Bishop Chadwick Catholic Education Trust



St Anthony's Girls' Catholic Academy

Policy type:	School
Policy:	Records Management Policy
Ratified by MAT Directors:	December 2020
Head Teacher signature:	M. Snephered.
Chair of Directors signature:	Sr.M. Jalepha
Review Date:	December 2021
Ownership:	M. Shepherd (Head Teacher)

1. Records management policy.

The school recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

1. Scope of the policy

1.1 This policy applies to all records created, received or maintained by staff of the academy in the course of carrying out its functions.

1.2 Records are defined as all those documents which facilitate the business carried out by the academy 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.

1.3 A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives and for historical research.

2. Responsibilities

2.1 The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher.

2.2 The person 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.

2.3 Individual employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines.

3. Relationship with existing policies This policy has been drawn up within the context of:

- The Academy ethos;
- The Academy Freedom of Information policy
- The Academy Data Protection policy
- Other legislation and/or regulation

2. Pupil record management guidelines.

These guidelines are intended to help provide consistency of practice in the way in which pupil records are managed. These will assist schools about how pupil records should be managed and what kind of information should be included in the file. It is hoped that the guidelines will develop further following suggestions and comments from those members of staff in schools who have the most contact with pupil records.

These guidelines apply to information created and stored in both physical and electronic format. These are guidelines. The pupil record

is 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 record.

a. File covers for pupil records and printing of electronic records.

A consistent folder for the pupil record should be used. Any electronic records eg. absence reports, grades etc. should be printed and included in the hard copy file, as required.

b. Recording information in pupil records.

Pupils have a right of access to their educational record and so do their parents under the Education (Pupil Information) (England) Regulations 2005. Under the Data Protection Act 1998 a pupil or their nominated representative has a right to see information held about them. This right exists until the point that the record is destroyed.

c. It is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

d. The contents of pupil records

These guidelines apply to information created and stored in both physical and electronic format. The pupil record starts its life when a record is opened for each new pupil as they begin school. This is the record which will follow the pupil for the rest of his/her school career.

If pre-printed covers are not being used then the following information should appear on the front of hard copy file:

- Surname
- Forename
- DOB (Date of Birth)

• Unique Pupil Number

The following information should be 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 records which contain personal Information, are managed against the information security guidelines.

e. Primary school pupil records

Items which should be included in the primary pupil record:

- If the pupil has attended an early-years setting, then the record of transfer should be included in the pupil record.
- Admission form (application form).
- Photography Consents.
- Privacy notice.
- Annual Written Report to Parents.
- 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/EHCP and supporting papers in relation to the statement /EHCP.
- Any relevant medical information (should be stored confidentially).
- · Child protection reports/disclosures (should be stored confidentially).
- Any information relating to exclusions (fixed term 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 in the pupil file as they are subject to shorter retention periods and if they are placed in the same file then it will involve a lot of unnecessary weeding of 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 record in the event of a major incident).

f. Transferring the pupil record from primary school to 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 record. 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. The secondary school should sign a copy of the list to say that they have received the file 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 le also need to be transferred.

g. Secondary school pupil records

Items which should be included in the pupil file:

- a. If the pupil has attended an early-years setting, then the record of transfer should be included on the pupil file
- b. Admission form (application form)
- c. Privacy Notice
- d. Photography Consents
- e. Written Report to Parents
- f. Any information relating to a major incident involving the child (either an accident or other incident)
- g. Any reports written about the child
- h. Any information about a statement and support in relation to the statement
- i. Any relevant medical information (should be stored confidentially)
- j. Child protection reports/disclosures (should be stored confidentially
- k. Any information relating to exclusions (fixed term or permanent should be stored confidentially)
- I. Any correspondence with parents or outside agencies relating to major issues
- m. 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 le then it will involve a lot of unnecessary weeding of the les once the pupil leaves the school.

