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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 school 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 school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.
- 1.3 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 Head of the school.
- 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 staff and 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 Information used to inform this policy

This policy has been drawn up within the context of:

- the Freedom of Information Scheme of Publication;
- the Data Protection Policy; and
- other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

Appendix A

Retention/disposal of records

A.1 – Introduction

The implementation of the retention or disposal of records at Devonshire Primary School will be in accordance with the Data Protection Policy, Freedom of Information Policy and Records Management Policy.

A.2 - Purpose of retention/disposal schedule

This schedule identifies the retention and disposal arrangements for all records, whether they are in paper or digital format, created by the school.

Categories of disposal

- Review/closing of records
- Destruction
- Permanent preservation

A.3 – Operation of this Schedule

a. Review/closing of records

Manual records should be closed as soon as they have ceased to be of active use other than for reference purposes. When a file is due to be closed the appropriate member of staff should review the file and consult the schedule marking the front cover of the file to indicate the date on which the file can be destroyed, or whether it should be selected for permanent preservation or retained by the school for research or litigation purposes. Closing a file simply means that no further papers can be added but the file can be used for reference.

b. Minimum retention period

The minimum retention period required for each type of record is calculated from the point the file/record is closed.

c. Destroy

Where the disposal action is 'Destroy' the records should be kept for the period stated and then destroyed by the school in accordance with the directions on recycling and shredding. All records containing personal information, or sensitive policy information, should be made either unreadable or unreconstructable. Before destruction authorisation must be given by the Headteacher or School Business Manager and the destruction recorded. The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction.

d. Permanent preservation

Where the disposal action is 'Permanent preservation' the records are exempt from the normal review procedures. In some cases, the Public Record Office will seek transfer of files that are marked for permanent preservation.

e. Commitment to preserving files/records

The school declares that it will take measures to ensure that the records it creates will be physically well maintained and cared for while they are in its custody (i.e. until either destroyed or retained for permanent preservation).

f. Roles and responsibilities

The Headteacher is responsible for ensuring that records and information systems in her areas conform to this policy and to the requirements of legislation. All members of staff are responsible for documenting their actions and decisions in the records and for maintaining the records in accordance with good records management practice.

The role of the appointed member of staff is to ensure compliance with records management standards within their area of responsibility, and to co-ordinate activities aimed at ensuring that information is recorded, stored, managed and disposed of both effectively and legally.

A.4 – Definitions of records held by the school in respect of each of its functional business areas.

There are **eight** main functional business areas for which the school keeps records as follows:

1. Management of the school
2. Human resources
3. Financial management of the school
4. Property management
5. Pupil management
6. Curriculum management
7. Extra-curricular activities
8. Central Government and policy

The records contained within these functional areas provide evidence and information about its business activities that are important for the efficient operation of the school.

A.5 – School RETENTION AND DISPOSAL SCHEDULE

1. Management of the school – this section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, Headteacher and Senior Leadership Team, admissions process and operational administration.

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of record
1.1 Governing Body				
Agendas for GB meetings	If dealing with confidential issues relating to staff		1 copy to be retained with the master set of minutes. All other copies disposed of	SECURE DISPOSAL
Minutes of GB meetings	If dealing with confidential issues relating to staff Principal Set Inspection Copies		PERMANENT (signed copies to be retained only) Date of meeting +3 years (drafts, working papers and copies of minutes in files held by governors, school staff or clerk).	N/A SHRED
Reports presented to GB	If dealing with confidential issues relating to staff		Min 6 years. If minutes refer directly to individual reports then the reports should be kept permanently	SECURE DISPOSAL or kept with the signed set of the minutes
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 meeting + min 6 years	SECURE DISPOSAL
Instruments of Government including Articles of Assn	No		PERMANENT	Retained in school whilst school open then archived
Trusts & Endowments managed by GB	No		PERMANENT	Retained in school whilst school open then archived
Action Plans created and administered by GB	No		Life of Plan + 3 years	SECURE DISPOSAL
Policy documents created and administered by GB	Yes		Life of Policy + 3 years	SECURE DISPOSAL

