



Lady Manners School

Record Retention and Deletion Policy

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|--------------------------|------------------------|
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| Approved by: | Senior Leadership Team |
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Through our shared school values, we aim for all students to thrive, feel included and aspire to grow as individuals who contribute to society with empathy, integrity and positivity.

This document will be reviewed annually by the Senior Leadership Team 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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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, alternatively you can select from an A-Z of relevant provisions.

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 Board](#)

[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](#)

[Student 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 \(student\)](#)

2. Introduction

This record retention and deletion policy contains recommended retention periods for the different record series created and maintained by Lady Manners 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 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.

3. Purpose

This policy, for managing records at Lady Manners 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.

As well as containing Record Retention tables, this document sets out more general information and 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. Equalities Statement of Intent

Lady Manners School welcomes a diverse population of both students and staff. In order to consolidate and build upon this diversity, equality of opportunity and the absence of unfair discrimination is at the core of all the school's activities. The school will not unfairly discriminate in the recruitment or general treatment of staff or students.

The school is committed to promoting and developing equality of opportunity in all its functions and will seek to do this by:

- communicating its commitment to equality and diversity to all members of the school community;
- maintaining systems for implementation, monitoring, evaluation and review;
- treating acts of discrimination and other contraventions of this policy as a disciplinary offence.

The Governing Board has responsibility for ensuring that the school operates within the legal framework for equality and for implementing the policy throughout the school. In addition, each member of the school community is responsible for preventing unfair discrimination or harassment or victimisation which it is within their control to prevent; and challenging or reporting such inappropriate behaviour if it occurs.

5. 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.

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 **Annex A**.

6. 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 for the collected materials could be turned over if the school archives should be discontinued.

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

8. Transfer of Records to other Settings and 'Last Known School'

When a child leaves the school, all student 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 2023](#) (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 student 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 should be aware that where electronic systems are used, sending a student file to the next setting does not mean that their own copy of the file is deleted, so action should be taken to delete or archive copies retained where they are no longer required by the school that the student has left.

There are four main categories of student records that need to be transferred to other settings:

- Management Information System (MIS) data
Data held on the MIS is extracted by the school using the Common Transfer File mechanism as specified in The Education (Student Information) (England) Regulations 2006 Statutory Instrument (SI) and in subsequent amendments (2005, 2008, 2016, 2018, 2019). The Department for Education specifies what data is to be included in the CTF file in technical specification documentation. This should mean that the majority of information held on the MIS is transferred using the CTF method. However, it is important to note that **not all personal data is transferred, only the data sets specified in the CTF schema**. If the MIS has been used to store additional information (documents such as copies of end of year reports or letters) schools must take proactive action to ensure these are sent separately and securely. Traditionally, this sort of documentation was held in a student 'buff' file, but as schools have turned to digital ways of working, these are frequently stored by attaching them to the digital MIS record.
- Safeguarding/Child Protection records
Schools frequently use vendor edtech products to hold and transfer these records. Many of these products include the functionality to electronically transfer a copy

of (and obtain receipt for) student records directly to the next school, where the same product is also used by the receiving school. Where this is not possible, these products should have the functionality to download a student record for it to them be transferred electronically or printed out and delivered to the new school. Paper records should be dealt with carefully to ensure that these are safely received by the new school.

Some safeguarding edtech products enable schools to use the same system to record behavioural and other information in the same log. Schools should ensure that safeguarding/child protection records are clearly identified as such so that the receiving school can quickly identify this information. The school should consider if information such as behaviour notes needs to be transferred to the next setting, or whether it should be deleted if no longer required or relevant (e.g. a child's toileting routine may be very relevant when younger, or merits/demerits re but does not need to be part of a permanent safeguarding record).

- **Special Educational Needs records**
It is becoming more common for schools to use vendor edtech products to manage these records. Whether stored in such edtech products, on school IT systems/cloud storage or on paper, the SEND co-ordinator must ensure that a complete record is compiled and passed securely to the next school.
- **Student 'buff' files**
For many schools, in recent years, the traditional student buff files have dwindled in relevance and importance as schools have increasingly moved to digital storage. Schools are left with either sending or receiving folders which are very light and seemingly irrelevant. However, there will be documentation, whether on paper or electronic (on the server, in emails, in the MIS) that should be sent to the next setting that the student will attend. The Education (Student Information) (England) Regulations 2005 state that this "Educational Record" should be transferred to the next setting within 15 school days of confirmation that a student is registered at another school. There may be a significant amount of material that is not contained in the CTF file, safeguarding or SEND records that should be transferred to the next setting. Schools may have inadvertently not adapted their records transfer practices as management of these records have moved from a paper 'buff' file to digital format and so this should be noted where relevant on the retention schedule below.

