



Martin Primary School

Data Retention Policy

Date adopted: June 2025
Date of next review: June 2027

Introduction

Martin Primary School has a responsibility to maintain its records and record keeping systems. When doing this, will take account of the following factors: -

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Their accessibility.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect Martin Primary School current practice, the requirements of current legislation and best practice and guidance. It may be amended by the school from time to time and any changes notified to employees. The school may also vary any parts of this procedure, including any time limits, as appropriate in any case.

DATA PROTECTION

This policy sets out how long employment-related and pupil data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the General Data Protection Regulation (UK GDPR), the Data protection Act 2018 and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of the school. The school's Data Protection Policy outlines its duties and obligations under the UK GDPR.

RETENTION SCHEDULE

Information (hard copy and electronic) will be retained for at least the period specified in the retention schedule. When managing records, the school will adhere to the standard retention times listed within that schedule.

Paper records will be regularly monitored by the school staff.

Electronic records will be regularly monitored by school staff.

The schedule is a relatively lengthy document listing the many types of records used by the school and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

DESTRUCTION OF RECORDS

Where records have been identified for destruction, they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information, or sensitive policy information should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate waste paper merchant. All electronic information will be deleted.

ARCHIVING

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives.

TRANSFERRING INFORMATION TO OTHER MEDIA

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

RESPONSIBILITY AND MONITORING

The head teacher has primary and day-to-day responsibility for implementing this policy. The Data Protection Officer (DPO), in conjunction with the school, is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The DPO will consider the suitability and adequacy of this policy and report improvements directly to management.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

A. Aims

This retention schedule has been produced based on the "Information Management Toolkit for Schools" dated April 2018 and DfE guidance dated 18th December 2024.

This retention schedule has been produced in accordance with the Data Protection Act 2018, UKGDPR 2021 and Freedom of Information Act (2000) legislation.

This is a retention schedule developed to enable School Business Managers, Clerks, SENCO and other School Staff to carry out an efficient annual review and safe destruction of school records and information.

Where there is legal statute behind a requirement this is detailed in the IMTIS document.

B. Safe Destruction of Data

- (i) [Disposal of records that have reached the end of the minimum retention period allocated](#)

The fifth data protection principle as per the data protection rules (updated for UK GDPR) states that:

"Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes"

In each school, the leadership must ensure that records that are no longer required for business use are reviewed as soon as possible under the criteria set out so that only the appropriate records are destroyed.

The school review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained by the school for research or litigation purposes.

Whatever decisions are made they need to be documented as part of the records management policy within the school.

(ii) **Safe destruction of records**

All records containing personal information, or sensitive policy information should be made either unreadable or unreconstructable.

- Paper records should be shredded using a cross-cutting shredder
- CDs / DVDs / Floppy Disks should be cut into pieces
- Audio / Video Tapes and Fax Rolls should be dismantled and shredded
- Hard Disks should be dismantled and sanded

Any other records should be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways.

There are companies who can provide confidential waste bins and other services which can be purchased to ensure that records are disposed of in an appropriate way.

- a) Where an external provider is used it is recommended that all records must be shredded on-site in the presence of an employee. The organisation must also be able to prove that the records have been destroyed by the company who should provide a Certificate of Destruction. Staff working for the external provider should have been trained in the handling of confidential documents. The shredding needs to be planned with specific dates and all records should be identified as to the date of destruction. It is important to understand that if the records are recorded as to be destroyed but have not yet been destroyed and a request for the records has been received they MUST still be provided.
- b) Where records are destroyed internally, the process must ensure that all records are recorded as authorised to be destroyed by a member of the Leadership team and the destruction recorded. Records should be shredded as soon as the record has been documented as being destroyed.

(iii) **Freedom of Information Act 2000 (FoIA 2000)**

The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction. Members of staff should record at least:

- File reference (or other unique identifier);
- File title (or brief description);
- Number of files and date range
- The name of the authorising officer
- Date action taken

Following this guidance will ensure that the school is compliant with the Data Protection rules and the Freedom of Information Act 2000.