Records relating to complaints dealt with by the GB	Yes		Date of resolution of complaint + min 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL
Annual Reports created under the requirements of the Education (Governors Annual Reports (England) (Amendment) Regs 2002	No	Education (Governors Annual Reports) (England) (Amendment) Regs 2002	Date of Report + 10 years	SECURE DISPOSAL
Proposals concerning change of status of maintained school including specialist status schools and academies	No		Date proposal accepted or declined + 3 years	SECURE DISPOSAL
1.2 Headteacher and Senior Leadership Team				
Log books of activity in the school maintained by HT	If reference to individual pupils or members of staff		Date of last entry in book + min 6 years then review	Could be of permanent historical value
Minutes of SLT meetings and the meetings of other internal administrative bodies	If reference to individual pupils or members of staff		Date of meeting + 3 years then review	SECURE DISPOSAL
Reports created by HT or Management Team	If reference to individual pupils or members of staff		Date of report + min 3 years then review	SECURE DISPOSAL
Records created by HT, DHTs and other members of staff with admin responsibilities	If reference to individual pupils or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL
Correspondence created by HTs, DHTs and other members of staff with admin resp.	If correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then review	SECURE DISPOSAL
Professional Development Plans	Yes		Life of Plan + 6 years	SECURE DISPOSAL
school Development Plans	No		Life of Plan + 3 years	SECURE DISPOSAL
1.3 Admissions Process				
Records relating to creation and implantation of school's Admissions' Policy	No	school Admissions Code. Statutory Guidance for	Date of Admission + 1 year	SECURE DISPOSAL

		Admission Authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels Dec 2014		
Admissions – if admission is successful	Yes	As above	Date of admission + 1 year	SECURE DISPOSAL
Admissions if the appeal is unsuccessful	Yes	As above	Resolution of case + 1 year	SECURE DISPOSAL
Register of Admissions	Yes	school attendance: Departmental advice for maintained schools, academies, independent schools and local authorities Oct 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	REVIEW schools may wish to consider keeping the register permanently as often schools receive enquiries from past pupils to confirm dates they attended the school
Admissions – Secondary school – casual	Yes		Current + 1 year	SECURE DISPOSAL
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, school adjudicators and admission appeals panels Dec 2014	Current + 1 year	SECURE DISPOSAL
Supplementary information form including additional information such as religion, medical conditions etc	Yes		For SUCCESSFUL admissions – add to pupil record file For UNSUCCESSFUL admissions – until appeals process completed	SECURE DISPOSAL SECURE DISPOSAL
1.4 Operational Administration				

General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
Records relating to the creation and management of PTAs and/or Old Pupils Associations	No		Current Year + 6 years then REVIEW	SECURE DISPOSAL

2. **Human resources** – this section deals with all matters of HR management within the school

Basic File Description	Data protection Issues	Statutory provisions	Retention period	Action at end of administrative life of record
2.1 Recruitment				
All records leading up to the appointment of a new Headteacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
All records leading up to the appointment of a new member of staff – UNSUCCESSFUL candidate	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
All records leading up to the appointment of a new member of staff – SUCCESSFUL candidate	Yes		All the personal recruitment documents should be added to the staff personnel file	SECURE DISPOSAL
Pre-employment vetting information – DBS checks	No	DBS Update Service Employer Guide June	The school does not have to keep copies of DBS certificates. If the school does so	