Schools may wish to retain some minimal 'skeleton' data about students' admission, departure and next destination (where known) in order to respond to any requests for information about these students and for the school's historical archive. They may also wish to retain records relating to safeguarding/child protection or SEND records, even though there is no legislative requirement to do so (i.e. to have their own copy of evidence in case of any later legal action). If schools intend to create and maintain skeleton records or retain copies of 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 student records for a longer time period. If the school does retain student 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 student has left the school. See section 17.5 below.

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

The school is the final or last known school if:

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

Tertiary colleges are not included in this definition, therefore the school will retain the record. However, the college must receive a copy of the child protection file, as per the requirements of KCSIE above.

The Student Record should be retained as a whole for 25 years from the date of birth of the student, 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.

9. Management Information System (MIS)

The majority of student records and some staff records are held on the school MIS. Managing data retention on the MIS can be complex because different data sets held on the MIS have different retention requirements. For example, information relating to emergency contacts is only required when a student or staff is a member of the school, and this information can be deleted quickly once they have left, whereas information relating to school meal and other financial transactions will need to be retained for six years (plus current) in line with financial retention requirements. Until 18 August 2024, legislation states that student admissions records and attendance records needed to be retained for three years from the date of entry, but from 19 August 2024, this information must be retained for six years. School staff have limited time and resources to manage these differing retention periods and should work with their MIS provider to request support on how to efficiently delete data sets from a record without deleting the entire record (or deleting all data sets except those that are required as part of the 'skeleton' record for long term retention). Where this is not possible, schools may make a policy decision to retain the entirety of a record for the longest applicable retention period for a data set within the MIS (usually current plus six years). The school should set out how records will be retained in the MIS in the relevant section of the Retention Table below.

10. 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 particularly need to consider digital continuity where:

- they hold relevant records for staff or governors, or
- they are the 'last known school' responsible for this long retention period for any relevant student records.

Where there is evidence, or allegations of child sexual abuse, then it will almost certainly be appropriate to retain the entire student, 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.

11. Retention of Records relating to Staff

As stated above regarding the long-term retention of minimal student 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).

12. Responsibility and Monitoring

The Headteacher and Data Lead, hold 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 Headteacher 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.

