record was created in		
22.3	Class Record books, mark books, homework records (eg teacher spreadsheets etc)	Electronic on server	Staff	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.4	Pupil work	Paper in class rooms	Staff	Where possible, pupils' work should be returned to the pupil at the end of the academic year. If this is not, currently, the school's policy then it should be retained for the current year +1	End of the academic year that the record was created in	Common practice	Secure disposal
22.5	Online learning platforms	Electronic on Online platform	Teacher responsible for each platform	As above. Work should be cleared from platforms at the end of the following academic year	End of the academic year that the record was created in	Common practice	Secure disposal
22.6	Teacher diaries & Notebooks	Paper	**Staff**	Contents should be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. Destroyed within 3 months.	Expiration of diary. Completion of notebook	Common practice	Secure disposal
23. Extra Curriculum Management							
23.1	Records created by schools to obtain approval to run an Educational Visit	Electronic on server & EVOLVE	**Staff**	Date of visit + 14 years	Date of visit	The Health and Safety at	Secure disposal

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	outside the Classroom (Primary schools) where there has not been a Major Incident (Records created might include risk assessments)					Work Act 1974	
23.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Secondary schools) where there has not been a Major Incident	n/a	**n/a**	Date of visit + 10 years	Date of visit	The Health and Safety at Work Act 1974	Secure disposal
23.3	Parental consent forms for school trips where there has been no Major Incident	Electronic on server	**Staff**	No retention is required		Common practice	Secure disposal
23.4	Records created by schools to obtain approval for to run an Educational Visit outside the Classroom, **where there has been a Major Incident** (Records created might include risk assessments)	Electronic on server & EVOLVE	Staff	Retain for 25 years from the date of birth of the pupil/s involved in the incident	Pupil's DOB	The Limitation Act 1980	Secure disposal
23.5	Parental consent forms for school trips, **where there has been a Major Incident**	Electronic on server	Staff	Retain for 25 years from the date of birth of the pupil/s involved in the incident. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	Pupil's DOB	The Limitation Act 1980	Secure disposal
24. Family Liaison / Early Help / Alternative Provision							
24.1	Day books	Electronic on server.	HT	Current year + 2 years then review	End of the calendar year that the record was created in	Common practice	Secure disposal

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24.2	Reports for outside agencies – where the report has been included on the agency case file	Electronic on server/Paper in HT Office	HT	Whilst the child is attending school and then destroy	Date of completion of report	Common practice	Secure disposal ~~(subject to IICSA)~~
24.3	Referral forms	Electronic on server/Paper in HT Office	HT	While the referral is current	Date of completion of form	Common practice	Secure disposal ~~(subject to IICSA)~~
24.5	Contact data sheets and database entries	Electronic on server/Paper in HT Office	HT	Current year then review – if contact is no longer active then destroy	End of the calendar year that the record was created in	Common practice	Secure disposal ~~(subject to IICSA)~~
24.6	Group registers	Electronic on server/Paper in HT Office	HT	Current year + 2 years	Last entry in register	Common practice	Secure disposal
25. Local Authority							
25.1	Secondary Transfer sheets	Electronic on server/Paper in lockable cupboards in HT / SBO Office	HT & SBO	Current year + 2 years	Year of transfer	Common practice	Secure disposal
25.2	Attendance Returns	Electronic on server/Paper in lockable cupboards in HT / SBO Office	HT & SBO	Current year + 1 year	End of the calendar year that the record was created in	Common practice	Secure disposal
25.3	School Census Returns	Electronic on server/Paper in lockable cupboards in HT / SBO Office	HT & SBO	Current year + 5 years	Completion of return	Common practice	Secure disposal
25.4	Circulars and other information sent from the Local Authority	Electronic on server/Paper in	HT & SBO	Operational use	Date of issue	Common practice	Secure disposal

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		lockable cupboards in HT / SBO Office					
26. Central Government							
26.1	OFSTED reports and papers	Electronic on server/Paper in lockable cupboards in HT / SBO Office	HT & SBO	Retain whilst current	Date new report is issued	Common practice	Offer to Local Authority Record Office
26.2	Returns made to central government, including Schools financial value standard (SFVS) and assurance statement	Electronic on server/Paper in lockable cupboards in HT / SBO Office	HT & SBO	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
26.3	Circulars and other information sent from central government	Electronic on server/Paper in lockable cupboards in HT / SBO Office	HT & SBO	Operational use	Date of issue	Common practice	Secure disposal
27. Parent / Alumni Associations							
27.1	Records relating to the creation and management of PTA and Old Pupil Associations	n/a – held and governed by PTA directly	n/a – held and governed by PTA directly	Current year + 6 years	Date of foundation	Common practice	Secure disposal
28. Recordings (meetings, calls, online lessons) – schools, please adapt this section to suit ensuring it is consistent with the Acceptable Use policy section 7.8							
28.1	Incoming & Outgoing calls	n/a	**n/a**	Current Year plus 6 months	Date of call	Common practice	Secure disposal

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28.2	Meetings	Electronic on Server	**HT & Staff**	Current Year plus 6 months	Date of meeting	Common practice	Secure disposal
28.3	Online lessons	Electronic on Server	**HT & Staff**	Current Year plus 6 months	Date of lesson	Common practice	Secure disposal
28.4	Staff training	Electronic on Server	HT	Current Year plus 6 months	Date of staff training	Common practice	Secure disposal
29. Pupil Work Experience / Placement Records (Secondary schools)							
29.1	Records created by schools in relation of offsite pupil work experience where there has not been a Major Incident	n/a	**n/a**	Date of placement + 10 years	Date of placement	The Health and Safety at Work Act 1974	Secure disposal
29.2	Records created by schools in relation of offsite pupil work experience **where there has been a Major Incident**	n/a	**n/a**	Retain for 25 years from the date of birth of the pupil/s involved in the incident	Pupil's DOB	The Limitation Act 1980	Secure disposal
30. Administration of Medication							
30.1	Non-prescription medicines and remedies inc painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers	Paper-With medication and then into pupil file once completed.	All staff	Current year + 1 year	Date of administration	Limitation Act 1980	Secure disposal
30.2	All other administration of medication not covered by 30.1 including, but not limited to: peg feeding, injections, treatments for serious conditions such as diabetes, ADHD or depression	Paper-With medication and then into pupil file once completed.	All staff	Date of birth of the pupil + 25 years	Date of administration	Limitation Act 1980	Secure disposal

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Appendix A – List of School Records and Data safely destroyed

Specimen Checklist for Annual Review of School Records and Safe Data Destruction

The following is an example of how to create a destruction record – this could be a spreadsheet.

Reference Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of Destruction	Confirm; (i) Safely Destroyed (ii) In accordance with Data Retention Guidelines Yes/No	Name of Authorising Officer
1.	School invoices	Copies of purchase invoices dated 2011/12	Folders marked 'Purchase Invoices 2011/13' 1-3	3 Folders	Cross shredded	Yes	J Smith (Head)

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