



4.0 Record Retention and Deletion Policy

Egginton Primary School

Last Reviewed	November 2023
Reviewed By (Name)	J. Cunningham
Job Role	Headteacher
Next Review Date	November 2024
Version produced Spring 2023	<p>Introductory information at 4.2 about IICSA removed as the Inquiry closed in Oct 2022.</p> <p>New section inserted at 4.8 relating to child sexual abuse and 4.9 regarding staff records.</p> <p>Recommendations from the Inquiry have been incorporated into the tables throughout in section 4.11 (subsections 1, 6, 7, 8, 18, 10 and 24)- please see green text.</p> <p>Some further minor amends and additions throughout retention table- please see green text.</p>

This document will be reviewed annually and sooner when significant changes are made to the law

Guidance from the Department for Education about school policies can be found here:

<https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts>

4.1 How to use this document

This is a very big document. It can be read from front to back, but this will take time. Therefore, you can use the drop-down boxes below to select your role in school – this will then suggest the most relevant sections, alternatively you can select from an A-Z of relevant provisions.

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4.2 Introduction

This record retention and deletion policy contains recommended retention periods for the different record series created and maintained by Egginton Primary School. The schedule refers to all information whether it is held in hard copy or electronic format including cloud and web based or on third party platforms.

Some of the retention periods are governed by statute. Others are guidelines, following best practice, employed by schools throughout the United Kingdom. Every effort has been made to ensure that these retention periods are compliant with the requirements of the UK General Data Protection Regulation 2018 (GDPR), the Data Protection Act 2018 (DPA), Article 8, the Human Rights Act 1998, the Freedom of Information Act 2000 (FOI) and the Code of Practice on Records Management (under Section 46 of the FOI).

Managing records series using these retention guidelines will be deemed to be 'normal processing' under the terms of the legislation noted above. If those record series are to be kept for longer or shorter periods than the time scales held in this document, the reasons for any deviation must be recorded.

4.3 Purpose

This policy, for managing records at Egginton Primary School has been drawn up in conformity with legislation, regulations affecting schools and best practice as promoted by the Information and Records Management Society of Great Britain.

This policy sets out guidelines for recording, managing, storing and the disposal of data, whether they are held on paper or electronically (including online), in order to assist staff, and the school, to comply with the General Data Protection Regulation (EU) 2016/679 (GDPR) including as adopted by the United Kingdom as a result of its exit from the European Union (“UK GDPR”), Data Protection Act 2018 and the Freedom of Information Act 2000. It should be read and used in conjunction with all of our related policies.

It is expected that;

- All information held by schools needs to be justifiable, by reference, to its purpose.
- Schools must be transparent and accountable as to what data they hold.
- Schools must understand and explain the reasons why they hold data.
- Schools must be able to respond to Subject Access Requests.
- Schools must be able to amend, delete or transfer data promptly upon any justified request.
- Schools must be able to audit how personal data was collected and when and why.
- Schools must hold sensitive data securely, accessed only by those with reason to view it and possess a policy as to why it is needed.
- Schools must have retention policies that reflect the importance of records relating to child sexual abuse to victims and survivors, and that they may take decades to seek access to such records.

4.4 Disposal of Data

Article 5(e) of the GDPR states that personal data should be ‘kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes... in order to safeguard the rights and freedoms of the data subject (‘storage limitation’).

Not all data needs to be destroyed. The school should determine whether records are to be selected for permanent preservation, or for destruction or to be transferred into a different format.

When information is no longer required, it should be disposed of. For confidential, sensitive or personal information, to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed.

Skips, ‘regular’ waste disposal and ribbon shredders are not secure.

Paper records should be cross-shredded, incinerated, or pulped.

CDs/DVDs/discs should be cut into pieces. Hard copy images, AV recordings and hard disks should be dismantled and destroyed. Where third party disposal companies are employed, a certificate of destruction must be obtained. Staff working for external provider should have been trained in the handling and destruction of confidential data.

If the school receives a request for records that have not yet been destroyed, even if they should have been destroyed, that record must still be made available to the requestor.

The Freedom of Information Act 2000 requires the school to maintain a list of all records that have been destroyed and who authorised their destruction. This record should be retained for 15 years. The appropriate members of staff (Data Lead) should record:

- File reference and/or unique identifier
- File title or brief description of contents
- Number of files
- Name of the authorising officer

An example is contained in Annex A.

4.5 Transfer of Records to Archives

A school archive is different from official school records. A school archive preserves data where there is a legitimate interest in holding that information e.g. to commemorate a significant event in the life of the school. It can take on many characteristics and serve many purposes--but it neither compliments nor replaces the official record-keeping systems.

Where records have been identified as being worthy of permanent preservation, due to their historical or social value, they may be retained on site or offered to the Local Authority Record Office (see local guidance [Find an archive | The National Archives](#)).

4.6 Transfer of Records to other Media

Where lengthy retention periods have been allocated to records, schools should consider converting paper records to other media (e.g. digital or virtual, 'cloud' based). The lifespan of the media, and the ability to migrate data, should be documented in a Digital Continuity Policy. A scanning risk assessment is recommended to ensure the procedure is adequate.

