

GDPR Compliant Records Management and Data Retention Policy



CAPENHURST C.E. (CONTROLLED) PRIMARY SCHOOL

Headteacher: Mrs Claire Green

Written: March 2018

Reviewed by staff: April 2018.

Reviewed by governors: Autumn 2019

Review date: May 2021 unless legislation dictates otherwise.

Statement of intent

Capenhurst CE Primary School (the school) is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulation (GDPR), the school also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The school has created this policy to outline how records are stored, accessed, monitored, retained and disposed of, in order to meet the school's statutory requirements.

This document complies with the requirements set out in the GDPR, which will come into effect on 25 May 2018. The government has confirmed that the UK's decision to leave the EU will not affect the commencement of the GDPR.

Legal framework

This policy has due regard to legislation including, but not limited to, the following:

- General Data Protection Regulation (2016)
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- This policy also has due regard to the following guidance:
- Information Records Management Society 'Information Management Toolkit for Schools' 2016

This policy will be implemented in accordance with the following school policies and procedures:

- GDPR Data Protection Policy
- Publication Scheme
- E-Safety Policy

Responsibilities

The school as a whole has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.

The **headteacher** holds overall responsibility for this policy and for ensuring it is implemented correctly.

The **data protection officer (DPO)** is responsible for the management of records at the school.

The **DPO** is responsible for promoting compliance with this policy and reviewing the policy on an **annual** basis, in conjunction with the **headteacher**.

The **DPO** is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of correctly.

All staff members are responsible for ensuring that any records for which they are responsible for are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

Management of pupil records

Pupil records are specific documents that are used throughout a pupil's time in the education system – they are passed to each school that a pupil attends and includes all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.

The following information is stored on the front of a pupil record, and will be easily accessible:

- Forename, surname, gender and date of birth
- Unique pupil number

- Note of the date when the file was opened
- Note of the date when the file was closed, if appropriate

The following information is stored in a pupil record, and will be easily accessible:

- Ethnic origin, religion and first language (if not English)
- Any preferred names
- Position in their family, e.g. eldest sibling
- Emergency contact details and the name of the pupil's doctor
- Any allergies or other medical conditions that are important to be aware of
- Names of parents, including their home address(es) and telephone number(s)
- Name of the school, admission number, the date of admission and the date of leaving, where appropriate
- Any other agency involvement, e.g. speech and language therapist
- Admissions form
- Details of any SEND
- If the pupil has attended an early years setting, the record of transfer
- Fair processing notice – only the most recent notice will be included
- Annual written reports to parents
- National curriculum and agreed syllabus record sheets
- Notes relating to major incidents and accidents involving the pupil
- Any information about an education and healthcare (EHC) plan and support offered in relation to the EHC plan
- Any notes indicating child protection disclosures and reports are held
- Any information relating to exclusions
- Any correspondence with parents or external agencies relating to major issues, e.g. mental health
- Notes indicating that records of complaints made by parents or the pupil are held

The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the pupil in the **school office**:

- Absence notes
- Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
- Correspondence with parents about minor issues, e.g. behaviour
- Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in a securely locked filing cabinet in the **school office** – a note indicating this is marked on the pupil's file.
- Hard copies of complaints made by parents or pupils are stored in a file in the **headteacher's office** – a note indicating this is marked on the pupil's file.
- Actual copies of accident and incident information are stored separately in the school office and held in line with the retention periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.

The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.

The only exception to the above is if any records placed on the pupil's file have a shorter retention period and may need to be removed.

Electronic records relating to a pupil's record will also be transferred to the pupils' next school, in line with the school's GDPR Data Protection Policy.

The school will not keep any copies of information stored within a pupil's record, unless there is ongoing legal action at the time during which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.

The school will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the school.

This policy will cover the retention of the following information:

1. Retention of pupil records and other pupil related information.
2. Retention of staff records.
3. Retention of senior leadership and management records.
4. Retention of health and safety records.
5. Retention of financial records.
6. Retention of other school records.

Function	Activity	Transaction	Transaction Description	Retention Period	Retention Action	Retention legal authority	Protective Marking	Disposal
School	Admissions Process	School Admissions Policy and Process	All records relating to the creation and implementation of the School Admissions' Policy	3	Review	Life of policy plus 3 years based on: <ul style="list-style-type: none"> • School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014¹ 	Official Sensitive	Secure Disposal
School	Admissions Process	School Admissions and Transfers	Primary, secondary school admissions and transfers, excluding appeals processing	1	Destroy	Date of admission +1 year. Based on <ul style="list-style-type: none"> • School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014² 	Official Sensitive	Secure Disposal
School	Admissions Process	School Admission Appeals	Administration of appeals panels and council case preparation including school exclusions, admissions, statementing and home-school transport appeals Excluding advocacy and parental support relating to appeals processes	1	Destroy	Date of resolution of case +1 year. Based on <ul style="list-style-type: none"> • School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014³ 	Official Sensitive	Secure Disposal
School	Admissions Process	Admissions Register	Register of Admissions	3	Review	Review annually to remove entries after 3 years. Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school	Official Sensitive	Secure Disposal

¹ School Admission Code - <https://www.gov.uk/government/publications/school-admissions-code--2>

² School Admission Code - <https://www.gov.uk/government/publications/school-admissions-code--2>

³ School Admission Code - <https://www.gov.uk/government/publications/school-admissions-code--2>

School	Admissions Process	Admissions Proof of Address	Proof of address supplied by parents as part of the admissions process	1	Destroy	Destroy current year +1 year. Based on <ul style="list-style-type: none"> School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014⁴ 	Official Sensitive	Secure Disposal
School	Asset Management	Inventories of furniture and equipment		6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	Asset Management	Burglary, theft and vandalism report forms		6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	Central Government and Local Authority	School Census Returns		5	Review	Current year plus 5 years	Official Sensitive	Secure Disposal
School	Central Government and Local Authority	Attendance Returns		1	Destroy	Current year plus 1 year	Official Sensitive	Secure Disposal
School	Central Government and Local Authority	Secondary School Transfer Sheets (Primary)		2	Destroy	Current year plus 2 years	Official Sensitive	Secure Disposal
School	Central Government and Local Authority	Ofsted Reports		3	Review	Current life of report then review	Official Sensitive	Secure Disposal
School	Central Government and Local Authority	Central Government Returns		6	Destroy	Destroy after 6 years	Official Sensitive	Secure Disposal

⁴ School Admission Code - <https://www.gov.uk/government/publications/school-admissions-code--2>

School	Child Protection	Child Protection Primary School Case Files	Child Protection Information held on a pupil file - If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.	25	Destroy	Destroy after the child / your persons 25th birthday. Based on: <ul style="list-style-type: none"> • Keeping children safe in education Statutory guidance for schools and colleges September 2016⁵ • Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015⁶ 	Official Sensitive	Transfer to Secondary School
School	Child Protection	Child Protection Secondary School Case Files	Child Protection Information held on a pupil file - If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.	25		Destroy after the child / your persons 25th birthday. Based on: <ul style="list-style-type: none"> • Keeping children safe in education Statutory guidance for schools and colleges September 2016⁷ • Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015⁸ 	Official Sensitive	See note on the Independent Enquiry into Sexual Abuse. Secure Disposal - These records must be shredded

⁵ Keeping Children Safe - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf

⁶ Working Together to Safeguard Children - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/592101/Working_together_to_safeguard_children.pdf

⁷ Keeping Children Safe - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf

⁸ Working Together to Safeguard Children - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/592101/Working_together_to_safeguard_children.pdf

School	Curriculum Management	Curriculum Management Administration	<p>Process involved in:</p> <ul style="list-style-type: none"> ● Curriculum Returns ● Examination Results ● SATs Records ● SATS Results - The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. ● Examination Papers ● Published Admission Number Reports ● Value Added and Contextual Data ● Self Evaluation Forms 	6	Destroy	Current year + 6 years. Based on section 6 IRMS⁹	Official Sensitive	Secure Disposal
School	Curriculum Management	implementation of Curriculum	<p>Process involved in:</p> <ul style="list-style-type: none"> ● Schemes of work ● Timetables ● Class Record Books ● Mark books ● Record of Homework set ● Pupils' work - Where possible pupils' work should be returned to the pupil at the end of the academic year 	1	Destroy	Current year + 1 year, It may be appropriate to review these records at the end of each year and allocate a further retention period	Official Sensitive	Secure Disposal
School	Educational Visits outside the Classroom	Parent Permission Slips	Parental permission slips for school trips where there has not been a major incident	0	Destroy	Destroy on the conclusion of the trip	Official Sensitive	Secure Disposal
School	Educational Visits outside the Classroom	Parent Permission Slips - Accident	Parental permission slips for school trips where there has been a major incident	25	Destroy	Keep until the pupils 25th birthday.	Official Sensitive	Secure Disposal
School	Educational Visits outside the Classroom	Educational Visits - Primary Schools	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	14	Destroy	Outdoor Education Advisers' Panel National Guidance website specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice"¹⁰ .	Official Sensitive	Secure Disposal
School	Educational Visits outside the Classroom	Educational Visits -	Records created by schools to obtain approval to run an Educational Visit outside the Classroom –Secondary Schools	10	Destroy	Outdoor Education Advisers' Panel National Guidance website specifically Section 3 - "Legal Framework and	Official Sensitive	Secure Disposal

⁹ IRMS Retention Schedule - https://cdn.ymaws.com/irms.site-ym.com/resource/collection/8BCEF755-0353-4F66-9877-CCDA4BFEEAC4/2016_IRMS_Toolkit_for_Schools_v5_Master.pdf

¹⁰ OEAP Guidance - <http://oeapng.info>

		Secondary Schools				Employer Systems” and Section 4 - “Good Practice¹¹” .		
School	Enquiries, Advice and Complaints Handling	Complaints - Children’s general complaints		25	Review	Until the child reaches the age of 25. Based on a 6 year timescale in which an action can be brought in the case of tort under Limitation Act 1980 s.2¹²	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Complaints - Routine Stage 1 and Stage 2 complaints	Processing, investigation of and response to routine complaints against CWAC concerning decision making, service provision or staff, including statutory, ombudsman, and non-statutory complaints processes and legal defence case preparation	2	Destroy	Based on CWAC best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Complaints - Complex Stage 2 complaints and investigations	Processing, investigation of and response to routine complaints against CWAC concerning decision making, service provision or staff, including statutory, ombudsman, and non-statutory complaints processes and legal defence case preparation	6	Destroy	Based on a 6 year timescale in which an action can be brought in the case of tort under Limitation Act 1980 s.2¹³	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Complaints - resulting in a change of policy	Complaints which result in significant changes of policy: - Reports, - Correspondence	999	Archive	Based on LGCRS RGLA 2.14	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Complaints - Register / Log	Summary log / register of complaints	999	Archive	Based on LGCRS RGLA 2.13	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Advice and enquiries	Enquiry or advice about a council service	12	Destroy	Destroy twelve months after enquiry. Based on CWAC best practice	Official Sensitive	Secure Disposal

¹¹ OEAP Guidance - <http://oeapng.info>

¹² Section 2 Limitation Act - <http://www.legislation.gov.uk/ukpga/1980/58/section/2>

¹³ Section 2 Limitation Act - <http://www.legislation.gov.uk/ukpga/1980/58/section/2>

School	Enquiries, Advice and Complaints Handling	Customer Satisfaction	Feedback on council performance in relation to services or other aspects of council business: - Customer satisfaction surveys	3	Destroy	Based on best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Individual Rights requests	All correspondence relating to: <ul style="list-style-type: none"> ● The right of access (subject access requests) ● The right to rectification ● The right to erasure ● The right to restrict processing ● The right to data portability ● The right to object ● Rights in relation to automated decision making and profiling. 	2	Review	Based on best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Data Protection exemption requests	All correspondence relating to requests for access to information under a data protection exemption for the purpose of: <ul style="list-style-type: none"> ● Crime and Taxation - Schedule 2 Para 2 ● Immigration - Schedule 2 Para 4 ● Information required to be disclosed by law etc or in connection with legal proceedings - Schedule 2 Para 5 ● Functions designed to protect the public etc - Schedule 2 Para 7 ● Regulatory functions relating to legal services, the health service and children's services - Schedule 2 Para 8 ● Regulatory functions of certain other bodies - Schedule 2 Para 9 ● Protection of the rights of others - Schedule 2 Para 14 	0.1	Destroy	Keep for one calendar month and then destroy - Based on best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Data Breach Complaints	All correspondence relating to complaints from clients, employees over the handling of their data	3	Destroy	Based on best practice	Official Sensitive	Secure Disposal

School	Enquiries, Advice and Complaints Handling	FOI and EIR Requests	Case file records detailing the Requests for Information (EIR, FOI), the consideration of possible exemptions and subsequent appeals:	2	Destroy	Based on best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Routine requests for information	Case file records detailing the routine requests for Information	1	Destroy	Based on CWAC best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	FOI, EIR statistics and disclosure logs	<ul style="list-style-type: none"> ● Statistical data about the number of requests you answered and their outcomes etc. ● Requests for Information disclosure logs 	10	Destroy	Based on best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Publication Scheme	The publication scheme that is required under the Freedom of Information Act 2000: - Publication scheme	9999	Archive	Based on good practice	Official Sensitive	Secure Disposal
School	Family Liaison Officers and Home School Liaison Assistants	Family Liaison Officers and Home School Liaison Administration	Records relating to Family Liaison Officers and Home School Liaison Assistants process, including but not limited to: <ul style="list-style-type: none"> ● Day Books ● Reports for outside agencies ● Referral forms ● Contact data sheets ● Group registers 	2	Review	Current year +2 years then review	Official Sensitive	Secure Disposal
School	Finance	Loans and Grants	Identification of funding opportunities and resources, development and submission of bids, management of funding resources, monitoring and reporting of outcomes to funding body Excluding grant funding administration	12	Review	Date of last payment on the loan + 12 years then Review	Official Sensitive	Secure Disposal
School	Finance	Student Grants	Processing and assessment of applications for grant funding, administration of funding payments, financial and outcome monitoring and reporting	6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	Finance	Annual Budget Statement		6	Destroy		Official Sensitive	Secure Disposal

School	Finance	Income Processing	Processing income received for supply of goods and services, posting slips, tabulations, income records, receipt books, debtor accounts, cash books, till rolls	6	Destroy	<ul style="list-style-type: none"> • Companies Act 2006¹⁴ • Value Added Tax Act 1994 s.6¹⁵ • Finance Act 1998 Sch.18 pt. 3¹⁶ 	Official Sensitive	Secure Disposal
School	Finance	Debt Management		6	Destroy	<ul style="list-style-type: none"> • Companies Act 2006¹⁷ • Value Added Tax Act 1994 s.6¹⁸ • Finance Act 1998 Sch.18 pt. 3¹⁹ 	Official Sensitive	Secure Disposal
School	Finance	Expenditure Processing	Records relating to the purchasing of goods, works and services	6	Destroy	<ul style="list-style-type: none"> • Companies Act 2006²⁰ • Value Added Tax Act 1994 s.6²¹ • Finance Act 1998 Sch.18 pt. 3²² 	Official Sensitive	Secure Disposal
School	Governing Body	Instruments of Government including Articles of Association		9999	Archive	These should be retained in the school whilst the school is open and then offered to Council Record Archives Service when the school closes.	Official Sensitive	Secure Disposal
School	Governing Body	Trusts and Endowments managed by the Governing Body		9999	Archive	These should be retained in the school whilst the school is open and then offered to Council Record Archives Service when the school closes. Based on IRMS 1.1.6	Official Sensitive	Secure Disposal

¹⁴ Companies Act - <http://www.legislation.gov.uk/ukpga/2006/46/section/388>

¹⁵ Value Added Tax Act - <http://www.legislation.gov.uk/ukpga/1994/23/schedule/11>

¹⁶ Finance Act - <http://www.legislation.gov.uk/ukpga/1998/36/schedule/18>

¹⁷ Companies Act - <http://www.legislation.gov.uk/ukpga/2006/46/section/388>

¹⁸ Value Added Tax Act - <http://www.legislation.gov.uk/ukpga/1994/23/schedule/11>

¹⁹ Finance Act - <http://www.legislation.gov.uk/ukpga/1998/36/schedule/18>

²⁰ Companies Act - <http://www.legislation.gov.uk/ukpga/2006/46/section/388>

²¹ Value Added Tax Act - <http://www.legislation.gov.uk/ukpga/1994/23/schedule/11>

²² Finance Act - <http://www.legislation.gov.uk/ukpga/1998/36/schedule/18>

School	Governing Body	Governing Body Action plans	Action plans created and administered by the Governing Body	3	Destroy	Life of the action plan + 3 years Based on IRMS 1.1.3	Official Sensitive	Secure Disposal
School	Governing Body	Governing Body Policy Documents	Policy documents created and administered by the Governing Body	3	Destroy	Life of the policy + 3 years Based on IRMS 1.1.8	Official Sensitive	Secure Disposal
School	Governing Body	Enquiries and Complaints Dealt with my Governing Body	Records relating to complaints dealt with by the Governing Body	6	Destroy	Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes. Based on IRMS 1.1.9	Official Sensitive	Secure Disposal
School	Governing Body	Governing Body Annual Report	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	10	Destroy	Date of Report + 10 years. Based on IRMS 1.1.10	Official Sensitive	Secure Disposal
School	Governing Body	School Status Changes	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	3	Destroy	Date Proposal accepted or declined plus 3 years. Based on IRMS 1.1.11	Official Sensitive	Secure Disposal
School	Governing Body	School Governors Agendas and Meeting Papers		9999	Archive	Retain in School for 6 years then offer to Archivist	Official Sensitive	Secure Disposal
School	Head Teacher and Senior Management Team	Log Book	Log books of activity in the school maintained by the Head Teacher	6	Review	Based on Best Practice	Official Sensitive	Secure Disposal
School	Head Teacher and Senior Management Team	Senior Management Team Minutes	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	6	Review	Based on Best Practice	Official Sensitive	Secure Disposal
School	Head Teacher and Senior Management Team	Senior Management Reports	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	3	Review	Based on Best Practice	Official Sensitive	Secure Disposal

School	Head Teacher and Senior Management Team	Senior Management Development Plans		6	Destroy	Based on Best Practice	Official Sensitive	Secure Disposal
School	Health and Safety	Health and Safety Policy	Health and Safety Policy and supporting statements	3	Review	Life of Policy + 3 years, based on best practice	Official Sensitive	Secure Disposal
School	Health and Safety	Health and Safety Risk Assessments				Life of risk assessment + 3 years, based on best practice	Official Sensitive	Secure Disposal
School	Health and Safety	Accident Reporting-Staff	Reporting and investigation of accidents or incidents, accidents, violent or aggressive conduct involving staff	12	Destroy	Date of incident +12years In the case of serious accidents a further retention period will need to be applied. Based on: <ul style="list-style-type: none"> • Social Security (Claims and Payments) Regulations 1979 Regulation 25²³. • Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995, Reg. 7²⁴ 	Official Sensitive	Secure Disposal
School	Health and Safety	Accident Reporting-Pupils	Reporting and investigation of accidents or incidents, accidents, violent or aggressive conduct involving children	25	Review	Date of birth of child plus 25 years In the case of serious accidents a further retention period will need to be applied. Based on: <ul style="list-style-type: none"> • Social Security (Claims and Payments) Regulations 1979 Regulation 25²⁵. • Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995, Reg. 7²⁶ 	Official Sensitive	Secure Disposal

²³ Social Security Claims - http://www.legislation.gov.uk/uksi/1979/628/pdfs/uksi_19790628_en.pdf

²⁴ Reporting Injuries - <http://www.legislation.gov.uk/uksi/1995/3163/regulation/7/made>

²⁵ Social Security Claims - http://www.legislation.gov.uk/uksi/1979/628/pdfs/uksi_19790628_en.pdf

²⁶ Reporting Injuries - <http://www.legislation.gov.uk/uksi/1995/3163/regulation/7/made>

School	Health and Safety	Control of Substances Hazardous to Health (COSHH)	Surveying, testing, identification, monitoring, risk assessment, management plans, records of control measures plans of work, licenses, notifications of works and remediation or demolition works including work operations and processes involving hazardous substances Excluding individual health surveillance and exposure monitoring	40	Destroy	Based on a period in which an action can be brought in the case of negligence under Limitation Act 1980 s.14A and <ul style="list-style-type: none"> • Control of Substances Hazardous to Health Regulations 2002 Reg. 10 (5²⁷) • Control of Lead at Work Regulations 2002 Reg.10²⁸ • Control of Asbestos Regulations 2012 Reg.22²⁹ 	Official Sensitive	Secure Disposal
School	Health and Safety	Radiation Monitoring	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	50	Destroy	Last action + 50 years. Based on: <ul style="list-style-type: none"> • Control of Substances Hazardous to Health Regulations 2002 Reg. 10 (5³⁰) • Ionising Radiations Regulations 1999 Reg. 24³¹ 	Official Sensitive	Secure Disposal
School	Health and Safety	Fire Precautions log books		6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	Health and Safety	Health Assessment	Manager referred and self-referred employee health assessment records	6	Destroy	Based on a 6 year period in which an action can be brought in the case of negligence under Limitation Act 1980 s.14A	Official Sensitive	Secure Disposal
School	Health and Safety	Pre-Employment Health Screening	Pre-employment health screening assessment	1	Destroy	Based on best practice	Official Sensitive	Secure Disposal

²⁷ Control of Substances- <http://www.legislation.gov.uk/uksi/2002/2677/regulation/10/made>

²⁸ Control of Lead - <http://www.legislation.gov.uk/uksi/2002/2676/regulation/10/made>

²⁹ Control of Asbestos - <http://www.legislation.gov.uk/uksi/2012/632/regulation/22/made>

³⁰ Control of Substances- <http://www.legislation.gov.uk/uksi/2002/2677/regulation/10/made>

³¹ Radiation - <http://www.legislation.gov.uk/uksi/1999/3232/regulation/24/made>

School	Human Resources	Child Protection Investigation following an Allegation	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	10	Review	Retain until the normal retirement age for the member of staff or for 10 years (whichever is the longer). Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned. Based on: <ul style="list-style-type: none"> • Keeping children safe in education Statutory guidance for schools and colleges September 2016 • Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015 	Official Sensitive	See note on the Independent Enquiry into Sexual Abuse. Secure Disposal - These records must be shredded
School	Human Resources	Leave and Time Recording	<ul style="list-style-type: none"> • Paternity Leave, Maternity Leave, • Annual Leave, unpaid leave, special leave • Toil, Flexisheet, Timesheets, 	3	Destroy	<ul style="list-style-type: none"> • Working Time Regulations 1998 • Statutory Sick Pay (General) Regulations 1982 reg. 13 • Statutory Paternity and Statutory Adoption Pay (Administration) Regulations 2002 reg.9 • Statutory Maternity Pay (General) Regulations 1986 reg.26 	Official Sensitive	Secure Disposal

School	Human Resources	Employee Files	<ul style="list-style-type: none"> ● Individual employees' terms and condition of employment, ● job description, personal specification, pay grade, ● change of role and record of changes to individuals' employment contracts, ● Sickness Records, Occupational Health referrals and reports, return to work documentation, formal absence process records ● Training and development records relating to attendance and achievement of individual employees Excluding records of training for work with hazardous substances ● Successful Recruitment Application and Process ● Termination of Employment ● Record of routine Disclosure and Barring Service (DBS) checks having been made during employment where required by nature of job role ● Staff supervision files ● Documentation relating to the performance appraisal of an employee, including performance related pay if applicable ● Probationary reports, Performance plans, Staff Capability Assessments ● One 2 Ones 	25	Review	<ul style="list-style-type: none"> ● High risk employees or occupations identified as requiring increased retention limits. Claims relating to such conditions do not have the usual limitations ● Home Office Code of Practice For Registered Persons and other recipients of Disclosure Information ● The Information Commissioner's Office, Employment Practices Code (data protection) 	Official Sensitive	Secure Disposal
School	Human Resources	Disciplinary and Grievance	Administration of formal disciplinary and grievance processes including tribunal cases when working with children (keep on employees personnel file permanently)	25	Review	<ul style="list-style-type: none"> ● High risk employees or occupations identified as requiring increased retention limits. Claims relating to such conditions do not have the usual limitations 	Official Sensitive	Secure Disposal
School	Human Resources	Recruitment - Unsuccessful Applicants	Recruitment planning, application processing and assessment, interview administration and candidate assessment (See Employee Files for Successful Applicants Retention Period)	1	Destroy	<ul style="list-style-type: none"> ● National Archives Guidance- 	Official Sensitive	Secure Disposal

School	Payroll and Pensions	Maternity, Adoption and Paternity Pay Record	Records relating to maternity, adoption and shared parental pay	3	Destroy	Current year + 3 years. Based on: ● Statutory Maternity Pay and Leave: employer guide	Official Sensitive	Secure Disposal
School	Payroll and Pensions	Pension Fund Management	School's pension fund management records including fund management strategy, policy and guidance influencing decisions Excluding accounting and reporting	6	Destroy	Current year + 6 years. The Retirement Benefits Schemes (Information Powers) Regulations 1995	Official Sensitive	Secure Disposal
School	Payroll and Pensions	Pension Scheme Administration	Records of member and employer pension contributions, member notifications administration of pension benefit payments to scheme members, repayment of contributions to members withdrawing from scheme including copies of legislation, regulation, guidance notices, policies affecting contributions and payments (Note: documents may that may not be readily available from other sources in the long-term)	6	Destroy	Retain records 6 years after death of last known beneficiary of member. Based on: ● The Retirement Benefits Schemes (Information Powers) Regulations 1995	Official Sensitive	Secure Disposal
School	Payroll and Pensions	Payroll Administration	Transactional HR records including expenses and allowances claims, changes to pay, increments, loss of earnings, statutory and non-statutory payments and deductions, additional hours claims redundancy payments, income tax and national insurance records	6		Retain records 6 years after the end of the financial year in which records created. Based on ● Taxes Management Act 1970 s.34	Official Sensitive	Secure Disposal
School	Procurement	Ordinary contracts		6	Destroy	Best Practice	Official Sensitive	Secure Disposal
School	Procurement	Contracts under seal		12	Destroy	Destroy - 12 years after the term of the contract has expired. Contracts with over a 10 year lifespan should be reviewed at the 5 year period to evaluate ongoing business need to retain	Official Sensitive	Secure Disposal
School	Property Management	Title Deeds	Title deeds of properties belonging to the school	9999	Archive	PERMANENT - These should follow the property unless the property has been registered with the Land Registry	Official Sensitive	Secure Disposal
School	Property Management	Property Plans	Plans of property belong to the school	3	Destroy	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.	Official Sensitive	Secure Disposal

School	Property Management	Leases	Leases of property leased by or to the school	6	Destroy	Expiry of lease + 6 years	Official Sensitive	Secure Disposal
School	Property Management	Letting of Properties	Records relating to the letting of school premises	6	Destroy	Current financial year + 6 years	Official Sensitive	Secure Disposal
School	Property Management	School Maintenance	All records relating to the maintenance of the school	6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	Pupil Records	SEN Assessment and Support	<ul style="list-style-type: none"> ● Educational arrangements for those with learning difficulties, and support for other special cases, eg talented or gifted children, or those disadvantaged by language or gender. 	31	Review	<ul style="list-style-type: none"> ● Based on a 6 year timescale in which an action can be brought in the case of a simple contract under Limitation Act 1980 s.5 ● Children and Families Act 2014 s.46 	Official Sensitive	Secure Disposal
School	Pupil Records	Absence Letters	Letters authorising absence from parents or guardians	2	Destroy	Retain for 2 years then destroy	Official Sensitive	Secure Disposal
School	Pupil Records	Pupil Primary School Case Files	<p>Pupil Case File Information, including but not limited to:-</p> <ul style="list-style-type: none"> ● Exclusions ● Educational Welfare ● Special Educational Needs files, reviews and Individual Education Plans ● Attendance and Truancy ● Student Health ● Pupil Careers Advice ● Data on attendance at out of school projects, outings etc <p>The file should follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> ● to another primary school ● to a secondary school ● to a pupil referral unit ● If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. 	25	Destroy	Retain for duration of the pupil's attendance at primary school	Official Sensitive	Transfer to Secondary School

School	Pupil Records	Pupil Secondary School Case Files	Pupil Case File Information, including but not limited to:- <ul style="list-style-type: none"> ● Exclusions ● Educational Welfare ● Special Educational Needs files, reviews and Individual Education Plans ● Attendance and Truancy ● Pupil Careers Advice ● Student health ● Data on attendance at out of school projects, outings etc 	25	Destroy	Retain for 25 years from data of birth, Based on a 6 year timescale in which an action can be brought in the case of tort under Limitation Act 1980 s.2	Official Sensitive	Secure Disposal
School	Pupil's Educational Record	Pupil's Primary School Educational Record	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	25	Destroy	Retain whilst the child remains at the primary school. The file should follow the pupil when he/she leaves the primary school. This will include: to another primary school, to a secondary school or to a pupil referral unit. The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	Official Sensitive	Secure Disposal
School	Pupil's Educational Record	Pupil's Secondary School Educational Record	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	25	Destroy	Retain until the child's 25th birthday. The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	Official Sensitive	Secure Disposal
School	Pupil's Educational Record	Examination Results	This information should be added to the pupil file. All uncollected certificates should be returned to the examination board.	25	Destroy	Retain until the child's 25th birthday. The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	Official Sensitive	Secure Disposal
School	Risk Management and Insurance	Employer's Liability Insurance Certificate		40	Destroy	Closure of the school + 40 years	Official Sensitive	Secure Disposal
School	School Meals Management	Free School Meals Registers		6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	School Meals Management	School Meals Registers		6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal

School	Walking Bus	Walking Bus Register		3	Destroy	Date of register + 3 years. This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting	Official Sensitive	Secure Disposal
School		Loans and Leasing Administration	Processing of staff loan and leasing applications, administration of loans, repayments and leasing	6		Retain records 6 years after the end of the financial year in which records created.	Official Sensitive	Secure Disposal