- a. Absence notes
- b. 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)
- c. Correspondence with parents about minor issues
- d. Accident forms (these should be stored separately, confidentially and retained on the school premises).

h. The 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 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.

i. 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.

j. The safe destruction of a pupil record

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

k. Transfer of a pupil record outside the EU area

If you are requested to transfer a pupil le outside the EU area because a pupil has moved into that area, please contact the Local Authority for further advice.

3. Good practice guide for managing e-mail.

These guidelines are intended to assist school staff to manage their e-mail in the most effective way, and must be used in conjunction with the school's policies on the use of ICT.

a. Things you need to know about e-mail:

- e-mail has replaced telephone calls and memos
- as communicating by e-mail is quick and easy, many people have replaced telephone conversations and memos with e-mail discussions. However, the language in which e-mail is written is often less formal and more open to misinterpretation than a written memo or a formal letter.
- remember that e-mail should be laid out and formulated to your school's standards for written communications.
- e-mail is not always a secure medium to send confidential information
- you need to think carefully about information security when you send any confidential information by e-mail.
- the consequences of an e-mail containing sensitive information being sent to an unauthorised person could be a civil penalty of up to £500,000 from the Information Commissioner or it could end up on the front page of a newspaper.
- confidential or sensitive information should only be sent by a secure encrypted e-mail system.
- never put personal information (such as a pupil's name) in the subject line of an e-mail.
- e-mail is disclosable under the access to information regimes
- all school e-mail is disclosable under Freedom of Information and Data Protection legislation.
- be aware that anything you write in an email could potentially be made public.
- e-mail is not necessarily deleted immediately and can remain in a system for a period of time after you have deleted it.
- remember that although you may have deleted your copy of the e-mail, the recipients may not and therefore there will still be copies in existence. These copies could be disclosable under the Freedom of Information Act 2000 or under the Data Protection Act 1998.
- e-mail can form a contractual obligation. Agreements entered into by e-mail can form a contract. You need to be aware of this if you enter into an agreement with anyone, especially external contractors.

Individual members of staff should not enter into agreements either with other members of staff internally or with external contractors unless they are authorised to do so by the Academy Business Manager or the Head Teacher.

- all attachments in e-mail should be saved into any appropriate electronic filing system or printed out and placed in paper files.
- as an employer we will be very careful about how we monitor e-mail. Any employer has a right to monitor the use of e-mail provided it has informed members of staff that it may do so. If you intend to monitor staff e-mail or telephone calls you should inform them how you intend to do this and who will carry out the monitoring.
- e-mail is one of the most common causes of stress in the work-place

b. Creating and sending e-mail

Here are some steps to consider when sending e-mail:

- · do I need to send this e-mail?
- ask yourself whether this transaction needs to be done by e-mail? It may be that it is more appropriate to use the telephone or to check with someone face to face.
- to whom do I need to send this e-mail?
- limit recipients to the people who really need to receive the e-mail.
- avoid the use of global or group address lists unless it is absolutely necessary. Never send on chain e-mails.
- when sending emails containing personal or sensitive data always respond to an authorised, approved address.
- all emails that are used for official business must be sent from an official business domain address.
- use a consistent method in a subject line
- having a clearly defined subject line helps the recipient to sort the email on receipt.
- a clear subject line also assists in ling all e-mails relating to individual projects in one place. For example, the subject line might be the name of the policy, or a reference number.

c. e-mail communication at St Anthony's:

- do not use text language or informal language in school e-mails.
- always sign with a name (and contact details).
- make sure that you use plain English and ensure that you have made it clear how you need the recipient to respond.
- use factual, unemotive content.
- never write a whole e-mail in capital letters. This can be interpreted as shouting.
- always spell check an e-mail before you send it.
- do not use the urgent flag unless it is absolutely necessary, recipients will not respond to the urgent flag if they perceive that you use it routinely.
- if possible, try to stick to one subject for the content of each e-mail, as it will be easier to categorise it later, if you need to keep the email.
- seek permission from senior staff for "whole school e-mail" distribution.