4.7 Transfer of Records to other Settings & 'Last Known School'

When a child leaves the school, all pupil records, including safeguarding/child protection records should be transferred in a secure manner, to the child's new school. If the records contain sensitive information (e.g. Child Protection records), proof of receipt must be obtained and logged by the school's Data Lead. [Keeping Children Safe in Education 2022](#) (KCSiE) states that "where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file." All copies of data held by the school that the child has departed should then be deleted or retained in line with the retention schedule below, including all paper records and data stored electronically. Generally, a record should be kept for tracking and auditing purposes only.

Schools may wish to retain some minimal 'skeleton' data about pupils' admission, departure and next destination (where known) in order to respond to any requests for information about these pupils and for the school's historical archive. If schools intend to create and maintain these records, this should be noted on the retention policy. In some instances, schools may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If the school does retain pupil records, then they should be prepared to justify this retention and will need to consider if a Data Protection Impact Assessment should be completed for any extended retention of records once a pupil has left the school. See section 17.5 below.

Responsibility for maintaining the pupil record passes to the 'last known school'.

The school is the final or last known school if:

- secondary phase and the pupil left at 16 years old or for post-16 or independent education, or;

- at any point the pupil left for elective home education, they are missing from education, or have left the UK, or have died.

The Pupil Record should be retained as a whole for 25 years from the date of birth of the pupil, after which time, if no longer required, it can be deleted or destroyed.

SEN and other support service records can be retained for a longer period of 31 years to enable defence in a “failure to provide a sufficient education” case.

If a school wishes to retain data for analysis or statistical purposes, it should be done in an anonymised fashion.

4.8 Records relating to Child Sexual Abuse

Records relating to child sexual abuse should be retained for 75 years, in line with the recommendations arising from the outcome of the [Independent Inquiry into Child Sexual Abuse \(IICSA\)](#). The Inquiry stated that these records should be retained for such a long period in recognition of the importance of these records to victims, but that they should be regularly reviewed during that extended retention period. Where records are held digitally, schools will particularly need to consider digital continuity if they hold records for staff or governors where there are relevant records or are the ‘last known school’ responsible for this long retention period for any relevant pupil records.

Where there is evidence, or allegations of child sexual abuse, then it will almost certainly be appropriate to retain the entire pupil, staff or other record as a whole, not just the parts of the record that pertain to the abuse. Staff whose duties include reviewing or digitising records should be trained to understand the importance of any evidence or allegations of child sexual abuse that they may happen to uncover, whether that was what they were looking for and the importance of them bringing these to the attention of school leadership and/or preserving these records.

The Inquiry report also recommends that the UK government directs the Information Commissioner’s Office (ICO) to introduce a Code of Practice on retention of and access to records known to relate to child sexual abuse. This Policy will be updated in line with any Code of Practice from the ICO. The report states that such a code should set out that institutions should have:

- retention policies that reflect the importance of such records to victims and survivors, and that they may take decades to seek to access such records;
- clear and accessible procedures for victims and survivors of child sexual abuse to access such records;
- policies, procedures and training for staff responding to requests to ensure that they recognise the long-term impact of child sexual abuse and engage with the applicant with empathy.

4.9 Retention of Records relating to Staff

As stated above regarding the long-term retention of minimal pupil records, schools may wish to retain very basic ‘skeleton’ records about staff that have worked in the school beyond the normal retention of the whole personnel/HR file. This information may include the staff name, role, contract start and end dates. This may be useful for schools who may need to respond to requests for information from/regarding staff, in the event of it being needed for litigation or other legal purpose and as part of their historical archive. If schools intend to create and maintain these records, this should be noted on the retention policy (at section 7.11 below)

4.10 Responsibility and Monitoring

The Head Teacher holds primary and day to day responsibility, for implementing this policy. The Data Protection Officer, in conjunction with the school, is responsible for monitoring its use and effectiveness and resolving any queries with regards the interpretation of the policy.

All permissions to access data are granted by the Head Teacher and recorded in the member of staff's personnel file.

All teaching and office staff are given training and guidance on accessing and managing school records, to ensure compliance with the time scales laid out under the retention schedule. All members of staff, with access to records, are expected to;

- Manage their current record keeping systems using the Retention Policy.
- Only dispose of records in accordance with the requirements outlined in this policy, if authorised to do so.
- Ensure that any proposed divergence from the records retention schedule and disposal policies is authorised and documented by the Head Teacher.

This policy does not form part of any employee's contract of employment and is not intended to have a contractual effect. However, it does reflect the school's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the school but any changes will be notified to employees within one month of the date on which the change is intended to take effect. The school may also vary any parts of the procedure, including time limits, as appropriate.