13. Retention Tables

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---------------------------|--|--|--------------------|--|------------------------|-----------------|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| 1. Governing Board | | | | | | | |
| 1.1 | Instrument of Government | GovernorHub | Clerk to Governors | 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 Board | School Business Manager | Clerk to Governors | 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 | GovernorHub | Clerk to Governors | Until superseded or whilst relevant (schools may wish to retain these records for reference purposes in case decisions | Expiration of terms | Common practice | If the school is unable to store these, they should be offered to the Local Authority Office |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----|---|--|--------------------|--|---------------------|-----------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | need to be justified) | | | |
| 1.4 | Governor's Code of Conduct | GovernorHub | Clerk to Governors | One copy of each version should be kept for the life of the school. | | Common practice | |
| 1.5 | Records relating to the election of chair and vice chair | GovernorHub | Clerk to Governors | 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 Board | HR records | HR Officer | 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 | Clerk to Governor records | Clerk to Governors | Date of election + 6 months | Date of election | Common practice | Secure disposal |
| 1.8 | Records relating to the appointment of co-opted governors | Clerk to Governor records | Clerk to Governors | Provided that the decision has been recorded in the minutes, the records relating to the | Date of appointment | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------|---|--|--------------------|--|-------------------------|-----------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | 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 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 | Clerk to Governor records | Clerk to Governors | End of term in office + 1 year | End of period of office | Common practice | Secure disposal |
| 1.10 | Appointment documentation: | Clerk to Governor /HR records | Clerk to Governors | End of term of office + 6 years (note HR | Date of appointment | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------|--|--|--------------------|--|---|--|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | <ul style="list-style-type: none"> • 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 Board • Governor personnel files. | | | records may require different retention) | | | |
| 1.11 | Annual Reports | Not applicable | Clerk to Governors | 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 |
| 1.12 | Annual reports required by the Department of Education | Not applicable | Clerk to Governors | Date of report + 10 years | Date of report | Common practice | Secure disposal |
| 1.13 | Meetings schedule | GovernorHub | Clerk to Governors | Current year | Date of meeting | Common practice | Secure disposal |
| 1.14 | Agendas for Governing Board meetings | GovernorHub | Clerk to Governor | Clerk to Governors | Conclusion of meeting | Common practice | Secure disposal |
| 1.15 | Register of attendance at Full Governing Board meetings | GovernorHub | Clerk to Governor | Date of meeting + 6 years | Date of meeting | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------|---|--|-------------------|---|---------------------------|-----------------|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| 1.16 | Minutes of Governing Board meetings (Principal Set signed) | GovernorHub | Clerk to Governor | 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 Board | GovernorHub | Clerk to Governor | Until superseded or whilst relevant | Expiration of action plan | Common practice | Secure disposal |
| 1.18 | Reports presented to the Governing Board | GovernorHub | Clerk to Governor | 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 Board | GovernorHub | Clerk to Governor | A copy of each policy should create a time line of policy development OR a robust version control which allows a snapshot of a | Expiration of the policy | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------|--|--|--------------------|---|-------------------------|-------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | 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 Board and/or Headteacher | Clerk to Governors documents | Clerk to Governors | 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 | Resolution of complaint | | |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|---|-----------------------|--|------------------------------------|-----------------|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. | | | |
| 1.21 | Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies | GovernorHub | Clerk to Governors | 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 | GovernorHub | Clerk to Governors | Date of visit + 3 years | Date of visit | Common practice | Secure disposal |
| 2. Headteacher and Senior Management/Leadership Team | | | | | | | |
| 2.2 | Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies | PA to the Headteacher documents | PA to the Headteacher | Date of the meeting + 3 years | Date of the meeting | Common practice | Secure disposal |
| 2.3 | Correspondence created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities - not principally concerning students, | Email (see email retention period in section 5) | | Date of correspondence + 3 years and then review | Date of correspondence | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|----------------------|---|--|-------------------------|---|---------------------|---|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | staff or complaints. In those cases, correspondence should be immediately transferred to the relevant file. | | | | | | |
| 2.4 | Professional Development Plans | HR records | HR Officer | Life of plan + 6 years | Date plan commences | Common practice | Secure disposal |
| 2.5 | School Development Plans | Headteacher records | Headteacher | Life of plan + 3 years | Date plan commences | Common practice | Secure disposal |
| 2.6 | Other records created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities outside of Business as Usual tasks | Staff documents | Staff | Current academic year + 6 years then review | Date of record | Common practice | Secure disposal |
| 3. Admissions | | | | | | | |
| 3.1 | All records relating to the creation and implementation of the School's Admission's Policy | GovernorHub | Clerk to Governors | Life of the policy + 7 years then review | | The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012 | 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. | Student file | School Business Officer | Added to the student file | Date of admission | and | |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----|---|--|-------------------------|--|-------------------------------|---|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| 3.3 | Admissions - if the admission is unsuccessful (where no appeal is made) | School Business Officer documents | School Business Officer | Date of applied for admission + 1 year | Date of applied for admission | School Admissions Code Statutory Guidance 2021 | Secure disposal |
| 3.4 | Admissions - if the admission is unsuccessful (where an appeal is made) | School Business Officer documents | School Business Officer | Resolution of case + 1 year | Resolution of case | | Secure disposal |
| 3.5 | Register of Admissions | | | Every entry in the School admission and attendance register is to be preserved for 6 years beginning with the day on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates. | Last entry in register | School Attendance (Student Registration) (England) Regulations 2024 Regulations 5, 7 (which comes into force on 19 August 2024) 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 | School Business Officer documents | School Business Officer | Current year + 1 year | Date of admission | School Admissions Code Statutory Guidance 2021 | Secure disposal |
| 3.7 | Admissions (Secondary School - Casual) | School Business Officer documents | School Business Officer | 3 years from the date of admission | Date of admission | The Education (Student | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
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| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | | | Registration) (England) Regulations 2006 | |
| 3.8 | Supplementary information forms to include; religion, medical conditions etc. For successful admissions | Student file | School Business Officer | This information should be added to the student file | Date of admission/annual data check | The Limitation Act 1980 | Secure disposal |
| 3.9 | Supplementary information forms to include; religion, medical conditions etc. For unsuccessful admissions | School Business Officer documents | School Business Officer | Until the appeal process is completed | Date of admission | | |
| 4. Operational Administration | | | | | | | |
| 4.1 | Records relating to the creation and publication of the school brochures or prospectus | School Business Officer documents | School Business Officer | 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 students | School Business Officer documents | School Business Officer | Current year + 1 year | Date of record | Common practice | Offer to the Local Authority Record Office |
| 4.3 | Newsletters and other items with short operational use | School Business Officer documents/web site | School Business Officer | 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) | Reception | Business Services Team Leader | Current year + 6 years then review | End of calendar year | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------|---|--|--------------------------------------|---|----------------------------|-----------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 4.5 | Records relating to the creation and management of Parent Teacher Associations and/or Old Student Associations | Main Office | Business Services Team Leader | Current year + 6 years then review | Date of record | Common practice | Secure disposal |
| 4.6 | Student and Family Privacy Notice which is made available via the school website as part of UK GDPR compliance | School Business Officer documents/web site | School Business Officer | 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 for photographs to be published, social media / website etc as well as for mailings) | Main Office | Business Services Team Leader | This information should be added to the student file | Date of admission | Common practice | |
| 4.8 | Security breach logs | School Business Officer documents | School Business Officer | Date of issue + 25 years (students) and 6 years (staff) | Date of implementation | Common practice | Secure disposal |
| 4.9 | Digital Continuity Plans | | | Date of issue + 6 years | Expiration of current plan | Common practice | Secure disposal |
| 4.10 | Call Recordings (including VOIP messages and recordings) | Main office | Business Services Team Leader | Not applicable | 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) | IT network | Network Manager / Facilities Manager | Maximum 40 days Extractions maintained as part of student record | Date of footage recording | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---------------------------------|---|---|-------------------------|--|--|-----------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 5. School Communications | | | | | | | |
| 5.1 | School emails containing personal data - inbox, sent items, deleted items | Deleted items (email) Inbox/Sent items | Network Manager | Deleted items permanently deleted regularly Inbox /sent items transferred to appropriate record keeping (eg staff file, student record, MIS safeguarding / behaviour log) as soon as possible. The Code of Practice states that there is no need to retain ephemeral material and this may be destroyed on a routine basis. | In line with guidance in Acceptable use policy | Common practice | Full deletion |
| 5.2 | Social media platforms | Facebook | School Business Officer | Current + 1 year | End of academic year | Common practice | Posts deleted |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|--|--|-------------------|---|----------------------|---|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 5.3 | Website - pictures / news stories | Website | IT Technician | | End of academic year | Common practice | Posts deleted |
| <p>6. HR - Recruitment</p> <p>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 2023 para 418).</p> | | | | | | | |