C. DfE Record Keeping and Management

Pupil records

| Document type | Retention period | Action at end of retention period | Further information |
|---|------------------------------------|--|--|
| Primary school pupil records | Until the pupil leaves the school. | Transfer to secondary school or other primary school when the pupil leaves. | See The Education (Pupil Information) (England) Regulations 2005 for details of what to keep in the pupil record. There is guidance on how to transfer information to another school. |
| Secondary school pupil records | Until the pupil's 25th birthday. | Dispose of records securely. If the pupil leaves to go to another school, transfer the records to that school. There is guidance on what to do if the school closes before the end of the retention period. | See The Education (Pupil Information) (England) Regulations 2005 for details of what to keep in the education record. Retain as detailed in section 2 of the Limitation Act 1980 . |
| Special educational needs and disabilities (SEND), including SEND statements and accessibility plans | Until the pupil's 30th birthday. | Dispose of records securely, unless the document is subject to a legal hold. If the pupil leaves to go to another school, transfer the records to that school. | SEND code of practice: 0 to 25 years . Retain as detailed in section 2 of the Limitation Act 1980 . |
| Attendance and absence for SEND | Until the pupil's 30th birthday. | Dispose of records securely, unless the document is subject to a legal hold. If the pupil leaves to go to another school, transfer the records to that school. | SEND code of practice: 0 to 25 years . Retain as detailed in section 2 of the Limitation Act 1980 . |

Child protection records

| Document type | Retention period | Action at end of retention period | Further information |
|---|---|--|---|
| Child protection files | Until the child's 25th birthday. If the file relates to child sexual abuse, retain until the child's 75th birthday. | Dispose of records securely. Child protection files should be passed on to any new school a child attends. This should be transferred separately from the main pupil file. | Should be stored in a separate child protection file. Keeping children safe in education sections 66, 67, 121 and 122. The Report of the Independent Inquiry into Child Sexual Abuse (IICSA), recommendation on access to records . |
| Allegations of child protection against a member of staff, including unfounded allegations | Until the staff member's normal retirement age, or 10 years from the date of the allegation, whichever is later. | Dispose of records securely. | Keeping children safe in education . Working together to safeguard children . |

Finance records

| Document type | Retention period | Action at end of retention period | Further information |
|-------------------------|--|-----------------------------------|---|
| Contracts | 6 years from the last payment on the contract. | Dispose of records securely. | Section 2 of the Limitation Act 1980 . |
| Debtor's records | 6 years from the end of the financial year. | Dispose of records securely. | Section 2 of the Limitation Act 1980 . |
| VAT records | 6 years from the end of the financial year. | Dispose of records securely. | May include invoices, budgets, bank statements and annual accounts. Record keeping (VAT Notice 700/21) . |

Governance records

| Document type | Retention period | Action at end of retention period | Further information |
|--------------------------------------|---|--|--|
| Admissions | 3 years from the admission date. | Dispose of records securely. | Working together to improve school attendance. |
| Attendance registers | 3 years from the date of entry. | Dispose of records securely. | Regulation 14 of the Education (Pupil Registration) (England) Regulations 2006. |
| Annual governors report | 10 years. | Dispose of records securely. | The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002. Retain as detailed in section 2 of the Limitation Act 1980 . |
| Curricular record | At least one year. | Dispose of records securely. | The Education (School Records) Regulations 1989. Regulation 3 of the Education (Pupil Information) (England) Regulations 2005. |
| Directors – disqualification | 15 years from the date of disqualification. | Dispose of records securely. | The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England) Regulations 2004 |
| Records of educational visits | 10 years from the date of the visit. If there was an incident on the visit, retain the | Dispose of records securely. | Health and safety on educational visits. Retain as detailed |

| Document type | Retention period | Action at end of retention period | Further information |
|---|--|-----------------------------------|--|
| | permission slips for all pupils and the incident report in the pupil record , or until the pupil reaches the age of 25. | | in section 2 of the Limitation Act 1980 . |
| School vehicles | 6 years from the disposal of the vehicle. | Dispose of records securely. | Section 2 of the Limitation Act 1980 . |
| Statutory registers and compliance | Retention periods vary, for example: Memorandums of understanding should be retained for the life of the academy plus 6 years. Annual reports should be retained for 10 years from the date of the report. Board meeting records should be retained for 10 years from the date of the meeting. | Dispose of records securely. | May include annual reports and governance records. Companies Act 2006 contains information on which statutory registers to keep. Compliance guidance in the maintained schools governance guide . Compliance guidance in the academy trust governance guide . Academy trust handbook . |

Health and safety records

| Document type | Retention period | Action at end of retention period | Further information |
|----------------------------|----------------------------|-----------------------------------|--|
| Accessibility plans | Life of plan plus 6 years. | Dispose of records securely. | Retain as detailed in section 2 of the Limitation Act 1980 . |

| Document type | Retention period | Action at end of retention period | Further information |
|--|--|-----------------------------------|--|
| Accident records | 3 years from the date of the accident. | Dispose of records securely. | Accidents involving pupils should be retained in the pupil record . Regulation 25 of the Social Security (Claims and Payments) Regulations 1979 . |
| Monitoring exposure to substances hazardous to health, including asbestos | 5 years. | Dispose of records securely. | The Control of Substances Hazardous to Health Regulations 2002 . |
| Health surveillance records | 40 years. | Dispose of records securely. | The Control of Substances Hazardous to Health Regulations 2002 . Health surveillance - Record keeping . |
| Other health records of staff | While the worker is employed in your school. | Dispose of records securely. | The Control of Substances Hazardous to Health Regulations 2002 . Health surveillance - Record keeping . |
| Fire assessments | Life of the risk assessment plus 6 years. | Dispose of records securely. | Fire Service Order 2005 . Retain as detailed in section 2 of the Limitation Act 1980 . |
| Property records | | | |
| Document type | Retention period | Action at end of retention period | Further information |
| Maintenance records | 6 years from the end of the financial year. | Dispose of records securely. | Record keeping (VAT Notice 700/21) . |

| Document type | Retention period | Action at end of retention period | Further information |
|-----------------------------------|--|--|--|
| Title deeds | 12 years from the end of the deed. | Dispose of records securely. | Section 2 of the Limitation Act 1980 . |
| Staff records | | | |
| Document type | Retention period | Action at end of retention period | Further information |
| Copies of DBS certificates | 6 months from the date of recruitment. | Dispose of records securely. | Keeping children safe in education . |
| Maternity pay records | 3 years after the end of the tax year in which the maternity pay period ends. | Dispose of records securely. | The Statutory Maternity Pay (General) Regulations 1986 . |
| Pay records | 3 years from the end of the tax year they relate to. | Dispose of records securely. | PAYE and payroll for employers: Keeping records . |
| Personnel files | 6 years from termination of employment. | Dispose of records securely. | Section 2 of the Limitation Act 1980 . |
| Retirement benefits | A minimum of 6 years from the end of the year in which the accounts were signed. | Dispose of records securely. | Regulation 15 of the Retirement Benefits Schemes (Information Powers) Regulations 1995 . |

D. Information Management Records Society Data Retention (further information)

1. Management of the School

This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Headteacher and the senior management team, the admissions process and operational administration.

| 1.1 Governing Body | | | | | |
|---------------------------|--|--|---|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 1.1.1 | Agendas for Governing Body meetings | There 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 DISPOSAL ¹ | |
| 1.1.2 | Minutes of Governing Body meetings | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | | | |
| | Principal Set (signed) | | PERMANENT | If the school is unable to store these then they should be offered to the County Archives Service | |
| | Inspection Copies ² | | Date of meeting + 3 years | If these minutes contain any sensitive, personal information they must be shredded. | |
| 1.1.3 | Reports presented to the Governing Body | There 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 permanently | SECURE DISPOSAL or retain with the signed set of the minutes | |
| 1.1.4 | Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002 | No | Date of the meeting + a minimum of 6 years | SECURE DISPOSAL | |

1.1 Governing Body (continued...)

¹ 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.