4.11 Retention tables

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
1. Governing Body							
1.1	Instruments of Government including Articles of Association	Digital Copy Governor Portal	Clerk	Permanent	Closure of school	Common practice	These should be retained in the schools whilst the school is open and then to the Local Authority Record Office, when the school closes
1.2	Scheme of delegation and terms of reference for committees	Governor Portal	Clerk	Until superseded or whilst relevant (schools may wish to retain these records for reference purposes in case decisions need to be justified)	Expiration of terms	Common practice	If the school is unable to store these, they should be offered to the Local Authority Office
1.3	Governor's Code of Conduct	Governor Portal	Clerk	One copy of each version should be kept		Common practice	

				for the life of the school.			
1.4	Records relating to the election of chair and vice chair	Governor Portal	Clerk	Once the designation has been recorded in the minutes, the records relating to the election can be destroyed	Date of appointment	Common practice	Secure disposal
1.5	Appointment of a clerk to the governing body	Staff File	HT	Date of end of appointment + 6 years	Date of appointment	Common practice	Secure disposal
1.6	Records relating to the appointment of parent and staff governors, not appointed by the governors	Governor Folder	Clerk	Date of election + 6 months	Date of election	Common practice	Secure disposal
1.7	Records relating to the appointment of co-opted governors	Governor Folder	Clerk	Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children – in this case, retain for 25 years, or for allegations involving child sexual abuse for 75 years in line with the IICSA recommendations)	Date of appointment	Common practice	Secure disposal

				for extended retention of records relating to child sexual abuse.			
1.8	Application forms – successful candidates	Governor Folder	Clerk	End of year in office + 1year	End of period of office	Common practice	Secure disposal
1.9	Appointment documentation: <ul style="list-style-type: none"> • Terms of office of serving governors, including evidence of appointment • Governor declaration against disqualification criteria • Register of business interests • Training required, and received, by governors • Induction programme for new governors • DBS checks carried out on the clerk and members of the governing body • Governor personnel files. 	Governor Folder	Clerk	Date of appointment + 6 years	Date of appointment	Common practice	Secure disposal
1.10	Annual Reports	Governor Folder	Clerk	Date of the report + 10 years	End of the calendar year that the record was created in	Education (Governor’s Annual Reports) (England) (Amendment) Regulations 2002	Secure disposal
1.11	Annual reports required by the Department of Education	Governor Folder	HT	Date of report + 10 years	Date of report	Common practice	Secure disposal
1.12	Meetings schedule	Governor Folder	Clerk	Current year	Date of meeting	Common practice	Secure disposal

1.13	Agendas for Governing Body meetings	Governor Portal	Clerk	One copy to be retained with the master set of minutes - all other copies can be disposed of	Conclusion of meeting	Common practice	Secure disposal
1.14	Register of attendance at Full Governing Board meetings	Governor Folder	Clerk	Date of meeting + 6 years	Date of meeting	Common practice	Secure disposal
1.15	Minutes of Governing Body meetings (Principal Set signed)	Governor Folder	Clerk	Permanent to be held at school	Date of meeting	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office
1.16	Action plans created and administered by the Governing Body	Governor Folder	Clerk	Until superseded or whilst relevant	Expiration of action plan	Common practice	Secure disposal
1.17	Reports presented to the Governing Body	Governor folder	Clerk	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	Date of report	Common practice	Secure disposal or retain with the signed set of minutes
1.18	Policy documents created and/or administered by the Governing Body	Governor Portal/school network	HT	A copy of each policy should create a time line of policy development OR a robust version control which allows a snapshot	Expiration of the policy	Common practice	Secure disposal

				of a policy at any given date. Keep all policies relating to safeguarding and child protection for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.			
1.19	Records relating to complaints made to, and investigated by the Governing Body and/or Head Teacher	Staff Files	HT	Date of the resolution of the complaint + a minimum of 6 years. If negligence or child protection/safeguarding is involved then current year + 15 years. If child sexual abuse issues are involved then for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Resolution of complaint		
1.20	Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies	Filing Cabinet	HT	For the life of the organisation	Date proposal accepted or declined	Common practice	If the school is unable to store these, they should be offered to the Local Authority

							Record Office
1.21	Records relating to Governor Monitoring Visits	Filing Cabinet	HT	Date of visit + 3 years	Date of visit	Common practice	Secure disposal
2. Headteacher & Senior Management/Leadership Team							
2.1	Records created by the Head Teacher	Staff Files	HT	Current academic year + 6 years then review	Date of record	Common practice	Secure disposal
2.2	Professional Development Plans	Staff Files	HT	Life of plan + 6 years	Date plan commences	Common practice	Secure disposal
2.3	School Development Plans	Network	HT	Life of plan + 3 years	Date plan commences	Common practice	Secure disposal
3. Admissions							
3.1	All records relating to the creation and implementation of the School's Admission's Policy	Website	HT	Life of the policy + 7 years then review		The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012	Secure disposal
3.2	Admissions – if the admission is successful Proofs of address, supplied by parents, as part of the admissions process Supplementary information forms to include; religion, medical conditions etc.	Pupil Files	SBM	Date of admission + 1 year Added to the pupil file	Date of admission	and School Admissions Code Statutory Guidance	Secure disposal
3.3	Admissions – if the admission is unsuccessful (where no appeal is made)	Office Filing Cabinet	SBM	Date of applied for admission + 1 year	Date of applied for admission		Secure disposal
3.4	Admissions – if the admission is unsuccessful (where an appeal is made)	Office Filing Cabinet	SBM	Resolution of case + 1 year	Resolution of case		Secure disposal

