

# **Longcause Community**Special School

# **DOCUMENT RETENTION POLICY**

| Signature of Head: | Anne Hutchinson |
|--------------------|-----------------|
| Date:              | 22/10/2025      |
| Minute Reference:  | 237             |

| Review by:            | Emma Moehle – Apex HR |
|-----------------------|-----------------------|
| Review date:          | October 2025          |
| Checked by:           | Anne Hutchinson       |
| Master file location: | Admin Shared Drive    |
| Next review date:     | October 2026          |

#### **Changes**

| Policy date | Summary of change        | Author   | Versi | Review date |
|-------------|--------------------------|----------|-------|-------------|
|             |                          |          | on    |             |
| 09/12/2022  | Policy has been created. | Apex HR  | 1.0   | 09/12/2023  |
|             |                          | Ltd      |       |             |
| 05/03/2024  | Policy reviewed –        | Reviewed | 2.0   | 05/03/2025  |
|             | Amended warning          | by EJM   |       |             |
|             | retention dates in line  |          |       |             |
|             | with Disciplinary Policy |          |       |             |
| 08/07/2024  | Archived school leavers  | Apex HR  | 3.0   |             |
|             | pupil files              | Ltd      |       |             |
| 08/07/2024  | Medication included      | Apex HR  | 3.0   |             |
|             |                          | Ltd      |       |             |
| 13/10/2025  | Reviewed – HR and        | Apex HR  | 4.0   | 15/10/2025  |
|             | Medical info updated     | Ltd      |       |             |

#### **School Records Management Policy**

Longcause 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 school. 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. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

#### 1. Scope of the policy

- 1.1 This policy applies to all records created, received or maintained by permanent or temporary staff of the school in the course of carrying out its functions. Also to any agents, contractors, consultants or third parties acting on behalf of the school.
- 1.2 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, received or maintained in hard copy or electronic format, e.g. paper documents, scanned documents, emails which document business activities and decisions, audio and video recordings, text messages, notes of telephone and skype conversations, spreadsheets, word documents, presentations etc.

#### 2. Responsibilities

- 2.1 The Board of Governors has a statutory responsibility to maintain school records and record keeping systems in accordance with the regulatory environment specific to the school. The person with overall responsibility for this policy is the Headteacher.
- 2.2 The person responsible for day to day operational management in the school will give guidance for 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.
- 2.3 The school will manage and document its records disposal process in line with the Records Retention Schedule. This will help ensure that it can meet its Freedom of Information requests and respond to requests to access personal data under data protection legislation (Subject Access Requests "SARS")
- 2.4 Individual staff and employees must ensure that with respect to records for which they are responsible, that they:
  - 2.4.1 Manage the schools records consistently, in accordance with the school policies and procedures.
  - 2.4.2 Properly document their actions and decisions.
  - 2.4.3 Hold personal information securely.
  - 2.4.4 Only share personal information appropriately and do not disclose it to any unauthorised third parties.
  - 2.4.5 Dispose of records securely in accordance with the schools retention

schedule.

#### 3. Relationship with Existing Policies

This policy has been drawn up within the context of:

- Freedom of Information
- Data Protection
- Information Governance policies and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

Further information regarding retention periods can also be found in the Information and Records Management Society Retention Guidelines for Schools at www.ims.org.uk.

#### **Document Retention Schedule – Longcause School**

#### 1.2 **Board of Directors, Members Meetings and Governing Body** Basic file description Data **Statutory Provisions** Retention Action at end of **Protection** Period administrative Issues [Operational] life of the record **Board of Directors** 1.2.1 Could be if the Minutes must be **Board Meeting Minutes Companies Act** OFFER 2006 section 248 minutes refer to kept for at least 10 TO living individuals years from the date **ARCHIV** of the meeting ES 1.2.2 **Board Decisions** Could be if the Date of the meeting OFFER decisions refer + a minimum of 10 TO **ARCHIV** to living years individuals ES 1.2.3 Board Meeting: Annual SECURE DISPOSAL Current year No Schedule of Business 1.2.4 **Board Meeting:** Limitation Act 1980 Date procedures SECURE DISPOSAL No Procedures for conduct of superseded + 6 years (Section 2) meeting Committees<sup>2</sup>

<sup>&</sup>lt;sup>2</sup> The board can establish any committee and determine the constitution, membership and proceedings that will apply.

|       | Basic file description  | Data Protection Issues                              | Statutory Provisions              | Retention Period [Operational]  | Action at end of administrative life of the record |
|-------|---|---|-----------------------------------|---|--|
| 1.2.5 | Minutes relating to any committees set up by the Board of Directors           | Could be if the minutes refer to living individuals |                                   | Date of the meeting<br>+ a minimum of 10<br>years   | OFFER<br>TO<br>ARCHIV<br>ES                        |
|       | General Members' Meeting  |   |                                   |   |  |
| 1.2.6 | Records relating to the management of General Members' Meetings               | Could be if the minutes refer to living individuals | Companies Act<br>2006 section 248 | Minutes must be<br>kept for at least 10<br>years from the date<br>of the meeting <sup>3</sup> | OFFER<br>TO<br>ARCHIV<br>ES                        |
| 1.2.7 | Records relating to the management of the Annual General Meeting <sup>4</sup> | Could be if the minutes refer to living individuals | Companies Act<br>2006 section 248 | Minutes must be<br>kept for at least 10<br>years from the date<br>of the meeting <sup>5</sup> | OFFER<br>TO<br>ARCHIV<br>ES                        |

<sup>&</sup>lt;sup>3</sup> The signed minutes must be kept securely together with the notice and agenda for the meeting and supporting documentation provided for consideration at the meeting. Documentation is generally filed in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

<sup>4</sup> Not all Schools are required to hold an Annual General Meeting for the Members – the requirement will be stated in the Constitution.

<sup>&</sup>lt;sup>5</sup> The signed minutes must be kept securely together with the notice and agenda for the meeting and any supporting documentation provided for consideration at the meeting. Documentation is generally filed in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

|       | Basic file description  | Data Protection Issues  | Statutory Provisions | Retention Period [Operational]  | Action at end or administrative life of the recor |
|-------|---|---|----------------------|---|---|
| 1.2.8 | Agendas for Governing Body<br>meetings  | May be data protection issues, if the meeting is dealing with confidential issues relating to staff |                      | One copy should be retained with the master set of minutes. All other copies can be disposed of | SECURE DISPOS                                     |
| 1.2.9 | Minutes of, and papers considered at, meetings of the Governing Body and its committees | May be data protection issues, if the meeting is dealing with confidential issues relating to staff |                      | One copy should be retained with the master set of minutes. All other copies can be disposed of | SECURE DISPOSAI                                   |
|       | Principal Set (signed)  |   |                      | Life of School  |   |
|       | Inspection Copies <sup>7</sup>  |   |                      | Date of meeting + 3 years   | SECURE DISPOS                                     |

<sup>&</sup>lt;sup>6</sup> In this context, SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross-cut shredder.

<sup>&</sup>lt;sup>7</sup> These are the copies which the clerk to the Governor may wish to retain, so that requestors can view all the relevant information, without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

|            | Basic file description   | Data Protection Issues  | Statutory Provisions              | Retention Period [Operational]  | Action at end of administrative life of the record |
|------------|--|---|-----------------------------------|---|--|
| 1.2.1<br>0 | Reports presented to the Governing Body  | May be data protection issues, if the report deals with confidential issues relating to staff |                                   | 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 for the life of the School | or retain with the signed set of minutes           |
| 1.2.1<br>1 | Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002 | No  | Education Act 2002,<br>Section 33 | Date of the meeting<br>+ a minimum of 6<br>years  | SECURE DISPOSAL                                    |
| 1.2.1<br>2 | Trusts and Endowments managed by the Governing Body  | No  |                                   | PERMANENT   |  |
| 1.2.1<br>3 | Records relating to complaints dealt with by the Governing Body  | Yes   |                                   | Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious   | SECURE DISPOSAL                                    |

|  |  | disputes |  |
|--|--|----------|--|
|  |  |          |  |
|  |  |          |  |
|  |  |          |  |
|  |  |          |  |

|            | Basic file description  | Data<br>Protection<br>Issues | Statutory Provisions   | Retention Period [Operational]  | Action at end of administrative life of the record |
|------------|---|------------------------------|--|---------------------------------|--|
| 1.2.1      | Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 | No                           | Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171 | Date of report + 10 years       | SECURE DISPOSA                                     |
|            | Statutory Registers <sup>8</sup>  |                              |  |                                 |  |
| 1.2.1<br>5 | Register of Directors   |                              | Companies Act 2006   | Life of the School +<br>6 years | SECURE DISPOSA                                     |
| 1.2.1      | Register of Directors' interests [this is not a statutory register]   |                              |  | Life of the School +<br>6 years | SECURE DISPOSA                                     |

<sup>&</sup>lt;sup>8</sup> Schools are required by law to keep specific records, collectively known as statutory registers or the statutory books. The registers record information relating to the School's operations and structure, such as the current directors. Records should be kept up-to-date to reflect any changes that take place.

#### 1.2 **Board of Directors, Members Meetings and Governing Body Basic file description Statutory Provisions** Retention Action at end of Data Protection Period administrative [Operational] life of the record Issues 1.2.1 Companies Act 2006 Life of the School + SECURE DISPOSAL Register of Directors' 6 years 7 residential addresses Companies Act 2006 Life of the School + SECURE DISPOSAL 1.2.1 Register of gifts, 6 years hospitality and 8 entertainments Companies Act 2006 Life of the School + SECURE DISPOSAL 1.2.1 Register of members 6 years Life of the School + 1.2.2 Companies Act 2006 SECURE DISPOSAL Register of secretaries 6 years 0 1.2.2 Life of the School + SECURE DISPOSAL Register of Trustees interests 6 years 1 Life of the School + SECURE DISPOSAL 1.2.2 **Declaration of Interests** Statements [Governors] 6 years 2 [this is not a statutory register]

|       | Basic file description                         | Data<br>Protection<br>Issues | Statutory Provisions | Retention Period [Operational]      | Action at end of administrative life of the record |
|-------|--|------------------------------|----------------------|-------------------------------------|--|
|       | Strategic Finance                              |                              |                      |                                     |  |
| 1.3.1 | Statement of financial activities for the year | No                           |                      | Current financial year + 6 years    | SECURE DISPOSAL                                    |
| 1.3.2 | Financial planning                             | No                           |                      | Current financial year + 6 years    | SECURE DISPOSAL                                    |
| 1.3.3 | Value for money statement                      | No                           |                      | Current financial year + 6 years    | SECURE DISPOSAL                                    |
| 1.3.4 | Records relating to the management of VAT      | No                           |                      | Current financial year + 6 years    | SECURE DISPOSAL                                    |
| 1.3.5 | Whole of government accounts returns           | No                           |                      | Current financial year + 6 years    | SECURE DISPOSAL                                    |
| 1.3.6 | Borrowing powers                               | No                           |                      | Current financial year + 6 years    | SECURE DISPOSAL                                    |
| 1.3.7 | Budget plan                                    | No                           |                      | Current financial year + 6 years    | SECURE DISPOSAL                                    |
| 1.3.8 | Charging and remissions policy                 | No                           |                      | Date policy superseded<br>+ 3 years | SECURE DISPOSAL                                    |

|        | Basic file description  | Data<br>Protection<br>Issues | Statutory Provisions | Retention Period [Operational]             | Action at end of administrative life of the record |
|--------|---|------------------------------|----------------------|--|--|
|        | Audit Arrangements  |                              |                      |  |  |
| 1.3.9  | Audit Committee and appointment of responsible officers                                 | No                           |                      | Life of the School                         | SECURE DISPOSAL                                    |
| 1.3.10 | Independent Auditor's report on regularity  | No                           |                      | Financial year report relates to + 6 years | SECURE DISPOSAL                                    |
| 1.3.11 | Independent Auditor's report on financial statements                                    | No                           |                      | Financial year report relates to + 6 years | SECURE DISPOSAL                                    |
|        | Funding Agreements  |                              |                      |  |  |
| 1.3.12 | Funding Agreement with<br>Secretary of State and<br>supplemental funding<br>agreements9 | No                           |                      | Date of last payment of funding + 6 years  | SECURE DISPOSAL                                    |

 $^{9}\,\mathrm{Where}$  there is multi-School governance.

|        | Basic file description   | Data<br>Protection<br>Issues | Statutory Provisions | Retention Period [Operational]            | Action at end of administrative life of the record |
|--------|--|------------------------------|----------------------|---|--|
| 1.3.13 | Funding Agreement –<br>Termination of the<br>funding agreement <sup>10</sup> |                              |                      | Date of last payment of funding + 6 years | SECURE DISPOSAL                                    |
| 1.3.14 | Funding Records –<br>Capital Grant   | No                           |                      | Date of last payment of funding + 6 years | SECURE DISPOSAL                                    |
| 1.3.15 | Funding Records – Earmarked Annual Grant (EAG)                               | No                           |                      | Date of last payment of funding + 6 years | SECURE DISPOSAL                                    |
| 1.3.16 | Funding Records – General Annual Grant (GAG)                                 | No                           |                      | Date of last payment of funding + 6 years | SECURE DISPOSAL                                    |
| 1.3.17 | Per pupil funding records  | No                           |                      | Date of last payment of funding + 6 years | SECURE DISPOSAL                                    |

<sup>&</sup>lt;sup>10</sup> Either party may give not less than 7 financial years' written notice to terminate the Agreement, such notice to expire on 31 August. Or, where the School has significant financial issues or is insolvent, the Agreement can be terminated by the Secretary of State to take effect on the date of the notice.

|        | Basic file description             | Data<br>Protection<br>Issues | Statutory Provisions | Retention Period [Operational]   | Action at end of administrative life of the record |
|--------|------------------------------------|------------------------------|----------------------|--|--|
| 1.3.18 | Exclusions agreement <sup>11</sup> | No                           |                      | Date of last payment of funding + 6 years  | SECURE DISPOSAL                                    |
| 1.3.19 | Funding records <sup>12</sup>      | No                           |                      | Date of last payment of funding + 6 years  | SECURE DISPOSAL                                    |
| 1.3.20 | Gift Aid and Tax Relief            | No                           |                      | Date of last payment of funding + 6 years  | SECURE DISPOSAL                                    |
| 1.3.21 | Records relating to loans          | No                           |                      | Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000 | SECURE DISPOSAL                                    |
|        | Payroll and Pensions               |                              |                      |  |  |

<sup>11</sup> The School can enter into an arrangement with a Local Authority (LA), so that payment will flow between the School and the LA, in the same way as it would do were the School a maintained school.

