Alfreton Park School

Retention Policy

Date	Review Date	Headteacher's Signature
April 2025	May 2026	*JODonnell*
Governors minute number:	24/84	

Chair of Governors: John Glasby
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Record Retention and Deletion Policy
Alfreton Park School
Version 1.1

Last Reviewed	April 2025
Reviewed By (Name)	Rebecca Dallman
Job Role	School Business Manager
Next Review Date	May 2026
Version produced April 2025	Minor amends in green Disposal of Data- amended some wording from 'disposed of' to destroyed 5. Transfer to Archives – this section has been re-written Added a paragraph to section 6 regarding the transfer of paper copies to digital and the disposal of said paper copes 8. Management Information System (MIS) section updated 11. Academisation- this section has been re-written Updated 'The Education (Pupil Registration) (England) Regulations 2006' to 'The School Attendance (Pupil Registration) (England) Regulations 2024'

	Wording and abbreviations updated throughout:
	KCSiE 2024 (also updated paragraph references and hyperlinks)
	Updated the words 'must' and 'should' to **'will'** where necessary throughout.
	13. Retention Tables:
	Amended Retention table throughout regarding when to offer certain information to the Local Authority Record Office at the end of use or when school closes.
	5. School Communications- added 5.2 section which covers Pupil emails.
	10.11. Fire Assessments added to retention table
	11.4. Records relating to school vehicles (records that are not required anywhere else e.g. health and safety, litigation etc) added to retention table
	Updated info for 15.1.
	15. Financial Management – School Meals, added a new section (15.4) which covers retention in relation to the breakfast club grant.
	19.3- Added in retention guidance for unauthorized absence
	20. Special Educational Needs (SEN) updated

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

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

Contents

1. How to use this document

This is a very big document. It can be read from front to back, but this will take time, alternatively you can select from an A-Z of relevant provisions.

A-Z

2 Introduction

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

Some of the retention periods are governed by statute. Others are guidelines, following best practice, employed by schools throughout the United Kingdom. Every effort has been made to ensure that these retention periods are compliant with the requirements of the UK General Data Protection Regulation 2018 (GDPR), the Data Protection Act 2018 (DPA), Article 8, the Human Rights Act 1998, the Freedom of Information Act 2000 (FOI) and the Code of Practice on Records Management (under Section 46 of the FOI).

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

3. Purpose

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

As well as containing Record Retention tables, this document sets out more general information and guidelines for recording, managing, storing and the disposal of data, whether they are held on paper or electronically (including online), in order to assist staff, and the school, to comply with the General Data Protection Regulation (EU) 2016/679 (GDPR) including as adopted by the United Kingdom as a result of its exit from the European Union ("UK GDPR"), Data Protection Act 2018 and the FOI. It will be read and used in conjunction with all of our related policies.

It is expected that;

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

4. Disposal of Data

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

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

When information is no longer required, it will be disposed of. For confidential, sensitive or personal information, to be considered securely disposed of, it will be in a condition where it cannot either be read or reconstructed.

Skips, 'regular' waste disposal and ribbon shredders are not secure.

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

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

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

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

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

An example is contained in Annex A.

5. Transfer of Records to Archives

a)   Storage archives, for school business purposes
Little-used records can clutter up the work environment. Some schools and trusts relieve pressure by moving records to a storage space until the retention period runs out. A school or trust lacking room to keep its records safe from harm (such as fire, flood, unauthorised access) may transfer them to a commercial storage service with credentials such as certification to the ISO 27001 information security standard. The school or trust remains legally responsible for the records.

b)   Historic archives, for school heritage
Usually, disposal means securely destroying the documents after the retention period. But if there is an enduring historical value in the records, disposal need not mean destruction. Instead, the school or trust may offer to transfer them to the care of a dedicated archival repository, such as the relevant local authority record office (see Find an archive | The National Archives). Establishing a relationship with an archival repository is the standard method for preserving institutional heritage, as it allows the community to view historic information in a comfortable and supervised setting. Archivists are trained not just to care for the physical documents (using acid-free packaging, humidity-controlled storage, etc) but to manage requests for access in accordance with data protection legislation. They may also loan documents back to the school or trust for special occasions such as anniversary events.

To identify records of historic value, look out for "offer to local record office" in the guidance below. Other records may have obvious historic interest even if they are not mentioned (e.g. a World War II roll of honour). The school / trust should approach the record office with a list of files and agree on how and when to transfer them. It may help to set aside items for permanent preservation routinely, such as by filing a single signed copy of the minutes and key agenda papers after each meeting of the governing body, ready to offer to the repository every few years.

Attempting to set up an onsite alternative to a local record office would be a complex undertaking. A school or trust wishing to do so should consult its Data Protection Officer and approach the record office for advice on management and storage conditions. Remember that archives can include electronic data such as digital photographs, which can only be digitally preserved with the right technical interventions (see the Digital Preservation Handbook).

6. Transfer of Records to other Media

Where lengthy retention periods have been allocated to records, organisations will consider converting paper records to other media (e.g. digital or virtual, 'cloud' based). The lifespan of the media, and the ability to migrate data, will be documented in a Digital Continuity Policy. A scanning risk assessment is recommended to ensure the procedure is adequate. Further information about digital continuity can be found on the National Archives website who also provide guidance on assessing and managing digital continuity risks and a digital continuity checklist. Organisations that believe that they need to retain digital records over a long period on devices, software systems or in formats that may become inaccessible due to developments in technology will seek further advice from the Data Protection Officer and their IT support staff.

7. Transfer of Records to other Settings & 'Last Known School'

When a child leaves the school, all pupil records, including safeguarding/child protection records will be transferred in a secure manner, to the child's new school. If the records contain sensitive information (e.g. Child Protection records), proof of receipt must be obtained and logged by the school's Data Lead. Keeping Children Safe in Education 2024 (KCSiE) states that "where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this will be transferred separately from the main pupil file."   All copies of data held by the school that the child has departed will then be deleted or retained in line with the retention schedule below, including all paper records and data stored electronically. Generally, a will should be kept for tracking and auditing purposes only. Schools should be aware that where electronic systems are used, sending a pupil file to the next setting does not mean that their own copy of the file is deleted, so action will be taken to delete or archive copies retained where they are no longer required by the school that the pupil has left.