						2021	
3.5	Register of Admissions	Integris	SBM	3 years after the date on which the last entry was made	Last entry in register	The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012 and School Admissions Code Statutory Guidance 2021	Offer to the Local Authority Record Office
3.6	Supplementary information forms to include; religion, medical conditions etc. For successful admissions	Pupil File	SBM	This information should be added to the pupil file	Date of admission/annual data check	The Limitation Act 1980	Secure disposal
3.7	Supplementary information forms to include; religion, medical conditions etc. For unsuccessful admissions	Office Filing Cabinet	SBM	Until the appeal process is completed	Date of admission		Secure disposal
4. Operational Administration							
4.1	Records relating to the creation and publication of the school brochures or prospectus	Website	HT	Current year + 3 years	Expiration of current publication	Common practice	Offer to the Local Authority Record Office

4.2	Records relating to the creation and distribution of circulars to staff, parents or pupils	Parentmail	SBM	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office
4.3	Newsletters and other items with short operational use	Website	HT	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office
4.4	Visitor management systems (including electronic systems, visitors' books and signing in sheets)	Envoy	SBM	Current year + 6 years then review	End of calendar year	Common practice	Secure disposal
4.5	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupil Associations	Website – Minutes Papers with PTA Secretary	SBM	Current year + 6 years then review	Date of record	Common practice	Secure disposal
4.6	Pupil & Family Privacy Notice which is made available via the school website as part of UK GDPR compliance	Website	HT	Date of issue + 6 years	When policy is superseded	Common practice	Secure disposal
4.7	Consents relating to school activities as part of UK GDPR compliance (e.g. consent to be sent circulars or mailings)	Parentmail & School Server	SBM	This information should be added to the pupil file	Date of admission	Common practice	Secure disposal
4.8	Security breach logs	GDPRIS	HT	Date of issue + 25 years (pupils) and 6 years (staff)	Date of implementation	Common practice	Secure disposal
4.9	Digital Continuity Plans	School Network	HT	Date of issue + 6 years	Expiration of current plan	Common practice	Secure disposal
5. School Communications							
5.1	School emails containing personal data – inbox, sent items, deleted items	Outlook	All staff	Automatically deleted after 3 years if not before	In line with guidance in	Common practice	Full deletion

					Acceptable use policy		
5.2	Website – pictures / news stories	Website	HT	Current Year + 2 years	End of academic year	Common practice	Posts deleted
<p>6. HR – Recruitment</p> <p>Information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2022 para 417)</p>							
6.1	All records leading up to the appointment of a new Head Teacher	HT Filing Cabinet	HT	Unsuccessful attempts - date of appointment + 6 months. Successful attempts - add to the staff personnel file and retain until the end of the appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years or information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Date of appointment	Common practice. Right to work - Immigration, Asylum and Nationality Act 2006	Secure disposal
6.2	All records leading up to the appointment of a new member of staff (successful candidate)	HT Filing Cabinet	HT	Date of appointment + 6 years. This information should be	Date of appointment	Common practice. Right to work - Immigration,	Secure disposal

				added to the staff personnel file		Asylum and Nationality Act 2006	
6.3	All records leading up to the appointment of a new member of staff (unsuccessful candidate)	HT Filing Cabinet	HT	Date of interview + 12 months	Date of interview	Common practice	Secure disposal
6.4	Pre-employment vetting information of successful candidates	HT Filing Cabinet	HT	Application forms, references and other documents – for the duration of their employment + 6 years. Note there is no requirement to keep a copy of DBS once the details have been entered into the Single Central Record. At the end of employment, information contained in the Single Central Record should be transferred to the personnel file.	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2022	Secure disposal
6.5	Proofs of identity	HT Filing Cabinet	HT	To be kept only as proof of right to work. Not kept for any other purpose. These documents should be added to the personal folder. Home Office requires that the documents are kept until termination of	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2022	Secure disposal (subject to IICSA)

				employment plus not less than 2 years.			
6.6	Pre-employment vetting information of successful candidates – for the purposes of ensuring school staff are adequately qualified	HT Filing Cabinet	HT	To be added to the member of staff's personal folder	Date of receipt	KCSIE 2022	Secure disposal (subject to IICSA)
7. HR – Operational Staff Management Information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (<u>KCSIE 2022</u> para 417)							
7.1	Staff Personnel File	HT Filing Cabinet	HT	Termination of employment + 6 years	Date of appointment	Limitation Act 1980	Secure disposal
7.2	Timesheets	Office Filing Cabinet	SBM	Current year + 6 years	Date of appointment	Common practice	Secure disposal
7.3	Annual appraisal/assessment records	HT Filing Cabinet	HT	Current year + 6 years	End of calendar year that the record was created in	Common practice	Secure disposal
7.4	Sickness absence monitoring	Office Portal	SBM & HT	Sickness records are categorised as 'sensitive data'. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records. Current practice recommends that sickness records should	Date of absence	Common practice & Statutory Sick Pay Act 1994	Secure disposal

				be held for the current year + 3 years.			
7.5	Staff training records	HT Filing Cabinet	HT	Keep on personnel file	Date of appointment	Common practice (unless dictated by a professional body)	Secure disposal
7.6	Maternity/Adoption/Paternity Leave records	HT Filing Cabinet	HT	Current year + 3 years	End of relevant tax year	Common practice	Secure disposal
7.7	Staff policy acknowledgement	HT Filing Cabinet	HT	Life of the policy + 3 years	Implementation of the policy	Common practice (unless otherwise dictated eg KCSIE, H&SWA)	Secure disposal
7.8	Register of business interests	HT Filing Cabinet	HT	Date of appointment + 6 years	Date of appointment	Common practice	Secure disposal
<p>8. HR - Management of Disciplinary and Grievance Processes</p> <p>Information containing allegations of sexual abuse must be preserved for 75 years in line with the ICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2022 para 417)</p>							
8.1	Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded	HT Filing Cabinet	HT	Until the person's normal retirement age or 10 years from the date of allegation, whichever is longer, then review. Information containing allegations of sexual abuse must be	Date of referral	KCSIE 2022	Secure disposal

				preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. NB – allegations that are found to be malicious should be removed from personnel files, from the date they are proven to be unfounded.			
8.2	Disciplinary proceedings: Verbal warning	HT Filing Cabinet	HT	Date of warning + 6 months	Date of warning	KCSIE 2022	Secure disposal
8.3	Disciplinary proceedings: Written warning (level 1)	HT Filing Cabinet	HT	Date of warning + 6 months	Date of warning	KCSIE 2022	Secure disposal
8.4	Disciplinary proceedings: Written warning (level 2)	HT Filing Cabinet	HT	Date of warning + 12 months	Date of warning	KCSIE 2022	Secure disposal
8.5	Disciplinary proceedings: Final Warning	HT Filing Cabinet	HT	Date of warning + 18 months	Date of warning	KCSIE 2022	Secure disposal
8.6	Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings)	HT Filing Cabinet	HT	If the incident is child protection related then see above; otherwise dispose following the conclusion of the case	Date of resolution	KCSIE 2022	Secure disposal

N.B. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.
Any disciplinary proceedings data will be a record of an important event in the course of the employer’s relationship with the employee. Should the same employee be accused of similar misconduct at a later date, and then defend themselves by denying they would undertake such an action, reference to the earlier proceedings may

show that they should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that they had e.g. “fifteen years of unblemished service”, the record of the disciplinary proceedings would be effective evidence to counter this claim. Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be “removed from the file”. This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.

9. HR – Payroll & Pensions

9.1	Maternity Pay Records	n/a	n/a	Current year + 3 years	End of the financial year in which the maternity pay period ends	Statutory Maternity Pay (General) Regulations 1986	Secure disposal
9.2	Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity	n/a	n/a	Current year + 6 years	End of the financial year	Retirement Benefits Schemes (Information Powers) Regulations 1995	Secure disposal
9.3	Batches, Bonus Sheets, Car Loans, Car Mileage Output, Insurance, Members Allowance Register, National Insurance (Schedule of payments), Part Time Fee claims, Payroll (gross/net, weekly or monthly), Payroll Reports, Payslips (copies), Pension Payroll, Superannuation adjustments and reports	n/a	n/a	Current year + 6 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal
9.4	Bonus sheets, Car Allowance claims, Overtime	n/a	n/a	Current year + 3 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation	Secure disposal

						Taxes Act 1988	
9.5	Income Tax P60, Personal bank details. Tax Forms P6/P11/P11D/P35/P45/P46/P48	n/a	n/a	Current year + 6 years	End of the financial year	Common practice	Secure disposal
9.6	Absence records, Sickness records, Staff returns, Time Sheets/Clock Cards/Flexitime	Office Filing Cabinet	SBM & HT	Current year + 3 years	End of the financial year	Common practice	Secure disposal
9.7	Statutory Sick Pay	n/a	n/a	Current year + 3 years	End of the financial year	Common practice	Secure disposal
10. Health and Safety							
10.1	Accessibility Plans	School Website	HT	Current year + 6 years	End of the calendar year that the records was created in	Equality Act 2010	Secure disposal
10.2	Health and Safety Policy Statements	HT Office	HT	Life of the policy + 3 years	Implementation of the policy	Common practice	Secure disposal
10.3	Health and Safety Risk Assessments	HT Office	HT	Life of the assessment + 3 years	Implementation of the assessment	Common practice	Secure disposal
10.4	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm) and https://www.hse.gov.uk/pubns/edis1.htm Adults	Medical Tracker	SBM & HT	Retain for 7 years	Date of incident	Common practice	Secure disposal
10.5	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm) and https://www.hse.gov.uk/pubns/edis1.htm Children	Medical Tracker	SBM & HT	Retain for 25 years	Date of birth	Common practice	Secure disposal
10.6	Minor incidents (non-reportable) accident book	Medical Tracker	SBM & HT	Retain for 3 years	End of academic year	Common practice	Secure disposal
10.7	Control of Substances Hazardous to Health (COSHH)	Orange Folder –	Cleaner & HT	Current year + 40 years	Last action on file	The Control of Substances	Secure disposal

