



# **PONTEFRACT**

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## ACADEMIES TRUST

### **Records Management Guidance**

Trust Board Approval Date	15 March 2017
Effective Date	1 May 2017
Planned Review Date	1 May 2020
Web Access	Internet
Owner	Director of Finance Business and Operations

# 1.Scope & Responsibilities

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- 1.1 The Trust recognises that by efficiently managing its records, it will be able to comply with its legal and regularity obligations and to contribute to the effective overall management of the Trust. Records provide evidence for protecting the legal rights and interests of the Trust and its schools, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.
- 1.2 This policy and associated procedures applies to **all** employees of Pontefract Academies Trust, this includes those employed within the central team and those employed in each individual academy school. Where Trust is referred to within this policy it is referring to the Trust and it's individual schools.
- 1.3 The purpose of this policy is to ensure that all records created, received or maintained by employees of the Trust are retained (for a set period) to provide evidence of transactions or activities. These records may be created or received, and then stored, in hard copy or electronically.
- 1.4 A small percentage of the Trust's records may be selected for permanent preservation as part of it's archives and for historical research. This will be done in liaison with local archives services.
- 1.5 **The CEO is** responsible for ensuring that an appropriate policy and procedures are in place for the Trust to ensure that it's employees understand their corporate responsibilities in accordance with the regularitory environment.
- 1.6 The **Headteacher/Head of School** of each individual school is responsible for ensuring that this policy and procedures are effectively communicated and implemented within their school. The Headteacher will ensure that a nominated individual is responsible for records management in the school, will give guidance for good records management practice, and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- 1.7 All **employees** must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the Trust's records management guidelines.
- 1.8 Compliance with this policy will be periodically reviewed through independent check to ensure that records are stored securely and can be accessed appropriately.
- 1.9 This policy will be reviewed on an annual basis, or as otherwise directed by the Chief Executive Officer, change of Trust policy, or legislative changes.
- 1.10 This policy has been developed in the context of:
  - The Academies Act 2010
  - Freedom of Information Act 2000

# 1.Scope & Responsibilities

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- Data Protection Act 1998
- Other Legislation or Regulations (including audit, equal opportunities and ethics) affecting the Trust and it's schools.
- Guidelines from the Information and Records Management Society

## 2. Managing Pupil Records

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2.1 These guidelines are intended to help provide consistency of practice in the way in which pupil records are managed, including what kind of information should be included in the files. These guidelines apply to information created and stored in both physical and electronic format.

2.2 The pupil record should be seen as the core record charting an individual pupil's progress through the education system. The pupil record should accompany the pupil to every school they attend and should contain information that is accurate, objective and easy to access. These guidelines are based on the assumption that the pupil record is a principal record and that all information relating to the pupil will be found in the file (although it may spread across more than one file cover).

### 2.2.1 **File covers for pupil records**

It is strongly recommended that schools use a consistent file cover for the pupil record. This assists the secondary school to ensure consistency of practice when receiving records from a number of different primary schools. If, for example, primary schools have many different file covers for their files, the secondary school that the pupil files were transferred to would then be holding different levels of information for pupils which had come from different primary schools.

By using pre-printed file covers all the necessary information is collated and the record looks tidy and reflects the fact that it is the principal record containing all the information about an individual child. The use of standard document wallets should be avoided as it is very difficult to ensure that all the information required by the school is recorded consistently.

### 2.2.2 **Recording information**

A pupil or their nominated representative have the legal right to see their file at any point during their education and even until the record is destroyed (when the pupil is 25 years of age or 35 years from date of closure for pupils with special educational needs). This is their right of subject access under the Data Protection Act 1998. It is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

### 2.3 **Primary School records**

#### 2.3.1 **Opening a file**

These guidelines apply to information created and stored in both physical and electronic format.