d.Sending attachments:

- sending large attachments (e.g. graphics or presentations) to a sizeable circulation list can cause resource problems on your network.
- where possible put the attachment in an appropriate area on the Learning Platform and send the link round to the members of staff who need to access it.

e.Disclaimers

Adding a disclaimer to an e-mail mitigates risk, such as sending information to the wrong recipient, or helps to clarify the school's position in relation to the information being e-mailed. Typically, they cover the fact that information may be confidential, the intention of being solely used by the intended recipient, and any views or opinions of the sender are not necessarily those of the school. There is some debate about how enforceable disclaimers are. Legal advice should be sought when using or drafting a disclaimer for your organisation to ensure it meets your specific needs.

f. Managing received e-mails

This section contains some hints and tips about how to manage incoming emails.

g. Managing e-mail interruptions

Incoming e-mail can be an irritating distraction. The following tips can help manage the interruptions:

- turn off any alert that informs you e-mail has been received
- plan times to check e-mail into your day
- use rules and alerts
- e-mails relating to a specific subject or project can be diverted to a named project folder
- e-mails from individuals can be diverted to a specific folder
- warn senders that you will assume that if you are copied in to an email, the message is for information only and requires no response from you.
- internally, use a list of key words to indicate in the subject line what is expected of recipients (for example: "for action:", FYI:", etc)
- use electronic calendars to invite people to meetings rather than sending e-mails asking them to attend
- use an out of office message when appropriate

h. Filing e-mail

• attachments only

Where the main purpose of the e-mail is to transfer documents, then the documents should be saved into the appropriate place in an electronic filing system or printed out and added to a paper file. The e-mail can then be deleted.

• e-mail text and attachments

Where the text of the e-mail adds to the context or value of the attached documents it may be necessary to keep the whole e-mail. The best way to do

this and retain information which makes up the audit trail, is to save the email in .msg format. This can be done either by clicking and dragging the email into the appropriate folder in an application such as MS Outlook, or by using the "save as" function to save the e-mail in an electronic filing system. If the e-mail needs to be re-sent it will automatically open into MS Outlook.

Where appropriate the e-mail and the attachments can be printed out to be stored in a paper file, however, a printout does not capture all the audit information which storing the e-mail in .msg format will.

• e-mail text only

If the text in the body of the e-mail requires filing, the same method can be used as that outlined above. This will retain information for audit trail purposes. Alternatively the e-mail can be saved in .html or .txt format. This will save all the text in the e-mail and a limited amount of the audit information. The e-mail cannot be re-sent if it is saved in this format.

The technical details about how to undertake all of these functions are available in application Help functions.

• How long to keep e-mails?

E-mail is primarily a communication tool, and e-mail applications are not designed for keeping as a record in a storage area which meeting records management storage standards. E-mail that needs to be kept should be identified by their content; for example, Does it form part of a pupil record? Is it part of a contract? The retention for keeping these e-mails will then correspond with the classes of records according to content in the retention schedule. These e-mails may need to be saved into any appropriate electronic ling system or hard copy.

<u>4. Good practice guide for information security and business continuity.</u>

Information Security and Business Continuity are both important activities in ensuring good information management and are vital for compliance with the Data Protection Act 1998. Taking measures to protect your records can ensure that:

- Your school can demonstrate compliance with the law and avoid data loss incidents;
- In the event of a major incident, your school should be able to stay open and will at least have access to its key administrative and teaching records.

Our Business Continuity Plan deals with records held in all media across all school systems;

- Electronic (including but not limited to databases, word processed documents and spreadsheets, scanned images);
- Hard copy (including but not limited to paper).

i) Digital information.