| 6.1 | All records leading up to the appointment of a new Headteacher | Clerk to Governor records | Clerk to Governor | 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 | Date of appointment | Common practice. Right to work - Immigration, Asylum and Nationality Act 2006 | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----|---|--|--------------------------------------|---|---------------------|---|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | must be preserved for 75 years in line with the IICSA recommendations for 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) | HR documents | HR Officer / School Business Officer | This information should be added to the staff personnel file | Date of appointment | Common practice. Right to work - Immigration, Asylum and Nationality Act 2006 | |
| 6.3 | All records leading up to the appointment of a new member of staff (unsuccessful candidate) | HR documents | HR Officer / School Business Officer | Date of appointment + 6 months | Date of appointment | Common practice | Secure disposal |
| 6.4 | Pre-employment vetting information of successful candidates | HR documents | HR Officer / School Business Officer | Application forms, references and other documents – for the duration of their employment + 6 years. Note | Date of receipt | Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2023 | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----|--------------------|--|--------------------------------------|--|-----------------|--|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | 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. | | | |
| 6.5 | Proofs of identity | HR documents | HR Officer / School Business Officer | 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 | Date of receipt | Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2023 | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|--|--|--|--------------------------------------|---|---|---|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | employment plus not less than 2 years. | | | |
| 6.6 | Pre-employment vetting information of successful candidates - for the purposes of ensuring school staff are adequately qualified | HR documents | HR Officer / School Business Officer | To be added to the member of staff's personal folder | Date of receipt | KCSIE 2023 | Secure disposal |
| 7. HR - Operational Staff Management | | | | | | | |
| <p>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 2023 para 418)</p> | | | | | | | |
| 7.1 | Staff Personnel File | HR documents | HR Officer | Termination of employment + 6 years | Date of appointment | Limitation Act 1980 | Secure disposal |
| 7.2 | Timesheets | HR documents | HR Officer | Current year + 6 years | Date of appointment | Common practice | Secure disposal |
| 7.3 | Annual appraisal/assessment records | SISRA Observe | HR Officer | Current year + 6 years | End of calendar year that the record was created in | Common practice | Secure disposal |
| 7.4 | Sickness absence monitoring | Access | HR Officer | Sickness records are categorised as 'sensitive data'. There is a legal obligation under | Date of absence | Common practice & Statutory Sick Pay Act 1994 | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----|------------------------|--|------------------|--|--------------------------|--|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | 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. | | | |
| 7.5 | Staff training records | SISRA Observe/Access | HR Officer | Keep on personnel file (see above). | Date of appointment | Common practice (unless dictated by a professional body) | Secure disposal |
| 7.6 | Annual leave records | Access | HR Officer | 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 |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------|--|--|------------------|--|-----------------------------------|---|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| 7.7 | Working Time Regulations: <ul style="list-style-type: none"> • Opt-out forms • Records of compliance with WTR | HR documents | HR Officer | 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 |
| 7.8 | Maternity/Adoption/Paternity Leave records | HR documents | HR Officer | Current year + 3 years | End of relevant tax year | Common practice | Secure disposal |
| 7.9 | Consents for the processing of personal and sensitive data | HR documents | HR Officer | 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 | HR documents | HR Officer | Life of the policy + 3 years | Implementation of the policy | Common practice (unless otherwise dictated eg KCSIE, H&SWA) | Secure disposal |
| 7.11 | [see para 1.9 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) | SIMS | HR Officer | 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 |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|--|-------------------------|---|---------------------|-----------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 7.12 | Register of business interests | School Business Officer documents | School Business Officer | Date of appointment + 6 years | Date of appointment | Common practice | Secure disposal |
| <p>8. HR - Management of Disciplinary and Grievance Processes</p> <p>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 2023 para 418)</p> | | | | | | | |
| 8.1 | Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded | HR files | HR Officer | Until the person's normal retirement age or 10 years from the 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 | Date of referral | KCSIE 2023 | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-----|--|--|------------------|--|--------------------|------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | 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 | HR files | HR Officer | Date of warning + 6 months | Date of warning | KCSIE 2023 | Secure disposal |
| 8.3 | Disciplinary proceedings: Written warning (level 1) | HR files | HR Officer | Date of warning + 6 months | Date of warning | KCSIE 2023 | Secure disposal |
| 8.3 | Disciplinary proceedings: Written warning (level 2) | HR files | HR Officer | Date of warning + 12 months | Date of warning | KCSIE 2023 | Secure disposal |
| 8.4 | Disciplinary proceedings: Final Warning | HR files | HR Officer | Date of warning + 18 months | Date of warning | KCSIE 2023 | Secure disposal |
| 8.5 | Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings) | HR files | HR Officer | If the incident is child protection related then see above; otherwise dispose following the conclusion of the case | Date of resolution | KCSIE 2023 | Secure disposal |