		Cleaning Cupboard				Hazardous to Health Regulations 2002	
10.8	Process of monitoring areas where employees/pupils are likely to come into contact with asbestos	Office – Fire Box	HT	Last action + 40 years	Last action on file	The Control of Asbestos at Work Health Regulations 2012	Secure disposal
10.9	Process of monitoring areas where employees/pupils are likely to come into contact with radiation	n/a	n/a	Last action + 50 years	Last action on file	The Ionising Radiations Regulation 2017	Secure disposal
10.10	Fire Precautions log books	Office – Fire Box	HT	Current year + 3 years	End of calendar year	Common practice	Secure disposal
11. Financial Management – Risk & Insurance, Asset Management							
11.1	Employer’s Liability Insurance Certificate	Office wall	SBM	Date of closure + 40 years	Closure of school	Common practice	Offer to Local Record Office
11.2	Inventories of furniture and equipment	SAP Inventory	SBM & HT	Current year + 6 years	End of calendar year	Common practice	Secure disposal
11.3	Burglary, theft and vandalism report forms	Office Filing Cabinet	SBM & HT	Current year + 6 years	End of calendar year	Common practice	Secure disposal
12. Financial Management – Accounts and Statements including Budget Management							
12.1	Annual accounts	Office Filing Cabinet	SBM	Current year + 6 years	End of financial year	Common practice	Offer to Local Record Office
12.2	Loans and grants managed by the school	n/a	n/a	Date of last payment on the loan + 12 years then review	End of financial year	Standard financial regulations	Secure disposal

12.3	Student Grant applications	n/a	n/a	Current year + 3 years	End of financial year	Standard financial regulations	Secure disposal
12.4	All records relating to the creation and managements of budgets, including the Annual Budget statement, and background papers	HT PC	HT	Current financial year + 3 years	End of financial year	Common practice	Secure disposal
12.5	Invoices, receipts, order books and requisitions, delivery notices	Office bookshelf	SBM	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.6	Records relating to the collection and banking of monies	Office Filing Cabinet & Drawer	SBM	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.7	Records relating to the identification and collection of debt	n/a	n/a	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.8	Pupil Premium Fund records	Office Filing Cabinet & SAM	SBM & HT	Date pupil leaves the provision + 6 years	End of financial year	Common practice	Secure disposal
13. Financial Management – Contract Management							
13.1	All records relating to the management of contracts under seal	n/a		Current year + 12 years	End of contract	The Limitation Act 1980	Secure disposal
13.2	All records relating to the management of contracts under signature	n/a		Current year + 6 years	End of contract	The Limitation Act 1980	Secure disposal
13.3	Records relating to the monitoring of contracts	n/a		Current year + 6 or 12 years	End of calendar year	The Limitation Act 1980	Secure disposal
14. Financial Management – School Fund							
14.1	School Fund: <ul style="list-style-type: none"> cheque books and paying in books ledger 	Office Filing Cabinet	SBM	Current year + 6 years	End of use	Financial Services Act	Secure disposal

	<ul style="list-style-type: none"> • invoices • receipts • bank statements • journey books 					2012, HMRC regulations Companies Act 2006	
15. Financial Management – School Meals							
15.1	Free School Meals Register	Office Filing cabinet	No longer applicable	Current year + 6 years	End of calendar year	Common practice	Secure disposal
15.2	School Meals Register	Parentmail	SBM	Current year + 3 years	End of calendar year	Common practice	Secure disposal
15.3	School Meals Summary Sheets	Office Filing Cabinet	SBM	Current year + 3 years	End of calendar year	Common practice	Secure disposal
16. Property Management							
16.1	Title deeds of properties belonging to the school	n/a		Permanent. These should follow the property unless the property has been registered with the Land Registry	Archive upon closure	Common practice	Offer to Local Authority Record Office
16.2	All records relating to the maintenance of the school, carried out by contractors	Red Box	SBM	Current financial year + 6 years Records relating to rewiring, major alterations etc must be retained in the health and safety file whilst the building belongs to the school and must be passed onto any new owners if the building is leased or sold.	End of financial year that the record was created in	Common practice	Secure disposal

16.3	All records relating to the maintenance of the school, carried out by school employees, including maintenance log book	n/a		Current calendar year + 6 years Records relating to rewiring, major alterations etc must be retained in the health and safety file whilst the building belongs to the school and must be passed onto any new owners if the building is leased or sold.	End of calendar year that the record was created in	Common practice	Secure disposal
16.4	Plans of property belonging to the school	n/a		These should be retained whilst the building belongs to the school and should be passed onto any new owners, if the building is leased or sold.	Transfer of asset	Common practice	Offer to Local Authority Record Office
16.5	Leases of property leased by, or to, the school	Office Filing cabinet	SBM	Expiry of lease + 6 years	Commencement of lease	Common practice	Secure disposal
16.6	Records relating to the letting of school premises	n/a		Current financial year + 6 years	End of financial year that the record was created in	Common practice	Secure disposal
17. Pupil Education Record (see s2 Education Record (Pupil Information) Regulations 2005). SEN is dealt with in section 20							
17.1	Primary	Office Filing Cabinet Electronic Records on Integris	SBM	Retain whilst the child remains at the primary school Retain for 3 years	Date pupil changes school Leaving date	Education (Pupil Information) Delete	The file should follow the pupil when they leave

						(England) Regulations 2005	the primary school (see 4.7 Last School . If pupil does not attend a secondary school, or the child dies, then records should be retained as per 17.2 below.)
17.2	Secondary (or where the school is the 'last known school')	n/a Office Filing Cabinet	SBM	Date of birth of the pupil + 25 years	Pupil's date of birth	The Limitation Act 1980	Secure disposal (subject to IICSA)
18. Child Protection (CP) / Safeguarding Records							
18.1	Child Protection Information - Primary	HT Filing Cabinet My Concern	HT	CP files must be transferred to the new school as soon as possible (5 days), to maintain continuity. Ensure secure transit, and a confirmation of receipt should be obtained.	Date pupil changes school (Where a child is removed from the roll to be educated at home/missing from education, see below)	KCSIE para 112 & Annex C	Transferred to new or Secondary school. Duplicates must be securely disposed of.

				<p>The CP file should be transferred separately from the main pupil file.</p> <p>My Concern safeguarding platform and copy of the log is retained once the child has left for secondary school.</p>			
18.2	Child Protection (CP) Information – Secondary (or where the school is the ‘last known school’)	n/a		<p>Where a pupil moves between secondary schools – treat as primary above. Otherwise, retain for 25 years from the child’s date of birth, then review.</p> <p>Information relating to child sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.</p>	Pupil’s date of birth (Where a child is removed from the roll to be educated at home/missing from education, see below)	KCSIE para 112 & Annex C Common Practice	Secure disposal (subject to IICSA)
18.3	Child Protection (CP) Information – Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths.	HT Filing Cabinet	HT	<p>Retain for 25 years from the child’s date of birth, then review.</p> <p>Information relating to child sexual abuse must be preserved for 75</p>	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Coordinator for Missing Children and

				years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.			Secure disposal
18.4	Child Protection (CP) Information – Child is removed from the roll and is Elective Home Educated	HT Filing cabinet	HT	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Elective Home Education Coordinator and Secure disposal
19. Attendance							
19.1	Attendance Registers	Integris	SBM	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	Last entry in register	The Education (Pupil Registration) (England) Regulations 2006	Secure disposal
19.2	Correspondence relating to authorised absence	Office Filing Cabinet	SBM	Date of absence + 2 years	Date of absence	DfE School attendance Guidance for maintained schools, academies, independent schools and	Secure disposal

						local authorities August 2020	
20. Special Educational Needs (SEN)							
20.1	SEN files, reviews and Individual Education Plans – Primary	HT Office & SEND filing cabinet	HT & SENDCO	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School
20.2	SEN files, reviews and Individual Education Plans – Secondary (or where the school is the 'last known school')	As above	As above	Date of birth of pupil + 35 years (This period is recommended by LA)	Pupil's date of birth	Special Educational Needs and Disability Act 2001 & Children and Families Act 2014	Secure disposal
20.3	Statement / Education Health Care Plan (EHCP) under <u>Section 324 of the Education Act 1996</u> and any amendments made to the plan	As above	As above	Date of birth of pupil + 25 years	Pupil's date of birth	Special Educational Needs and Disability Act 2001, Children and Families Act 2014 & The Limitation Act 1980	Secure disposal
21. Curriculum Management							
21.1	Curriculum returns	n/a		Current year + 3 years	End of the calendar year	Common practice	Secure disposal

					that the record was created in		
21.2	Curriculum development	n/a		Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.3	SATs Results	HT Office cabinet	HT	The SATS result should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the ages of 25 years. The school may wish to keep a composite record of all the whole year SATS results. These could be kept for the current year + 6 years to allow suitable comparison	Date that results are released	Common practice	Secure disposal
21.4	SATs Examination papers	HT Filing Cabinet	HT	The examination papers should be kept until any appeals/validation process is complete	Date of examination	Common practice	Secure disposal
21.5	Published Admission Number (PAN) Reports	n/a		Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.6	Value Added and Contextual Data	Perspective Lite	HT	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal

21.7	Self-Evaluation Forms	HT Filing Cabinet	HT	Current year + 6 years	Date of completion	Common practice	Secure disposal
21.8	Internal Moderation	HT Filing Cabinet	HT	Academic year + 1 academic year	Date of commencement	Common practice	Secure disposal
21.9	External Moderation	HT Filing Cabinet	HT	Until superseded	Date of commencement	Common practice	Secure disposal
22. Implementation of Curriculum							
22.1	Schemes of Work	Staff Server	Teaching Staff	Current year + 1 year	End of the academic year that the record was created in	Common practice	Review these records at the end of each year and allocate a further retention period or secure disposal
22.2	Timetable	HT PC	HT	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.3	Class Record books, mark books, homework records (eg teacher spreadsheets etc)	Classrooms	Teaching Staff	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.4	Pupil work	Classrooms	Teaching Staff	Where possible, pupils' work should be returned to the pupil at the end of the academic year.	End of the academic year that the record was created in	Common practice	Secure disposal

22.5	Online learning platforms	n/a	Teacher responsible for each platform	As above. Work should be cleared from platforms at the end of the following academic year	End of the academic year that the record was created in	Common practice	Secure disposal
22.6	Teacher diaries & Notebooks	Classrooms	Teaching Staff	Contents should be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. Destroyed within 3 months.	Expiration of diary. Completion of notebook	Common practice	Secure disposal
23. Extra Curriculum Management							
23.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Primary schools) where there has not been a Major Incident <small>(Records created might include risk assessments)</small>	Evolve	HT	Date of visit + 14 years	Date of visit	The Health and Safety at Work Act 1974	Secure disposal
23.2	Parental consent forms for school trips where there has been no Major Incident	Parentmail	SBM	No retention is required		Common practice	Secure disposal
23.3	Records created by schools to obtain approval for to run an Educational Visit outside the Classroom, where there has been a Major Incident <small>(Records created might include risk assessments)</small>	Evolve	HT	Retain for 25 years from the date of birth of the pupil/s involved in the incident	Pupil's DOB	The Limitation Act 1980	Secure disposal
23.4	Parental consent forms for school trips, where there has been a Major Incident	Parentmail – transfer to Office Filing Cabinet	SBM	Retain for 25 years from the date of birth of the pupil/s involved in the incident. The permission slips for all the pupils on the trip	Pupil's DOB	The Limitation Act 1980	Secure disposal

				need to be retained to show that the rules had been followed for all pupils			
24. Family Liaison / Early Help / Alternative Provision							
24.1	Day books	n/a		Current year + 2 years then review	End of the calendar year that the record was created in	Common practice	Secure disposal
24.2	Reports for outside agencies – where the report has been included on the agency case file	HT Filing Cabinet	HT	Whilst the child is attending school and then destroy	Date of completion of report	Common practice	Secure disposal
24.3	Referral forms	HT Filing Cabinet/SEND Cabinet /MyConcern	HT & SENDCO	While the referral is current	Date of completion of form	Common practice	Secure disposal
24.5	Contact data sheets and database entries	n/a		Current year then review – if contact is no longer active then destroy	End of the calendar year that the record was created in	Common practice	Secure disposal
24.6	Group registers	n/a		Current year + 2 years	Last entry in register	Common practice	Secure disposal
25. Local Authority							
25.1	Secondary Transfer sheets	Office Filing Cabinet	SBM	Current year + 2 years	Year of transfer	Common practice	Secure disposal
25.2	Attendance Returns	Integriss	SBM	Current year + 1 year	End of the calendar year that the record was created in	Common practice	Secure disposal
25.3	School Census Returns	Office Filing Cabinet	SBM	Current year + 5 years	Completion of return	Common practice	Secure disposal

25.4	Circulars and other information sent from the Local Authority	Email	HT & SBM	Operational use	Date of issue	Common practice	Secure disposal
26. Central Government							
26.1	OFSTED reports and papers	HT Filing Cabinet	HT	Retain whilst current	Date new report is issued	Common practice	Offer to Local Authority Record Office
26.2	Returns made to central government, including Schools financial value standard (SFVS) and assurance statement	HT Filing Cabinet	HT	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
26.3	Circulars and other information sent from central government	Email	HT & SBM	Operational use	Date of issue	Common practice	Secure disposal
27. Parent / Alumni Associations							
27.1	Records relating to the creation and management of PTA and Old Pupil Associations	PTA	PTA Chair & Secretary	Current year + 6 years	Date of foundation	Common practice	Secure disposal
28. Administration of Medication							
28.1	Non-prescription medicines and remedies inc painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers	Office Filing Cabinet	SBM	Current year + 1 year	Date of administration	Limitation Act 1980	Secure disposal
28.2	All other administration of medication not covered by 30.1 including, but not limited to: peg feeding, injections, treatments for serious conditions such as diabetes, ADHD or depression	Office Filing Cabinet	SBM	Date of birth of the pupil + 25 years	Date of administration	Limitation Act 1980	Secure disposal

Appendix A – List of School Records and Data safely destroyed

Specimen Checklist for Annual Review of School Records and Safe Data Destruction

The following is an example of how to create a destruction record – this could be a spreadsheet.

Reference Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of Destruction	Confirm; (i) Safely Destroyed (ii) In accordance with Data Retention Guidelines Yes/No	Name of Authorising Officer
1.	School invoices	Copies of purchase invoices dated 2011/12	Folders marked 'Purchase Invoices 2011/13' 1-3	3 Folders	Cross shredded	Yes	J Smith (Head)