		2014: KCSIE statutory guidance	the copy must NOT be retained for more than 6 months	
Proofs of identity collected as part of the process of checking 'portable' enhanced DBS disclosure	Yes		These should be checked and kept on individual personnel file	
Pre-employment vetting information – evidence proving right to work in the UK	Yes	An employer's guide to right to work checks (Home Office May 2015)	These documents should be added to the staff personnel file (Home Office requires that the documents are kept for termination of employment plus not less than 2 years)	
2.2 Operational staff management				
Staff Personnel File	Yes	Limitation Act 1980 (Section 2)	Termination of employment + 6 years	SECURE DISPOSAL
Timesheets	Yes		Current + 6 years	SECURE DISPOSAL
Annual appraisal/assessment records	Yes		Current year + 5 years	SECURE DISPOSAL
2.3 Management of disciplinary and grievance processes				
Allegation of a child protection nature, against a member of staff including where the allegation is unfounded	Yes	KCSIE Statutory Guidance for schools and Colleges. Working to Safeguard Children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned	SECURE DISPOSAL These records must be shredded on site by a senior member of staff
Disciplinary Proceedings	Yes			
Oral Warning			Date of warning + 6 months	SECURE DISPOSAL - if placed on personnel file must be removed
Written warning Level 1			Date of warning + 6 months	As above
Written warning Level 2			Date of warning + 12 months	As above
Final Warning			Date of Warning + 18 months	As above
Case not found			If the incident is child protection related then see above, otherwise dispose of at conclusion of case	SECURE DISPOSAL

2.4 Health & Safety				
Health & Safety Policy statements	No		Life of Policy + 3 years	SECURE DISPOSAL
Health & Safety risk assessments	No		Life of Risk Assessment + 3 years	SECURE DISPOSAL
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
Accident reporting	Yes	Social Security (Claims & Payments) Regs 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
ADULTS			Date of the incident + 6 years	SECURE DISPOSAL
CHILDREN			DOB of the child + 25 years	SECURE DISPOSAL
Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regs 2002. SI 2002 No 2677 Regulation 1.1; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Reg 18 (2)	Current year + 40 years	SECURE DISPOSAL
Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regs 2012 SI 1012 No 632 Regulation 19	Last Action + 40 years	SECURE DISPOSAL
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
Fire Precaution Log books	No		Current year + 6 years	SECURE DISPOSAL

2.5 Payroll and Pensions				
Maternity pay records	Yes	Statutory Maternity Pay (General) Regs 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
Records held under retirement benefits schemes (information powers) Regs 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.

Basic File Description	Data protection issues	Statutory provisions	Retention period	Action at end of administrative life of record
3.1 Risk Management & Insurance				
Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
3.2 Asset management				
Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL
3.3 Accounts and statements including budget management				
Annual accounts	No		Current year + 6 years	STANDARD DISPOSAL
Loans and grants managed by the school	No		Date of last payment on loan + 12 years then REVIEW	SECURE DISPOSAL
Student grant applications	Yes		Life of budget + 3 years	SECURE DISPOSAL
All records relating to the creation and management of budgets including the annual budget statement and background papers	No		Life of budget + 3 years	SECURE DISPOSAL
Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year+ 6 years	SECURE DISPOSAL

Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL
3.4 Contract Management				
All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
All contracts relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL
3.5 School fund				
School Fund Cheque Books	No		Current year + 6 years	SECURE DISPOSAL
School Fund Paying In Books	No		Current year + 6 years	SECURE DISPOSAL
School Fund – ledger	No		Current year + 6 years	SECURE DISPOSAL
School Fund – invoices	No		Current year + 6 years	SECURE DISPOSAL
School Fund – receipts	No		Current year + 6 years	SECURE DISPOSAL
School Fund – bank statements	No		Current year + 6 years	SECURE DISPOSAL
School Fund – journey books	No		Current year + 6 years	SECURE DISPOSAL
3.6 school Meals Management				
Free school Meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL

4. **Property management** – this section covers the management of buildings and property.