<sup>&</sup>lt;sup>12</sup> Funding agreement which says that the School can receive donations and can only charge where the law allows maintained schools to charge [see Charging and Remission Policy].

|        | Basic file description   | Data<br>Protection<br>Issues | Statutory Provisions   | Retention Period [Operational]  | Action at end of administrative life of the record |
|--------|--|------------------------------|--|---|--|
| 1.3.22 | Maternity pay records  | Yes                          | Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)    | Current year + 3 years  | SECURE DISPOSAL                                    |
| 1.3.23 | Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Yes                          | Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103) | From the end of the year in which the accounts were signed for a minimum of 6 years | SECURE DISPOSAL                                    |
| 1.3.24 | Management of the<br>Teachers' Pension<br>Scheme                                     | Yes                          |  | Date of last payment<br>on the pension + 6<br>years                                 | SECURE DISPOSAL                                    |
| 1.3.25 | Records relating to pension registrations  | Yes                          |  | Date of last payment<br>on the pension + 6<br>years                                 | SECURE DISPOSAL                                    |
| 1.3.26 | Payroll records  | Yes                          |  | Date payroll run + 6 years  | SECURE DISPOSAL                                    |
|        | Risk Management and Ins  | surance                      |  |   |  |

|        | Basic file description                                 | Data<br>Protection<br>Issues | Statutory Provisions | Retention Period [Operational]                                | Action at end of administrative life of the record |
|--------|--|------------------------------|----------------------|---|--|
| 1.3.27 | Insurance policies                                     | No                           |                      | Date the policy expires<br>+ 6 years                          | SECURE DISPOSAL                                    |
| 1.3.28 | Records relating to the settlement of insurance claims | No                           |                      | Date claim settled + 6<br>years                               | SECURE DISPOSAL                                    |
| 1.3.29 | Employer's Liability Insurance Certificate             | No                           |                      | Closure of the school +<br>40 years                           | SECURE DISPOSAL                                    |
|        | Endowment Funds and Inve                               | estments                     |                      |   |  |
| 1.3.30 | Investment policies                                    | No                           |                      | Life of the investment + 6 years                              | SECURE DISPOSAL                                    |
| 1.3.31 | Management of Endowment Funds                          | No                           |                      | Life of the fund + 6 years                                    |  |
|        | Accounts and Statements                                |                              |                      |   |  |
| 1.3.32 | Annual accounts  | No                           |                      | Current year + 6 years  | STANDARD DISPOSAL                                  |
| 1.3.33 | Loans and grants<br>managed by the<br>school           | No                           |                      | Date of last payment<br>on the loan + 12 years<br>then REVIEW | SECURE DISPOSAL                                    |

|        | Basic file description  | Data<br>Protection<br>Issues | Statutory Provisions | Retention Period [Operational]   | Action at end of administrative life of the record |
|--------|---|------------------------------|----------------------|----------------------------------|--|
| 1.3.34 | Student<br>Grant<br>applications  | Yes                          |                      | Current year + 3 years           | SECURE DISPOSAL                                    |
| 1.3.35 | All records relating to the creation and management of budgets, including the Annual Budget statement and background papers | No                           |                      | Life of the budget + 3<br>years  | SECURE DISPOSAL                                    |
| 1.3.36 | Invoices, receipts, order books and requisitions, delivery notices  | No                           |                      | Current financial year + 6 years | SECURE DISPOSAL                                    |
| 1.3.37 | Records relating to the collection and banking of monies  | No                           |                      | Current financial year + 6 years | SECURE DISPOSAL                                    |
| 1.3.38 | Records relating to<br>the identification and<br>collection of debt   | No                           |                      | Current financial year + 6 years | SECURE DISPOSAL                                    |
|        | Contract Management   |                              |                      |                                  |  |

|        | Basic file description  | Data<br>Protection<br>Issues | Statutory Provisions | Retention Period [Operational]          | Action at end of administrative life of the record |
|--------|---|------------------------------|----------------------|---|--|
| 1.3.39 | All records relating to the management of contracts under seal                        | No                           | Limitation Act 1980  | Last payment on the contract + 12 years | SECURE DISPOSAL                                    |
| 1.3.40 | All records relating to<br>the management of<br>contracts under<br>signature          | No                           | Limitation Act 1980  | Last payment on the contract + 6 years  | SECURE DISPOSAL                                    |
| 1.3.41 | Records relating to the monitoring of contracts                                       | No                           |                      | Current year + 2 years                  | SECURE DISPOSAL                                    |
|        | Asset Management  |                              |                      |   |  |
| 1.3.42 | Inventories of furniture and equipment  | No                           |                      | Current year + 6 years                  | SECURE DISPOSAL                                    |
| 1.3.43 | Burglary, theft and vandalism report forms  | No                           |                      | Current year + 6 years                  | SECURE DISPOSAL                                    |
| 1.3.44 | Records relating to<br>the leasing of shared<br>facilities, such as<br>sports centres | No                           |                      | Current year + 6 years                  | SECURE DISPOSAL                                    |

|        | Basic file description                  | Data<br>Protection<br>Issues | Statutory Provisions | Retention Period [Operational]                          | Action at end of administrative life of the record |
|--------|---|------------------------------|----------------------|---|--|
| 1.3.45 | Land and building valuations            | No                           |                      | Date valuation<br>superseded + 6 years                  | SECURE DISPOSAL                                    |
| 1.3.46 | Disposal of assets                      | No                           |                      | Date asset disposed of + 6 years                        | SECURE DISPOSAL                                    |
| 1.3.47 | Community School leases for land        | No                           |                      | Date lease expires + 6 years                            | SECURE DISPOSAL                                    |
| 1.3.48 | Commercial<br>transfer<br>arrangements  | No                           |                      | Date of transfer + 6 years                              | SECURE DISPOSAL                                    |
| 1.3.49 | Transfer of land to the<br>School Trust | No                           |                      | Life of land ownership<br>then transfer to new<br>owner | SECURE DISPOSAL                                    |
| 1.3.50 | Transfers of freehold land              | No                           |                      | Life of land ownership<br>then transfer to new<br>owner | SECURE DISPOSAL                                    |
|        | School Fund                             |                              |                      |   |  |
| 1.3.51 | School Fund –<br>Cheque books           | No                           |                      | Current year + 6 years                                  | SECURE DISPOSAL                                    |

| 1.3 F  | 1.3 Funding and Finance          |                              |                      |                                |  |  |  |  |  |  |
|--------|----------------------------------|------------------------------|----------------------|--------------------------------|--|--|--|--|--|--|
|        | Basic file description           | Data<br>Protection<br>Issues | Statutory Provisions | Retention Period [Operational] | Action at end of administrative life of the record |  |  |  |  |  |
| 1.3.52 | School Fund – Paying in books    | No                           |                      | Current year + 6 years         | SECURE DISPOSAL                                    |  |  |  |  |  |
| 1.3.53 | School Fund – Ledger             | No                           |                      | Current year + 6 years         | SECURE DISPOSAL                                    |  |  |  |  |  |
| 1.3.54 | School Fund – Invoices           | No                           |                      | Current year + 6 years         | SECURE DISPOSAL                                    |  |  |  |  |  |
| 1.3.55 | School Fund – Receipts           | No                           |                      | Current year + 6 years         | SECURE DISPOSAL                                    |  |  |  |  |  |
| 1.3.56 | School Fund – Bank<br>statements | No                           |                      | Current year + 6 years         | SECURE DISPOSAL                                    |  |  |  |  |  |
| 1.3.57 | School Fund –<br>Journey books   | No                           |                      | Current year + 6 years         | SECURE DISPOSAL                                    |  |  |  |  |  |
|        | School Meals <sup>13</sup>       |                              |                      |                                |  |  |  |  |  |  |
| 1.3.58 | Free school meals                | Yes                          |                      | Current year + 6 years         | SECURE DISPOSAL                                    |  |  |  |  |  |

registers

<sup>&</sup>lt;sup>13</sup> Unless it would be unreasonable to do so, school lunches should be provided when they are requested by, or on behalf of, any pupil. A school lunch must be provided free of charge to any pupil entitled to free school lunches. From September 2014, free school lunches must be provided to all KS1 pupils.

| 1.3 F  | 1.3 Funding and Finance     |                              |                      |                                |  |  |  |  |  |
|--------|-----------------------------|------------------------------|----------------------|--------------------------------|--|--|--|--|--|
|        | Basic file description      | Data<br>Protection<br>Issues | Statutory Provisions | Retention Period [Operational] | Action at end of administrative life of the record |  |  |  |  |
| 1.3.59 | School meals registers      | Yes                          |                      | Current year + 3 years         | SECURE DISPOSAL                                    |  |  |  |  |
| 1.3.60 | School meals summary sheets | No                           |                      | Current year + 3 years         | SECURE DISPOSAL                                    |  |  |  |  |

As a charity, an School is not permitted to trade and make a profit. It is, however, possible to set up a subsidiary trading company, which can sell products or services and Gift Aid profits back to the School. If the School operates a subsidiary company, it is expected that these records will be managed in line with standard business practice.

| 1.4   | Policies, Frameworks and Overarching Requirements   |    |  |                                     |                 |  |  |  |  |
|-------|---|----|--|-------------------------------------|-----------------|--|--|--|--|
|       | Basic file description  Data Protection Issues  Statutory Provisions Period [Operational]  Action at end of administrative life of the record |    |  |                                     |                 |  |  |  |  |
| 1.4.1 | Data Protection Policy, including data protection notification  | No |  | Date policy superseded<br>+ 6 years | SECURE DISPOSAL |  |  |  |  |
| 1.4.2 | Freedom of Information Policy   | No |  | Date policy superseded<br>+ 6 years | SECURE DISPOSAL |  |  |  |  |

### 1.4 Policies, Frameworks and Overarching Requirements

|        | Basic file description  | Data<br>Protection<br>Issues | Statutory<br>Provisions | Retention Period [Operational]            | Action at end of administrative life of the record |
|--------|---|------------------------------|-------------------------|---|--|
| 1.4.3  | Information Security Breach Policy  | No                           |                         | Date policy superseded + 6 years          | SECURE DISPOSAL                                    |
| 1.4.4  | Special Educational Needs Policy  | No                           |                         | Date policy superseded + 6 years          | SECURE DISPOSAL                                    |
| 1.4.5  | Complaints Policy   | No                           |                         | Date policy superseded + 6 years          | SECURE DISPOSAL                                    |
| 1.4.6  | Risk and Control Framework  | No                           |                         | Life of framework + 6<br>years            | SECURE DISPOSAL                                    |
| 1.4.7  | Rules and Bylaws  | No                           |                         | Date rules or bylaws superseded + 6 years | SECURE DISPOSAL                                    |
| 1.4.9  | Home School Agreements <sup>14</sup>  | No                           |                         | Date agreement revised + 6 years          | SECURE DISPOSAL                                    |
| 1.4.10 | Equality Information and Objectives (public sector equality duty) Statement for publication | No                           |                         | Date of statement + 6 years               | SECURE DISPOSAL                                    |
|        |   |                              |                         |   |  |

 $<sup>^{14}</sup>$  This should be drawn up in consultation with parents and should apply to all pupils.

<sup>&</sup>lt;sup>15</sup> Schools do not necessarily have to employ people with qualified teacher status; only the SEN and designated LAC teacher must be qualified.

# 1. HUMAN RESOURCES

| 2.1   | 2.1 Recruitment <sup>15</sup>   |                              |                      |                                |  |  |  |  |  |  |
|-------|---|------------------------------|----------------------|--------------------------------|--|--|--|--|--|--|
|       | Basic file description  | Data<br>Protection<br>Issues | Statutory Provisions | Retention Period [Operational] | Action at end of administrative life of the record |  |  |  |  |  |
| 2.1.1 | All records leading up to<br>the appointment of a new<br>Head Teacher | Yes                          |                      | Date of appointment + 6 years  | SECURE DISPOSAL                                    |  |  |  |  |  |

# 2.1 Recruitment<sup>15</sup>

|       | Basic file description  | Data<br>Protection<br>Issues | Statutory Provisions | Retention Period [Operational]  | Action at end of administrative life of the record |
|-------|---|------------------------------|----------------------|---|--|
| 2.1.2 | All records leading up to<br>the appointment of a new<br>member of staff –<br>unsuccessful candidates       | Yes                          |                      | Date of appointment of successful candidate + 6 months  | SECURE DISPOSAL                                    |
| 2.1.3 | All records leading up to<br>the appointment of a new<br>member of staff –<br>successful candidate          | Yes                          |                      | All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months   | SECURE DISPOSAL                                    |
| 2.1.4 | Pre-employment vetting information – DBS Checks <sup>16</sup>   | No                           | Employer Guide       | Schools and colleges do not have to keep copies of DBS certificates, in order to fulfil the duty of maintaining the single central record   | SECURE DISPOSAL                                    |
| 2.1.5 | Proofs of identity collected<br>as part of the process of<br>checking "portable"<br>enhanced DBS disclosure | 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 added to the Staff Personal File | SECURE DISPOSAL                                    |

<sup>&</sup>lt;sup>16</sup> Schools are bound by the legislation that applies to independent schools NOT maintained schools.

# 2.1 Recruitment<sup>15</sup>

|       | Basic file description  | Data<br>Protection<br>Issues | Statutory Provisions  | Retention Period [Operational]  | Action at end of administrative life of the record |
|-------|---|------------------------------|---|---|--|
| 2.1.6 | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom <sup>17</sup> | Yes                          | An employer's guide<br>to right to work<br>checks [Home Office<br>May 2015] | Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years.  Kept in line with personnel file termination date + 6 years | SECURE DISPOSAL                                    |
| 2.1.7 | Annual disqualification declaration   | Yes                          | Keeping children safe in education 2025                                     | Current year + 1  | SECURE DISPOSAL                                    |
| 2.1.8 | Records relating to the employment of overseas teachers   | Yes                          |   | Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years.  Kept in line with personnel file termination date + 6 years | SECURE DISPOSAL                                    |
| 2.1.9 | Records relating to the TUPE process  | Yes                          |   | Date last member of staff transfers or leaves the organisation + 6 years  | SECURE DISPOSAL                                    |

<sup>17</sup> Employers are required to take a "clear copy" of the documents which they are shown as part of this process.

| 2.2   | .2 Operational Staff Management   |                              |                                    |  |  |  |  |  |  |
|-------|---|------------------------------|------------------------------------|--|--|--|--|--|--|
|       | Basic file description  | Data<br>Protection<br>Issues | Statutory<br>Provisions            | Retention Period [Operational]               | Action at end of administrative life of the record |  |  |  |  |
| 2.2.1 | Staff Personal File, including employment contract and staff training records | Yes                          | Limitation Act<br>1980 (Section 2) | Termination of employment + 6 years          | SECURE DISPOSAL                                    |  |  |  |  |
| 2.2.2 | Timesheets  | Yes                          |                                    | Current year + 6 years                       | SECURE DISPOSAL                                    |  |  |  |  |
| 2.2.3 | Annual appraisal/assessment records   | Yes                          |                                    | Current year + 6 years                       | SECURE DISPOSAL                                    |  |  |  |  |
| 2.2.4 | Records relating to the agreement of pay and conditions                       | No                           |                                    | Date pay and conditions superseded + 6 years | SECURE DISPOSAL                                    |  |  |  |  |
| 2.2.5 | Training needs analysis   | No                           |                                    | Current year + 1 year                        | SECURE DISPOSAL                                    |  |  |  |  |

# 2.3 Management of Disciplinary and Grievance Processes

|       | Basic file description  | Data<br>Protection<br>Issues | Statutory Provisions   | [Operational]   | Action at end of administrative life of the record |
|-------|---|------------------------------|--|---|--|
| 2.3.1 | Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded <sup>18</sup> | Yes                          | "Keeping children safe in education<br>Statutory guidance for schools and<br>colleges March 2025"; "Working<br>together to safeguard children. A guide<br>to inter-agency working to safeguard and<br>promote the welfare of children March<br>2023" | Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW  | SECURE DISPOSAL  These records must be shredded    |
| 2.3.2 | Disciplinary Proceedings  | Yes                          |  |   |  |
|       | Oral warning  |                              |  | Date of warning <sup>19</sup> + length of time notified [i.e. 6-18 months]. Then remove from personnel file and archived.  Destroy in line with termination of employment | SECURE<br>DISPOSAL <sup>20</sup>                   |

<sup>18</sup> This review took place when the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention.

<sup>19</sup> Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice.

<sup>20</sup> If warnings are placed on personal files, then they must be weeded from the file.

# 2.3 Management of Disciplinary and Grievance Processes

|       | Basic file description     | Data<br>Protection<br>Issues | Statutory Provisions | [Operational]  | Action at end of administrative life of the record |
|-------|----------------------------|------------------------------|----------------------|--|--|
| 2.3.3 | Written warning – level 1  |                              |                      | Date of warning <sup>19</sup> + length of time notified [i.e 6-18 months]. Then remove from personnel file and archived.  Destroy in line with termination of employment | SECURE<br>DISPOSAL <sup>21</sup>                   |
| 2.3.4 | Written warning –  level 2 |                              |                      | Date of warning <sup>19</sup> + length of time notified [i.e 6-18 months]. Then remove from personnel file and archived.  Destroy in line with termination of employment | SECURE<br>DISPOSAL <sup>22</sup>                   |
| 2.3.5 | ● Final warning            |                              |                      | Date of warning <sup>19</sup> + length of time notified [i.e 6-18 months]. Then remove from personnel file and archived.   | SECURE<br>DISPOSAL <sup>23</sup>                   |

|       |                | Destroy in line with termination of employment   |                 |
|-------|----------------|--|-----------------|
| 2.3.6 | Case not found | If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case  Destroy in line with termination of employment | SECURE DISPOSAL |
| 2.3.7 | ● Grievance    | Date of Grievance + length of time notified. Then removed from personnel file and archived.  Destroy in line with termination of employment                      | SECURE DISPOSAL |

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<sup>&</sup>lt;sup>21</sup> If warnings are placed on personal files, then they must be weeded from the file.

 $<sup>^{\</sup>rm 22}$  If warnings are placed on personal files, then they must be weeded from the file.

<sup>&</sup>lt;sup>23</sup> If warnings are placed on personal files, then they must be weeded from the file.

# 2.4 Health and Safety

|       | Basic file description                      | Data<br>Protection<br>Issues | Statutory<br>Provisions  | Retention Period [Operational]  | Action at end of administrative life of the record |
|-------|---|------------------------------|--|---|--|
| 2.4.1 | Health and Safety policy statements         | No                           |  | Life of policy + 3 years  | SECURE DISPOSAL                                    |
| 2.4.2 | Health and Safety risk assessments          | No                           |  | Life of risk assessment + 3 years   | SECURE DISPOSAL                                    |
| 2.4.3 | Records relating to accident/injury at work | Yes                          |  | Date of incident + 12 years  In the case of serious accidents, a further retention period will need to be applied   | SECURE DISPOSAL                                    |
| 2.4.4 | Accident reporting                          | Yes                          | Social Security (Claims and Payments)  Regulations 2024 Security Administration Act 1992 Section  8. Limitation Act 1980 | The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format  The incident reporting form may be retained as below |  |

# 2.4 Health and Safety

|        | Basic file description   | Data<br>Protection<br>Issues | Statutory<br>Provisions   | Retention Period [Operational]        | Action at end of administrative life of the record |
|--------|--|------------------------------|---|---------------------------------------|--|
|        | • Adults   |                              |   | Date of incident + 6 years            | SECURE DISPOSAL                                    |
|        | • Children   |                              |   | Date of birth of the child + 25 years | SECURE DISPOSAL                                    |
| 2.4.5  | Control of Substances Hazardous to Health (COSHH)  | No                           |   | Current year + 10 years then REVIEW   | SECURE DISPOSAL                                    |
| 2.4.6  | Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos  | No                           |   | Last action + 40 years                | SECURE DISPOSAL                                    |
| 2.4.7  | Process of monitoring of areas where employees and persons are likely to have come into contact with radiation | No                           |   | Last action + 50 years                | SECURE DISPOSAL                                    |
| 2.4.8  | Fire precautions log books   | No                           |   | Current year + 6 years                | SECURE DISPOSAL                                    |
| 2.4.9  | Fire risk assessments  | No                           | Fire Service Order 2005   | Life of the risk assessment + 6 years | SECURE DISPOSAL                                    |
| 2.4.10 | Incident reports   | Yes                          |   | Current year + 20 years               | SECURE DISPOSAL                                    |
| 2.5.10 | Administering of medication records  |                              | Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 | Date administered + 8 years           | SECURE DISPOSAL                                    |

### 2. MANAGEMENT OF THE SCHOOL

\* School leaver pupil files before 2019 have been moved to the National Archives at The Box, Plymouth. These will be stored up to 100 years and can be requested via The National Archives for Plymouth. School leaver pupil files from 2019 and after will be retained and destroyed in line with the policy items below.

|       | Basic file description   | Data<br>Protection<br>Issues | Statutory Provisions  | Retention Period [Operational]              | Action at end of administrative life of the record |
|-------|--|------------------------------|---|---|--|
| 3.1.1 | All records relating to the creation and implementation of the School Admissions' Policy | No                           | School Admissions Code  Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014 | Life of the policy + 3 years<br>then REVIEW | SECURE DISPOSAL                                    |
| 3.1.2 | Admissions – if the admission is successful  | Yes                          | School Admissions Code  Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014 | Date of admission + 1 year                  | SECURE DISPOSAL                                    |

#### 3.1 Admissions

|       | Basic file description                     | Data<br>Protection<br>Issues | Statutory Provisions  | Retention Period<br>[Operational]  | Action at end of administrative life of the record   |
|-------|--|------------------------------|---|--|--|
| 3.1.3 | Admissions – if the appeal is unsuccessful | Yes                          | School Admissions Code  Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014 | Resolution of case + 1 year  | SECURE DISPOSAL  |
| 3.1.4 | Register of admissions                     | Yes                          | School attendance: Departmental advice for maintained schools, Schools, independent schools and local authorities August 2024   | Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made <sup>24</sup> | 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 |

<sup>&</sup>lt;sup>24</sup> School attendance: Departmental advice for maintained schools, Schools, independent schools and local authorities August 2024 p6.

#### 3.1 Admissions

|       | Basic file description   | Data<br>Protection<br>Issues | Statutory Provisions  | Retention Period [Operational]                     | Action at end of administrative life of the record |
|-------|--|------------------------------|---|--|--|
| 3.1.5 | Admissions – Secondary<br>Schools – Casual   | Yes                          |   | Current year + 1 year                              | SECURE DISPOSAL                                    |
| 3.1.6 | Proofs of address supplied by parents as part of the admissions process                                  | Yes                          | School Admissions Code  Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014 | Current year + 1 year                              | SECURE DISPOSAL                                    |
| 3.1.7 | Supplementary information form, including additional information such as religion and medical conditions | Yes                          |   |  |  |
|       | <ul><li>For successful admissions</li></ul>  |                              |   | This information should be added to the pupil file | SECURE DISPOSAL                                    |
|       | For unsuccessful     admissions  |                              |   | Until appeals process completed                    | SECURE DISPOSAL                                    |

| 3.2   | 3.2 Head Teacher and Senior Management Team   |   |                         |   |   |  |  |  |  |
|-------|---|---|-------------------------|---|---|--|--|--|--|
|       | Basic file description  | Data Protection Issues  | Statutory<br>Provisions | Retention Period [Operational]                                    | Action at end of administrative life of the record  |  |  |  |  |
| 3.2.1 | Log books of activity in the school maintained by the Head Teacher  | There may be data protection issues if the log book refers to individual pupils or members of staff |                         | Date of last entry in the book + a minimum of 6 years then REVIEW | These could be of permanent historical value and should be offered to the County Archives Service, if appropriate |  |  |  |  |
| 3.2.2 | Minutes of Senior Management Team meetings and meetings of other internal administrative bodies                                       | There may be data protection issues if the minutes refers to individual pupils or members of staff  |                         | Date of the meeting + 3 years then REVIEW                         | SECURE DISPOSAL   |  |  |  |  |
| 3.2.3 | Reports created by the Head<br>Teacher or the Management Team   | There may be data protection issues if the report refers to individual pupils or members of staff   |                         | Date of the report + a<br>minimum of 3 years<br>then REVIEW       | SECURE DISPOSAL   |  |  |  |  |
| 3.2.4 | Records created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities | There may be data protection issues if the records refer to individual pupils or members of staff   |                         | Current academic year<br>+ 6 years then REVIEW                    | SECURE DISPOSAL   |  |  |  |  |

| 3.2   | Head Teacher and Senior Management Team  |   |                         |  |  |  |  |  |
|-------|--|---|-------------------------|--|--|--|--|--|
|       | Basic file description   | Data Protection Issues  | Statutory<br>Provisions | Retention Period [Operational]               | Action at end of administrative life of the record |  |  |  |
| 3.2.5 | Correspondence created by Head<br>Teachers, Deputy Head Teachers,<br>heads of year and other members<br>of staff with administrative<br>responsibilities | There may be data protection issues if the correspondence refers to individual pupils or members of staff |                         | Date of correspondence + 3 years then REVIEW | SECURE DISPOSAL                                    |  |  |  |
| 3.2.6 | Professional Development Plans   | Yes   |                         | Terminication of employment + 6 years        | SECURE DISPOSAL                                    |  |  |  |

| 3.3   | 3 Operational Administration  |                        |                         |  |  |  |  |  |
|-------|---|------------------------|-------------------------|--|--|--|--|--|
|       | Basic file description  | Data Protection Issues | Statutory<br>Provisions | Retention Period [Operational]             | Action at end of administrative life of the record |  |  |  |
| 3.3.1 | Management of complaints  | Yes                    |                         | Date complaint resolved<br>+ 3 years       | SECURE DISPOSAL                                    |  |  |  |
| 3.3.2 | Records relating to the management of contracts with external providers | No                     |                         | Date of last payment on contract + 6 years | SECURE DISPOSAL                                    |  |  |  |
| 3.3.3 | Records relating to the management of software licences                 | No                     |                         | Date licence expires + 6 years             | SECURE DISPOSAL                                    |  |  |  |

| 3.3   | 3 Operational Administration  |                              |                         |                                       |  |  |  |
|-------|---|------------------------------|-------------------------|---------------------------------------|--|--|--|
|       | Basic file description  | Data<br>Protection<br>Issues | Statutory<br>Provisions | Retention Period [Operational]        | Action at end of administrative life of the record |  |  |
| 3.3.4 | General file series   | No                           |                         | Current year + 5 years<br>then REVIEW | SECURE DISPOSAL                                    |  |  |
| 3.3.5 | Records relating to the creation and publication of the school brochure or prospectus                         | No                           |                         | Current year + 3 years                | STANDARD DISPOSAL                                  |  |  |
| 3.3.6 | Records relating to the creation and distribution of circulars to staff, parents or pupils                    | No                           |                         | Current year + 1 year                 | STANDARD DISPOSAL                                  |  |  |
| 3.3.7 | Newsletters and other items with a short operational use  | No                           |                         | Current year + 1 year                 | STANDARD DISPOSAL                                  |  |  |
| 3.3.8 | Visitors' books and signing in log, paper and digital system  | Yes                          |                         | Current year + 6 years<br>then REVIEW | SECURE DISPOSAL                                    |  |  |
| 3.3.9 | Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations | No                           |                         | Current year + 6 years<br>then REVIEW | SECURE DISPOSAL                                    |  |  |
| 3.3.1 | Subject Access Request, request, data, sift, redacted, final files, acknowledgement and response letters      | Yes                          |                         | Pupil leave date +3 years             | SECURE DISPOSAL                                    |  |  |

## 3. PROPERTY MANAGEMENT

This section covers the management of buildings and property.

| 4.1   | 1.1 Property Management                                     |                              |                         |   |  |  |  |
|-------|---|------------------------------|-------------------------|---|--|--|--|
|       | Basic file<br>description                                   | Data<br>Protection<br>Issues | Statutory<br>Provisions | Retention Period [Operational]  | Action at end of administrative life of the record |  |  |
| 4.1.1 | Title deeds of properties belonging to the school           | No                           |                         | These should follow the property, unless the property has been registered with the Land Registry  |  |  |  |
| 4.1.2 | Plans of property belonging to the school                   | No                           |                         | 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 |  |  |  |
| 4.1.3 | Leases of property leased by or to the school               | No                           |                         | Expiry of lease + 6 years   | SECURE DISPOSAL                                    |  |  |
| 4.1.4 | Records relating to the letting of school premises          | No                           |                         | Current financial year + 6 years  | SECURE DISPOSAL                                    |  |  |
| 4.1.5 | Business<br>continuity<br>and disaster<br>recovery<br>plans | No                           |                         | Date the plan superseded + 3 years  | SECURE DISPOSAL                                    |  |  |

| 4.      | .2 Ma             | Maintenance   |                              |                         |                                      |  |  |  |  |
|---------|-------------------|---|------------------------------|-------------------------|--------------------------------------|--|--|--|--|
|         | Bas               | ic file description   | Data<br>Protection<br>Issues | Statutory<br>Provisions | Retention<br>Period<br>[Operational] | Action at end of administrative life of the record |  |  |  |
| 4.<br>1 | mai               | records relating to the intenance of the school ried out by contractors                                   | No                           |                         | Current year +<br>6 years            | SECURE DISPOSAL                                    |  |  |  |
| 4.      | mai<br>carı<br>em | records relating to the intenance of the school ried out by school ployees, including intenance log books | No                           |                         | Current year +<br>6 years            | SECURE DISPOSAL                                    |  |  |  |

| 4.3  | Fleet Management  |                              |                                       |   |  |  |  |
|------|---|------------------------------|---------------------------------------|---|--|--|--|
|      | Basic file description  | Data<br>Protection<br>Issues | Statutory<br>Provisions               | Retention Period [Operational]  | Action at end of administrative life of the record |  |  |
| 4.3. | The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals          | N                            | Limitation<br>Act 1980<br>(Section 2) | Disposal of the vehicle + 6 years   | SECURE<br>DISPOSAL                                 |  |  |
| 4.3. | The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, maintenance | N                            | Limitation<br>Act 1980<br>(Section 2) | Disposal of the vehicle + 6 years   | SECURE<br>DISPOSAL                                 |  |  |
| 4.3. | Service logs and vehicle logs   | N                            | Limitation<br>Act 1980<br>(Section 2) | Life of the vehicle,<br>then either to be<br>retained for 6 years<br>by school or to be<br>returned to lease<br>company | SECURE<br>DISPOSAL                                 |  |  |

| 4.3. | GPS tracking data relating | N | Limitation  | Date of journey + 6 | SECURE   |
|------|----------------------------|---|-------------|---------------------|----------|
| 4    | to the vehicles            |   | Act 1980    | years               | DISPOSAL |
|      |                            |   | (Section 2) |                     |          |
|      |                            |   |             |                     |          |

#### 4. PUPIL MANAGEMENT

This section includes all records which are created during the time a pupil spends at the school. For information about accident reporting, see under Health and Safety above.

