"Everyone can achieve, everyone can learn, everyone belongs"

Records Retention Policy

Date adopted: July 2022
Review Period: 1 year
Next Review: May 2027

History of most recent policy reviews:

Date	Review	Who is Responsible?
May 2026	Updated with current guidance and recommendations from Data Protection Officer (Judicium)	Finance Committee

Air Balloon Hill Primary 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;
- Data Protection
- Relationships with existing policies.
- Destruction of Records
- Retention of Safeguarding Records
- Transferring of records to other media
- Transferring pupil records
- Responsibility and Monitoring
- Emails
- Pupil Records

1. Scope of the policy

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

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. The retention schedule in this policy refers to all records regardless of the media (e.g., paper, electronic, microfilm, photographic etc) in/on which they are stored.

The School has a responsibility to maintain its records and record keeping systems. When doing this, the School will take account of the following factors:

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Accessibility of records and record keeping systems.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the School's current practice, the requirements of current legislation and best practice and guidance.

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

2. Responsibilities

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.

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.

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. Data Protection

This policy sets out how long employment-related and pupil data will normally be held by the School and when that information will be confidentially destroyed in compliance with the terms of the UK General Data Protection Regulation (UK GDPR) and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of the School. The School's Data Protection Policy outlines its duties and obligations under the UK GDPR

4. Relationship with existing policies

This policy has been drawn up within the context of:

- Data Protection policy;
- Freedom of Information publication scheme;
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

5. Destruction of Records

The schedule is a relatively lengthy document listing the many types of records used by the School and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

Where records have been identified for destruction, they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information or sensitive policy information should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate wastepaper merchant. All electronic information will be deleted.

6. Retention of Safeguarding Records

Any allegations made that are found to be malicious must not be part of the personnel records.

For any other allegations made, the School must keep a comprehensive summary of the allegation made, details of how the investigation was looked into and resolved and any decisions reached. This should be kept on the personnel files of the accused.

Any allegations made of sexual abuse should be preserved by the School for the term of an inquiry by the Independent Inquiry into Child Sexual Abuse. All other records (for example, the personnel file of the accused) should be retained 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. In 2022 the Independent Inquiry into Child Sexual Abuse (IICSA) concluded and published their final report, leaving a recommendation that all records relating to child sexual abuse should be retained for a period of 75 years.

The ICO has not currently produced guidance or frameworks regarding retention as recommended by the inquiry. Until this has been produced, records will still be retained for a prolonged period as recommended initially by IISCA in order to fulfil potential legal duties that a school may have in relation to the inquiry or any further guidance.

7. Transferring 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 digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

8. Transferring Information to Another School

We retain the pupil's educational record whilst the child remains at the School. Once a pupil leaves the School, the records should be sent to their next school. The responsibility for retention then shifts onto the next school. We retain the file for a year following transfer in case any issues arise as a result of the transfer.

We may delay destruction for a further period where there are special factors such as potential litigation.

9. Responsibility and Monitoring

The School Business Manager has 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 dealing with any queries on its interpretation. The Data Protection Officer will consider the suitability and adequacy of this policy and report improvements directly to management.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

10. Emails

Emails accounts are not a case management tool in itself. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost.

11. Pupil Records

All schools with the exception of independent schools, are under a duty to maintain a pupil record for each pupil. If a child changes schools, the responsibility for maintaining the pupil record moves to the next school. We retain the file for a year following transfer in case any issues arise as a result of the transfer.

Retention 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, the Headteacher and the senior management team, the admissions process and operational administration

1.1 Governing Body					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
1.1.1	Agendas for Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of Date of meeting + 10 years	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		Date of meeting + 10 years	
	Principal Set (signed)			Date of meeting + 10 years	
	Inspection Copies[2]			Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded.
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently	SECURE DISPOSAL or retain with the signed set of the minutes

1 In this context SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross cut shredder.

2 These are the copies which the clerk to the Governor may wish to retain so that requestors can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

1.1 Governing Body					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
1.1.5	Instruments of Government including Articles of Association	No		PERMANENT	These should be retained in the school whilst the school is open and then offered to Local Authority Archives Service when the school closes.
1.1.6	Register of attendance at full governing board meetings	Yes		Current Year + plus 6 years	
1.1.7	Records relating to the terms of office of serving governors, including evidence of appointment	Yes		Date appointment ceases plus 6 years except where there have been allegations concerning children. In this case retain for 25 years.	
1.1.8	Register of Business Interests	Yes	Companies Act 2006	Date appointment ceases plus 10 years	
1.1.9	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 Local Authority Archives Service when the school closes.
1.1.10	Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years	SECURE DISPOSAL
1.1.11	Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years	SECURE DISPOSAL
1.1.12	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 If negligence involved: current year plus 15 years. If child protection or safeguarding issues are involved then: current year plus 40years. If the complaint relates to child sexual abuse, then indefinitely. (Based	SECURE DISPOSAL

				on2recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)	
1.1.13	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
1.1.14	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
1.1.15	Correspondence sent and received by the governing body or head teacher	Yes		General correspondence should be retained for current year plus 3 years	SECURE DISPOSAL

Please note that all information about the retention of records concerning the recruitment of Headteachers can be found in the Human Resources section below.

1.2 Headteacher and Senior Management Team					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
1.2.1	Log books of activity in the school maintained by the Headteacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then review	SECURE DISPOSAL
1.2.3	Reports created by the Headteacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then review	SECURE DISPOSAL
1.2.4	Records created by Headteachers, deputy Headteachers, and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL
1.2.5	Correspondence created by Headteachers, deputy Headteachers, and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then review	SECURE DISPOSAL
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
1.2.7	School Development Plans	No		Life of the plan + 3 years If major changes are made to the plan then an archive copy of previous plans should be retained	SECURE DISPOSAL

1.2.8	Subject Access Requests	Yes		Date of the response to the request +7 years	SECURE DISPOSAL

1.3 Admissions Process					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
1.3.1	All records relating to the creation and implementation of the School Admissions' Policy [3]	No	School Admissions Code. Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	Life of the policy + 3 years then review	SECURE DISPOSAL
1.3.2	Admissions – if the admission is successful [3]	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	Date of admission + 1 year	SECURE DISPOSAL
1.3.3	Admissions – if the appeal is unsuccessful [3]	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	Resolution of case + 1 year	SECURE DISPOSAL
1.3.4	Register of Admissions	Yes	Working together to improve school attendance, Section, 36, 2024 Statutory guidance	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made[4] The school will keep the admission register permanently in order to respond to enquiries from past pupils to confirm the dates they attended the school	REVIEW.

3 These records relating to Admissions and Admissions Policy are currently held by Bristol City Council as Air Balloon Hill Primary School is a Local Authority Maintained School

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

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

1.4 Operational Administration					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
1.4.1	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
1.4.2	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
1.4.3	Newsletters and other items with a short operational use	No		Current year + 2 years The School may choose to archive School Newsletters	STANDARD DISPOSAL
1.4.4	Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
1.4.5	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL
1.4.6	Consents relating to school activities as part of UK GDPR compliance (for example, consent to be sent circulars or mailings)	Yes	UK General Data Protection Regulation	Evidence of consent will be retained whilst the pupil attends the school, or until withdrawn, whichever the shorter.	SECURE DISPOSAL
1.4.7	Emails	Yes		Current year + 2 years	DELETION
1.4.8	CCTV	Yes		1 calendar month Recorded images will only be retained long enough for any incident to come to light (e.g., for a theft to be noticed) and the incident to be investigated. In the absence of a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.	

2. Human Resources

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

2.1 Recruitment					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
2.1.1	All records leading up to the appointment of a 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
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All the relevant information should be added to the staff personal file (and kept for period of 6 years after employment ends)	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks	No	DBS Update Service Employer Guide; Keeping children safe in education. (Statutory Guidance from Dept. of Education) Sections 73, 74	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months	
2.1.5	Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	Yes		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's personal file	
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom[5]	Yes	An employer's guide to right to work checks [Home Office]	Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years	

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

2.2 Operational Staff Management					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
2.2.1	Staff Personnel File – Including Written particulars of employment, contracts of employment and changes to terms and conditions	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal/assessment records	Yes		Current year + 3 years	SECURE DISPOSAL
2.2.4	Consents for the processing of personal and sensitive data	Yes		For as long as the data is being processed and up to 6 years afterwards	SECURE DISPOSAL
2.2.5	Working Time Regulations: • Opt out forms • Records of compliance with WTR	Yes		• Two years from the date on which they were entered into • Two years after the relevant period	SECURE DISPOSAL

2.3 Management of Disciplinary and Grievance Processes					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	"Keeping children safe in education Statutory guidance for schools and colleges"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children"	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned	SECURE DISPOSAL These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	oral warning			Date of warning[6]5+ 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they
	written warning – level 1			Date of warning + 6 months	

	written warning – level 2			Date of warning + 12 months	must be weeded from the file]
	final warning			Date of warning + 18 months	
	case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL
	Disciplinary Records relating to a dismissal from employment		Limitation Act 1980	6 years after employment ceases	SECURE DISPOSAL
2.3.3	Grievance Proceedings	Yes	Limitation Act 1980	6 years after employment ceases	SECURE DISPOSAL

6 Where the warning relates to child protection issues see above. If the disciplinary proceedings relate to a child protection matter please contact Safeguarding Children Officer for further advice

2.4 Health and Safety					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
2.4.1	Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
2.4.4	Accident Reporting Adults (Individuals who were over 18 years of age at the time of the incident)	Yes	(Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980)	Date of the incident + 6 years but if there is possibility of negligence allegation then date of incident + 15 years or date of settlement + 6 years.	SECURE DISPOSAL
2.4.4.1	Accident Reporting Children (individuals who are under 18 years of age at the time of the incident)	Yes	Limitations Act 1980	Until the child reaches the age of 21.	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	Current year + 40 years	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire Precautions log books	No		Current year + 6 years	SECURE DISPOSAL

2.5 Payroll and Pensions					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
2.5.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SECURE DISPOSAL
2.5.3	Pension Records	Yes		12 years	SECURE DISPOSAL
2.5.4	Payroll Records	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	6 years after end of tax year they relate to	SECURE DISPOSAL
2.5.5	Statutory Sick Pay Records	Yes	Taxes Management Act 1970; Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL
2.5.6	Records relating to hours worked and payments made to Casual or Temporary workers	Yes		Current year + 3 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.

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

3.2 Asset Management					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL

3.3 Accounts and Statements including Budget Management					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**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 loan + 6 years if the loan is under 10,000 or date of last payment on loan + 12 years if the loan is over 10,000then REVIEW	SECURE DISPOSAL
3.3.3	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.6	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.7	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.8	School fund documentation (including but not limited to invoices, cheque books, receipts, bank statements etc).	No		Current financial year + 6 years	SECURE DISPOSAL

3.4 Contract Management					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
3.4.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL
3.4.3	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL

3.5 School Meals Management					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
3.5.1	Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.5.2	School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
3.5.3	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 Property Management					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
4.1.1	Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry	
4.1.2	Plans of property belong to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL

4.2 Maintenance					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No		Current year + 6 years	SECURE DISPOSAL

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 and Safety above.

5.1 Pupil's Educational Record					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 including non-child protection safeguarding records Primary	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	Retain whilst the child remains at the primary school + 1 academic year	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 • 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 to be retained for the statutory retention period. The school will retain Educational Records for a period of 1 academic year after a pupil has left, in case of query or request for clarification on the data from the next school.
5.1.2	Pupil Photographs	Yes	UK General Data Protection Regulation	Retain whilst the child remains at the primary school + 1 academic year	REVIEW Selected images may also be kept for longer (for example to illustrate history of the school)
5.1.3	Parental Consent for School Trips (Where there has been no major incident)	Yes		End of the trip or end of the academic year (subject to a risk assessment carried out by the School)	SECURE DISPOSAL
5.1.4	Parental Consent for School Trips (where there has been a major incident)	Yes		Date of birth of the pupil involved in the incident plus 25 years. Permission slips for all the pupils on the trip should be retained to demonstrate the rules had been followed for all pupils	SECURE DISPOSAL

5.2 Pupil's Safeguarding and Child Protection Records					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
5.2.1	Child Protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children"	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.	SECURE DISPOSAL – these records MUST be shredded
5.2.2	Child protection information held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children"	DOB of the child + 25 years then review. If aspects of the record relate to child sexual abuse, then these records should be retained indefinitely. (Based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)	SECURE DISPOSAL – these records MUST be shredded
5.2.3	Allegations of sexual abuse	Yes	"Keeping children safe in education Statutory guidance for schools and colleges"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children"	If the complaint relates to child sexual abuse, then indefinitely. (Based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)	SECURE DISPOSAL – these records MUST be shredded
5.2.4	Records relating to any allegation of a child protection nature against a member of staff	Yes	Retention period informed by the guidance of KCSIE	Until the accused normal retirement age or 10 years from the date of the allegation (whichever is the longer)	SECURE DISPOSAL – these records MUST be shredded

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

5.3 Attendance					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
5.3.1	Attendance Registers	Yes	Working together to improve school attendance, Section 36, 2024 Statutory guidance	Every entry in the attendance register will be preserved for a period of 6 years after the date of entry.	SECURE DISPOSAL
5.3.2	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL
5.3.3	Correspondence relating to unauthorised absence		Education Act 1996 Section 444	Current academic year + 2 Years	REVIEW – The school may retain records relating to unauthorised absence for a longer time period if there is reason to believe that the records may form part of a legal proceeding for irregular attendance under Section 444 of the Education Act 1996

5.4 Special Educational Needs					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
5.4.1	Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Yes	Limitation Act 1980 (Section 2)	Whilst the child attends the school.	REVIEW Information could be retained by primary school should it be felt that a claim may arise in relation to the provision, but otherwise there is no requirement to keep this information once the child has transferred to their next school of compulsory education.
5.4.2	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
5.4.3	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

5.4.4	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 Statistics and Management Information					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination Results (Schools Copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	SATS records –	Yes			
	Results			The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil leaves the school + I year. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL
	Examination Papers			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL

6.2 Implementation of Curriculum					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
6.2.1	Schemes of Work	No		Current year + 1 year	It may be appropriate to review these records at the end of each

6.2.2	Timetable	No		Current year + 1 year	year and allocate a further retention period or SECURE DISPOSAL
6.2.3	Class Record Books	No		Current year + 1 year	
6.2.4	Mark Books	No		Current year + 1 year	
6.2.5	Record of homework set	No		Current year + 1 year	
6.2.6	Pupils' Work	No		Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year	SECURE DISPOSAL

7. Extra Curricular Activities

7.1 Educational Visits outside the Classroom					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
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	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.
7.1.3	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	

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

8.2 Central Government					
	Basic file description	**Data Protection 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