In order to mitigate against the loss of electronic information:

a. We operate an effective back-up system. ICT technicians undertake regular backups of all information held electronically to enable restoration of the data in the event of an environmental or data corruption incident. Options for the management of back-up facilities include:

• Off-site, central back up service (usually operated by another provider). This involves a back-up being taken remotely over a secure network (usually overnight) and stored in encrypted format in premises other than the school.

b. Control of the way data is stored within the academy.

Personal information should not be stored on the hard drive of any laptop or PC unless the device is running encryption software. Staff are advised not to hold personal information about students or other staff on personal mobile storage devices including but not limited to memory sticks, phones, i-pads, portable hard drives or even on CD.

c. Staff must maintain strict control of passwords. Data is subject to a robust password protection regime, ideally with users changing their passwords every 30 days. Password sharing is not allowed. Staff should always lock their PC's when they are away from their desk to prevent unauthorised use.

d. The location of server equipment. Technicians must ensure that the server environment is managed to prevent access by unauthorised people.

e. Governors and senior staff will ensure that business continuity plans are reviewed and tested. Test restore processes on a regular basis to ensure that the first time you identify a problem with the backup is not the first time you need to retrieve data from it.

ii) Hard copy information and records.

Records which are not stored on the school's servers are at greater risk of damage by fire and flood as well as risk of loss and of unauthorised access.

a. Fire and flood.

The cost of restoring records damaged by water can be high but a large percentage may be saved. Fire is much more destructive of records. In order to limit the amount of damage which fire or flood can do to paper records, all vital information should be stored in filing cabinets, drawers or cupboards. Metal filing cabinets are a good first level barrier against fire and water. Where possible vital records should not be left on open shelves or on desks as these records will almost certainly be completely destroyed in the event of fire and will be seriously damaged (possibly beyond repair) in the event of a flood. The bottom shelves of a storage cupboard should be raised at least 2 inches from the ground. Physical records should not be stored on the floor.

b. Unauthorised access, theft or loss.

Staff are encouraged not to take personal data on staff or students out of the school unless there is no other alternative. Records held within the school are in lockable rooms and/or cabinets. Restricted access to areas in which personal information is being worked on or stored. Has been assisted by having separate office spaces for senior administrative and leadership staff. All archive or records storage areas are lockable and have restricted access. Paper files are only checked out to the offices of senior admin staff and senior leadership staff.

c. Clear desk policy.

A clear desk policy is the best way to avoid unauthorised access to physical records which contain sensitive or personal information and will protect physical records. A clear desk policy involves the removal of the physical records which contain sensitive personal information to a cupboard or drawer (lockable where appropriate). N.B. It does not mean that the desk has to be cleared of all its contents, just anything containing sensitive or personal information.

iii) Disclosure.

Staff must note the importance of ensuring that personal information is only disclosed to people who are entitled to receive it. Ensure that where you intend to share personal information with a third party that you have considered the requirements of the Data Protection Act. Be careful of giving out personal information over the telephone; invite the caller to put the request in writing or supply a return address which can be verified.

iv) Risk analysis.

We review business risk annually to identify which records are vital to school management and to ensure these records are stored in the most secure manner. We have an information asset/risk register to assist with this process which is included in the Academy Business Continuity Plan.

v) Responding to data breach incidents.

In the event of an incident involving the loss of information or records the school has an incident response team to manage the situation. Please see the Data Breach Policy.

5. Disposal of records that have reached the end of the minimum retention period allocated.

1. Retention.

The fifth data protection principle states that:

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

In each organisation, local records managers must ensure that records that are no longer required for business use are reviewed as soon as possible under the criteria set out so that only the appropriate records are destroyed. The local review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained by the organisation for research or litigation purposes. Refer to the Retention Guidelines contained in the Records Management Policy.

2. Safe destruction of records.

All records containing personal information, or sensitive policy information should be made either unreadable or un-re-constructable.

- Paper records should be shredded using a cross-cutting shredder
- CDs / DVDs / Floppy Disks should be cut into pieces or shredded in shredders with this facility.
- Audio / Video Tapes and Fax Rolls should be dismantled and shredded
- Hard Disks should be dismantled and sanded,

6. Freedom of Information Act.

1. List.

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

• File reference (or other unique identifier);

- File title (or brief description);
- Number of files and date range
- The name of the authorising member of staff
- Date the action was taken

Following this guidance will ensure that the school is compliant with the Data Protection Act 1998 and the Freedom of Information Act 2000.

2. Transfer of records to archives.

Where records have been identified as being worthy of permanent preservation arrangements should be made to transfer the records to the County Archives Service. 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.

We will retain some archive records in a locked facility in the school contact the local record office for specialist advice as required.

3. 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.

5. Recording of all archiving, permanent destruction and digitisation of records.

Sample appendices are provided for the recording of all records to be used. These records could be kept in an Excel spreadsheet or other database format.

7. Retention guidelines.

i) The purpose of the retention guidelines

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.

Members of staff 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.

ii) The benefits of a retention schedule

There are a number of benefits which arise from the use of a complete 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. Members of staff should be aware that once a Freedom of Information request is received or a legal hold imposed then records disposal relating to the request or legal hold must be stopped.
- Members of staff can be confident about safe disposal information at the appropriate time.
- Information which is subject to Freedom of Information and Data Protection legislation will be available when required. The school is not maintaining and storing information unnecessarily.

iii) Maintaining and amending the retention schedule

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

This retention schedule contains recommended retention periods for the different record series created and maintained by schools in the course of

their business. The schedule refers to all information regardless of the media in which it is stored.

Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the Data Protection Act 1998 and the Freedom of Information Act 2000.

Managing record series using these retention guidelines will be deemed to be "normal processing" under the legislation mentioned above. If record series are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented.

This schedule should be reviewed on a regular basis.

iv) Using the Retention Schedule

The Retention Schedule is divided into six sections:

- 1. Management of the School
- 2. Human Resources
- 3. Financial Management of the School
- 4. Property Management
- 5. Pupil Management
- 6. Curriculum Management

The Records Management Policy and the Retention Schedule are the responsibility of the Business Manager.

Management of the School

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

1.1 Go	overning Body				
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.1.1	Agendas for Governing Body meetings	There may be data protection issues if the mee ting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL ¹
1.1.2	Minutes of Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)			PERMANENT	If the school is unable to store these then they should be offered to the County Archives Service
	Inspection Copies ²			Date of meeting+3 years	If these minutes contain any sensitive, per sonal information they must be shredded
UJ	Repor ts presented to the Governing Body	There may be data protection issues if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently	SECURE DISPOSAL or retain with the signed set of the minutes
1.1 <i>A</i>	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 Go	verning Body Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.15	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.
U .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	Action plans created and administered by the Governing Body	No		Life of the action pian + 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 5 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
1. U 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

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

1.2 Head Teacher and Senior Management Team							
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]		n at the end of the nistrative life of the l	
1.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection iss if the log book refers to individua pupil s or members of staff		Date of last entry in the book - minimum of 6 years then revie		These could be of permanent historical value and should be offered to the County Archive 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 iss if the minutes refers to individual pupils or members of staff		Date of the meeting+ 3 years review	then	SECURE DISPOSAL	
1.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection iss if the report refers to individual pupil s or members of staff	ues	Date of the report+ a minimu years then review	m of 3	SECURE DISPOSAL	
1.24	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protec tion iss if the records refer to individual pupil s or members of staff	sues	Current academic year+6 yea review	ars then	SECURE DISPOSAL	
1.25	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection iss if the correspondence refers to individual pupils or members of		Date of correspondence+ 3 ye review	ears then	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	

<mark>1.3 Ac</mark>	Imissions Process Basic file description	Data Prot 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 December 2014	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 December 2014	Date of admission+ 1 year	SECURE DISPOSAL
1JJ	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
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 school s receive enquiries from past pupil s 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 December 2014	Current year + 1 year	SECURE DISPOSAL

1.3 A	dmissions Process Basic file description Data Prot Statu Issues	tory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.3.7	Supplementary Informa tion Yes form including additional information such as religion, medical conditions etc			
	For successful admissions	. —		SECURE DISPOSAL
	For unsuccessful admissions		Until appeal s process completed	SECURE DISPOSAL
<mark>1.4 O</mark> i i	perational Administration	Data Prot <mark>Statutory</mark>	Retention Period [Operational]	Action at the end of the administrative life
1.4.1	General file series	No	Current year+ 5 years then REVIEW	SECURE DISPOSAL
1.4.2	Records relating to the creation and publica tion 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 ParentTeacher Associations and/or Old Pupils Associations	No	Current year+6 years then REVEW	SECURE DISPOSAL

2. Human Resources

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

2.1 Recruitment

	Basic file description	Data Prot Issues	Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.U	All records leading up to the appointment of a new headteacher	Yes		Date of appointment+ 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
2.13	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 per sonal file (see below) and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks	No	OBS Upda te Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutor y Guidance from Dept of Education) Sections 73, 74	The school does not have to keep copies of OBS certificates. If the school does so the copy must NOT be retained for more than 6 months	
2.15	Proofs of identity collec ted as part of the proces s of checking "portable" enhanced OBS 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 per sonal file	
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 pos sible these documents should be added to the Staff Personal File [see below), but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years	

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

2.3 Management of Disciplinary and Grievance Processes **Basic file description Statutory Provisions Retention Period [Operational]** Action at the end of the administrative Data Prot Issues Allegation of a child Yes "Keeping children safe in education Until the person's normal retirement SECURE DISPOSAL These records must be shredded protection nature against a Statutory guidance for schools and age or 10 years from the date of the member of staff including colleges March 2015";"Working together allegation which ever is the longer then where the allegation is to safeguard children. A guide to REVIEW Note allega tions that are found unfounded⁵ inter -agency wor king to safegua rd and to be malicious should be removed from promote the welfa re of children March per sonnel files. If found they are to be 2015" kept on the file and a copy provided to the person concerned Disciplinary Proceedings Yes oral warning Date of warning 6 + 6 months SECURE DISPOSAL written warning - level 1 Date of warning + 6 months ------[If warnings are placed on per sonal files then they must be weeded from the file] written warning - level 2 Date of warning + 12 months final warning Date of warning + 18 months If the incident is child protection related case not found SECURE DISPOSAL

2.3.1

2.3.2

then see above otherwise dispose of at the conclusion of the case

<mark>2.4 H</mark> ≅ i	ealth and Safety	Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
24.1	Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL
24.2	Health and Safety Risk Assessments	No		Life of risk assessment+ 3 years	SECURE DISPOSAL
2AJ	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
2AA	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			DOS of the child + 25 years	SECURE DISPOSAL
2A5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. 51 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
24.6	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 Sl 1012 No 632 Regulation 19	Last action+ 40 years	SECURE DISPOSAL
2A.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
24.8	Fire Precautions log books	No		Current year + 6 years	SECURE DISPOSAL

4 Employers are required to take a "clear copyof the documents which they are shown as part of this process

2.5 Pa	ayroll and Pensions				
1 🖬 1	Basic file description	Data Prot	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
25.1	Maternity pay records	Yes	Statutor y Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (Sil999/567)	Current year + 3 years	SECURE DISPOSAL
25.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SECURE DISPOSAL

3. Financial Management of the School

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



5 This review took place as the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention 6 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

	counts and Statements including Budget				
	Basic file description	Data Prot	Statutory	Retention Period [Operational]	Action at the end of the administrative life of the record
3.3.1	Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
3.3.2	Loans and grants managed by the school	No		Date of last payment on the Ioan + 12 years then REVIEW	SECURE DISPOSAL
3JJ	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
3.35	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year+ 6 years	SECURE DISPOSAL
3.3.6	Records relating to the collec tion and banking of monies	No		Current financial year+ 6 years	SECURE DISPOSAL
3.3.7	Records relating to the identification and collection of debt	No		Current financial year+ 6 years	SECURE DISPOSAL
	Easic fiedescription			Retent on Feriod (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 School Fund

