



St Gabriel
the Archangel

Catholic Multi-Academy Trust

RECORDS MANAGEMENT POLICY

POLICY TO BE REVIEWED EVERY TWO YEARS OR EARLIER DUE TO ANY LEGISLATIVE CHANGES

FOR ALL ACADEMIES PART OF ST GABRIEL THE ARCHANGEL CATHOLIC MULTI-ACADEMY TRUST

Approved by Board of Directors: 12th February 2026

Next Review: March 2028

Statement of Intent

St Gabriel the Archangel Catholic Multi Academy Trust is committed to maintaining the confidentiality of its information and ensuring that all records within Academies are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulation (GDPR), the Academies also have a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

St Gabriel the Archangel Catholic Multi Academy Trust has created this policy to outline how records are stored, accessed, monitored, retained and disposed of, in order to meet the statutory requirements of GDPR.

The retention periods outlined in this policy are good practice guidelines only, and Academies should ensure that they consider requirements specific to their Academy when implementing these timeframes. The tables for retention periods are based on information provided by the Information Records Management Society (IRMS) and are not an exhaustive list of records that may be kept by Academies. Where the IRMS has not provided guidance for disposal methods or retention periods, good practice recommendations have been provided.

This policy applies to all records created, received or maintained by staff of St Gabriel the Archangel Catholic Multi Academy Trust in the course of carrying out its functions.

Records are defined as all documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

1. Legal framework

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

- General Data Protection Regulation (2018)
- Freedom of Information Act 2012
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)

1.2 This policy also has due regard to the following guidance:

- Information Records Management Society 'Information Management Toolkit for School's

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

- General Data Protection Policy
- Freedom of Information Policy
- Information Security Policy
- Subject Access Request (SAR) Process
- Reporting a Breach Procedure

2. Responsibilities

- 2.1 Each Academy has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The Head Teacher/Principal in each Academy hold overall responsibility for this policy within their Academies and for ensuring it is implemented correctly
- 2.2 The person responsible for records management in the Academy will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- 2.3 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the provisions of this policy.
- 2.4 The Data Protection Officer (DPO) is responsible for promoting compliance with this policy and reviewing the policy on a **regular** basis.

3. Management of pupil records

- 3.1. Pupil records are specific documents that are used throughout a pupil's time in the education system – they are passed to each Academy/school that a pupil attends and includes all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.
- 3.2. The following information is stored on a pupil record held on a MIS system, and will be easily accessible:
 - Forename, surname, gender and date of birth
 - Unique pupil number
 - Note of the date when the file was opened
 - Note of the date when the file was closed, if appropriate
 - Ethnic origin, religion and first language (if not English)
 - Any preferred names
 - Position in their family, e.g. eldest sibling
 - Emergency contact details and the name of the pupil's doctor
 - Any allergies or other medical conditions that are important to be aware of
 - Names of parents, including their home addresses and telephone number(s)
 - Name of the school, admission number, the date of admission and the date of leaving, where appropriate
 - Any other agency involvement, e.g. speech and language therapist
 - Admissions form
 - Details of any SEND
 - If the pupil has attended an early years setting, the record of transfer
 - Privacy statement – only the most recent notice will be included
 - Annual written reports to parents
 - National curriculum and agreed syllabus record sheets
 - Notes relating to major incidents and accidents involving the pupil

- Any information about an Education and Healthcare (EHC) Plan and support offered in relation to the EHC Plan
 - Any notes indicating child protection disclosures and reports are held
 - Any information relating to exclusions and concerns on behaviour
 - Any correspondence with parents or external agencies relating to major issues, e.g. mental health
 - Notes indicating that records of complaints made by parents or the pupil are held
 - Absence notes
 - Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
 - Correspondence with parents about minor issues, e.g. behaviour
- 3.3 Hard copies of disclosures and reports relating to child protection issues are recorded on a safeguarding system, ie CPOMS.
- 3.4 Complaints made by parents or pupils are kept confidential within the IT system.
- 3.5 Actual copies of accident and incident information are stored separately on the Academy's Management Information System and held in line with the retention periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.
- 3.6 The Academy will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.
- 3.7 The only exception to the above is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, the Principal responsible for disposing of records, will remove these records.
- 3.8 Electronic records relating to a pupil's record will also be transferred to the pupils' next school. Section 10 of this policy outlines how electronic records will be transferred.
- 3.9 Sixth Form If any pupil attends an Academy until statutory school leaving age, the Academy will keep the pupil's records until the pupil reaches the age of 25 years. The Academy will transfer an electronic copy of the file.
- 3.10 All Academies will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The Academy/school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the Academy.
- 3.11 The template at Annex A is to be used to record the transfer of pupil records between Academies/Schools.

4. Management of the School

- 4.1 The table at Annex B below outlines the 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.

5. Human Resources

5.1 The table at Annex C deals with all matters of Human Resources management within the school.

6. Financial Management of the School

6.1 The table at Annex D deals with all aspects of retention for the financial management of the school.

7. Property Management

7.1 The table at Annex E covers the management of buildings and property.

8. Retention of pupil records and other pupil-related information

8.1 The table at Annex F outlines the retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.

9. Curriculum Management

9.1 The table at Annex G outlines the retention period for curriculum related documents.

10. Extra-Curricular Activities

10.1 The table at Annex H outlines the retention period relating to extra-curricular activities.

11. Central Government and Local Authority

11.1 The table at Annex I covers records created in the course of interaction between the school, Central Government and the local authority.

12. Storing and protecting information

12.1 The DPO will undertake a risk analysis to identify which records are vital to school management and these records will be stored in the most secure manner.

12.2 IT Support will conduct a back-up of information on a regular basis to ensure that all data can still be accessed in the event of a security breach, e.g. ransomware, and to protect against loss or theft.

12.3 Backed-up information will be stored offsite, following the NCSC guidance.

12.4 Confidential papers are to be kept in a locked filing cabinet, drawer or safe, with restricted access.

- 12.5 Confidential paper records are not to be left unattended or in clear view when held in a location with general access.
- 12.6 Local data and copies of data, including backups are encrypted.
- 12.7 Where data is saved on removable storage or a portable device, the device must be encrypted and kept in a locked and fireproof filing cabinet, drawer or safe when not in use. Use of memory sticks is prohibited in St Gabriel the Archangel Catholic Multi Academy Trust.
- 12.8 All mobile devices that store data for offline use are password-protected to protect the information on the device in case of theft.
- 12.9 Where possible, the school should enable electronic devices to allow the remote blocking or deletion of data in case of theft.
- 12.10 Staff are not to use their personal laptops or computers for school purposes.
- 12.11 All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password. 2 factor authentication is enforced for all accounts.
- 12.12 Emails containing sensitive or confidential information are sent using 'confidential mode' to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email or via the use of a One Time Password.
- 12.13 Circular emails to parents are to be sent using blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 12.14 Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the UK GDPR, either in an electronic or paper format, staff are to take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.
- 12.15 Before sharing data, staff always ensure that:
- They have consent from data subjects to share it
 - Adequate security is in place to protect it
 - The data recipient has been outlined in a privacy notice
 - A data protection impact assessment has been completed and approved.
- 12.16 All staff members are to implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer or safe with restricted access.
- 12.17 Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are to be supervised at all times.
- 12.18 The physical security of the school's buildings and storage systems, and access to

them, is reviewed regularly by the Estate/Site Manager/Caretakers. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the Principal and extra measures to secure data storage are to be put in place. The DPO is to be informed of any such circumstances.

12.19 St Gabriel the Archangel Catholic Multi Academy Trust takes its duties under the UK GDPR seriously and any unauthorised disclosure may result in disciplinary action.

12.20 The DPO is responsible for ensuring that continuity and recovery measures are in place to ensure the security of protected data.

13. Accessing information

13.1 St Gabriel the Archangel Catholic Multi Academy Trust is transparent with data subjects, the information that is held and how it can be accessed.

13.2 All members of staff, parents of registered pupils and other users of St Gabriel the Archangel Catholic Multi Academy Trust schools, e.g. visitors and third-party clubs, are entitled to:

- Know what information the school holds and processes about them or their child and why
- Understand how to gain access to it
- Understand how to provide and withdraw consent to information being held
- Understand what the St Gabriel the Archangel Catholic Multi Academy Trust is doing to comply with its obligations under the UK GDPR.

13.3 All members of staff, parents of registered pupils and other users of St Gabriel the Archangel Catholic Multi Academy Trust schools and facilities have the right, under the UK GDPR, to access certain personal data being held about them or their child.

13.4 Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents if the pupil is under 12-years of age.

13.5 Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights. (12 years and over).

13.6 St Gabriel the Archangel Catholic Multi Academy Trust will adhere to the provisions outlined in the company's GDPR General Data Protection Policy and Subject Access Request (SAR) Policy when responding to requests seeking access to personal information.

14. Digital continuity statement

14.1 Digital data that is retained for longer than six years will be named as part of a Digital Continuity Statement.

14.2 The DPO will identify any digital data that will need to be named as part of a Digital Continuity Statement.

14.3 The data will be archived to dedicated files on the Academy server, which are password-protected – this will be backed-up in accordance with Section 10 of this

policy.

14.4 Memory sticks will never be used to store digital data, subject to a Digital Continuity Statement.

14.5 The IT Director will review new and existing storage methods annually and, where appropriate, add them to the Digital Continuity Statement.

14.6 The following information will be included within the Digital Continuity Statement:

- A statement of purpose and requirements for keeping the records
- The names of the individuals responsible for long-term data preservation
- A description of the information assets to be covered by the digital preservation statement
- A description of when the record needs to be captured into the approved file formats
- A description of the appropriate supported file formats for long-term preservation
- A description of the retention of all software specification information and license information
- A description of how access to the information asset register is to be managed in accordance with the UK GDPR

15. Information audit

15.1 St Gabriel the Archangel Catholic Multi Academy Trust will conduct information audits on a regular basis against all information held by the schools to evaluate the information the schools are holding, receiving and using, and to ensure that this is correctly managed in accordance with the UK GDPR. This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information

15.2 The information audit may be completed in a number of ways, including, but not limited to:

- Interviews with staff members with key responsibilities – to identify information and information flows, etc.
- Questionnaires to key staff members to identify information and information flows, etc.
- A mixture of the above.

15.3 The DPO is responsible for ensuring the information audits are completed. The information audit will include the following:

- The school's data needs
- The information needed to meet those needs

- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

15.4 The DPO will consult with staff members involved in the information audit process to ensure that the information is accurate.

16. Disposal of data

16.1 Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper shredded recycling, electronic recycling.

16.2 Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut.

16.3 Where the disposal action is indicated as reviewed before it is disposed, the DPO will review the information against its administrative value – if the information should be kept for administrative value, the DPO will keep a record of this.

16.4 If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

16.5 Where information has been kept for administrative purposes, the DPO will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.

16.6 Where information must be kept permanently, this information is exempt from the normal review procedures.

16.7 Electronic copies of any information and files will be destroyed in line with the retention periods in the below Annexes.

17. Monitoring arrangements

We may update this policy from time to time. Any changes will be posted on our website and will be effective from the date of posting.

Version	Date	Action/Notes	Chair of Board of Directors/Sub Committee
1	12/02/2026	Approved by BoD	<i>JCBudgewater</i>

Annex B: 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. Please note that all information about the retention of records concerning the recruitment of Head Teachers can be found in the Human Resources section below.

1.1 Governing Body					
Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.1.1	Agendas for Board of Directors/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 Board of Directors/ 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 Board of Directors/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 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

1.1 Governing Body					
Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
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	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL

1.1.1	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
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1.2 Head Teacher and Senior Management Team

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	Life of the policy + 3 years then review	SECURE DISPOSAL
1.3.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	Date of admission + 1 year	SECURE DISPOSAL
1.3.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	Resolution of case + 1 year	SECURE DISPOSAL

1.3.4	Register of Admissions	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	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	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	Current year + 1 year	SECURE DISPOSAL

1.3 Admissions Process

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.3.7	Supplementary Information form including additional information such as religion, medical conditions etc	Yes			
	For successful admissions	Yes		This information should be added to the pupil file	SECURE DISPOSAL

³ School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014 p6

	For unsuccessful admissions	Yes		Until appeals process completed	SECURE DISPOSAL
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1.4 Operational Administration

Basic file description		Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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

Annex C: Human Resources

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

2.1 Recruitment					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.1.1	All records leading up to the appointment of a 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	Yes	DBS Update Service Employer Guide September 2018: Keeping children safe in education. Renewed annually in September	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	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes	Keeping children safe in education. Renewed annually in September	These are to be checked and the details of what was seen and what has been checked recorded on the Single Central Record (SCR).	

2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ⁴	Yes	An employer’s guide to right to work checks [Home Office May 2015]	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	
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2.2 Operational Staff Management

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.2.1	Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal/ assessment records	Yes		Current year + 5 years	SECURE DISPOSAL
2.2.4	Absence Data	Yes	Financial Regulations	Current year + 6 years	SECURE DISPOSAL

2.3 Management of Disciplinary and Grievance Processes

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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⁴ Employers are required to take a “clear copy” of the documents which they are shown as part of this process

2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	"Keeping children safe in education Statutory guidance for schools and colleges"; "Working together to safeguard children. A guide to interagency working to safeguard and promote the welfare of children"	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 ⁵	SECURE DISPOSAL These records must be shredded
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⁵ Where the warning relates to child protection issues see above. If the disciplinary proceedings relate to a child protection matter please contact your Safeguarding Children Officer for further advice

2.3.2	Disciplinary Proceedings	Yes			
	oral warning			Date of warning ¹¹ + 12 months	SECURE DISPOSAL (If warnings are placed on personal files then they must be weeded from the file)
	Statement of concern			Date of concern + 12 months	
	written warning – level 1			Date of warning + 12 months	
	final warning			Date of warning + 24 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

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.4.1	Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/ injury at work	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL

2.4.4	Accident Reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
	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	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	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	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	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
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2.5 Payroll and Pensions					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.5.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	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

Annex D: Financial Management of the School

This section deals with all aspects of the financial management of the school.

3.1 Risk Management and Insurance					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.1.1	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL

3.2 Asset Management					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.3.1	Annual Accounts	No	Financial Regulations	Current year + 6 years	STANDARD DISPOSAL
3.3.2	Loans and grants managed by the school	No	Financial Regulations	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	Yes		Current financial year + 6 years	SECURE DISPOSAL

3.3.8	Records relating to Condition Improvement Fund projects (CIF projects), to include: Payment Profile Payment Remittances Project cost details spreadsheet(s) Invoices	No	ESFA T&Cs relating to CIF funding	Final project payment date + 7 years	SECURE DISPOSAL
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3.4 Contract Management

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
3.4.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	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 Main Bank Account

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.5.1	Cheque books	No		Current year + 6 years	SECURE DISPOSAL
3.5.2	Paying in books	No		Current year + 6 years	SECURE DISPOSAL
3.5.3	Purchase Orders	No		Current year + 6 years	SECURE DISPOSAL

3.5.4	Invoices	No	Financial Regulations	Current year + 6 years	SECURE DISPOSAL
3.5.5	Receipts	No	Financial Regulations	Current year + 6 years	SECURE DISPOSAL
3.5.6	Bank statements	No	Financial Regulations	Current year + 6 years	SECURE DISPOSAL
3.5.7	Debtors records	Yes	Limitations Act	Current year + 6 years	SECURE DISPOSAL

3.6 School 'Petty Cash' Bank Account					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.6.1	Cheque books	No		Current year + 6 years	SECURE DISPOSAL
3.6.2	Paying in books	No		Current year + 6 years	SECURE DISPOSAL
3.6.3	Purchase Orders	No		Current year + 6 years	SECURE DISPOSAL
3.6.4	Invoices	No	Financial Regulations	Current year + 6 years	SECURE DISPOSAL
3.6.5	Receipts	No	Financial Regulations	Current year + 6 years	SECURE DISPOSAL
3.6.6	Bank statements	No	Financial Regulations	Current year + 6 years	SECURE DISPOSAL

Annex E: Property Management

This section covers the management of buildings and property.

4.1 Property Management					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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 log books	No		Current year + 6 years	SECURE DISPOSAL
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Annex F: 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					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	Primary			Retain whilst the child remains at the primary school	<p>The file should follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> to another primary school to a secondary school to a pupil referral unit <p>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.</p> <p>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 LA</p>
	Secondary		Limitation Act 1980 (Section 2)	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 Pupil's Educational Record

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.1.3	Child Protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children"	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	Yes	"Keeping children safe in education Statutory guidance for schools and colleges"; "Working together to safeguard children. A guide to inter-agency working to safeguard	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	SECURE DISPOSAL – these records MUST be shredded

		and promote the welfare of children”	on the Local Authority Social Services record	
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Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule.

5.2 Attendance					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.2.1	Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	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 authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL
5.3 Special Educational Needs					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	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	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	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	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	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
5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	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

Annex G: Curriculum Management

6.1 Statistics and Management Information					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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 –	Yes			
	Results			The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL
	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						
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
6.2.1	Schemes of Work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL	
6.2.2	Timetable	No		Current year + 1 year		
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 of 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	

Annex H: Extra- Curricular Activities

7.1 Educational Visits outside the Classroom					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Outdoor Education Advisers’ Panel National Guidance website http://oeapng.info specifically Section 3 – “Legal Framework and Employer Systems” and Section 4 – “Good Practice”.	Date of visit + 14 years	SECURE DISPOSAL
7.1.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Outdoor Education Advisers’ Panel National Guidance website http://oeapng.info specifically Section 3 – “Legal Framework and Employer Systems” and Section 4 – “Good Practice”.	Date of visit + 10 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	Limitation Act 1980 (Section 2)	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	
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7.2 Family Liaison Officers and Home School Liaison Assistants

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.2.1	Day Books	Yes		Current year + 2 years then review	
7.2.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	
7.2.3	Referral forms	Yes		While the referral is current	
7.2.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	
7.2.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	
7.2.6	Group Registers	Yes		Current year + 2 years	

Annex I: Central Government and Local Authority

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

8.1 Local Authority					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
8.1.2	Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
8.1.3	School Census Returns	No		Current year + 5 years	SECURE DISPOSAL
8.1.4	Circulars and other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL

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