² These are the copies which the clerk to the Governor may wish to retain so that requestors can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

| Ref | Basic file description | Data Protection Issues | Retention [Operational] | Period | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|--------|---|------------------------|--|--------|--|----------------------------------|
| 1.1.5 | Instruments of Government including Articles of Association | No | PERMANENT | | These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes. | |
| 1.1.6 | Trusts and Endowments managed by the Governing Body | No | PERMANENT | | These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes. | |
| 1.1.7 | Action plans created and administered by the Governing Body | No | Life of the action plan + 3 years | | SECURE DISPOSAL | |
| 1.1.8 | Policy documents created and administered by the Governing Body | No | Life of the policy + 3 years | | SECURE DISPOSAL | |
| 1.1.9 | 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 disputes | | SECURE DISPOSAL | |
| 1.1.10 | Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 | No | Date of report + 10 years | | SECURE DISPOSAL | |
| 1.1.11 | Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies | No | Date proposal accepted or declined + 3 years | | SECURE DISPOSAL | |

1.2 Head Teacher and Senior Management Team

| Ref | Basic file description | Data Protection Issues | Retention [Operational] | Period | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|-----|------------------------|------------------------|-------------------------|--------|--|----------------------------------|
|-----|------------------------|------------------------|-------------------------|--------|--|----------------------------------|

| | | | | | |
|-------|--|---|---|--|--|
| 1.2.1 | 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 | |
| 1.2.2 | Minutes of Senior Management Team meetings and the 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 | |
| 1.2.3 | Reports created by the Head 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 minimum of 3 years then review | SECURE DISPOSAL | |
| 1.2.4 | 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 + 6 years then review | SECURE DISPOSAL | |
| 1.2.5 | Correspondence 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 correspondence refers to individual pupils or members of staff | Date of correspondence + 3 years then review | SECURE DISPOSAL | |
| 1.2.6 | Professional Development Plans | Yes | Life of the plan + 6 years | SECURE DISPOSAL | |
| 1.2.7 | School Development Plans | No | Life of the plan + 3 years | SECURE DISPOSAL | |

| 1.3 Admissions Process | | | | | |
|-------------------------------|--|-------------------------------|--|--|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 1.3.1 | All records relating to the creation and implementation of the School Admissions' Policy | No | Life of the policy + 3 years then review | SECURE DISPOSAL | |
| 1.3.2 | Admissions – if the admission is successful | Yes | Date of admission + 1 year | SECURE DISPOSAL | |
| 1.3.3 | Admissions – if the appeal is unsuccessful | Yes | Resolution of case + 1 year | SECURE DISPOSAL | |
| 1.3.4 | Register of Admissions | Yes | Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. ³ | REVIEW 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. | |
| 1.3.5 | Admissions – Secondary Schools – Casual | Yes | Current year + 1 year | SECURE DISPOSAL | |
| 1.3.6 | Proofs of address supplied by parents as part of the admissions process | Yes | Current year + 1 year | SECURE DISPOSAL | |
| 1.3.7 | Supplementary Information form including additional information such as religion, medical conditions etc | Yes | | | |
| | For successful admissions | | This information should be added to the pupil file | SECURE DISPOSAL | |
| | For unsuccessful admissions | | Until appeals process completed | SECURE DISPOSAL | |

| 1.4 Operational Administration | | | | | |
|---------------------------------------|---|-------------------------------|---------------------------------------|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 1.4.1 | General file series | No | Current year + 5 years then REVIEW | SECURE DISPOSAL | |
| 1.4.2 | Records relating to the creation and publication of the school brochure or prospectus | No | Current year + 3 years | STANDARD DISPOSAL | |
| 1.4.3 | Records relating to the creation and distribution of circulars to staff, parents or pupils | No | Current year + 1 year | STANDARD DISPOSAL | |
| 1.4.4 | Newsletters and other items with a short operational use | No | Current year + 1 year | STANDARD DISPOSAL | |
| 1.4.5 | Visitors' Books and Signing in Sheets | Yes | Current year + 6 years then REVIEW | SECURE DISPOSAL | |
| 1.4.6 | Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations | No | Current year + 6 years then REVIEW | SECURE DISPOSAL | |

2. Human Resources

This section deals with all matters of Human Resources management within the school.

| 2.1 Recruitment | | | | | |
|------------------------|--|-------------------------------|---|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 2.1.1 | All records leading up to the appointment of a new headteacher | Yes | Date of appointment + 6 years | SECURE DISPOSAL | |
| 2.1.2 | All records leading up to the appointment of a new member of staff – unsuccessful candidates | Yes | Date of appointment of successful candidate + 6 months | SECURE DISPOSAL | |
| 2.1.3 | All records leading up to the appointment of a new member of staff – successful candidate | Yes | All the 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 | No | The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months | | |
| 2.1.5 | Proofs of identity collected as part of the process of checking “portable” 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 placed on the member of staff's personal file | | |
| 2.1.6 | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom Checking a job applicant's right to work - GOV.UK (www.gov.uk) | Yes | Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years | | |

| 2.2 Operational Staff Management | | | | | |
|---|--------------------------------------|-------------------------------|---------------------------------------|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 2.2.1 | Staff Personal File | Yes | 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 + 5 years | SECURE DISPOSAL | |

| 2.3 Management of Disciplinary and Grievance Processes | | | | | |
|---|---|-------------------------------|--|--|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 2.3.1 | Allegation of a child protection nature against a member of staff including where the allegation is unfounded – Please refer to KCSiE Managing Allegations Against Staff – Record keeping | Yes | Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned | SECURE DISPOSAL These records must be shredded | |
| 2.3.2 | Disciplinary Proceedings | Yes | | | |
| | oral warning | | Date of warning + 6 months | SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file] | |
| | written warning – level 1 | | Date of warning + 6 months | | |
| | written warning – level 2 | | Date of warning + 12 months | | |
| | final warning | | Date of warning + 18 months | | |
| | case not found | | If the incident is child protection related then see above otherwise dispose of at the conclusion of the case | SECURE DISPOSAL | |

| |
|------------------------------|
| 2.4 Health and Safety |
|------------------------------|

| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|-------|--|------------------------|--|--|----------------------------------|
| 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 | | | |
| | Adults | | Date of the incident + 6 years | SECURE DISPOSAL | |
| | Children | | DOB of the child + 25 years | SECURE DISPOSAL | |
| 2.4.5 | Control of Substances Hazardous to Health (COSHH) | No | Current year + 40 years | SECURE DISPOSAL | |
| 2.4.6 | Process of monitoring of areas where employees and persons are likely to have become in 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 become in 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 Payroll and Pensions

| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|-------|--|------------------------|--------------------------------|--|----------------------------------|
| 2.5.1 | Maternity pay records | Yes | Current year + 3 years | SECURE DISPOSAL | |
| 2.5.2 | Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Yes | Current year + 6 years | SECURE DISPOSAL | |

3. Financial Management of the School

This section deals with all aspects of the financial management of the school including the administration of school meals

3.1 Risk Management and Insurance

| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|-------|--|------------------------|--|--|----------------------------------|
| 3.1.1 | Employer's Liability Insurance Certificate | No | Closure of the school + 40 years | SECURE DISPOSAL | |
| | Insurance after case closure | Yes | Closure of case + 6 years (LA recommended) | Secure Disposal | |

3.2 Asset Management

| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|-------|--|------------------------|--------------------------------|--|----------------------------------|
| 3.2.1 | Inventories of furniture and equipment | No | Current year + 6 years | SECURE DISPOSAL | |
| 3.2.2 | Burglary, theft and vandalism report forms | No | Current year + 6 years | SECURE DISPOSAL | |

3.3 Accounts and Statements including Budget Management

| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|-------|--|------------------------|---|--|----------------------------------|
| 3.3.1 | Annual Accounts | No | Current year + 6 years | STANDARD DISPOSAL | |
| 3.3.2 | Loans and grants managed by the school | No | Date of last payment on the loan + 12 years then REVIEW | SECURE DISPOSAL | |
| 3.3.3 | Student Grant applications | Yes | Current year + 3 years | SECURE DISPOSAL | |
| 3.3.4 | All records relating to the creation and management of budgets including the Annual Budget statement and background papers | No | Life of the budget + 3 years | SECURE DISPOSAL | |
| 3.3.5 | Invoices, receipts, order books and requisitions, delivery notices | No | Current financial year + 6 years | SECURE DISPOSAL | |
| 3.3.6 | Records relating to the collection and banking of monies | No | Current financial year + 6 years | SECURE DISPOSAL | |
| 3.3.7 | Records relating to the identification and collection of debt | No | Current financial year + 6 years | SECURE DISPOSAL | |

3.4 Contract Management

| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|-----|------------------------|------------------------|--------------------------------|--|----------------------------------|
|-----|------------------------|------------------------|--------------------------------|--|----------------------------------|

| | | | | | |
|-------|---|----|---|-----------------|--|
| 3.4.1 | All records relating to the management of contracts under seal | No | Last payment on the contract + 12 years | SECURE DISPOSAL | |
| 3.4.2 | All records relating to the management of contracts under signature | No | Last payment on the contract + 6 years | SECURE DISPOSAL | |
| 3.4.3 | Records relating to the monitoring of contracts | No | Current year + 2 years | SECURE DISPOSAL | |

3.5 School Fund

| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|-------|-------------------------------|------------------------|--------------------------------|--|----------------------------------|
| 3.5.1 | School Fund - Cheque books | No | Current year + 6 years | SECURE DISPOSAL | |
| 3.5.2 | School Fund - Paying in books | No | Current year + 6 years | SECURE DISPOSAL | |
| 3.5.3 | School Fund – Ledger | No | Current year + 6 years | SECURE DISPOSAL | |
| 3.5.4 | School Fund – Invoices | No | Current year + 6 years | SECURE DISPOSAL | |
| 3.5.5 | School Fund – Receipts | No | Current year + 6 years | SECURE DISPOSAL | |
| 3.5.6 | School Fund - Bank statements | No | Current year + 6 years | SECURE DISPOSAL | |
| 3.5.7 | School Fund – Journey Books | No | Current year + 6 years | SECURE DISPOSAL | |

3.6 School Meals

| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|-------|-----------------------------|------------------------|--------------------------------|--|----------------------------------|
| 3.6.1 | Free School Meals Registers | Yes | Current year + 6 years | SECURE DISPOSAL | |
| 3.6.2 | School Meals Registers | Yes | Current year + 3 years | SECURE DISPOSAL | |
| 3.6.3 | School Meals Summary Sheets | No | Current year + 3 years | SECURE DISPOSAL | |

4. Property Management

This section covers the management of buildings and property.

| 4.1 Property Management | | | | | |
|--------------------------------|--|-------------------------------|--|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 4.1.1 | Title deeds of properties belonging to the school | No | PERMANENT These should follow the property unless the property has been registered with the Land Registry | | |
| 4.1.2 | Plans of property belong 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 | |

| 4.2 Maintenance | | | | | |
|------------------------|--|-------------------------------|---------------------------------------|---|---|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 4.2.1 | All records relating to the maintenance of the school carried out by contractors | No | Current year + 6 years | SECURE DISPOSAL | |
| 4.2.2 | All records relating to the maintenance of the school carried out by school employees including maintenance logbooks | No | Current year + 6 years | SECURE DISPOSAL | |

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

| 5.1 Pupil's Educational Record | | | | | |
|--------------------------------|---|------------------------|--|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 5.1.1 | Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 | Yes | | | |
| | Primary | | Retain whilst the child remains at the primary school | The file should follow the pupil when he/she leaves the primary school. ³ | |
| | Secondary | | Date of Birth of the pupil + 25 years | SECURE DISPOSAL | |
| 5.1.2 | 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 | | |
| 5.1.3 | Child Protection information held on pupil file Please see DFE guidance | | 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 | |
| 5.1.4 | Child protection information held in separate files | | DOB 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 Local Authority Social Services record | SECURE DISPOSAL – these records MUST be shredded | |

5.2 Attendance

³ This will include: (i) to another primary school (ii) to a secondary school (iii) to a pupil referral unit (iv) If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention 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 Local Authority as it is more likely that the pupil will request the record from the Local Authority

| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|-------|---|------------------------|--|--|----------------------------------|
| 5.2.1 | Attendance Registers | Yes | Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made. | SECURE DISPOSAL | |
| 5.2.2 | Correspondence relating to authorized absence | | Current academic year + 2 years | SECURE DISPOSAL | |

| 5.3 Special Educational Needs | | | | | |
|-------------------------------|---|------------------------|---|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 5.3.1 | Special Educational Needs files, reviews and Individual Education Plans | Yes | Date of Birth of the pupil + 25 years | REVIEW 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 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 and this should be documented. | |
| 5.3.2 | Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement | Yes | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold | |
| | | | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold | |

| | | | | | |
|-------|--------------------------|--|---|--|--|
| | | | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold | |
| 5.3.3 | Records of intimate care | | 3 years | Secure Disposal unless the document is subject to legal hold | |