118	Basic file description	Data Prot Statutory Issue: Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
35.1	School Fund - Cheque books	No	Current year + 6 years	SECURE DISPOSAL
352	School Fund - Paying in books	No	Current year + 6 years	SECURE DISPOSAL
35J	School Fund – Ledger	No	Current year + 6 years	SECURE DISPOSAL
35A	School Fund – I nvoices	No	Current year + 6 years	SECURE DISPOSAL
35.5	School Fund – Receipts	No	Current year+ 6 years	SECURE DISPOSAL
35.6	School Fund - Bank statements	No	Current year+ 6 years	SECURE DISPOSAL
35.7	School Fund – Journey Books	No	Current year + 6 years	SECURE DISPOSAL

3.6 School Meals Management

	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	Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.6.2	School Meals Registers	Yes		Current year+ 3 years	SECURE DISPOSAL
3.6J	School Meals Summary Sheets	No		Current year+ 3 years	SECURE DISPOSAL

4. Property Management

This section covers the management of buildings and property.

4.1 Pr	operty Management				
4.1.1	Title deeds of properties belonging to the school	No		PERMANENT These should follow the proper ty unless the proper ty has been registered with the Land Registry	
4.1.2	Plans of property belong to the school	No		These should be retained whil st 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 proper ty leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1 <i>A</i>	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.2 Ma	aintenance		1 C		1.1
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operationa I]	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

5. Pupil Management

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

5.1 Pı	pil's Educational Record				
	Basic file description	Data Prot	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.1.1	Pupil's Educa tional Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	Primary			Retain whilst the child remains at the primary school	 The file should follow the pupil when he/she leaves the prima ry school. This will include: to another primary school to a secondary school to a pupil referral unit If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority 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
	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 examina tion board.
	Internal			This information should be added to the pupil file	

5.1 Pupil's Educational Record

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

5.1J	Child Protection information held on pupil file	Yes	"Keeping children safe in educa tion 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 Ma rch 2015"	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
5.14	Child protection information held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges Ma rch 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children Ma rch 2015"	DOS of the child+ 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	SECURE DISPOSAL- these records MUST be shredded

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

	Basic file description	Data Prot Issues		Retention Period [Operational]	Action at the end of the admini strative 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 authorized 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 [Operationa I]	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

6. Curriculum Management

6.1 Sta	6.1 Statistics and Management Information									
	Basic file description	Data Prot Issues	Statutory Provisions		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					

<mark>6.21</mark> m											
•••••	Basic file description	Data Prot Statutory Issues Provisions	Retention Period [Operational]	Action at the end of the admini strative life of the record							
6.2.1	Schemes of Work	No	Current year + 1 year								
6.2.2	Timetable	No <u>;</u> ;	Current year + 1 year	serecordsattheend							
			0	feach year and allocate a further retention period or							
6.2.4	Mark Books	No	Current year+ 1 year	SECURE DISPOSAL							
6.2.5	Record of home ork set	No	Current year+ 1 year								
6.2.6	Pupils'Work	No	Where possible pupils' ork 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							

7. Extra Curricular Activities

	Basic file description	Data Prot Issues		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 D08 + 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)	D08 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 pupil s	

	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	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	SECURE DISPOSAL [If these records are retained electronically any back up copies should

7.3 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
7.3.1	Day Books	Yes		Current year + 2 years then review	
7.3.2	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	
7.3.3	Referral forms	Yes		While the referral is current	
7.3.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	
7.35	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	
7.3.6	Group Registers	Yes		Current year + 2 years	

8. 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								
		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 Governmen

		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