The pupil record starts its life when a file is opened for each new pupil as they begin school. This is the file which will follow the pupil for the rest of his/her school career. If pre-printed file covers are not being used then the following information should appear on the front of the paper file:

- Surname
- Forename

## 2. Managing Pupil Records

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- DOB
- Unique Pupil Number

The file cover should also contain a note of the date when the file was opened and the date when the file is closed if it is felt to be appropriate.

### 2.3.2 Inside the front cover the following information should be easily accessible:

- The name of the pupil's doctor
- Emergency contact details
- Gender
- Preferred name
- Position in family
- Ethnic origin
- Language of home (if other than English)
- Religion
- Any allergies or other medical conditions that it is important to be aware of
- Names of adults who hold parental responsibility with home address and telephone number (and any additional relevant carers and their relationship to the child)
- Name of the school, admission number and the date of admission and the date of leaving.
- Any other agency involvement e.g. speech and language therapist, paediatrician

It is essential that these files, which contain personal information, are managed against the information security guidelines also contained in this policy.

### 2.3.3 Items which should be included on the pupil record

- If the pupil has attended an early years setting, then the record of transfer should be included on the pupil file
- Admission form (application form)
- Privacy Notice [if these are issued annually only the most recent need be on the file]
- Photography Consents
- Years Record
- Annual Written Report to Parents
- National Curriculum and Religious Education Locally Agreed Syllabus Record Sheets
- Any information relating to a major incident involving the child (either an accident or other incident)
- Any reports written about the child
- Any information about a statement and support offered in relation to the statement
- Any relevant medical information (should be stored in the file in a sealed envelope clearly marked as such)
- Child protection reports/disclosures (should be stored in the file in a sealed envelope clearly marked as such)

## 2. Managing Pupil Records

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- Any information relating to exclusions (fixed or permanent)
- Any correspondence with parents or outside agencies relating to major issues
- Details of any complaints made by the parents or the pupil

The following records should be stored separately to the pupil record as they are subject to shorter retention periods and if they are placed on the file then it will involve a lot of unnecessary weeding of the files before they are transferred on to another school.

- Absence notes
- Parental consent forms for trips/outings [in the event of a major incident all the parental consent forms should be retained with the incident report not in the pupil record]
- Correspondence with parents about minor issues
- Accident forms (these should be stored separately and retained on the school premises until their statutory retention period is reached. A copy could be placed on the pupil file in the event of a major incident)

### 2.4 **Transferring the pupil record to the secondary school**

The pupil record should not be weeded before transfer to the secondary school unless any records with a short retention period have been placed in the file. It is important to remember that the information which may seem unnecessary to the person weeding the file may be a vital piece of information required at a later stage.

Primary schools do not need to keep copies of any records in the pupil record except if there is an ongoing legal action when the pupil leaves the school. Custody of and responsibility for the records passes to the school the pupil transfers to.

Files should not be sent by post unless absolutely necessary. If files are sent by post, they should be sent by registered post with an accompanying list of the files. The secondary school should sign a copy of the list to say that they have received the files and return that to the primary school. Where appropriate, records can be delivered by hand with signed confirmation for tracking and auditing purposes.

Electronic documents that relate to the pupil file also need to be transferred, or, if duplicated in a master paper file, destroyed.

### 2.7 **Secondary School records**

Items which should be included on the pupil record

- If the pupil has attended an early years setting, then the record of transfer should be included on the pupil file
- Admission form (application form)
- Privacy Notice [if these are issued annually only the most recent need be on the file]
- Photography Consents
- Years Record

## 2. Managing Pupil Records

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- Annual Written Report to Parents
- National Curriculum and Religious Education Locally Agreed Syllabus Record Sheets
- Any information relating to a major incident involving the child (either an accident or other incident)
- Any reports written about the child
- Any information about a statement and support offered in relation to the statement
- Any relevant medical information (should be stored in the file in a sealed envelope clearly marked as such)
- Child protection reports/disclosures (should be stored in the file in a sealed envelope clearly marked as such)
- Any information relating to exclusions (fixed or permanent)
- Any correspondence with parents or outside agencies relating to major issues
- Details of any complaints made by the parents or the pupil Admission form (application form).