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

- **Management Information System (MIS) data**

Data held on the MIS is extracted by the school using the Common Transfer File mechanism as specified in The Education (Pupil Information) (England) Regulations 2005 and in subsequent amendments (2005, 2008, 2016, 2018, 2019). The Department for Education specifies what data is to be included in the CTF file in technical specification documentation. This will mean that the majority of information held on the MIS is transferred using the CTF method. However, it is important to note that **not all personal data is transferred, only the data sets specified in the CTF schema.** If the MIS has been used to store additional information (documents such as copies of end of year reports or letters) schools will take proactive action to ensure these are sent separately and securely. Traditionally, this sort of documentation was held in a pupil 'buff' file, but as organisations have turned to digital ways of working, these are frequently stored by attaching them to the digital MIS record.

- **Safeguarding/Child Protection records**

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

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

- **Special Educational Needs records**

It is becoming more common for schools to use vendor edtech products to manage these records. Whether stored in such edtech products, on school IT systems/cloud storage or on paper, the SEND co-ordinator will ensure that a complete record is compiled and passed securely to the next school.

- **Pupil 'buff' files**

For many schools, in recent years, the traditional pupil buff files have dwindled in relevance and importance as organisations have increasingly moved to digital storage. Schools are left with either sending or receiving folders which are very light and seemingly irrelevant. However, there will be documentation, whether on paper or electronic (on the server, in emails, in the MIS) that will be sent to the next setting that the pupil will attend. The Education (Pupil Information) (England) Regulations 2005 state that this "Educational Record" will be transferred to the next setting within 15 school days of confirmation that a pupil is registered at another school. There may be a significant amount of material that is not contained in the CTF file, safeguarding or SEND records that will be transferred to the next setting. Schools may have inadvertently not adapted their records transfer practices as management of these records have moved from a paper 'buff' file to digital format and so this will be noted where relevant on the retention schedule below.

Schools may wish to retain some minimal 'skeleton' data about pupils' admission, departure and next destination (where known) in order to respond to any requests for information about these pupils and for the school's historical archive. They may also wish to retain records relating to safeguarding/child protection or SEND records, even though there is no legislative requirement to do so (i.e. to have their own copy of evidence in case of any later legal action). If schools intend to create and maintain skeleton records or retain copies of records, this will be noted on the retention policy. In some instances, schools may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If the school does retain pupil records, then they will be prepared to justify this retention and will need to consider if a Data Protection Impact Assessment should be completed for any extended retention of records once a pupil has left the school. See section 17.5 below.

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

The school is the final or last known school if:

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

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

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

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

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

8. Management Information System (MIS)

The majority of pupil records and some staff records are held on the school MIS. Managing data retention on the MIS can be complex because different data sets held on the MIS have different retention requirements. School staff have limited time and resources to manage these differing retention periods and will work with their MIS provider to request support on how to efficiently delete data sets from a record without deleting the entire record (or deleting all data sets except those that are required as part of the 'skeleton' record for long term retention). Where this is not possible, schools may make a policy decision to

retain the entirety of a record for the longest applicable retention period for a data set within the MIS (usually current plus six years). The school will set out how records will be retained in the MIS in the relevant section of the Retention Table below.

9. Records relating to Child Sexual Abuse

Records relating to child sexual abuse will be retained for 75 years, in line with the recommendations arising from the outcome of the <u>Independent Inquiry into Child Sexual Abuse</u> (IICSA). The Inquiry stated that these records should be retained for such a long period in recognition of the importance of these records to victims, but that they should be regularly reviewed during that extended retention period. Organisations will particularly need to consider digital continuity where:

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

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

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

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

10. Retention of Records relating to Staff

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

11. Academisation

When a maintained school becomes an academy, it is legally a new organisation. However, it can still have an operational need for the records of the original school, including files relating to former pupils and employees. The Commercial Transfer Agreement that created the academy may include a section assigning responsibility for these old records, so the rights of the academy and the local authority are formally established. For instance, the agreement might direct the academy to keep the school records on trust until the retention period runs out, and to offer historically valuable documents to the local record office (see 5. Transfer of Records to Archives).

For further information regarding academy record keeping and retention information from the DfE, please see the following link:

Record keeping and retention information for academies - GOV.UK

12. Responsibility and Monitoring

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

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

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

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

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

4.9 Retention tables

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	**Trigger**	**Basis**	
1. Governing Body							
1.1	Instruments of Government including Articles of Association	Server GOVERNORHUB	Clerk	Permanent	Closure of school	Common practice	Offer to the Local Authority Record Office when the school closes
1.2	Trusts and Endowments managed by the Governing Body	N/A	N/A	Permanent	End of operational use	Common practice	Offer to the Local Authority Record Office when the school closes
1.3	Scheme of delegation and terms of reference for committees	GOVERNORHUB Server	Clerk Chair Headteacher	Until superseded or whilst relevant (schools may wish to retain these records for reference purposes in case decisions need to be justified)	Expiration of terms	Common practice	If the school is unable to store these, they will be offered to the Local Record Authority Office
1.4	Governor's Code of Conduct	GOVERNORHUB Server	Clerk Chair Headteacher	One copy of each version should be kept for the life of the school.		Common practice	
1.5	Records relating to the election of chair and vice chair	GOVERNORHUB Server	Clerk Chair	Once the designation has been recorded in the minutes, the records relating to the election can be destroyed	Date of appointment	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention				Action at end of use
				Period	Trigger	Basis		
1.6	Appointment of a clerk to the governing body	Server	Headteacher	Date of end of appointment + 6 years (note HR records may require different retention)	Date of appointment	Common practice	Secure disposal
1.7	Records relating to the appointment of parent and staff governors, not appointed by the governors	Server	Clerk Chair	Date of election + 6 months	Date of election	Common practice	Secure disposal
1.8	Records relating to the appointment of co-opted governors	Server GOVERNORHUB	Clerk Chair	Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children – in this case, retain for 25 years, or for allegations involving child sexual abuse for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Date of appointment	Common practice	Secure disposal
1.9	Application forms – successful candidates	Server	Clerk	End of term in office + 1year	End of period of office	Common practice	Secure disposal
1.10	Appointment documentation: • Terms of office of serving governors, including evidence of appointment • Governor declaration against disqualification criteria • Register of business interests • Training required, and received, by governors	Server GOVERNORHUB	Clerk Chair	End of term of office + 6 years (note HR records may require different retention)	Date of appointment	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
	• Induction programme for new governors • DBS checks carried out on the clerk and members of the governing body • Governor personnel files.						
1.11	Annual Reports	Server GOVERNORHUB	Clerk Chair	Date of the report + 10 years	End of the calendar year that the record was created in	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 and The Limitation Act 1990	If the school is unable to store these, they will be offered to the Local Authority Record Office
1.12	Annual reports required by the Department of Education	GOVERNORHUB	Clerk SLT	Date of report + 10 years	Date of report	Common practice	Secure disposal
1.13	Meeting schedule	GOVERNORHUB	Clerk	Current year	Date of meeting	Common practice	Secure disposal
1.14	Agendas for Governing Body meetings	GOVERNORHUB Server	Clerk Chair	One copy to be retained with the master set of minutes - all other copies can be disposed of	Conclusion of meeting	Common practice	Secure disposal
1.15	Register of attendance at Full Governing Board meetings	GOVERNORHUB	Clerk	Date of meeting + 6 years	Date of meeting	Common practice	Secure disposal
1.16	Minutes of Governing Body meetings (Principal Set signed)	GOVERNORHUB	Clerk	Permanent to be held at school	Date of meeting	Common practice	If the school is unable to store these, they will be offered to the Local Authority Record Office
1.17	Action plans created and administered by the Governing Body	GOVERNORHUB	Clerk Chair	Until superseded or whilst relevant	Expiration of action plan	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	Trigger	Basis	
1.18	Reports presented to the Governing Body	GOVERNORHUB	Clerk SLT	Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently	Date of report	Common practice	If the school is unable to store these, they will be offered to the Local Authority Record Office
1.19	Policy documents created and/or administered by the Governing Body	GOVERNORHUB Server	Clerk Headteacher	A copy of each policy should create a time line of policy development OR a robust version control which allows a snapshot of a policy at any given date. Keep all policies relating to safeguarding and child protection for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Expiration of the policy	Common practice	Secure disposal
1.20	Records relating to complaints made to, and investigated by the Governing Body and/or Head Teacher	Server	Clerk Headteacher Chair	Date of the resolution of the complaint + a minimum of 6 years. If negligence or child protection/safeguarding is involved then current year + 15 years. If child sexual abuse issues are involved then for 75 years in line with the IICSA recommendations for extended retention of	Resolution of complaint		

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	**Trigger**	**Basis**	
				records relating to child sexual abuse.			
1.21	Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies	GOVERNORHUB	Clerk Chair	For the life of the organisation	Date proposal accepted or declined	Common practice	If the school is unable to store these, they will be offered to the Local Authority Record Office
1.22	Records relating to Governor Monitoring Visits	GOVERNORHUB Server	Clerk Chair SLT	Date of visit + 3 years	Date of visit	Common practice	Secure disposal
2. Headteacher & Senior Management/Leadership Team							
2.1	Log books of activity in the school maintained by the Head Teacher (Legislation no longer requires the completion of a school log book)	Server	Head SLT	Date of the last entry in the log book + a minimum of 6 years and then review	Date of last entry in the log book	Common practice	If the school is unable to store these, they will be offered to the Local Authority Record Office
2.2	Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies	Server	Head SLT	Date of the meeting + 3 years	Date of the meeting	Common practice	If the school is unable to store these, they will be offered to the Local Authority Record Office
2.3	Correspondence created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities – **not**	Email (see email retention period) Server	Head SLT Head PA	Date of correspondence + 18mths and then review	Date of correspondence	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	Trigger	Basis	
	principally concerning pupils, staff or complaints. In those cases, correspondence should be immediately transferred to the relevant file.						
2.4	Professional Development Plans	Server GOVERNORHUB	Head	Life of plan + 6 years	Date plan commences	Common practice	Secure disposal
2.5	School Development Plans	Server GOVERNORHUB	Head	Life of plan + 3 years	Date plan commences	Common practice	Secure disposal
2.6	Other records created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities outside of 'Business as Usual' tasks			Current academic year + 6 years then review	Date of record	Common practice	Secure disposal
3. Admissions							
3.1	All records relating to the creation and implementation of the School's Admission's Policy	Server GOVERNORHUB	Head	Life of the policy + 7 years then review		The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012 and School Admissions Code Statutory Guidance 2021	Secure disposal
3.2	Admissions – if the admission is successful Proofs of address, supplied by parents, as part of the admissions process Supplementary information forms to include; religion, medical conditions etc.	Server RM Integris	Head Admin	Date of admission + 1 year Added to the pupil file	Date of admission		Secure disposal
3.3	Admissions – if the admission is unsuccessful (where no appeal is made)	Server	Head Admin	Date of applied for admission + 1 year	Date of applied for admission		Secure disposal
3.4	Admissions – if the admission is unsuccessful (where an appeal is made)	Server	Head Admin	Resolution of case + 1 year	Resolution of case		Secure disposal
3.5	Register of Admissions	Server RM Integris	Head Admin	Every entry in the school admission and attendance register is to	Last entry in register	School Attendance (Pupil	Offer to the Local Authority

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	Trigger	Basis	
				be preserved for 6 years beginning with the day on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates.		Registration) (England) Regulations 2024 Regulations 5, 7 (which comes into force on 19 August 2024 and	Record Office
3.6	Proofs of address, supplied by parents, as part of the admissions process	N/A		Current year + 1 year	Date of admission	School Admissions Code Statutory Guidance 2021	Secure disposal
3.7	Admissions (Secondary School – Casual)	Server RM Integris	Head Admin	6 years from the date of admission	Date of admission	The School Attendance (Pupil Registration) (England) Regulations 2024	Secure disposal
3.8	Supplementary information forms to include; religion, medical conditions etc. For successful admissions	RM Integris	Head Admin	This information will be added to the pupil file	Date of admission/annual data check	The Limitation Act 1980	Secure disposal
3.9	Supplementary information forms to include; religion, medical conditions etc. For unsuccessful admissions	Server	Head Parent Liaison	Until the appeal process is completed	Date of admission		Secure disposal
4. Operational Administration							
4.1	Records relating to the creation and publication of the school brochures or prospectus	Server	Head SBM SLT	Current year + 3 years	Expiration of current publication	Common practice	Offer to the Local Authority Record Office

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | Action at end of use |
				Period	Trigger	Basis	
4.2	Records relating to the creation and distribution of circulars to staff, parents or pupils	Server	Head SLT	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office
4.3	Newsletters and other items with short operational use	Server	Head SLT Admin	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office
4.4	Visitor management systems (including electronic systems, visitors' books and signing in sheets)	Sign-In App/CLoud	ICT Systems Development Ofifcer (ICT SDO)	Current year + 6 years then review	End of calendar year	Common practice	Secure disposal
4.5	Pupil & Family Privacy Notice which is made available via the school website as part of UK GDPR compliance	Server	SBM ICT SDO	Date of issue + 6 years	When policy is superseded	Common practice	Secure disposal
4.6	Consents relating to school activities as part of UK GDPR compliance (e.g. consent to be sent circulars or mailings)	Server RM Integris	Head Admin	This information should be added to the pupil file	Date of admission	Common practice	Secure disposal
4.7	Security breach logs	GDPRis/Cloud	SBM ICT SDO	Date of issue + 25 years (pupils) and 6 years (staff)	Date of implementation	Common practice	Secure disposal
4.8	Digital continuity plans which may include: - Digital Strategy - IT Disaster Recovery Procedure and Plan	Server Email	SBM	Date of issue + 6 years	Expiration of current plan	Common practice	Secure disposal
4.9	Call Recordings (including VOIP messages and recordings)			School to document here	Date of call recording	Common practice	Secure disposal
4.10	CCTV Recordings (retention for all 'ordinary' footage- any footage retained for specific purposes e.g. accident will need to be considered individually regarding how long it should be retained- please see CCTV policy)			School to document here	Date of footage recording	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention Period	Trigger	Basis	Action at end of use
5. School Communications							
5.1	School staff/governor emails and other platforms such as Microsoft Teams containing personal data – inbox, sent items, deleted items	Server	ICT SDO	Date of issue + 18mths Where forming part of a record, information in these must be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. The Code of Practice states that there is no need to retain ephemeral material and this may be destroyed on a routine basis.	End of academic year	Common practice	Full deletion
5.2	Social media platforms	Facebook/Cloud	SLT	Date of post + 25 years (pupils) and 6 years (staff)	Date of implementation	Common practice	Posts deleted
5.3	Website – pictures / news stories	Server CODA Education	SBM Network Mgr	On-going	End of academic yr	Common practice	Posts deleted
6. HR – Recruitment Information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person **will** be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. **(KCSIE 2024 para 424)**							
6.1	All records leading up to the appointment of a new Head Teacher	Server Main Office DCC Recruitment Portal	SBM Chair	Unsuccessful attempts - date of appointment + 6 months. Successful attempts - add to the staff personnel file and retain until the end of the appointment + 6 years, except in cases of negligence or claims of child abuse then at	Date of appointment	Common practice. Right to work - Immigration, Asylum and Nationality Act 2006	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	**Trigger**	**Basis**	
				least 15 years or information containing allegations of sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.			
6.2	All records leading up to the appointment of a new member of staff (successful candidate)	Server Main Office DCC Recruitment Portal	SBM Head Admin	This information will be added to the staff personnel file	Date of appointment	Common practice. Right to work - Immigration, Asylum and Nationality Act 2006	
6.3	All records leading up to the appointment of a new member of staff (unsuccessful candidate)	Server Main Office (secured) DCC Recruitment Portal	SBM Admin	Date of appointment + 6 months	Date of appointment	Common practice	Secure disposal
6.4	Pre-employment vetting information of successful candidates	Server Main Office (secured)	SBM Admin	Application forms, references and other documents – for the duration of their employment + 6 years. Note there is no requirement to keep a copy of DBS once the details have been entered into the Single Central Record. At the end of employment, information contained in the Single Central Record will be	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2024	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	**Trigger**	**Basis**	
				transferred to the personnel file.			
6.5	Proofs of identity	Server Main Office (secured)	SBM Admin	To be kept only as proof of right to work. Not kept for any other purpose. These documents should be added to the personal folder. Home Office requires that the documents are kept until termination of employment plus not less than 2 years.	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2024	Secure disposal
6.6	Pre-employment vetting information of successful candidates – for the purposes of ensuring school staff are adequately qualified	Server Main Office (secured)	SBM Admin	To be added to the member of staff's personal folder	Date of receipt	KCSIE 2024	Secure disposal

7. HR – Operational Staff Management
Information containing allegations of sexual abuse **will** be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. **(KCSIE 2024 para 424)**

Reference	File description	Format / How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
7.1	Staff Personnel File	Server RM Integris	SBM Admin	Termination of employment + 6 years	Date of appointment	Limitation Act 1980	Secure disposal
7.2	Timesheets	Server Main Office (secured)	Admin	Current year + 6 years	Date of appointment	Common practice	Secure disposal
7.3	Annual appraisal/assessment records	Server RM Integris	Head	Current year + 6 years	End of calendar year that the record was created in	Common practice	Secure disposal
7.4	Sickness absence monitoring	Server Main Office (secured) RM Integris	Admin	Sickness records are categorised as 'sensitive data'. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring.	Date of absence	Common practice & Statutory Sick Pay Act 1994	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	**Trigger**	**Basis**	
				Sickness records will be kept separate from accident records. Current practice recommends that sickness records will be held for the current year + 3 years.			
7.5	Staff training records	Server SLT Office RM Integris	SLT	Keep on personnel file	Date of appointment	Common practice (unless dictated by a professional body)	Secure disposal
7.6	Annual leave records	Server	Admin	6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year	End of relevant tax year	Common practice	Secure disposal
7.7	Working Time Regulations: · Opt out forms · Records of compliance with WTR	N/A		2 years from the date on which they were entered into 2 years after the relevant period	End of relevant tax year	Common practice	Secure disposal
7.8	Maternity/Adoption/Paternity Leave records	Server RM Integris	Admin	Current year + 3 years	End of relevant tax year	Common practice	Secure disposal
7.9	Consents for the processing of personal and sensitive data (this will be rare as the majority of staff data is processed due to: - contract (UK GDPR A9 (1) (b) - public task (UK GDPR A9 (1) (e) - legal obligation (UK GDPR A9 (1) (c) Consent (UK GDPR A9 (1) (a) is only required where one of the above is not relevant.)	Server RM Integris	Admin	For as long as the data is being processed and up to 6 years afterwards	End of employment	Common practice	Secure disposal
7.10	Staff policy acknowledgement	Server RM Integris	Admin	Life of the policy + 3 years	Implementation of the policy	Common practice (unless otherwise	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	Trigger	Basis	
						dictated eg KCSIE, H&SWA)	
7.11	[see section 10 above regarding this] Staff 'skeleton' record (which would include a brief record of name, job role, contract start and end dates (and any information that would be needed to be included in a reference))	Server RM Integris	Admin	Permanent. These form part of the historical archives of the school.	Archive on closure of the school.	Common Practice.	Offer to the Local Authority Record Office
7.12	Register of business interests	Server	**Admin**	Date of appointment + 6 years	Date of appointment	Common practice	Secure disposal

8.1	Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded	Server RM Integris Email	Head	Until the person's normal retirement age or 10 years from the date of allegation, whichever is longer, then review. Information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse NB – allegations that are found to be malicious should be removed from personnel files, from the date they are proven to be unfounded.	Date of referral	KCSIE 2024 and Working Together to Safeguard Children	Secure disposal
8.2	Disciplinary proceedings: Verbal warning	Server RM Integris	Head SBM	Date of warning + 6 months	Date of warning	KCSIE 2024	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	Trigger	Basis	
8.3	Disciplinary proceedings: Written warning (level 1)	Server RM Integris	Head SBM	Date of warning + 6 months	Date of warning	KCSIE 2024	Secure disposal
8.4	Disciplinary proceedings: Written warning (level 2)	Server RM Integris	Head SBM	Date of warning + 12 months	Date of warning	KCSIE 2024	Secure disposal
8.5	Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings)			If the incident is child protection related then see above; otherwise dispose following the conclusion of the case	Date of resolution	KCSIE 2024	Secure disposal

N.B. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.

Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct at a later date, and then defend themselves by denying they would undertake such an action, reference to the earlier proceedings may show that they should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that they had e.g. "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim.

Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.

9.   HR – Payroll & Pensions

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	Trigger	Basis	
9.1	Maternity Pay Records	Server SAP	Head Admin DCC	Current year + 3 years	End of the financial year in which the maternity pay period ends	Statutory Maternity Pay (General) Regulations 1986	Secure disposal
9.2	Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity	Server RM Integris SAP	Head DCC	Current year + 6 years	End of the financial year	Retirement Benefits Schemes (Information Powers) Regulations 1995	Secure disposal
9.3	Batches, Bonus Sheets, Car Loans, Car Mileage Output, Insurance, Members Allowance Register, National Insurance (Schedule of payments), Part Time Fee	Server RM Integris SAP	Admin DCC	Current year + 6 years	End of the financial year	Taxes and Management Act 1970, Income and	Secure disposal

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | Action at end of use |
				Period	Trigger	Basis	
	claims, Payroll (gross/net, weekly or monthly), Payroll Reports, Payslips (copies), Pension Payroll, Superannuation adjustments and reports					Corporation Taxes Act 1988	
9.4	Bonus sheets, Car Allowance claims, Overtime	Server RM Integris SAP	Admin DCC	Current year + 3 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal
9.5	Income Tax P60, Personal bank details. Tax Forms P6/P11/P11D/P35/P45/P46/P48	Server RM Integris SAP	Admin DCC	Current year + 6 years	End of the financial year	Common practice	Secure disposal
9.6	Absence records, Sickness records, Staff returns, Time Sheets/Clock Cards/Flexitime	Server RM Integris SAP	Admin DCC	Current year + 3 years	End of the financial year	Common practice	Secure disposal
9.7	Statutory Sick Pay	Server RM Integris SAP	Admin DCC	Current year + 3 years	End of the financial year	Common practice	Secure disposal
10. Health and Safety							
10.1	Accessibility Plans	Server	Head SLT Admin	Current year + 6 years	End of the calendar year that the records was created in	Equality Act 2010 and The Limitation Act 1980	Secure disposal
10.2	Health and Safety Policy Statements	Server Website	Head SLT Admin	Life of the policy + 3 years	Implementation of the policy	Common practice	Secure disposal
10.3	Health and Safety Risk Assessments	Server	Head SLT Admin	Life of the assessment + 3 years	Implementation of the assessment	Common practice	Secure disposal
10.4	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm): Adults	DCC Portal	SLT	Retain for 7 years	Date of incident	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	Trigger	Basis	
10.5	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm): Children	Server	SLT	Retain for 25 years	Date of birth	Common practice	Secure disposal
10.6	Minor incidents (non reportable in 10.4 & 10.5 above) accident book	Server	Head	Retain for 3 years	End of academic year	Common practice and The Social Security (Claims and Payments Regulations 1979) Regulation 25	Secure disposal
10.7	Control of Substances Hazardous to Health (COSHH)	Server	SBM Premises Mgr	Current year + 40 years	Last action on file	The Control of Substances Hazardous to Health Regulations 2002	Secure disposal
10.8	Process of monitoring areas where employees/pupils are likely to come into contact with asbestos	Server DCC	Head DCC	Last action + 40 years	Last action on file	The Control of Asbestos at Work Health Regulations 2012	Secure disposal
10.9	Process of monitoring areas where employees/pupils are likely to come into contact with radiation	DCC		Last action + 50 years	Last action on file	The Ionising Radiations Regulation 2017	Secure disposal
10.10	Fire Precautions log books	Server	SBM	Current year + 3 years	End of calendar year	Common practice	Secure disposal
10.11	Fire Assessments	Server	SBM	Life of the risk assessment + 6 years	End of calendar year	Fire Service Order 2005 and The Limitation Act 1980	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	**Trigger**	**Basis**	
11. Financial Management – Risk & Insurance, Asset Management							
11.1	Employer's Liability Insurance Certificate	Server DCC	SBM	Date of closure + 40 years	Closure of school	Common practice	Transfer to Local Record Office
11.2	Inventories of furniture and equipment	Server SAP	SBM Admin	Current year + 6 years	End of calendar year	Common practice	Secure disposal
11.3	Burglary, theft and vandalism report forms	Server	SBM	Current year + 6 years	End of calendar year	Common practice	Secure disposal
11.4	Records relating to school/trust vehicles (records that are not required anywhere else e.g. health and safety, litigation etc)	Server	SBM Admin	6 years from the disposal of the vehicle	End of calendar year	The Limitation Act 1980	Secure disposal
12. Financial Management – Accounts and Statements including Budget Management							
12.1	Annual accounts	Server	DCC	Current year + 6 years	End of financial year	Common practice	Transfer to Local Record Office
12.2	Loans and grants managed by the school	N/A		Date of last payment on the loan + 12 years then review	End of financial year	Standard financial regulations	Secure disposal
12.3	Student Grant applications	Server	SBM	Current year + 3 years	End of financial year	Standard financial regulations	Secure disposal
12.4	All records relating to the creation and managements of budgets, including the Annual Budget statement, and background papers	Server	SBM DCC Patch Officer	Current financial year + 3 years	End of financial year	Common practice	Secure disposal
12.5	Invoices, receipts, order books and requisitions, delivery notices, VAT records	Server Fiori SAP	Admin DCC	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.6	Records relating to the collection and banking of monies	Server Main Office (secured)	Admin	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	**Trigger**	**Basis**	
12.7	Records relating to the identification and collection of debt	Server	Admin SBM	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.8	Pupil Premium Fund records, including evidence of successful FSM eligibility checks	Server Website DCC	SBM SLT	Date pupil leaves the provision + 6 years	End of financial year	Common practice	Secure disposal
13. Financial Management – Contract Management [where one exists, or has done in the previous 7yrs]							
13.1	All records relating to the management of contracts under seal	Server	SBM Admin	Current year + 12 years	End of contract	The Limitation Act 1980	Secure disposal
13.2	All records relating to the management of contracts under signature	Server	SBM Admin	Current year + 6 years	End of contract	The Limitation Act 1980	Secure disposal
13.3	Records relating to the monitoring of contracts	Server	SBM Admin	Current year + 6 or 12 years	End of calendar year	The Limitation Act 1980	Secure disposal
14. Financial Management – School Fund							
	School Fund: • cheque books and paying in books • ledger • invoices • receipts • bank statements • journey books	Main office	SBM Admin	Current year + 6 years	End of use	Financial Services Act 2012, HMRC regulations Companies Act 2006	Secure disposal
15. Financial Management – School Meals							
15.1	Free School Meals Register, including evidence of successful SFM eligibility checks	Server RM Integris DCC Scopay	Admin SBM	Current year + 6 years	End of calendar year	Common practice	Secure disposal
15.2	School Meals Register	Server RM Integris DCC Scopay	Admin SBM	Current year + 3 years	End of calendar year	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	Trigger	Basis	
153	School Meals Summary Sheets	Server RM Integris DCC Scopay	Admin SBM	Current year + 3 years	End of calendar year	Common practice	Secure disposal
16. Property Management							
16.1	Title deeds of properties belonging to the school	N/A		Permanent. These will follow the property unless the property has been registered with the Land Registry	Archive upon closure	Common practice	Offer to Local Authority Record Office
16.2	All records relating to the maintenance of the school, carried out by contractors	Server Premises	Premises Mgr SBM	Current financial year + 6 years Records relating to rewiring, major alterations etc will be retained in the health and safety file whilst the building belongs to the school and will be passed onto any new owners if the building is leased or sold.	End of financial year that the record was created in	Common practice and Record Keeping (VAT Notice 700/21	Secure disposal
16.3	All records relating to the maintenance of the school, carried out by school employees, including maintenance log book	Server	Premises Mgr	Current calendar year + 6 years Records relating to rewiring, major alterations etc will be retained in the health and safety file whilst the building belongs to the school and will be passed onto any new owners if the building is leased or sold.	End of calendar year that the record was created in	Common practice and Record Keeping (VAT Notice 700/21	Secure disposal
16.4	Plans of property belonging to the school	Server	SBM	These will be retained whilst the building	Transfer of asset	Common practice	Offer to Local

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | Action at end of use |
				Period	Trigger	Basis	
				belongs to the school and will be passed onto any new owners, if the building is leased or sold.			Authority Record Office
16.5	Leases of property leased by, or to, the school	Server	SBM	Expiry of lease + 6 years	Commencement of lease	Common practice	Secure disposal
16.6	Records relating to the letting of school premises	Server	SBM	Current financial year + 6 years	End of financial year that the record was created in	Common practice	Secure disposal

17. Pupil Education Record (see s2 Education Record (Pupil Information) Regulations 2005). Much of this information is stored in electronic form on the school's Management Information System, RM Integris SEN is dealt with in section 20.

Reference	File description	Format / How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
17.1	Primary	Server RM Integris	Head Teachers SLT Admin	Retain whilst the child remains at the primary school. Records may be kept on the MIS in an archive or 'former roll' area) after a pupil has left the school – see 1.7 Last School and 1.8 Management Information System	Date pupil changes school	Education (Pupil Information) (England) Regulations 2005	The file should follow the pupil when they leave the primary school (see 1.7 Last School. If pupil does not attend a secondary school, or the child dies, then records will be retained as per 17.2 below)

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | Action at end of use |
				Period	Trigger	Basis	
17.2	Secondary (or where the school is the 'last known school')	Server RM Integris	Head Teachers SLT Admin	Date of birth of the pupil + 25 years	Pupil's date of birth	Education (Pupil Information) (England) Regulations 2005 and The Limitation Act 1980	Secure disposal
17.3	Examination Results - Pupil Copies Public	NA		This information will be added to the pupil file and any certificates will be safely handed over to pupils.	Date of examination	Common practice	Contact the relevant exam board to obtain instructions regarding whether uncollected certificates to be returned to the examination board or destroyed after reasonable attempts to contact the pupil have failed.
17.4	Examination Results - Pupil Copies Internal	NA		This information will be added to the pupil file	Date of examination	Common practice	Secure disposal
17.5	[see section7 above regarding this] Pupil 'skeleton' record (which would include a brief record of pupil names, UPNs, date of birth, address, parent details, date of admission, date of departure and destination (if known))			Permanent. These form part of the historical archives of the school.	Archive on closure of the school.	Common Practice.	Offer to the Local Authority Record Office

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	**Trigger**	**Basis**	
18. Child Protection (CP) / Safeguarding Records							
18.1	Child Protection Information - Primary	My Concern Server	DSL Head	CP files will be transferred to the new school as soon as possible (5 days), to maintain continuity. Ensure secure transit, and a confirmation of receipt will be obtained. The CP file will be transferred separately from the main pupil file. LA Safeguarding Services advise that the principal copy of this information will be held by the LA	Date pupil changes school (Where a child is removed from the roll to be educated at home/missing from education, see below)	KCSiE 2024 & Annex C	Transferred to new or Secondary school. Duplicates will be securely disposed of.
18.2	Child Protection (CP) Information – Secondary (or where the school is the 'last known school')	My Concern	DSL Head	Where a pupil moves between secondary schools – treat as primary above. Otherwise, retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse LA Safeguarding Services advise that the	Pupil's date of birth (Where a child is removed from the roll to be educated at home/missing from education, see below)	KCSiE 2024 & Annex C Common Practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	**Trigger**	**Basis**	
				principal copy of this information will be held by the LA			
18.3	Child Protection (CP) Information – Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths.	Server RM Integris	Head DSL Admin	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. LA Safeguarding Services advise that the principal copy of this information will be held by the LA	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Coordinator for Missing Children and Secure disposal
18.4	Child Protection (CP) Information – Child is removed from the roll and is Elective Home Educated	Server RM Integris	Head DSL Admin	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. LA Safeguarding Services advise that the principal copy of this information will be held by the LA	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Elective Home Education Coordinator and Secure disposal
18.5	Filtering & Monitoring Logs. Where these indicate a child protection/safeguarding concern, the log	Email/Server	Headteacher ICT SDO	See Email Retention Policy 18mths	Date of log	Common Practice	Deletion

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	Trigger	Basis	
	will be added to the pupil CP Information and retained in line with the periods in 18.1-18.4.						
19. Attendance							
19.1	Attendance Registers	RM Integris	Teachers Admin	Every entry in the school admission and attendance register is to be preserved for 6 years beginning with the day on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates.	Last entry in register	School Attendance (Pupil Registration) (England) Regulations 2024 Regulations 5, 7	Secure disposal
19.2	Correspondence relating to authorized absence	Server RM Integris	Admin Head	Date of absence + 2 years	Date of absence	DfE School attendance Guidance for maintained schools, academies, independent schools and local authorities August 2020	Secure disposal
20. Special Educational Needs (SEN)							
20.1	Statements and Reviews of Special Educational Needs under Section 324 and 328 of the Education Act 1996 and any amendments made to the plan – Primary	Server RM Integris	Admin Head SLT	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	**Trigger**	**Basis**	
20.2	Statements and Reviews of Special Educational Needs under Section 324 and 328 of the Education Act 1996 and any amendments made to the plan - Secondary (or where the school is the 'last known school')	Server RM Integris	Admin Head SLT	Date of birth of pupil + 35 years	Pupil's date of birth	Special Educational Needs and Disability Act 2001 & Children and Families Act 2014 The Limitation Act 1980	Secure disposal
20.3	Individual Education Plans and Education Health Care Plan (EHCP) and all other SEN files -**Primary**	Server RM Integris	Admin Head SLT	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School
20.4	Individual Education Plans and Education Health Care Plan (EHCP) and all other SEN files - **Secondary** (or where the school is the 'last known school')	Server RM Integris	Admin Head SLT	Date of birth of pupil + 35 years	Pupil's date of birth	Special Educational Needs and Disability Act 2001, Children and Families Act 2014 & The Limitation Act 1980	Secure disposal
21. Curriculum Management							
21.1	Curriculum returns	NA		Current year + 3 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.2	Curriculum development	Server	Head SLT	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Offer to the Local Authority Record Office
21.3	Examination Results (School's copy)	NA		Current year + 6 years	Date of examination	Common practice	Secure disposal
21.4	SATs Results	NA		The SATS result will be recorded on the pupil's	Date that results are released	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	Trigger	Basis	
				educational file and will therefore be retained until the pupil reaches the ages of 25 years. The school may wish to keep a composite record of all the whole year SATS results. These could be kept for the current year + 6 years to allow suitable comparison			
21.5	SATs Examination papers	NA		The examination papers will be kept until any appeals/validation process is complete	Date of examination	Common practice	Secure disposal
21.6	Published Admission Number (PAN) Reports	Server	Head SLT Admin	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.7	Value Added and Contextual Data	NA	NA	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.8	Self-Evaluation Forms	Server	Head SLT	Current year + 6 years	Date of completion	Common practice	Secure disposal
21.9	Internal Moderation	Server	Head SLT	Academic year + 1 academic year	Date of commencement	Common practice	Secure disposal
21.10	External Moderation	Server	Head SLT	Until superseded	Date of commencement	Common practice	Secure disposal
22. Implementation of Curriculum							
22.1	Schemes of Work	Server B-Squared	Head SLT Teacher	Current year + 1 year	End of the academic year that the record was created in	Common practice	Review these records at the end of each year and allocate

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	**Trigger**	**Basis**	
							a further retention period or secure disposal
22.2	Timetable	Server	Head SLT Teacher	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.3	Class Record books, mark books, homework records (eg teacher spreadsheets etc)	Classroom locked away	Teachers Head SLT	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.4	Pupil work	Classroom locked away	Teachers Head SLT	Where possible, pupils' work will be returned to the pupil at the end of the academic year.	End of the academic year that the record was created in	Common practice	Secure disposal
22.5	Online learning platforms	Purplemash TT Rockstars	Teacher responsible for each platform	As above. Work will be cleared from platforms at the end of the following academic year	End of the academic year that the record was created in	Common practice	Secure disposal
22.6	Teacher diaries & Notebooks	In a secured place	Teachers	Contents will be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. Destroyed within 3 months.	Expiration of diary. Completion of notebook	Common practice	Secure disposal
23. Extra Curriculum Management							
23.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Primary schools) where there has not been a Major Incident	Evolve	Head SLT Teachers	Date of visit + 14 years	Date of visit	The Health and Safety at Work Act 1974	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention				Action at end of use
				Period	Trigger	Basis		
	(Records created might include risk assessments)							
23.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Secondary schools) where there has not been a Major Incident	Evolve	Head SLT Teachers	Date of visit + 10 years	Date of visit	The Health and Safety at Work Act 1974		Secure disposal
23.3	Parental consent forms for school trips where there has been no Major Incident	Server RM Integris Evolve	Teachers Admin	No retention is required		Common practice		Secure disposal
23.4	Records created by schools to obtain approval for to run an Educational Visit outside the Classroom, **where there has been a Major Incident** (Records created might include risk assessments)	Server RM Integris Evolve	Teachers Admin	Retain for 25 years from the date of birth of the pupil/s involved in the incident	Pupil's DOB	The Limitation Act 1980		Secure disposal
23.5	Parental consent forms for school trips, **where there has been a Major Incident**	Server RM Integris Evolve Main Office (secured)	Teachers Admin	Retain for 25 years from the date of birth of the pupil/s involved in the incident. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	Pupil's DOB	The Limitation Act 1980		Secure disposal
24. Family Liaison / Early Help / Alternative Provision								
24.1	Day books	Classroom	Parents Staff	Current year + 2 years then review	End of the calendar year that the record was created in	Common practice		Secure disposal
24.2	Reports for outside agencies – where the report has been included on the agency case file	Server Main Office My Concern	Safeguarding Leads Head	Whilst the child is attending school and then destroy	Date of completion of report	Common practice		Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	Trigger	Basis	
24.3	Referral forms	RM Integris My Concern	Parent Liaison Safeguarding Leads Head	While the referral is current	Date of completion of form	Common practice	Secure disposal
24.5	Contact data sheets and database entries	RM Integris My Concern	Parent Liaison Safeguarding Leads Head	Current year then review – if contact is no longer active then destroy	End of the calendar year that the record was created in	Common practice	Secure disposal
24.6	Group registers	NA		Current year + 2 years	Last entry in register	Common practice	Secure disposal
25. Local Authority							
25.1	Secondary Transfer sheets	NA		Current year + 2 years	Year of transfer	Common practice	Secure disposal
25.2	Attendance Returns	RM Integris	Head SLT Admin	Current year + 1 year	End of the calendar year that the record was created in	Common practice	Secure disposal
25.3	School Census Returns	RM Integris Main Office	Head SLT Admin	Current year + 5 years	Completion of return	Common practice	Secure disposal
25.4	Circulars and other information sent from the Local Authority	Email Server	Admin SLT	Operational use	Date of issue	Common practice	Secure disposal
26. Central Government							
26.1	OFSTED reports and papers	Server Website Ofsted	General access	Retain whilst current	Date new report is issued	Common practice	Offer to Local Authority Record Office
26.2	Returns made to central government, including Schools financial value standard (SFVS) and assurance statement	Server	Head SLT	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
26.3	Circulars and other information sent from central government	RM Integris Server	Head SLT	Operational use	Date of issue	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention Period	Retention Trigger	Retention Basis	Action at end of use
27. Parent / Alumni Associations							
27.1	Records relating to the creation and management of PTA and Old Pupil Associations	Server	**SBM**	Current year + 6 years	Date of foundation	Common practice	Offer to Local Authority Record Office
28. Recordings (meetings, calls, online lessons) – schools, please adapt this section to suit ensuring it is consistent with the Acceptable Use policy section 7.8							
28.1	Incoming & Outgoing calls	NA				Common practice	
28.2	Meetings	NA				Common practice	
28.3	Online lessons	NA				Common practice	
28.4	Staff training	NA				Common practice	
29. Pupil Work Experience / Placement Records (Secondary schools)							
29.1	Records created by schools in relation of offsite pupil work experience where there has not been a Major Incident	Server RM Integris	SLT Work Exp TA	Date of placement + 10 years	Date of placement	The Health and Safety at Work Act 1974	Secure disposal
29.2	Records created by schools in relation of offsite pupil work experience **where there has been a Major Incident**	Server RM Integris	SLT Head	Retain for 25 years from the date of birth of the pupil/s involved in the incident	Pupil's DOB	The Limitation Act 1980	Secure disposal
30. Administration of Medication							
30.1	Non-prescription medicines and remedies inc painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers	RM Integris HPCA	Head SLT	Current year + 1 year	Date of administration	Limitation Act 1980	Secure disposal
30.2	All other administration of medication not covered by 30.1 including, but not limited	RM Integris HPCA	Head SLT	Date of birth of the pupil + 25 years	Date of administration	Limitation Act 1980	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			Action at end of use
				Period	**Trigger**	**Basis**	
	to: peg feeding, injections, treatments for serious conditions such as diabetes, ADHD or depression						

Appendix A – List of School Records and Data safely destroyed

Specimen Checklist for Annual Review of School Records and Safe Data Destruction
The following is an example of how to create a destruction record – this could be a spreadsheet.

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