5. Curriculum Management

| 6.1 Statistics and Management Information | | | | | |
|---|--|------------------------|---|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 6.1.1 | Curriculum returns | No | Current year + 3 years | SECURE DISPOSAL | |
| 6.1.2 | Examination Results (Schools Copy) | Yes | Current year + 6 years | SECURE DISPOSAL | |
| | SATS records – Results | Yes | | | |
| | | | 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 | |
| | Examination Papers | | The examination papers should be kept until any appeals/validation process is complete | SECURE DISPOSAL | |
| 6.1.3 | Published Admission Number (PAN) Reports | Yes | Current year + 6 years | SECURE DISPOSAL | |
| 6.1.4 | Value Added and Contextual Data | Yes | Current year + 6 years | SECURE DISPOSAL | |
| 6.1.5 | Self-Evaluation Forms | Yes | Current year + 6 years | SECURE DISPOSAL | |

| 6.2 Implementation of Curriculum | | | | | |
|----------------------------------|------------------------|------------------------|---|---|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 6.2.1 | Schemes of Work | No | Current year + 1 year | 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 | | |
| 6.2.3 | Class Record Books | No | Current year + 1 year | | |
| 6.2.4 | Mark Books | No | Current year + 1 year | | |
| 6.2.5 | Record homework set | No | Current year + 1 year | | |
| 6.2.6 | Pupils' Work | No | Where possible pupils' 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 | |

6. Extra Curriculum Management

| 7.1 Educational Visits outside the Classroom | | | | | |
|--|------------------------|------------------------|--------------------------------|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |

| | | | | | |
|-------|---|-----|---|---|--|
| 7.1.1 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom—Primary Schools | No | Date of visit + 14 years | SECURE DISPOSAL | |
| 7.1.2 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools | No | Date of visit + 10 years | SECURE DISPOSAL | |
| 7.1.3 | Parental consent forms for school trips where there has been no major incident | Yes | Conclusion of the trip | Although the consent forms could be retained for DOB + 22 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 | DOB 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 | | |

8. Central Government and Local Authority

| 8.1 Local Authority | | | | | |
|--------------------------|--|------------------------|--------------------------------|--|----------------------------------|
| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
| 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 | |
| 8.1.3 | School Census Returns | No | Current year + 5 years | SECURE DISPOSAL | |
| Local School Policy 8.15 | Circulars and other information sent from the Local Authority Off-rolling information | No Yes | Operational use Aged 25 | SECURE DISPOSAL SECURE DISPOSAL | |

8.2 Central Government

| Ref | Basic file description | Data Protection Issues | Retention Period [Operational] | Action at the end of the administrative life of the record | Annual Review Completed Tick (✓) |
|-------|--|------------------------|--------------------------------|--|----------------------------------|
| 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 | |

Appendix A – List of School Records and Data safely destroyed outside to scope of this retention schedule

The following sheet can be completed or alternatively documented in a spreadsheet.

| Ref 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 Tick (✓) |
|------------|------------------------|--|--|---------------------------|-----------------------|--|
| e.g. | <i>School Invoices</i> | <i>Copies of purchase invoices dated 2011/12</i> | <i>Folders marked "Purchase Invoices 2011/12" 1 to 3</i> | <i>3 Folders</i> | <i>Shredding</i> | ✓ |
| 1 | | | | | | |
| 2 | | | | | | |
| 3 | | | | | | |
| 4 | | | | | | |
| 5 | | | | | | |
| 6 | | | | | | |
| 7 | | | | | | |
| 8 | | | | | | |
| 9 | | | | | | |
| 10 | | | | | | |
| 11 | | | | | | |
| 12 | | | | | | |
| 13 | | | | | | |

| Ref Number | File/Record Title | Description | Reference or Cataloguing Information | Number of Files Destroyed | Method of destruction | <u>Confirm</u> (i) Safely destroyed (ii) In accordance with Data Retention Guidelines Tick (✓) |
|------------|-------------------|-------------|--------------------------------------|---------------------------|-----------------------|---|
| 14 | | | | | | |