The following records should be stored separately to the pupil record as they are subject to shorter retention periods and if they are placed on the file then it will involve a lot of unnecessary weeding of the files once the pupil leaves the school.

- Absence notes
- Parental consent forms for trips/outings [in the event of a major incident all the parental consent forms should be retained with the incident report not in the pupil record]
- Correspondence with parents about minor issues
- Accident forms (these should be stored separately and retained on the school premises until their statutory retention period is reached. A copy could be placed on the pupil file in the event of a major incident)

### 2.8 **Responsibility for the pupil record once the pupil leaves the school**

The school which the pupil attended until statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25 years. This retention is set in line with the Limitation Act 1980 which allows that a claim can be made against an organisation by a minor for up to 7 years from their 18th birthday.

### 2.9 **Safe destruction of the pupil record**

The pupil record should be disposed of in accordance with the safe disposal of records guidelines.

### 2.10 **Transfer of a pupil record outside the EU area**

If you are requested to transfer a pupil i.e. outside the EU area because a pupil has moved into that area, please contact Wakefield M D Council for further advice.

### 2.11 **Storage of pupil records**

All pupil records should be kept securely at all times. Paper records, for example, should be kept in lockable storage areas with restricted access, and the contents

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should be secure within the file. Equally, electronic records should have appropriate security.

Access arrangements for pupil records should ensure that confidentiality is maintained whilst equally enabling information to be shared lawfully and appropriately, and to be accessible for those authorised to see it.



## 3. Safe disposal of records

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- 3.1 This guidance applies to all types of record, whether they are in paper or electronic form.

### **Disposal of records that have reached their minimum retention schedule**

The Data Protection Act 1998 stipulates that records should be kept for no longer than necessary.

In the Central Trust, the **CEO** must ensure that records that are no longer required for business use are reviewed as soon as practicable under the criteria set out so that ill-considered destruction is avoided.

In each school, **Headteachers** must ensure that records that are no longer required for business use are reviewed as soon as practicable under the criteria set out so that ill-considered destruction is avoided.

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

Refer to the Retention Guidelines at the end of this document.

Whatever decisions are made they need to be documented as part of a consistent and consistently applied records management policy throughout the Trust

### 3.2 **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. Do not put records in with the regular waste or a skip.

### 3.3 **Safe Disposal**

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 Trust 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

## 3. Safe disposal of records

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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 are authorised to be destroyed by a Senior Leader and the destruction recorded. Records should be shredded as soon as the record has been documented as being destroyed.

### 3.4 **Freedom of Information Act 2000 (FoIA 2000)**

The Freedom of Information Act 2000 requires the Trust and it's schools 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 Trust is compliant with the Data Protection Act 1998 and the Freedom of Information Act 2000.

### 3.5 **Transfer of records to the Archives**

Where records have been identified as being worthy of permanent preservation arrangements should be made to transfer the records to the Archives or the local records office. The school should contact the local record office if there is a requirement to permanently archive the records, and the records will continue to be managed via the DPA 1998 and the FoIA 2000.

If you would like to retain archive records in a special archive room in the school for use with pupils and parents please contact the local record office for specialist advice.

### 3.6 **Transfer of 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 microform or digital media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

Consideration should also be given to the legal admissibility of records that have been converted from paper to electronic media. It is essential to have procedures in place so that conversion is done in a standard way. This means that organisations can prove that the electronic version is a genuine original and could not have been tampered with in any way.

Reference should be made to 'British Standard 10008:2008 'Evidential weight and legal admissibility of electronic information' when preparing such procedures.

## 4. Retention Guidelines

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### 4.1 **Purpose of Retention Guidelines**

Under the Freedom of Information Act 2000, the Trust and its schools are required to maintain a retention schedule listing the record series which the school creates in the course of its business. The retention schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use. The retention schedule lays down the basis for normal processing under both the Data Protection Act 1998 and the Freedom of Information Act 2000.

Employees are expected to manage their current record keeping systems using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems.

The retention schedule refers to record series regardless of the media in which they are stored.

### 4.2 **Why are we required to keep a retention schedule?**

Managing records against the retention schedule is deemed to be “normal processing” under the Data Protection Act 1998 and the Freedom of Information Act 2000.

Provided employees are managing record series using the retention schedule they can not be found guilty of unauthorised tampering with files once a freedom of information request or a data subject access requests have been made.

Employees can be confident about shredding information at the appropriate time.

Information which is subject to Freedom of Information and Data Protection legislation will be available when required.

The Trust and its schools are not maintaining and storing information unnecessarily.

### 4.3 **Maintaining and amending the retention schedule**

Where appropriate the retention schedule will be reviewed and amended to include any new record series created and remove any obsolete record series.

## 5. Retention Guidelines

1. Trustees / School Governors					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
1.1	Register of Members, Membership Certificates	No	Companies Act 2006	Permanent	SECURE DISPOSAL
1.2	Register of Trustees, Declaration of willingness and eligibility to act as a Director	No	Companies Act 2006	Permanent	SECURE DISPOSAL
1.3	Minutes (Members, Trustees, Governors)	There may be data protection issues if the meeting is dealing with confidential issues relating to staff	Companies Act 2006	Permanent	If the school is unable to store these then the archives service should be used.
	a) Trust/School set (signed)				
	b) Inspection Copies	No		Date of Meeting + 3 years	SECURE DISPOSAL
1.4	Agendas (Members, Trustees, Governors)	There may be data protection issues if the meeting is dealing with confidential issues relating to staff	Companies Act 2006	Date of Meeting + 6 Years (One master copy retained with signed minutes)	SECURE DISPOSAL
1.5	Reports (Members, Trustees, Governors)	There may be data	Companies Act 2006	Reports should be kept for a minimum of 6 years.	SECURE DISPOSAL

## 5. Retention Guidelines

1. Trustees / School Governors					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
		protection issues if the report deals with confidential issues relating to staff		However, if the minutes refer directly to individual reports then the reports should be kept permanently	
1.6	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 report + 6 years	SECURE DISPOSAL
1.7	Instruments of Government including the Memorandum and Articles of Association	No		Permanent	Retain whilst school open
1.8	Trust and Endowments	No		Permanent	Retain whilst operationally required
1.9	Action plans created and administered by the Trust Board and/or School Governance Committee	No		Expiry of Plan + 3 years	SECURE DISPOSAL
1.10	Policy documents created and administered by the Trust Board and/or School Governance Committee	No		Expiry of Policy+ 3 years	SECURE DISPOSAL
1.11	Records relating to complaints dealt with by the Trust Board or School Governance Committee	Yes		Date of resolution of complaint + 6 years. After six years review for further retention in the case of contentious disputes.	SECURE DISPOSAL
1.13	Signed Business interest forms	No	Companies Act 2006	Permanent	SECURE DISPOSAL
1.14	Signed Gifts and Hospitality forms	No	Companies Act 2006	Permanent	SECURE DISPOSAL
1.15	EFA Approvals	No	Funding Agreement	Permanent	SECURE DISPOSAL

## 5. Retention Guidelines

2. CEO, Executive Headteacher, Headteacher, Head of School, Senior Leadership Teams					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
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
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
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
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
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 records refer to individual pupils or members of staff		Date of correspondence + 3 years then review	SECURE DISPOSAL
2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
2.7	School Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL

## 5. Retention Guidelines

3. Property and Insurance					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
3.1	Title Deeds	No		Permanent	
3.2	Plans	No		Permanent	
3.3	Planning Permission	No		Permanent	
3.4	Maintenance and Contractors	No		Current year + 6 years	SECURE DISPOSAL
3.5	Lease Register and Leases	No		Expiry of lease + 6 years	SECURE DISPOSAL
3.6	Lettings Diary and Receipts	Yes		Current year + 3 years	SECURE DISPOSAL
3.7	Burglary, theft, vandalism report forms	Yes		Current year + 6 years	SECURE DISPOSAL
3.9	Employers Liability insurance certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
3.10	Claims made against insurance policies – damage to property	Yes		Case concluded + 3 years	SECURE DISPOSAL
3.11	Claims made against insurance policies – personal injury	Yes		Case concluded + 6 years	SECURE DISPOSAL
3.12	Inventories of equipment and furniture	No		Current year + 6 years	SECURE DISPOSAL
3.13	Visitors Book and signing in sheets	Yes		Current Year + 6 Years then review	SECURE DISPOSAL

## 5. Retention Guidelines

4. Finance					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
4.1	Annual Report and Financial Statements	No		Current Year + 6 years	STANDARD DSIPOSAL
4.2	Loans and Grants	No		Date of last payment on loan + 12 years then review	SECURE DISPOSAL
4.3	Contract				
	a) Under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
	b) Under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
	c) Monitoring records	No		Current year + 2 years	SECURE DISPOSAL
	d) Register	No		Include all current plus those completed within last 6 years	SECURE DISPOSAL
4.4	Orders & Requisitions	No		Current year + 6 years	SECURE DISPOSAL
4.5	Copy remittances	No		Current year + 6 years	SECURE DISPOSAL
4.6	Receipt Books	No		Current year + 6 years	SECURE DISPOSAL
4.7	Budget Reports, Budget monitoring	Possible		Life of the Budget + 3 years	SECURE DISPOSAL
4.8	Invoices	No		Current year + 6 years	SECURE DISPOSAL
4.9	Delivery / Goods Received Notes	No		Current year + 6 years	SECURE DISPOSAL
4.10	Debtor records	No		Current year + 6 years	SECURE DISPOSAL
4.11	Cheque books	No		Current year + 6 years	SECURE DISPOSAL
4.12	Paying in books	No		Current year + 6 years	SECURE DISPOSAL
4.13	Petty Cash Books	No		Current year + 6 years	SECURE DISPOSAL



## 5. Retention Guidelines

4. Finance					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
4.14	Signed Bank Reconciliations	No		Current year + 6 years	SECURE DISPOSAL
4.15	Bank Statements	No		Current year + 6 years	SECURE DISPOSAL
4.16	Grant Claims	No		Current year + 6 years	SECURE DISPOSAL
4.17	Consultants – Diary of visits, reports generated	No		Current year + 6 years	SECURE DISPOSAL
4.18	Donations Register	No		Current year + 6 years	SECURE DISPOSAL
4.19	Free School Meal Registers	No		Current year + 6 year	SECURE DISPOSAL
4.20	School Meal Registers + Summarues	No		Current year + 6 year	SECURE DISPOSAL

5. Recruitment					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
5.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
5.2	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
5.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		6 years from the end of employment	SECURE DISPOSAL
5.4	Pre-employment vetting information – DBS Checks	No	DBS Update Service Employer Guide June 2014: Keeping children safe in education.	The Trust/schools do not have to keep copies of DBS certificates. If the Trust/school do so the copy must NOT be retained for	SECURE DISPOSAL

## 5. Retention Guidelines

5. Recruitment					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
			July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74	more than 6 months	
5.5	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	SECURE DISPOSAL
5.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom <sup>4</sup>	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	SECURE DISPOSAL
5.7	Staff Personal File – Staff NOT working with children	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	SECURE DISPOSAL
	Staff Personal File – Staff working with children	Yes		Termination of employment + 25 years	SECURE DISPOSAL
5.8	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
5.9	Annual appraisal/ assessment records	Yes		Current year + 5 years	SECURE DISPOSAL