\* School leaver pupil files before 2019 have been moved to the National Archives at The Box, Plymouth. These will be stored up to 100 years and can be requested via The National Archives for Plymouth. School leaver pupil files from 2019 and after will be retained and destroyed in line with the policy items below.

| 5.1   | 5.1 Pupil's Educational Record   |                              |   |                                |  |  |  |  |  |
|-------|--|------------------------------|---|--------------------------------|--|--|--|--|--|
|       | Basic file<br>description  | Data<br>Protection<br>Issues | Statutory<br>Provisions   | Retention Period [Operational] | Action at end of administrative life of the record |  |  |  |  |
| 5.1.1 | Pupil's Educational<br>Record required by<br>The Education<br>(Pupil Information)<br>(England)<br>Regulations 2005 | Yes                          | The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 |                                |  |  |  |  |  |

| Primary        | Retain whilst the | The file should follow             |
|----------------|-------------------|------------------------------------|
| , and a second | child remains at  | the pupil when they                |
|                | the primary       | leave the primary                  |
|                | school            | school. This will                  |
|                | 3011001           | include:                           |
|                |                   | iliciade.                          |
|                |                   | <ul><li>To another</li></ul>       |
|                |                   | primary school                     |
|                |                   | <ul> <li>To a secondary</li> </ul> |
|                |                   | school                             |
|                |                   | <ul><li>To a pupil</li></ul>       |
|                |                   | referral unit                      |
|                |                   | If the pupil dies whilst           |
|                |                   | at primary school, the             |
|                |                   | file should be returned            |
|                |                   | to the LA to be                    |
|                |                   | retained for the                   |
|                |                   | statutory retention                |
|                |                   | period.                            |
|                |                   | If the pupil transfers to          |
|                |                   | an independent school,             |
|                |                   | transfers to home                  |
|                |                   | schooling or leaves the            |
|                |                   | country, the file should           |
|                |                   | be returned to the LA              |
|                |                   | to be retained for the             |
|                |                   | statutory retention                |
|                |                   | statutory retention                |

| 5.1   | •  |            |                  |   |   |  |  |  |
|-------|--|------------|------------------|---|---|--|--|--|
|       | Basic file                                       | Data       | Statutory        | Retention   | Action at end of  |  |  |  |
|       | description                                      | Protection | Provisions       | Period  | administrative life of the  |  |  |  |
|       | ·  | Issues     |                  | [Operational]   | record  |  |  |  |
|       | <ul><li>Secondary</li></ul>                      | 1330003    | Limitation Act   | Date of birth of  | period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA SECURE DISPOSAL |  |  |  |
|       |  |            | 1980 (Section 2) | the pupil + 25<br>years   |   |  |  |  |
| 5.1.2 | Records relating to the management of exclusions | Yes        | 2)               | Date of birth of<br>the pupil<br>involved<br>+ 25 years                               | SECURE DISPOSAL   |  |  |  |
| 5.1.3 | Management of examination registrations          | Yes        |                  | The examination board will usually mandate how long these records need to be retained |   |  |  |  |
| 5.1.4 | Examination results – pupil copies               | Yes        |                  |   |   |  |  |  |
|       | • Public   |            |                  | This information should be added to the pupil file                                    | All uncollected certificates should be returned to the examination board  |  |  |  |
|       | ● Internal                                       |            |                  | This information should be added to the pupil file                                    |   |  |  |  |

| 5.1   | Pupil's Educational Record   |                              |   |  |  |  |  |  |
|-------|--|------------------------------|---|--|--|--|--|--|
|       | Basic file<br>description  | Data<br>Protection<br>Issues | Statutory<br>Provisions   | Retention Period [Operational]   | Action at end of administrative life of the record |  |  |  |
|       | This review took place when the Independent Inquiry on Historical Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention |                              |   |  |  |  |  |  |
| 5.1.5 | Child protection information held on pupil file  | Yes                          | "Keeping children safe in education Statutory guidance for schools and colleges March 2025"; "Working together to safeguard children. A guide to interagency working to safeguard and promote the welfare of children 2023" | 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 | SECURE DISPOSAL – these records MUST be shredded   |  |  |  |

| 5.1   | Pupil's Educational                                 | Record                       |   |  |  |
|-------|---|------------------------------|---|--|--|
|       | Basic file<br>description                           | Data<br>Protection<br>Issues | Statutory<br>Provisions   | Retention Period [Operational]   | Action at end of administrative life of the record |
| 5.1.6 | Child protection information held in separate files | Yes                          | "Keeping children safe in education Statutory guidance for schools and colleges 2025"; "Working together to safeguard children. A guide to interagency working to safeguard and promote the welfare of children 2023" | Date of birth of the child + 25 years then REVIEW  This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record | SECURE DISPOSAL – these records MUST be shredded   |

Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule.

#### 5.2 Attendance

|       | Basic file description                                     | Data Protection<br>Issues | Statutory Provisions   | Retention Period [Operational]  | Action at end of administrative life of the record |
|-------|--|---------------------------|--|---|--|
| 5.2.1 | Attendance registers                                       | Yes                       | School attendance: Departmental advice for maintained schools, Schools, independent schools and local authorities August 2024 Education Act 2002 Section 7 | Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made | SECURE DISPOSAL                                    |
| 5.2.2 | Correspondence relating to authorised absence              |                           | Education Act 2002<br>Section 7  | Current academic year + 2 years   | SECURE<br>DISPOSAL                                 |
| 5.2.3 | Medical records including administering medication records |                           | Health and Social care Act<br>2008 (regulated Activities)<br>Regulation 2014   | 8 Years from Leave date   | SECURE<br>DISPOSAL                                 |

| 5.3 Sp | ecial Educational Needs   |                           |                                    |                                       |  |
|--------|---|---------------------------|------------------------------------|---------------------------------------|--|
|        | Basic file description  | Data Protection<br>Issues | Statutory<br>Provisions            | Retention Period [Operational]        | Action at end of administrative life of the record   |
| 5.3.1  | Special Educational Needs files, reviews and Individual Education Plans | Yes                       | Limitation Act 1980<br>(Section 2) | Date of birth of the pupil + 25 years | NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time in order 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 – this should be documented |

#### **5.3 Special Educational Needs**

|       | Basic file<br>description   | Data<br>Protection<br>Issues | Statutory<br>Provisions   | Retention Period [Operational]   | Action at end of administrative life of the record                    |
|-------|---|------------------------------|---|--|---|
| 5.3.2 | Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement | Yes                          | Education Act<br>1996<br>Special<br>Educational<br>Needs and<br>Disability Act<br>2001 Section<br>1 | Date of birth of<br>the pupil + 25<br>years [This<br>would normally<br>be retained on<br>the pupil file] | SECURE DISPOSAL, unless<br>the document is subject to a<br>legal hold |
| 5.3.3 | Advice and information provided to parents regarding educational needs                                    | Yes                          | Special Educational Needs and Disability Act 2001 Section 2 Education Act 2002                      | Date of birth of<br>the pupil + 25<br>years [This<br>would normally<br>be retained on<br>the pupil file] | SECURE DISPOSAL, unless<br>the document is subject to a<br>legal hold |
| 5.3.4 | Accessibility<br>strategy   | Yes                          | Special Educational Needs and Disability Act 2001 Section 14 Education Act 2002                     | Date of birth of<br>the pupil + 25<br>years [This<br>would normally<br>be retained on<br>the pupil file] | SECURE DISPOSAL, unless<br>the document is subject to a<br>legal hold |