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of record
4.1 Property management				

Title Deeds of properties belonging to the school	No		PERMANENT These follow the property unless the property has been registered with the Land Registry	
Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold	
Leases of property leased by or to the school	No		Expiry of Lease + 6 years	SECURE DISPOSAL
Records – letting of premises	No		Current financial year + 6 yrs	SECURE DISPOSAL
4.2 Property maintenance				
All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
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 information about accident reporting see under Health & Safety above.

Basic file Description	Data protection issues	Statutory provisions	Retention period	Action at end of administrative life of record
5.1 Pupil's educational record				
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		
PRIMARY			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: To another primary school To a secondary school To a pupil referral unit

				<p>If the pupil dies whilst at primary school the file should be returned to the LA to be retained for the statutory retention period.</p> <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the LA as above.</p>
Secondary		Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	SECURE DISPOSAL
Examination Results – pupil copies	Yes			
Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
Internal			This information should be added to the pupil file	
Child Protection information held on pupil file	Yes	KCSIE statutory guidance for schools and colleges. Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children	If any records relating to CP 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
Child Protection information held in separate files	Yes	As above	DOB of the child + 25 years then REVIEW. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services Record	SECURE DISPOSAL – these records MUST be shredded
5.2 Attendance				

Attendance registers	Yes	school attendance: Departmental advice for maintained schools, academies, independent schools and local authorities Oct 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	SECURE DISPOSAL
Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL
5.3 Special Educational Needs				
SEN files, reviews and Individual Education Plans (IEPs)	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	REVIEW. The retention period is the minimum that any pupil file should be kept. Some authorities choose to keep for a longer period. 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.
Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 SEN and Disability Act 2001 Section 1	Date of birth of the pupil plus 25 years (this would normally be retained on the pupil file)	SECURE DISPOSAL unless the document is subject to a legal hold
Advice and information provided to parents regarding educational needs	Yes	SEN 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
Accessibility Strategy	Yes	SEN 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

Basic file description	Data protection issues	Statutory provisions	Retention period	Action at end of administrative life of record
6.1 Statistics and management information				
Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
Examination Results (school 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 25 years of age. The school may wish to keep a composite record of all the whole year results. These could be kept for current year + 6 years to allow comparison.	SECURE DISPOSAL
Examination Papers			The papers should be kept until any appeals/validation process complete	SECURE DISPOSAL
Published Admission Number (PAN) Reports	Yes		Current year + 6 years	SECURE DISPOSAL
Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
Self-Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL
6.2 Implementation of curriculum				
Schemes of Work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate further retention period or SECURE DISPOSAL
Timetable	No		Current year + 1 year	
Class Record Books	No		Current year + 1 year	
Mark Books	No		Current year + 1 year	
Record of homework set	No		Current year + 1 year	
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

7. Extra-curricula activities

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of record
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7.1 Educational Visits outside the Classroom				
Records created by schools to obtain approval to run a visit outside the classroom – PRIMARY schools	No	Outdoor Education Advisers' Panel National guidance	Date of Visit + 14 years	SECURE DISPOSAL
Records created by schools to obtain approval to run a visit outside the classroom – SECONDARY schools	No	As above	Date of visit + 10 years	SECURE DISPOSAL
Parental consent forms for school trips where they has been no major incident	Yes		Conclusion of trip	Although the 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
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	
7.2 Walking Bus				
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 or accident reporting.	SECURE DISPOSAL (If these records are retained electronically any back up copies should be destroyed at the same time)
7.3 Family Liaison Officers and Home School Liaison Assistants				
Day Books	Yes		Current year + 2 years then review	
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	
Referral forms	Yes		While the referral is current	

Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	
Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	
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.

Basic file description	Data protection issues	Statutory provisions	Retention period	Action at end of administrative life of record
8.1 Local Authority				
Secondary Transfer Sheets (PRIMARY)	Yes		Current year + 2 years	SECURE DISPOSAL
Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
School Census Returns	No		Current year + 5 years	SECURE DISPOSAL
Circulars and other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL
8.2 Central Government				
OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL
Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL