



# Storing and Retention Policy



Approved by FGB November 2023

Next review due: November 2025

# RECORDS MANAGEMENT POLICY

## 1 Introduction

The School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

## 2 Scope of the Policy

2.1 This policy applies to all records that are created, received or maintained by staff of the school in the course of carrying out its functions.

2.2 Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions

or activities. These records may be created or received, and then stored, in hard copy or electronically.

2.3 A small percentage of the school's records may be selected for permanent preservation as part of the institution's archives and for historical research.

### 3 Responsibilities

3.1 The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher.

3.2 The person responsible for records management in the school will give guidance about good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

3.3 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines.

### 4 Recording Systems

Information created by the school must be managed against the same standards regardless of the media in which it is stored.

#### 4.1 Maintenance of Record Keeping Systems

- i. It is important that filing information is properly resourced and is carried out on a regular basis. It is equally important that the files are weeded of extraneous information where appropriate on a regular basis. Removing information from a file once a freedom of information request has been made will be a criminal offence (unless it is part of normal processing).
- ii. Applying retention periods is straightforward provided files are closed on a regular basis.
- iii. Once a file has been closed, it should be moved out of the current filing system and stored in an appropriate place until it has reached the end of the retention period.
- iv. Information security is very important especially when dealing with personal information or sensitive policy information. There are a number of basic rules:
  - All personal information should be kept in lockable filing cabinets which are kept locked when the room is unattended;
  - Personal information held on computer systems should be adequately password protected. Information should never be left up on a screen if the computer is unattended;
  - Files containing personal or sensitive information should not be left out on desks over night;

- Where possible sensitive personal information should not be sent by e-mail;
  - If files need to be taken off the premises they should be secured in the boot of a car or in lockable containers;
  - Teachers may carry data on memory sticks or other removable data carriers in order to access their files both at home and at school. Any data carried in this way must be encrypted using appropriate encryption software.
  - All computer information should be backed up regularly and the back-up should be stored off the site.
- v. Information contained in email, fax should be filed into the appropriate electronic or manual filing system once it has been dealt with.

#### 4 The Safe Disposal of Information Using the Retention Schedule

4.1 Files should be disposed of in line with the attached retention schedule (see appendix). This is a process which should be undertaken on an annual basis during the month of July.

4.2 Paper records containing personal information should be shredded. Other files can be bundled up and put in a skip or disposed of to the waste paper merchant. Loose papers should not be put in skips unless the skip has a lid. CD's/DVD's/Floppy disks should be cut into pieces. Audio/Video tapes and fax rolls should be dismantled and shredded.

4.3 Electronic data should be archived on electronic media and 'deleted' appropriately at the end of the retention period.

#### 5 Monitoring and Review

This policy has been reviewed and approved by the head teacher and Chair of governors. The Records Management Policy will be reviewed and updated as necessary.

## (a) Retention Schedule

| <b>Child Protection</b><br>The retention and use of records relating to child protection matters concerning pupils, and child protection allegations against staff requires specific guidance in this schedule. This will be subject to update following implementation of the recommendations by Sir Michael Bichard. |                  |  |   |  |
|--|------------------|--|---|--|
| Basic File Description   | Data Prot Issues | Statutory Provisions   | Retention Period [operational]  | Action at the end of the administrative life of the record |
| <b>Child Protection files</b>  | Yes              | Education Act 2002, s175, related guidance 'Safeguarding Children in Education', September 2016  | DOB + 25 years  | SECURE DISPOSAL  |
| <b>Allegation of a child protection nature against a member of staff, including where the allegation is unfounded</b>  | Yes              | Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance)<br>Education Act 2002 guidance 'Dealing with allegations of Abuse against teachers and Other Staff' November 2005 | Until the person's normal retirement age, or 10 years from the date of the allegation if that is longer | SECURE DISPOSAL  |

| <b>Governors</b>  |                         |  |   |  |
|---|-------------------------|--|---|--|
| <b>Basic File Description</b>   | <b>Data Prot Issues</b> | <b>Statutory Provisions</b>  | <b>Retention Period [operational]</b>     | <b>Action at the end of the administrative life of the record</b>  |
| <b>Minutes</b>  |                         |  |   |  |
| ▪ Principal set (signed)  | No                      |  | Permanent                                 | Retain in school for 6 years from date of meeting  |
| ▪ Inspection Copies   | No                      |  | Date of meeting + 3 years                 | SECURE DISPOSAL [If these minutes contain any sensitive personal information they must be shredded]  |
| <b>Agendas</b>  | No                      |  | Date of meeting                           | SECURE DISPOSAL  |
| <b>Reports</b>  | No                      |  | Date of report + 6 years                  | Retain in school for 6 years from date of meeting  |
| <b>Instruments of Government</b>  | No                      |  | Permanent                                 | Retain in school whilst school is open   |
| <b>Trusts and Endowments</b>  | No                      |  | Permanent                                 | Retain in school whilst operationally required   |
| <b>Action Plans</b>   | No                      |  | Date of action plan + 3 years             | SECURE DISPOSAL  |
| <b>Policy documents</b>   | No                      |  | Expiry of policy                          | Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)                      |
| <b>Complaints files</b>   | Yes                     |  | Date of resolution of complaint + 6 years | Retain in school for the first six years. Review for further retention in the case of contentious disputes.<br>SECURE DISPOSAL routine complaints. |
| <b>Annual Reports required by the Department for Education</b>  | No                      | Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.S1 2002 No 1171 | Date of report + 10 years                 |  |
| <b>Management</b>   |                         |  |   |  |
| <b>Basic File Description</b>   | <b>Data Prot Issues</b> | <b>Statutory Provisions</b>  | <b>Retention Period [operational]</b>     | <b>Action at the end of the administrative life of the record</b>  |
| <b>Minutes of the Senior Management Team and other internal administrative bodies</b>   | Yes                     |  | Date of meeting + 5 years                 | Retain in the school for 5 years from meeting  |
| <b>Reports made by the headteacher or the management team</b>   | Yes                     |  | Date of report + 3 years                  | Retain in the school for 3 years from meeting  |
| <b>Records created by head teachers, deputy head teachers, and other members of staff with administrative responsibilities.</b> | Yes                     |  | Closure of file + 6 years                 | SECURE DISPOSAL  |

|  |     |  |                                  |                 |
|--|-----|--|----------------------------------|-----------------|
| Correspondence created by headteachers, deputy headteachers, and other members of staff with administrative responsibilities | No  |  | Date of correspondence + 3 years | SECURE DISPOSAL |
| School Development Plans   | Yes |  | Closure + 6 years                | Review          |

| Pupils  |                  |   |  |  |
|---|------------------|---|--|--|
| Basic File Description  | Data Prot Issues | Statutory Provisions  | Retention Period [operational]   | Action at the end of the administrative life of the record   |
| Admission Registers   | Yes              |   | Date of last entry in the book (or file) + 6 years   | Retain in the school for 6 years from the date of the last entry then consider transfer to the archives.               |
| Attendance registers  | Yes              |   | Date of register + 3 years   | SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time] |
| Pupil data  | Yes              |   | Retain for the time which the pupil remains at the primary school  | Transfer to the secondary school (or other primary school) when the child leaves the school.                           |
| Special Educational Needs files, reviews and Individual Education Plans | Yes              |   | DOB of the pupil + 25 years then review.<br>NOTE: This retention period is the minimum period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period. | SECURE DISPOSAL  |
| Correspondence Relating to Authorised Absence and Issues                | No               |   | Date of absence + 2 years  | SECURE DISPOSAL  |
| Examination results   | Yes              |   |  |  |
| ▪ Public  | No               |   | Year of examinations + 6 years   | SECURE DISPOSAL  |
| ▪ Internal examination results  | Yes              |   | Current year + 5 years <sup>(2)</sup>  | SECURE DISPOSAL  |
| Any other records created in the course of contact with pupils          | Yes/No           |   | Current year + 3 years   | Review at the end of 3 years and either allocated a further retention period or SECURE DISPOSAL                        |
| Statement maintained under The Education Act 1006 – Section 324         | Yes              | Special Educational Needs and Disability Act 2001 Section 1 | DOB + 30 years   | SECURE DISPOSAL unless legal action is pending   |

## Pupils cont'd.

| Basic File Description   | Data Prot Issues | Statutory Provisions   | Retention Period [operational]  | Action at the end of the administrative life of the record |
|--|------------------|--|---|--|
| <b>Proposed EHCP or amended EHCP</b>   | Yes              | Special Educational Needs and Disability Act 2001 Section 1  | DOB + 30 years  | SECURE DISPOSAL unless legal action is pending             |
| <b>Advice and information to parents regarding educational needs</b>                       | Yes              | Special Educational Needs and Disability Act 2001 Section 2  | Closure + 12 years  | SECURE DISPOSAL unless legal action is pending             |
| <b>Accessibility Strategy</b>  | Yes              | Special Educational Needs and Disability Act 2001 Section 14 | Closure + 12 years  | SECURE DISPOSAL unless legal action is pending             |
| <b>Parental permission slips for school trips – where there has been no major incident</b> | Yes              |  | Conclusion of the trip  | SECURE DISPOSAL  |
| <b>Parental permission slips for school trips – where there has been a major incident</b>  | Yes              | Limitation Act 1980  | DOB of the pupil involved in the incident + 25 years.<br>The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils. | SECURE DISPOSAL  |

## Curriculum

| Basic File Description                               | Data Prot Issues | Statutory Provisions | Retention Period [operational] | Action at the end of the administrative life of the record   |
|--|------------------|----------------------|--------------------------------|--|
| <b>School Development Plan</b>                       | No               |                      | Current year + 6 years         | SECURE DISPOSAL  |
| <b>Schemes of work</b>                               | No               |                      | Current year + 1 year          | It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL |
| <b>Timetable</b>                                     | No               |                      | Current year + 1 year          | SECURE DISPOSAL  |
| <b>Class record books</b>                            | No               |                      | Current year + 1 year          | SECURE DISPOSAL  |
| <b>Mark Books</b>                                    | No               |                      | Current year + 1 year          | SECURE DISPOSAL  |
| <b>Record of Homework set</b>                        | No               |                      | Current year + 1 year          | SECURE DISPOSAL  |
| <b>Samples of Pupils work</b>                        | No               |                      | Current year + 1 year          | SECURE DISPOSAL  |
| <b>Examination results</b>                           | Yes              |                      | Current year + 6 years         | SECURE DISPOSAL  |
| <b>SATS records – Examination Papers and Results</b> | Yes              |                      | Current year + 6 years         | SECURE DISPOSAL  |
| <b>PAN reports</b>                                   | Yes              |                      | Current year + 6 years         | SECURE DISPOSAL  |



|  |     |  |                        |                 |
|--|-----|--|------------------------|-----------------|
| <b>Value Added &amp; Contextual Data</b> | Yes |  | Current year + 6 years | SECURE DISPOSAL |
| <b>Self-Evaluation forms</b>             | Yes |  | Current year + 6 years | SECURE DISPOSAL |

| <b>Personnel</b>  |                         |   |   |   |
|---|-------------------------|---|---|---|
| <b>Basic File Description</b>   | <b>Data Prot Issues</b> | <b>Statutory Provisions</b>   | <b>Retention Period [operational]</b>   | <b>Action at the end of the administrative life of the record</b>                     |
| <b>Timesheets, sick pay</b>   | Yes                     | Financial Regulations   | Current year + 6 years  | SECURE DISPOSAL   |
| <b>Staff Personal files</b>   | Yes                     |   | Termination + 7 years   | SECURE DISPOSAL   |
| <b>Interview notes and recruitment records</b>  | Yes                     |   | Date of interview + 6 months  | SECURE DISPOSAL   |
| <b>Pre-employment vetting information (including unsuccessful DBS checks)</b>             | No                      | DBS guidelines  | Date of check + 6 months  | SECURE DISPOSAL [by the designated member of staff]                                   |
| <b>Disciplinary proceedings</b>   | Yes                     | Where the warning relates to child protection issues see 1.2. If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice. |   |   |
| ▪ Oral warning  |                         |   | Date of warning + 6 months  | SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file |
| ▪ Written warning – level 1   |                         |   | Date of warning + 6 months  | SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file |
| ▪ Written warning – level 2   |                         |   | Date of warning + 12 months   | SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file |
| ▪ Final warning   |                         |   | Date of warning + 18 months   | SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file |
| ▪ Case not found  |                         |   | If child protection related please see 1.2, otherwise SECURE DISPOSAL immediately at the conclusion of the case     |   |
| <b>Records relating to accident/injury at work</b>  | Yes                     |   | Date of incident + 12 years<br>In the case of serious accidents a further retention period will need to be applied. | SECURE DISPOSAL   |
| <b>Annual appraisal/assessment records</b>  | No                      |   | Current year + 5 years  | SECURE DISPOSAL   |
| <b>Maternity pay records</b>  | Yes                     | Statutory Maternity Pay (General Regulations 1986 (SI 1986/1990), revised 1999 (SI 1999/567)  | Current year + 3 years  | SECURE DISPOSAL   |
| <b>Records held under Retirement Benets Schemes (Information Powers) Regulations 1995</b> | Yes                     |   | Current year + 6 years  | SECURE DISPOSAL   |

|   |     |  |  |  |
|---|-----|--|--|--|
| <b>Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure</b> | Yes |  | Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file. |  |
|---|-----|--|--|--|

| <b>Health and Safety</b>  |                         |   |   |   |
|---|-------------------------|---|---|---|
| <b>Basic File Description</b>   | <b>Data Prot Issues</b> | <b>Statutory Provisions</b>   | <b>Retention Period [operational]</b>   | <b>Action at the end of the administrative life of the record</b> |
| <b>Accessibility Plans</b>  |                         | Disability Discrimination Act   | Current year + 6 years  | SECURE DISPOSAL   |
| <b>Accident Reporting</b>   |                         | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980. |   |   |
| ▪ Adults  | Yes                     |   | Date of incident + 7 years  | SECURE DISPOSAL   |
| ▪ Children  | Yes                     |   | DOB of child + 25 years <sup>(3)</sup>  | SECURE DISPOSAL   |
| <b>COSHH</b>  |                         |   | Current year + 10 years [Where appropriate an additional retention period may be allocated] |   |
| <b>Incident reports</b>   | Yes                     |   | Current year + 20 years   | SECURE DISPOSAL   |
| <b>Policy Statements</b>  |                         |   | Date of expiry + 1 year   | SECURE DISPOSAL   |
| <b>Risk Assessments</b>   | Yes                     |   | Current year + 3 years  | SECURE DISPOSAL   |
| <b>Process of monitoring of areas where employees and persons are likely to have come in contact with asbestos</b>  |                         |   | Last action + 40 years  | SECURE DISPOSAL   |
| <b>Process of monitoring of areas where employees and persons are likely to have come in contact with radiation</b> |                         |   | Last action + 50 years  | SECURE DISPOSAL   |
| <b>Fire Precautions log books</b>   |                         |   | Current year + 6 years  | SECURE DISPOSAL   |

<sup>(1)</sup> A child may make a claim for negligence for 7 years from their 18<sup>th</sup> birthday. To ensure that all records are kept until the pupil reaches the age of 25 this retention period has been applied.

| Administrative                         |                  |                      |                                  |   |
|--|------------------|----------------------|----------------------------------|---|
| Basic File Description                 | Data Prot Issues | Statutory Provisions | Retention Period [operational]   | Action at the end of the administrative life of the record  |
| Employer's Liability Certificate       |                  |                      | Closure of the school + 40 years | SECURE DISPOSAL   |
| Inventories of equipment and furniture |                  |                      | Current year + 6 years           | SECURE DISPOSAL   |
| General file series                    |                  |                      | Current year + 5 years           | Review to see whether a further retention period is required  |
| School brochure/prospectus             |                  |                      | Current year + 3 years           | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| Circulars (staff/parents/pupils)       |                  |                      | Current year + 1 year            | SECURE DISPOSAL   |
| Newsletters, ephemera                  |                  |                      | Current year + 1 year            | Review to see whether a further retention period is required  |
| Visitors' book                         |                  |                      | Current year + 2 years           | Review to see whether a further retention period is required  |
| PTA/Old Pupils' Associations           |                  |                      | Current year + 6 years           | Review to see whether a further retention period is required  |

| Finance                                |                  |                       |   |  |
|--|------------------|-----------------------|---|--|
| Basic File Description                 | Data Prot Issues | Statutory Provisions  | Retention Period [operational]          | Action at the end of the administrative life of the record   |
| Annual Accounts                        |                  | Financial Regulations | Current year + 6 years                  | Archive  |
| Loans and grants                       |                  | Financial regulations | Date of last payment on loan + 12 years | Review to see whether a further retention period is required |
| Contracts                              |                  |                       |   |  |
| ▪ Under seal                           |                  |                       | Contract completion date + 12 years     | SECURE DISPOSAL  |
| ▪ Under signature                      |                  |                       | Contract completion date + 6 years      | SECURE DISPOSAL  |
| ▪ Monitoring records                   |                  |                       | Current year + 2 years                  | SECURE DISPOSAL  |
| Copy orders                            |                  |                       | Current year + 2 years                  | SECURE DISPOSAL  |
| Budget reports, budget monitoring etc. |                  |                       | Current year + 3 years                  | SECURE DISPOSAL  |

## Finance cont'd.

| Basic File Description   | Data Prot Issues | Statutory Provisions  | Retention Period [operational]     | Action at the end of the administrative life of the record |
|--|------------------|-----------------------|------------------------------------|--|
| Invoice, receipts and other records covered by the Financial Regulations |                  | Financial Regulations | Current year + 6 years             | SECURE DISPOSAL  |
| Annual Budget and background papers                                      |                  |                       | Current year + 6 years             | SECURE DISPOSAL  |
| Order books and requisitions   |                  |                       | Current year + 6 years             | SECURE DISPOSAL  |
| Delivery Documentation   |                  |                       | Current year + 6 years             | SECURE DISPOSAL  |
| Debtors' Records   |                  | Limitation Act 1980   | Current year + 6 years             | SECURE DISPOSAL  |
| School Fund – Cheque books   |                  |                       | Current year + 3 years             | SECURE DISPOSAL  |
| School Fund – Paying in books  |                  |                       | Current year + 6 years then review | SECURE DISPOSAL  |
| School Fund – Ledger   |                  |                       | Current year + 6 years then review | SECURE DISPOSAL  |
| School Fund – Invoices   |                  |                       | Current year + 6 years then review | SECURE DISPOSAL  |
| School Fund – Receipts   |                  |                       | Current year + 6 years             | SECURE DISPOSAL  |
| School Fund – Bank statements  |                  |                       | Current year + 6 years then review | SECURE DISPOSAL  |
| School Fund – School Journey books                                       |                  |                       | Current year + 6 years then review | SECURE DISPOSAL  |
| Student grant applications   |                  |                       | Current year + 3 years             | SECURE DISPOSAL  |
| Petty cash books   |                  | Financial Regulations | Current year + 6 years             | SECURE DISPOSAL  |

Property

| Basic File Description                     | Data Prot Issues | Statutory Provisions  | Retention Period [operational] | Action at the end of the administrative life of the record                                    |
|--|------------------|-----------------------|--------------------------------|---|
| Title Deeds                                |                  |                       | Permanent                      | These should follow the property unless the property has been registered at the Land Registry |
| Plans                                      |                  |                       | Permanent                      | Retain in school whilst operational   |
| Maintenance and contractors                |                  | Financial Regulations | Current year + 6 years         | SECURE DISPOSAL   |
| Leases                                     |                  |                       | Expiry of lease + 6 years      | SECURE DISPOSAL   |
| Lettings                                   |                  |                       | Current year + 3 years         | SECURE DISPOSAL   |
| Burglary, theft and vandalism report forms |                  |                       | Current year + 6 years         | SECURE DISPOSAL   |
| Maintenance log books                      |                  |                       | Current year + 6 years         | SECURE DISPOSAL   |
| Contractors' Reports                       |                  |                       | Current year + 6 years         | SECURE DISPOSAL   |

Department for Education

| Basic File Description    | Data Prot Issues | Statutory Provisions | Retention period [operational]                       | Action at the end of the administrative life of the record   |
|---------------------------|------------------|----------------------|--|--|
| HMI reports               |                  |                      | These do not need to be kept any longer              |  |
| OFSTED reports and papers |                  |                      | Replace former report with any new inspection report | Review to see whether a further retention period is required |
| Returns                   |                  |                      | Current year + 6 years                               | SECURE DISPOSAL  |
| Circulars from DFE        |                  |                      | Whilst operationally required                        | Review to see whether a further retention period is required |

School Meals

| Basic File Description      | Data Prot Issues | Statutory Provisions | Retention Period [operational] | Action at the end of the administrative life of the record |
|-----------------------------|------------------|----------------------|--------------------------------|--|
| Dinner Register             |                  |                      | Current year + 3 years         | SHRED  |
| School Meals Summary Sheets |                  |                      | Current year + 3 years         | SHRED  |