#### **6.1** Statistics and Management Information

|       | Basic file description             | Data<br>Protection<br>Issues | Statutory<br>Provisions | Retention Period [Operational] | Action at end of administrative life of the record |
|-------|------------------------------------|------------------------------|-------------------------|--------------------------------|--|
| 6.1.1 | Curriculum returns                 | No                           |                         | Current year + 3 years         | SECURE<br>DISPOSAL                                 |
| 6.1.2 | Examination results (schools copy) | Yes                          |                         | Current year + 6 years         | SECURE<br>DISPOSAL                                 |

#### **6.1** Statistics and Management Information

|       | Basic file description                         | Data<br>Protection<br>Issues | Statutory<br>Provisions | Retention Period [Operational]   | Action at end of administrative life of the record |
|-------|--|------------------------------|-------------------------|--|--|
|       | SATs records –                                 | Yes                          |                         |  |  |
|       | • Results                                      |                              |                         | The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years  The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison | SECURE DISPOSAL                                    |
|       | <ul><li>Examination papers</li></ul>           |                              |                         | The examination papers should be kept until any appeals/validation process is complete   | SECURE<br>DISPOSAL                                 |
| 6.1.3 | Published Admission<br>Number (PAN)<br>reports | Yes                          |                         | Current year + 6 years   | SECURE<br>DISPOSAL                                 |
| 6.1.4 | Value added and contextual data                | Yes                          |                         | Current year + 6 years   | SECURE<br>DISPOSAL                                 |
| 6.1.5 | Self-evaluation forms                          | Yes                          |                         | Current year + 6 years   | SECURE<br>DISPOSAL                                 |

### **6.2** Implementation of Curriculum

|       | Basic file<br>description    | Data<br>Protection<br>Issues | Statutory<br>Provisions | Retention Period [Operational]   | Action at end of administrative life of the record  |
|-------|------------------------------|------------------------------|-------------------------|--|---|
| 6.2.1 | Schemes of<br>work           | No                           |                         | Current year + 1 year  | It may be appropriate to review these records at the end of each year and allocate a further retention period, or, SECURE DISPOSAL                |
| 6.2.2 | Timetable                    | No                           |                         | Current year + 1 year  | It may be appropriate to<br>review these records at<br>the end of each year and<br>allocate a further<br>retention period, or,<br>SECURE DISPOSAL |
| 6.2.3 | Class record<br>books        | No                           |                         | Current year + 1 year  | It may be appropriate to<br>review these records at<br>the end of each year and<br>allocate a further<br>retention period, or,<br>SECURE DISPOSAL |
| 6.2.4 | Mark books                   | No                           |                         | Current year + 1 year  | It may be appropriate to<br>review these records at<br>the end of each year and<br>allocate a further<br>retention period, or,<br>SECURE DISPOSAL |
| 6.2.5 | Record of<br>homework<br>set | No                           |                         | Current year + 1 year  | It may be appropriate to<br>review these records at<br>the end of each year and<br>allocate a further<br>retention period, or,<br>SECURE DISPOSAL |
| 6.2.6 | Pupils' work                 | No                           |                         | Where possible, work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year | SECURE DISPOSAL   |

# **5. EXTRA CURRICULAR ACTIVITIES**

|       | Basic file description   | Data<br>Protection<br>Issues | Statutory Provisions  | Retention Period [Operational] | Action at end of administrative life of the record |
|-------|--|------------------------------|---|--------------------------------|--|
| 7.1.1 | Records created by schools in order to obtain approval to run an educational visit outside the classroom – Primary schools   | No                           | Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice". | Date of visit + 14<br>years    | SECURE DISPOSAL                                    |
| 7.1.2 | Records created by schools in order to obtain approval to run an educational visit outside the classroom – Secondary schools | No                           | Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – "Legal Framework and Employer Systems" and Section 4 – "Good Practice". | Date of visit + 10<br>years    | SECURE DISPOSAL                                    |

|       | Basic file<br>description  | Data<br>Protection<br>Issues | Statutory Provisions               | Retention Period [Operational]  | Action at end of administrative life of the record   |
|-------|--|------------------------------|------------------------------------|---|--|
| 7.1.3 | Parental consent forms for school trips where there has been no major incident <sup>25</sup> | Yes                          |                                    | Conclusion of the trip  | Although the consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time |
| 7.1.4 | Parental permission slips for school trips – where there has been a major incident           | Yes                          | Limitation Act 1980<br>(Section 2) | Date of birth of the pupil involved in the incident + 25 years  The permission slips for all the pupils on the trip need to be retained to show that the rules had been |  |

followed for all

pupils

<sup>&</sup>lt;sup>25</sup> One-off or blanket consent: The Department for Education (DfE) has prepared a one-off consent form to be signed by the parent on enrolment of their child in a school. This form is intended to cover all types of visits and activities where parental consent is required. The form is available on the DfE website for establishments to adopt and adapt, as appropriate, at www.gov.uk/government/publications/consent-for-school-trips-and-other-off-site-activities. A similar form could be used for other establishments, such as Early Years Foundation Stage (EYFS) providers and youth groups, or at the start of programmes for young people.

| 7.1 Ed | ucational Visits outside              | the Classroom             |                      |   |  |
|--------|---------------------------------------|---------------------------|----------------------|---|--|
|        | Basic file description                | Data Protection<br>Issues | Statutory Provisions | Retention Period [Operational]                            | Action at end of administrative life of the record |
| 7.1.5  | Records relating to residential trips | Yes                       |                      | Date of birth of<br>youngest pupil involved<br>+ 25 years | SECURE DISPOSAL                                    |

|       | Basic file<br>description | Data Protection Issues | Statutory<br>Provisions | Retention Period [Operational]  | Action at end of administrative life of the record  |
|-------|---------------------------|------------------------|-------------------------|---|---|
| 7.2.1 | Walking bus registers     | Yes                    |                         | 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 | SECURE DISPOSAL  [If these records are retained electronically any back up copies should be destroyed at the same time] |

# 6. Central Government and Local Authority (LA)

This section covers records created in the course of interaction between the school and the LA.

|       | Basic file description                 | Data Protection Issues    | Statutory<br>Provisions | Retention Period [Operational]    | Action at end of administrative life of the record |
|-------|--|---------------------------|-------------------------|-----------------------------------|--|
| 8.1.1 | Secondary transfer sheets (Primary)    | Yes                       |                         | Current year + 2 years            | SECURE DISPOSAL                                    |
| 8.1.2 | Attendance returns                     | Yes                       |                         | Current year + 1 year             | SECURE DISPOSAL                                    |
| 8.1 L | ocal Authority                         |                           |                         |                                   |  |
| 8.1 L | ocal Authority  Basic file description | Data Protection           | Statutory               | Retention Period                  | Action at end of administrative                    |
| 8.1 L | ·                                      | Data Protection<br>Issues | Statutory<br>Provisions | Retention Period<br>[Operational] | Action at end of administrative life of the record |

|       | Basic file description                                       | Data Protection<br>Issues | Statutory<br>Provisions | Retention Period [Operational] | Action at end of administrative life of the record |
|-------|--|---------------------------|-------------------------|--------------------------------|--|
| 8.2.1 | OFSTED reports and papers                                    | No                        |                         | Life of the report then REVIEW | SECURE DISPOSAL                                    |
| 8.2.2 | Returns made to central government                           | No                        |                         | Current year + 6 years         | SECURE DISPOSAL                                    |
| 8.2.3 | Circulars and other information sent from central government | No                        |                         | Operational use                | SECURE DISPOSAL                                    |