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.

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|--|--|------------------|------------------------|--|---|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| <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 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.</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, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.</p> | | | | | | | |
| 9. HR - Payroll and Pensions | | | | | | | |
| 9.1 | Maternity Pay Records | HR files | HR Officer | 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 | HR files | HR Officer | Current year + 6 years | End of the financial year | Retirement Benefits Schemes (Information Powers) Regulations 1995 | Secure disposal |
| 9.3 | Batches, Bonus Sheets, Car Loans, Car Mileage Output, Insurance, Members Allowance Register, National Insurance | HR files | HR Officer | Current year + 6 years | End of the financial year | Taxes and Management Act 1970, Income and | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------------------------------|---|--|-------------------------|------------------------|--|--|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | (Schedule of payments), Part Time Fee claims, Payroll (gross/net, weekly or monthly), Payroll Reports, Payslips (copies), Pension Payroll, Superannuation adjustments and reports | | | | | Corporation Taxes Act 1988 | |
| 9.4 | Bonus sheets, Car Allowance claims, Overtime | HR files | HR Officer | 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 | HR files | HR Officer | 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 | HR files | HR Officer | Current year + 3 years | End of the financial year | Common practice | Secure disposal |
| 9.7 | Statutory Sick Pay | HR files | HR Officer | Current year + 3 years | End of the financial year | Common practice | Secure disposal |
| 10. Health and Safety | | | | | | | |
| 10.1 | Accessibility Plans | Student and staff records | School Business Manager | Current year + 6 years | End of the calendar year that the records was created in | Equality Act 2010 | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------|--|--|-------------------------|----------------------------------|----------------------------------|--|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 10.2 | Health and Safety Policy Statements | Moodle | School Business Manager | Life of the policy + 3 years | Implementation of the policy | Common practice | Secure disposal |
| 10.3 | Health and Safety Risk Assessments | SBM documents | School Business Manager | 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 | SBM documents | School Business Manager | Retain for 7 years | Date of incident | Common practice | Secure disposal |
| 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 | SBM documents | School Business Manager | Retain for 25 years | Date of birth | Common practice | Secure disposal |
| 10.6 | Minor incidents (non reportable) accident book | SBM documents | School Business Manager | Retain for 3 years | End of academic year | Common practice | Secure disposal |
| 10.7 | Control of Substances Hazardous to Health (COSHH) | SBM documents | School Business Manager | Current year + 40 years | Last action on file | The Control of Substances Hazardous to Health Regulations 2002 | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|--|-------------------------|----------------------------|-----------------------|---|------------------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 10.8 | Process of monitoring areas where employees/students are likely to come into contact with asbestos | SBM documents | School Business Manager | 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/students are likely to come into contact with radiation | SBM documents | School Business Manager | Last action + 50 years | Last action on file | The Ionising Radiations Regulation 2017 | Secure disposal |
| 10.10 | Fire Precautions log books | SBM documents | School Business Manager | Current year + 3 years | End of calendar year | Common practice | Secure disposal |
| 11. Financial Management - Risk and Insurance, Asset Management | | | | | | | |
| 11.1 | Employer's Liability Insurance Certificate | SBM documents | School Business Manager | Date of closure + 40 years | Closure of school | Common practice | Offer to Local Record Office |
| 11.2 | Inventories of furniture and equipment | SBM documents | School Business Manager | Current year + 6 years | End of calendar year | Common practice | Secure disposal |
| 11.3 | Burglary, theft and vandalism report forms | SBM documents | School Business Manager | 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 | SBM documents | School Business Manager | Current year + 6 years | End of financial year | Common practice | Offer to Local Record Office |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|--|-------------------------|---|-----------------------|--------------------------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 12.2 | Loans and grants managed by the school | SBM documents | School Business Manager | 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 | SBM documents | School Business Manager | 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 | SBM documents | School Business Manager | Current financial year + 3 years | End of financial year | Common practice | Secure disposal |
| 12.5 | Invoices, receipts, order books and requisitions, delivery notices | SBM documents | School Business Manager | 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 | SBM documents | School Business Manager | 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 | SBM documents | School Business Manager | Current financial year + 6 years | End of financial year | Standard financial regulations | Secure disposal |
| 12.8 | Student Premium Fund records, including evidence of successful FSM eligibility checks | SBM documents | School Business Manager | Date student 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 | SBM documents | School Business Manager | Current year + 12 years | End of contract | The Limitation Act 1980 | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|--|---|--|-------------------------|------------------------------|----------------------|--|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 13.2 | All records relating to the management of contracts under signature | SBM documents | School Business Manager | Current year + 6 years | End of contract | The Limitation Act 1980 | Secure disposal |
| 13.3 | Records relating to the monitoring of contracts | SBM documents | School Business Manager | 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: <ul style="list-style-type: none"> • cheque books and paying in books • ledger • invoices • receipts • bank statements • journey books | SBM documents | School Business Manager | 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, including evidence of successful SFM eligibility checks | SIMS | School Business Officer | Current year + 6 years | End of calendar year | Common practice | Secure disposal |
| 15.2 | School Meals Register | SIMS | School Business Officer | Current year + 3 years | End of calendar year | Common practice | Secure disposal |
| 15.3 | School Meals Summary Sheets | Not applicable | Not applicable | Current year + 3 years | End of calendar year | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|--------------------------------|---|--|-------------------------|--|--|-----------------|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| 16. Property Management | | | | | | | |
| 16.1 | Title deeds of properties belonging to the school | SBM documents | School Business Manager | 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 |
| 16.2 | All records relating to the maintenance of the school, carried out by contractors | SBM documents | School Business Manager | 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 |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------|--|--|-------------------------|---|---|-----------------|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| 16.3 | All records relating to the maintenance of the school, carried out by school employees, including maintenance log book | SBM documents | School Business Manager | 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 | SBM documents | School Business Manager | 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. | Transfer of asset | Common practice | Offer to Local Authority Record Office |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|--|--|-------------------------|---|--|-------------------------|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| 16.5 | Leases of property leased by, or to, the school | SBM documents | School Business Manager | Expiry of lease + 6 years | Commencement of lease | Common practice | Secure disposal |
| 16.6 | Records relating to the letting of school premises | SBM documents | School Business Manager | Current financial year + 6 years | End of financial year that the record was created in | Common practice | Secure disposal |
| <p>17. Student Education Record (see s2 Education Record (Student Information) Regulations 2005)</p> <p>Much of this information is stored in electronic form on the school's Management Information System SIMS SEN is dealt with in section 20.</p> | | | | | | | |
| 17.2 | Secondary (or where the school is the 'last known school') | SIMS | School Business Officer | Date of birth of the student + 25 years | Student's date of birth | The Limitation Act 1980 | Secure disposal |
| 17.3 | Examination Results - Student Copies Public | SIMS | Data Manager | This information should be added to the student file and any certificates should be safely handed over to students. | Date of examination | Common practice | Contact the relevant exam board to obtain instructions regarding whether uncollected certificates to be returned to the examination board or destroyed after reasonable attempts to contact the |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|--|------------------|---|---|---|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | | | | student have failed. |
| 17.4 | Examination Results - Student Copies Internal | SIMS | Data Manager | This information should be added to the student file | Date of examination | Common practice | Secure disposal |
| 17.5 | [see para 4.7 above regarding this] Student 'skeleton' record (which would include a brief record of student names, UPNs, date of birth, address, parent details, date of admission, date of departure and destination (if known)) | SIMS | Data Manager | 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 | | | | | | | |
| 18.2 | Child Protection (CP) Information - Secondary (or where the school is the 'last known school') | CPOMS | DSL | Where a student 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 | Student's date of birth (Where a child is removed from the roll to be educated at home/missing from education, see below) | KCSIE 2023 & Annex C Common Practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------|--|--|------------------|---|------------------------|--|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. | | | |
| 18.3 | Child Protection (CP) Information - Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths. | CPOMS | DSL | 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 Coordinator for Missing Children and Secure disposal |
| 18.4 | Child Protection (CP) Information - Child is removed from the roll and is Elective Home Educated | CPOMS | DSL | Retain for 25 years from the child's date of | Date removed from roll | Common Practice (there is | Transfer to LA Elective Home |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------|--|--|------------------|--|-------------|--|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | 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. | | guidance in KCSIE, but not as to retention period) | Education Coordinator and Secure disposal |
| 18.5 | Filtering and Monitoring Logs. Where these indicate a child protection/safeguarding concern, the log will be added to the student CP Information and retained in line with the periods in 18.1-18.4. | CPOMS | DSL | [Schools to complete this by checking with provider e.g. Retained on [provider dash board] for up to 18 months. We will request deletion of erroneous logs as soon as is practically possible.] | Date of log | Common Practice | Deletion |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
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| | | | | Period | Trigger | Basis | Action at end of use |
| 19. Attendance | | | | | | | |
| 19.1 | Attendance Registers | SIMS | Deputy Headteacher (Pastoral) | Every entry in the School admission and attendance register is to be preserved for 6 years beginning with the day on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates. | Last entry in register | School Attendance (Student Registration) (England) Regulations 2024 Regulations 5, 7 (which comes into force on 19 August 2024). | Secure disposal |
| 19.2 | Correspondence relating to authorised absence | SIMS | Assistant Headteacher | Date of absence + 2 years | Date of absence | DfE School attendance Guidance for maintained schools, academies, independent schools and local authorities May 2022 | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|--|---|--|------------------|--|---|---|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 20. Special Educational Needs (SEN) | | | | | | | |
| 20.2 | SEN files, reviews and Individual Education Plans - Secondary (or where the school is the 'last known school') | Student records | SENDCo | Date of birth of student + 35 years (This period is recommended by LA) | Student's date of birth | Special Educational Needs and Disability Act 2001 & Children and Families Act 2014 | Secure disposal |
| 20.3 | Statement / Education Health Care Plan (EHCP) under Section 324 of the Education Act 1996 and any amendments made to the plan | Student records | SENDCo | Date of birth of student + 25 years | Student's date of birth | Special Educational Needs and Disability Act 2001, Children and Families Act 2014 & The Limitation Act 1980 | Secure disposal |
| 21. Curriculum Management | | | | | | | |
| 21.1 | Curriculum returns | | | Current year + 3 years | End of the calendar year that the record was created in | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|------|-------------------------------------|--|------------------|--|---|-----------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 21.2 | Curriculum development | | | 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) | SIMS | Data Manager | Current year + 6 years | Date of examination | Common practice | Secure disposal |
| 21.4 | SATs Results | SIMS | Data Manager | The SATS result should be recorded on the student's educational file and will therefore be retained until the student 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 |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
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| | | | | Period | Trigger | Basis | Action at end of use |
| 21.6 | Published Admission Number (PAN) Reports | School records | School Business Officer | 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 | In IDSR | Headteacher | Current year + 6 years | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 21.8 | Self-Evaluation Forms | School records | Headteacher | Current year + 6 years | Date of completion | Common practice | Secure disposal |
| 21.9 | Internal Moderation | School records | Senior Assistant Headteacher | Academic year + 1 academic year | Date of commencement | Common practice | Secure disposal |
| 21.10 | External Moderation | School records | LA and DfE | Until superseded | Date of commencement | Common practice | Secure disposal |
| 22. Implementation of Curriculum | | | | | | | |
| 22.1 | Schemes of Work | School records | Curriculum Leaders | 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 | School records | Deputy Headteacher | Current year + 1 year | End of the academic year that the | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
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| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | | record was created in | | |
| 22.3 | Class Record books, mark books, homework records (eg teacher spreadsheets etc) | School records | Teachers | Current year + 1 year | End of the academic year that the record was created in | Common practice | Secure disposal |
| 22.4 | Student work | School records | Teachers | Where possible, students' work should be returned to the student 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 | School records | 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 | Staff | Staff | Contents should be transferred to appropriate | Expiration of diary. | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|--|--|--|-------------------------------|--|------------------------|--|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | | | | record keeping (eg staff file, student record, MIS safeguarding / behaviour log) as soon as possible. Destroyed within 3 months. | Completion of notebook | | |
| 23. Extra Curriculum Management | | | | | | | |
| 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 | Evolve | Deputy Headteacher | 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 | School records | Business Services Team Leader | 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) | School records | Deputy Headteacher | Retain for 25 years from the date of birth of the student/s involved in the incident | Student's DOB | The Limitation Act 1980 | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|--|---|--|--------------------|---|---|-------------------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 23.5 | Parental consent forms for school trips, where there has been a Major Incident | School records | Deputy Headteacher | Retain for 25 years from the date of birth of the student/s involved in the incident. The permission slips for all the students on the trip need to be retained to show that the rules had been followed for all students | Student's DOB | The Limitation Act 1980 | Secure disposal |
| 24. Family Liaison / Early Help / Alternative Provision | | | | | | | |
| 24.1 | Day books | | | Current year + 2 years then review | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 24.2 | Reports for outside agencies - where the report has been included on the agency case file | Student records | Pastoral Team | Whilst the child is attending school and then destroy | Date of completion of report | Common practice | Secure disposal |
| 24.3 | Referral forms | Student records | Pastoral Team | While the referral is current | Date of completion of form | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|-------------------------------|---|--|-------------------------|--|---|-----------------|--|
| | | | | Period | Trigger | Basis | Action at end of use |
| 24.5 | Contact data sheets and database entries | Student records | Pastoral Team | 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 |
| 24.6 | Group registers | Student records | Pastoral Team | Current year + 2 years | Last entry in register | Common practice | Secure disposal |
| 25. Local Authority | | | | | | | |
| 25.1 | Secondary Transfer sheets | | | Current year + 2 years | Year of transfer | Common practice | Secure disposal |
| 25.2 | Attendance Returns | | | Current year + 1 year | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 25.3 | School Census Returns | School records | Data Manager | Current year + 5 years | Completion of return | Common practice | Secure disposal |
| 25.4 | Circulars and other information sent from the Local Authority | School records | School Business Officer | Operational use | Date of issue | Common practice | Secure disposal |
| 26. Central Government | | | | | | | |
| 26.1 | OFSTED reports and papers | Website and school records | School Business Officer | 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 | School Business | School Business Manager | Current year + 6 years | End of the calendar year that the | Common practice | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|--|-------------------------|--|-----------------------|--|---------------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| | financial value standard (SFVS) and assurance statement | Manager records | | | record was created in | | |
| 26.3 | Circulars and other information sent from central government | Email | School Business Officer | 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 Student Associations | School records | School Business Manager | Current year + 6 years | Date of foundation | Common practice | Secure disposal |
| 28. Recordings (meetings, calls, online lessons) | | | | | | | |
| 28.1 | Incoming & Outgoing calls | | | | | Common practice | |
| 28.2 | Meetings | Mobile device | School Business Officer | Once approval of minutes has been received | Minutes approval | Common practice | Delete from mobile device |
| 28.3 | Online lessons | Google Meet | Individual staff | Current + 1 year | End of school year | Common practice | Delete |
| 28.4 | Staff training | IT network | Trainer | Current + 1 year | End of school year | Common practice | Delete |
| 29. Student Work Experience / Placement Records | | | | | | | |
| 29.1 | Records created by schools in relation of offsite student work experience where there has not been a Major Incident | School records | Sixth Form team | Date of placement + 10 years | Date of placement | The Health and Safety at Work Act 1974 | Secure disposal |

| Ref | File Description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|--|------------------|--|------------------------|-------------------------|----------------------|
| | | | | Period | Trigger | Basis | Action at end of use |
| 29.2 | Records created by schools in relation of offsite student work experience where there has been a Major Incident | School records | Sixth Form team | Retain for 25 years from the date of birth of the student/s involved in the incident | Student'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 | Student files | Pastoral Team | 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 | Student files | Pastoral Team | Date of birth of the student + 25 years | Date of administration | Limitation Act 1980 | Secure disposal |

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) |