## 5. Retention Guidelines

6. Personnel Records					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
6.1	Timesheets, sick pay	Yes		Current Year + 6 years	SECURE DISPOSAL
6.2	Staff personal files	Yes	Limitation Act 1980 (Section 2)	Termination + 6 years	SECURE DISPOSAL
6.3	Interview notes and recruitment records	Yes		Date of interview + 6 months	SECURE DISPOSAL
6.4	Pre-employment vetting information (including CRB/DBS checks)	No	CRB / DBS guidelines	Date of check + 6 months	SECURE DISPOSAL
6.5	Disciplinary proceedings	Yes	Warnings will not be referred to outside the parameters of	Where the warning relates to child protection issues contact LADO for further advice. Otherwise termination + 6 years.	SECURE DISPOSAL
6.6	Records relating to accident / injury at work	Yes		Date of incident + 12 years. In the case of serious incident further retention period will need to be applied	SECURE DISPOSAL
6.7	Annual appraisal/assessment records	No		Current year + 5 years	SECURE DISPOSAL
6.8	Pay Slips	Yes		Last date of employment + 85 years	SECURE DISPOSAL
6.9	Maternity / Paternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year + 3 years	SECURE DISPOSAL
6.10	Records held under retirement benefits schemes (information powers) regulations 1995	Yes		Current year + 6 years	SECURE DISPOSAL
6.11	Proofs of identify collected as part of the process of checking "portable" enhanced CRB/DBS disclosure	Yes		Note retained of what has been seen and checked no retention of proofs required.	SECURE DISPOSAL

## 5. Retention Guidelines

7. Health & Safety					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
7.1	Accessibility Plans		Disability Discrimination Act	Current year + 6 years	SECURE DISPOSAL
7.2	Accident Reporting				
	Adults	Yes	Social Security (Claims & Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of incident +7years	SECURE DISPOSAL
	Children	Yes		DOB of child + 25 years	
7.3	Record of Medicinal Product Administered on the premises, including the date and circumstances of its administration, by whom it was administered, including medicinal products which the child is permitted to administer alone, together with a record of parents consent.	Yes		DOB of child + 25 years	SECURE DISPOSAL
7.4	Medical Records as specified by the Control of Substances Hazardous to Health which also includes health surveillance (eg hearing tests, vibration white finger)			Current Year + 40 years (where appropriate an additional retention period may be allocated)	SECURE DISPOSAL
7.4	Incident Reports	Yes		Current year + 20 years	SECURE DISPOSAL
7.5	Policy Statements	No		Date of expiry + 1 year	SECURE DISPOSAL
7.6	Risk Assessments	Yes		Current Year + 3 years	SECURE DISPOSAL
7.7	Process of monitoring areas where employees and persons are likely to have become in contact with asbestos (including asbestos plans)	No	Control of Asbestos at Work Regulations	Last Action + 40 years	SECURE DISPOSAL
7.8	Process of monitoring areas where employees and persons are likely to have become in contact with radiation	No	Ionising Radiations Regulations 1999	Last Action + 50 Years (or until the person reaches 75 years of age)	SECURE DISPOSAL
7.9	Fire precautions log books (including evacuation logs)	No		Current Year + 6 years	SECURE DISPOSAL

## 5. Retention Guidelines

7. Health & Safety					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
7.10	Emergency Lighting testing and log books	No		Current Year + 6 years	SECURE DISPOSAL
7.11	Gas Safety Certificates	No		Current Year + 6 years	SECURE DISPOSAL
7.12	Fixed Electrical Testing	No		Current Year + 6 years	SECURE DISPOSAL
7.13	Portable Appliance Testing	No		Current Year + 6 years	SECURE DISPOSAL
7.14	Legionella Testing and Log books	No		Current Year + 6 years	SECURE DISPOSAL

8. Pupil's/Student's Educational Record					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
8.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
8.2	Primary	Yes		Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school. This will include: <ul style="list-style-type: none"> <li>• to another primary school</li> <li>• to a secondary school</li> <li>• to a pupil referral unit</li> <li>• If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained</li> </ul>

## 5. Retention Guidelines

8. Pupil's/Student's Educational Record					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
					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
8.3	Secondary	Yes	Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	SECURE DISPOSAL
8.4	Examination Results – Pupil Copies	Yes			
8.4.1	Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.

## 5. Retention Guidelines

8. Pupil's/Student's Educational Record					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
8.4.2	Internal			This information should be added to the pupil file	

9. Child Protection Files					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
9.1	Child Protection Information held on pupil Files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	DOB + 25 Years * <i>It is recommended that all records relating to child abuse are retained until the National Child Abuse Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention</i>	SECURE DISPOSAL
9.2	Child protection information held in separate files	Yes	Employment Practices Code: Supplementary Guidance 2.13.1 (records of Disciplinary and Grievance) Education Act 2002 guidance "Dealing with Allegations of Abuse against Teachers and Other Staff" November 2005	DOB of the child + 25 years then review This retention period is on the understanding that the principal copy of this information will be found on the Local Authority records	SECURE DISPOSAL

## 5. Retention Guidelines

10. Attendance					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
10.1	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
10.2	Correspondence relating to authorised absence	Yes	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL

11. Special Educational Needs					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
11.1	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. An SEN file may be kept for a longer period of time for defence 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



## 5. Retention Guidelines

11. Special Educational Needs					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
					should be documented.
11.2	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
11.3	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
11.4	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

12. Curriculum					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
12.1	Curriculum returns	No		Current Year + 3 Year	SECURE DISPOSAL
12.2	Examination Results (Schools Copy)	Yes		Current Year + 6 Year	SECURE DISPOSAL
12.2.1	SATS records –	Yes			SECURE DISPOSAL
12.2.2	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	SECURE DISPOSAL

## 5. Retention Guidelines

12.	Curriculum				
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
				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	
12.2.3	Examination Papers			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
12.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	SECURE DISPOSAL
12.4	Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
12.5	Self Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL

## 5. Retention Guidelines

13. Implementation of Curriculum					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
13.1	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
13.2	Timetable	No		Current year + 1 year	
13.3	Class Record Books	No		Current year + 1 year	
13.4	Mark Books	No		Current year + 1 year	
13.5	Record of homework set	No		Current year + 1 year	
13.6	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

14. Educational Visits Outside the Classroom					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
14.1	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 <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice"	Date of visit + 14 years	SECURE DISPOSAL
14.2	Records created by schools to obtain approval to run an Educational Visit outside the	No	Outdoor Education Advisers' Panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically	Date of visit + 10 years	SECURE DISPOSAL

## 5. Retention Guidelines

14.	Educational Visits Outside the Classroom				
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
	Classroom – Secondary Schools		Section 3 - “Legal Framework and Employer Systems” and Section 4 - “Good Practice		
14.3	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.
14.4	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	SECURE DISPOSAL

## 5. Retention Guidelines

15. Walking Bus					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
15.1	Walking Bus Registers	Yes		Date of register + 3 years This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]

16. Family Liaison Officers and Home School Liaison Assistants					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
16.1	Day Books	Yes		Current year + 2 years then review	SECURE DISPOSAL
16.2	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	SECURE DISPOSAL
16.3	Referral forms	Yes		While the referral is current	SECURE DISPOSAL
16.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
16.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL

## 5.Retention Guidelines

16.6	Group Registers	Yes		Current year + 2 years	SECURE DISPOSAL
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17.	Local Authority and Central Government Liason				
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
17.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
17.2	Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
17.3	School Census Returns	No		Current year + 5 years	SECURE DISPOSAL
17.4	OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
17.5	Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL