



Records Management Policy



ASPIRATION

Aspiration: Dream Big

If your dreams don't scare you, they aren't big enough!



RESILIENCE

Resilience: Be Determined

Resilience is a skill, not an ability. It can be learnt.



RESPECT

Respect: Communicate with Kindness

Manners cost nothing but mean everything.



INITIATIVE

Initiative: Solve Problems

Every problem is a gift – without problems we would not grow.



REFLECTIVE

Reflective: Never Stop Learning

Never stop learning because life never stops teaching.

Approved 9th February 2018

The School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability.

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.

A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives and for historical research. This will be done in liaison with the West Yorkshire Archives Service.

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 Head however operational management will be delegated to the Business Manager.

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 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. Information Security

The school is committed to its obligations for information security under the General Data Protection Regulations for both electronic and paper records. The following controls are in place:

- Daily off-site back ups stored in multiple locations.
- Use of remote storage devices is not permitted unless appropriate encryption measures have been approved by the school's Network Manager.
- Personal data is not permitted to be stored on any laptop or downloaded to a personal computer or device.
- Passwords are to be changed every 60 days
- School servers are in secure locations with keys only available to essential personnel.
- Paper records are locked in secure locations.
- Paper records are not to be removed from the school site unless there is no other reasonable alternative. If they are to be transported, staff are to consider their security in transit and secure storage when off-site. They should be removed from the site for as little time is required to complete the task.

- No paper records containing personal data should be left on a desk, instead they should be kept in a locked drawer.

School staff understand the importance of ensuring that personal information is only disclosed to people who are entitled to see it.

4. Disposal of Records

In line with GDPR requirements, personal data will not be retained for any longer than is required. Retention periods are set out in the school's Retention Schedule (Appendix A). Records will be disposed of securely to make them unreadable and un-reconstructable. This will normally be done in the following manner:

- Paper records will be shredded using a cross-cutting shredder
- CDs, DVDs and other disks will be cut into pieces
- Audio / Video Tapes and Fax Rolls will be dismantled and shredded
- Hard Disks will be dismantled and sanded
- IT equipment will be sent to a third party provider.

Any third party providers the school uses will be expected to provide evidence of their quality assurance processes and compliance with GDPR. When using third party providers a Certificate of Destruction will be required.

A list of records that have been disposed of will be retained. See Appendix B.

5. Digital Continuity

Digital Continuity Statements (DCS) will be created for any electronic record which needs to be retained for longer than six years which have not been created by the school. They will be archived to a separate part of the server and saved in an internationally recognised format. See Appendix C.

Appendix A: Retention Schedule

School Management: Governing Body					
File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
1.1.1	Agendas for Governing Body	Potential references to confidential staff issues	Institute of Records Management (IRM) guidance	One copy to be retained with the master set of minutes. All other copies to be disposed of	Secure disposal
1.1.2	Minutes of Governing Body meetings: principal set	Potential references to confidential staff issues	IRM guidance	Permanent	Retained as long as the school is open and transferred to West Yorkshire Archives when the school closes.
	Minutes of Governing Body meetings: inspection copies			Date of meeting plus three years.	Minutes which contain personal information will be securely disposed of.
1.1.3	Reports presented to the Governing Body	Potential references to confidential staff issues	IRM guidance	General reports to be kept for 6 years.	Secure disposal
				Reports referenced in the minutes are to be retained permanently.	Retained as long as the school is open and transferred to West Yorkshire Archives when the school closes.
1.1.4	Meeting papers relating to the annual parents' meeting	None	Section 33 of the Education Act 2002	Date of meeting plus six years.	Secure disposal
1.1.5	Instruments of Government including Articles of Association	None	IRM guidance	Permanent	Retained as long as the school is open and transferred to West Yorkshire Archives when the school closes.
1.1.6	Trusts and Endowments managed by the Governing Body	None	IRM guidance	Permanent	Retained as long as the school is open and transferred to West Yorkshire Archives when the school closes.
1.1.7	Action plans created and administered by the Governing Body / incidental governance documentation	None	IRM guidance	Life of the document plus three years	Secure disposal

School Management: Governing Body (continued)

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
1.1.8	Policy documents created and administered by the Governing Body	None	IRM guidance	One copy to be retained with the master set of minutes. All other copies to be disposed of	Secure disposal
1.1.9	Records relating to complaints dealt with by the Governing Body	Probable	IRM guidance	Date of the resolution of the complaint plus a minimum of 6 years then they will be reviewed for further retention in case of contentious disputes	Secure disposal
1.1.10	Annual Reports created under the requirements of the Education Regulations 2002	None	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report plus ten years	Secure disposal
1.1.11	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	None	IRM guidance	Date proposal accepted or declined plus three years	Secure disposal
1.1.12	Equality and diversity monitoring	Possible	Disability Discrimination (Public Authorities) (Statutory Duties) Regulations 2005; SI No 2966, Regulation 2	Keep until superseded. To be reviewed every three years	Secure disposal

School Management: Headteacher and Senior Leadership Team

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
1.2.1	Log books of activity in the school maintained by the Headteacher	Probable	IRM guidance	One copy to be retained with the master set of minutes. All other copies to be disposed of	Offered to the West Yorkshire County Archives
1.2.2	Minutes of Senior Leadership Team meetings and the meetings of other internal administrative bodies	Probable	IRM guidance	Date of the meeting plus three years and then review	Secure disposal
1.2.3	Reports created by the Headteacher or the Leadership Team	Probable	IRM guidance	Date of the report plus three years and then review	Secure disposal
1.2.4	Records created by staff	Probable	IRM guidance	Current academic year plus six years and then review	Secure disposal
1.2.5	Correspondence created or complaints handled by staff	Probable	IRM guidance	Date of correspondence plus three years and then review	Secure disposal
1.2.6	Professional Development Plans	Yes	IRM guidance	Life of the plan plus six years	Secure disposal
1.2.7	School Development Plans	No	IRM guidance	Life of the plan plus three years	Secure disposal

School Management: Admissions Process

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Life of the policy plus three years and then review	Secure disposal
1.3.2	Successful admissions	Yes		Date of admission plus one year	Secure disposal
1.3.3	Unsuccessful admissions	Yes		Resolution of the case plus one year	Secure disposal
1.3.4	Register of admissions	Yes		Preserved for a period of three years after the date on which the entry was made.	Permeant
1.3.5	Proof of address supplied by the parent as part of the admissions process	Yes		Current plus one year	Secure disposal
1.3.6	Supplementary information given as part of admissions e.g. medical or religious details	Yes	IRM guidance	Added to the student's file	Secure disposal
	Successful applications			Until the appeals process is complete	
	Unsuccessful applications				

School Management: Operational Administration

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
1.4.1	General file series	None	IRM guidance	Current year plus five years and then review	Secure disposal
1.4.2	Records relating to the creation and publication of the school brochure or prospectus	None	IRM guidance	Current year plus three years	Standard disposal
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or students.	None	IRM guidance	Current year plus one year	Standard disposal
1.4.4	Newsletters and other items with a short operational use	None	IRM guidance	Current year plus one year	Standard disposal
1.4.5	Visitors' Books and Signing in Sheets	Yes	IRM guidance	Current year plus six years and then review	Secure disposal
1.4.6	Records relating to the creation and management of Parent Teacher Associations	None	IRM guidance	Current year plus six years and then review	Secure disposal

Human Resources: Recruitment

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
2.1.1	All records leading up to the appointment of a new Headteacher	Yes	IRM guidance	Date of appointment plus six years	Secure disposal
2.1.2	All records leading up to the appointment of a new member of staff: unsuccessful candidates	Yes	IRM guidance	Date of appointment of successful candidate plus six months	Secure disposal
2.1.3	All records leading up to the appointment of a new member of staff: successful candidate	Yes	IRM guidance	All relevant information to be transferred to the staff personal file. All other information retained for six months	Secure disposal
2.1.4	Pre-employment vetting Information: DBS Checks	Yes	DBS Update Service Employer Guide, June 2014.	DBS certificates are not normally to be retained. Where copies are taken	Secure disposal
2.1.5	Proofs of identity collected as part of the process of checking enhanced DBS disclosure	Yes	Keeping Children Safe in Education. September 2016	Two forms of ID to be taken at interview which become part of the personnel file. Additional ID to be disposed of once the application is returned.	Secure disposal
2.1.6	Pre-employment vetting Information: evidence proving the right to work in the United Kingdom (clear copies to be taken)	Yes	An employer's guide to right to work checks [Home Office May 2015]	As above. Additional home office documentation must be kept for at least two years from the termination of employment.	Secure disposal
2.1.7	Single Central Record entry and other safeguarding information required by KCSiE	Yes	Keeping Children Safe in Education. September 2016	Retained in the SCR until the termination of the contract and then disposed of	Secure disposal

Human Resources: Operational Staff Management

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
2.2.1	Staff Personnel File	Yes	Limitation Act 1980 (Section 2)	Termination of employment plus six years	Secure disposal
2.2.2	Timesheets, special leave etc	Yes	Limitation Act 1980 (Section 2)	Current year plus one for paper records Current year plus six years for electronic	Secure disposal
2.2.3	Annual appraisal / assessment records	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
2.2.4	Sickness records: Occupational health reports, records of visits and meetings, details of managing attendance stages and hearings, correspondence, return to work notes.	Yes	Limitation Act 1980 (Section 2)	If no sanction against employee, destroy file at outcome of case, with the exception of only outcome / summary document for length of employment plus six years. If sanction against employee, retain whole file for length of employment plus six years. Dispose of duplicates one year after conclusion of issue.	Secure disposal
2.2.5	Planned absence requests, including CPD	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
2.2.6	Staff ID Photo	Yes	None	Six months post-employment then review	Deletion

Human Resources: Personnel Files

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
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 September 2016 Working Together to Safeguard Children. March 2015	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then review. Note allegations that are found to be malicious will be removed from personnel files. If upheld, they are to be kept on the file and a copy provided to the person concerned	Secure disposal: must be shredded by the school
2.3.2	Disciplinary proceedings	Yes	Disciplinary Policy Limitation Act 1980 Retention Guidelines for Local Authorities, 6.4 (Records Management Society)	Issues resolved informally: manager to review personnel file every two years from the time employment commences; If the matter has not proceeded to a formal disciplinary / grievance / managing attendance case, then first warnings / related records can be destroyed two years from date of warning / management instructions; Further management instructions four years from date of warning. Unfounded allegations to be destroyed immediately Formal disciplinary file: Length of employment plus six years, except any allegations regarding safeguarding - these should be kept for 100 years from employees date of birth.	Secure disposal
	Oral warning				
	Written warning: L1				
	Written warning: L2				
	Final warning				
	Management Instruction				
	Case not found				

Human Resources: Personnel Files (continued)

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
2.3.3	Grievance file	Yes	Limitation Act 1980	Length of employment plus six years, except any allegations regarding safeguarding - these should be kept for 100 years from employees date of birth.	Secure disposal
2.3.4	Performance management	Yes	Limitation Act 1980	If there is a sanction against employee as an outcome, retain record for length of employment plus six years. If no sanction against the employee, only retain documents summarising case / outcome - destroy others at resolution of case.	Secure disposal
2.3.5	Managing workforce change e.g. redundancy	Yes	Limitation Act 1980	Length of employment plus six years	Secure disposal
2.3.6	Probationary procedure	Yes	Limitation Act 1980	Length of employment plus six years, except any allegations regarding safeguarding - these should be kept for 100 years from employees date of birth.	Secure disposal
2.3.7	Occupational health	Yes	Control of Asbestos at Work Regulations 1996; Control of Lead at work Regulations 1980; Work in Compressed Air Regulations 1996; Ionising Radiation Regulations 1999; Also The Control of Substances Hazardous to Health Regulations 1997 and 2002, and the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995. Recommendation from the RCN & the Faculty of Occupational Medicine	Depending on circumstances, place a disposal date of minimum 40 years from date of last action, maximum 60 years from the date the person leaves the authority. May place a review date on file if necessary. Retain for eight years from the date of last entry / date the employee leaves the school	Secure disposal

Human Resources: Personnel Files (continued)

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
2.3.8	Pre-employment health questionnaires	Yes	Local Government Classification Retention Scheme (LGCRS); Limitation Act 1980; Employment Practices Data protection Code Part 1: Recruitment and Selection (2002)	Review every four years, dispose if no longer relevant. If becomes part of Occupational Health case file, retain as per 'Occupational health case file'.	Secure disposal
2.3.9	Payroll details e.g. bank account and pension information	Yes	ICO	Pension information: 75 years post-employment Other information: three years post-employment	Secure disposal
2.3.10	Personal protective equipment, records of maintenance and examination, e.g. PPE evaluation report	Yes	Health and Safety Act	Life of the risk assessment plus three years	Secure disposal
2.3.11	Personal risk assessments: including restrictions i.e. cannot lift or desk work only	Yes	Health and Safety Act	Life of the risk assessment plus three years	Secure disposal
2.3.12	Training	H&S / safeguarding	Limitation Act 1980	H&S: Retain for 50 years after course Completion Safeguarding: normally length of employment plus 15 years however 35 years if subject to an investigation	Secure disposal
		Other		Length of employment plus six years	
2.3.13	Safeguarding supervision	Yes	Limitation Act 1980	Retain for length of employment plus 25 years	Secure disposal

Human Resources: Health and Safety

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
2.4.1	Health and Safety Policy Statements	No	IRM guidance	Life of the policy plus three years	Secure disposal
2.4.2	Health and Safety Risk Assessments	No	IRM guidance	Life of the risk assessment plus three years	Secure disposal
2.4.3	Records relating to accident or injury at work	Yes	IRM guidance	Date of the incident plus 12 years with a further retention period for serious incidents	Secure disposal
2.4.4	Accident reporting	Adults	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of the incident plus six years	Secure disposal
		Children		Child's 25 th birthday	
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 plus 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 plus 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	IRM guidance	Last action plus 50 years	Secure disposal
2.4.8	Fire log books and records	No	Regulatory Reform (Fire Safety) Order 2005, SI 2005 No 1541 Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal

Human Resources: Payroll and Pensions

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
2.5.1	Maternity or paternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year plus three years	Secure disposal
2.5.2	Overtime or casual claim forms	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
2.5.3	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
2.5.4	Payroll reports	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
2.5.5	Pay determinations and Pay Committee records	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal

Financial Management: Risk Management and Insurance

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
3.1.1	Employers Liability Insurance Certificate	No	Limitation Act 1980 (Section 2)	Closure of the school plus 40 years	Secure disposal
3.1.2	Other insurance certificates	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
3.1.3	Insurance claim forms	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
3.1.4	Risk register	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal

Financial Management: Asset Management

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
3.2.1	Inventory of furniture and equipment	No	Limitation Act 1980 (Section 2)	Closure of the school plus 40 years	Secure disposal
3.2.2	Records of burglary, theft and vandalism	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
3.2.3	Records relating to leasing or financing of purchases	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal

Financial Management: Accounts and Statements including Budget Management

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
3.3.1	Annual Accounts	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
3.3.2	Loans and grants managed by the school	No	Limitation Act 1980 (Section 2)	Date of last payment on the loan plus 12 years then review	Secure disposal
3.3.3	Student grant applications e.g. 16-19 Bursary applications or SEN funding	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
3.3.5	Invoices, receipts, order books, purchase card records, petty cash and requisitions, delivery notices	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
3.3.6	Records relating to the collection and banking of monies	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
3.3.7	Records relating to the identification and collection of debt	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal

Financial Management: Contract Management

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980 (Section 2)	Last payment on the contract plus 12 years	Secure disposal
3.4.2	All records relating to the management of contracts under signature	No	Limitation Act 1980 (Section 2)	Last payment on the contract plus six years	Secure disposal
3.4.3	Records relating to the monitoring of contracts	No	IRM guidance	Current year plus two years unless there are performance concerns	Secure disposal
3.4.4	Papers relating to the procurement of contracts	No	Limitation Act 1980 (Section 2)	Successful contract: date of awarding plus six years Unsuccessful contract: six months with quotes / evidence of process retained for six years.	Secure disposal

Financial Management: School Fund

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
3.5.1	Cheque books	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
3.5.2	Paying in books	No	Limitation Act 1980 (Section 2)	Date of last payment on the loan plus 12 years then review	Secure disposal
3.5.3	Ledger and other records	No	Limitation Act 1980 (Section 2)	Current year plus three years	Secure disposal
3.5.4	Invoices	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
3.5.5	Receipts	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
3.5.6	Bank statements	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal

Financial Management: School Meals Management

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
3.6.1	Free school meals records	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
3.6.2	Meals or milk registers	Yes	IRM guidance	Current year plus three years	Secure disposal
3.6.3	Meals or milk summary sheets	No	IRM guidance	Current year plus three years	Secure disposal

Asset Management: Legal Documentation

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
4.5.1	Title deeds of properties or land belonging to the school	No	IRM guidance	These should follow the property unless the property has been registered with the Land Registry	Return to the LA or future owner on closure
4.5.2	Plans of property belong to the school	No	IRM guidance	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.	Return to the LA or future owner on closure
4.5.3	Leases of property leased by or to the school	No	Limitation Act 1980 (Section 2)	Expiry of the lease plus three years	Secure disposal
4.5.4	Records relating to the letting of school premises	No	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal

Asset Management: Maintenance and Compliance

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
4.6.1	All records relating to the maintenance of the school carried out by contractors	Possible	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
4.6.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	Possible	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
4.6.3	Gas safety	No	Gas Safety (Installation and Use) (Amendment) Regulations 1998 SI 1998 No 2451 Part F 36 (3)	Two years from the end of the year in which last check carried out.	Secure disposal
4.6.4	Legionella and water safety	No	Health and Safety Executive/Local Authorities Enforcement Liaison Committee HELA, Local Authority Circular 46/2	Until equipment or building disposed of plus two years	Secure disposal
4.6.5	Records of other compliance testing	No	Limitation Act 1980 (Section 2)	Current year plus six years unless subject to other provision e.g. COSHH	Secure disposal
4.6.6	Risk assessment	Possible	Management of Health and Safety at Work Regulations 1992 SI 1992 No 2051 Regulation 3: Risk assessments	Retain and review every three years	Secure disposal
4.6.7	Emergency planning	Possible	Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995/3163. Regulation 7	Retain for current year plus three years	Secure disposal

Asset Management: Information and Communications Technology

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action	
4.7.1	Client services: Management of the interface between ICT team and internal clients across the school and delivery of services to those clients	Potential	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal	
4.7.2	ICT project management	Potential	None	Project with minor or medium strategic impact - retain for life of project plus six years Major strategic impact - retain for life of project plus 10 years.	Secure disposal	
4.7.3	Infrastructure support	Potential	Desktops	Corporate authority	Current year plus three years and then review	Secure disposal (Potential DCS)
			Help desk	Corporate authority	Current year plus three years	
			Information security	Corporate authority	Current year plus three years and then review. Records with legal implications e.g. breaches, may require a longer period	
			License management	Limitation Act 1980 (Section 2)	Current year plus six years	
			Network management	Corporate authority	Current year plus three years and then review	
			Printing and Scanning	Corporate authority Limitation Act 1980 (Section 2)	Current year plus three years unless relating to an external contract. If external, current year plus six years	
			Server management	Corporate authority	Current year plus three years and then review	
			Storage management	Corporate authority	Current year plus three years and then review	

Asset Management: Information and Communications Technology

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
4.7.4	System support	Change control	Corporate authority	Current year plus three years	Secure disposal (Potential DCS)
		Configuration management	Corporate authority	Current year plus three years	
		Design and construction	Corporate authority	While systems are used plus three years	
		Development	Limitation Act 1980 (Section 2)	While systems are used plus three years	
		Implementation	Corporate authority	While systems are used plus three years	
		Integration and interfaces	Corporate authority Limitation Act 1980 (Section 2)	While systems are used plus three years	
		Maintenance	Corporate authority	Retain as long as required to support the use of the system. Review for archive value	
		Manuals	Corporate authority	Retain as long as required to support the use of the system	
		Data management: documentation	Corporate authority	Current year plus three years	
		Data management: back-up	Potential	Various depending on type of data held	

Student Management: Student Educational Records

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	Leaving prior to Year 11: retain while the child is in school	Transfer the file or record to the receiving school. If the student becomes home educated, moves to an independent school or dies, the file is returned to the LA
			Limitation Act 1980 (Section 2)	On leaving at the end of Year 11 or Year 13 Student's 25 th birthday	Secure disposal
5.1.2	Examination results: student copies	Yes	IAR Guidance	Paper certificates retained for two years	Returned to the exam board
				Add to student file	Secure disposal
5.1.3	Child protection records	Yes	Keeping Children Safe in Education September 2016	Child's 25 th birthday	Secure disposal. Must be shredded

Student Management: Attendance

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
5.2.1	Attendance register entries	Yes	School Attendance Departmental Advice November 2016	Three years after the date on which the entry was made.	Secure disposal
5.2.2	Correspondence relating to absence	Yes	Education Act 1996 Section 7	Current year plus two years	Secure disposal
5.2.3	Paperwork and correspondence relating to casework	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
5.2.4	Paperwork and correspondence relating to prosecutions	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal

Curriculum Management: Statistics and Management Information

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
6.1.1	Curriculum returns	No	IAR Guidance	Current year plus three years	Secure disposal
6.1.2	Exam results (school copy)	Yes	IAR Guidance	Kept on file until the student's 25 th birthday. Anonymised after three years to allow for comparison and retained for a further three	Secure disposal
				Papers and paperwork	
6.1.3	PAN / number reports	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
6.1.4	External performance data	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal
6.1.5	Self-Evaluation Forms	Yes	Limitation Act 1980 (Section 2)	Current year plus six years	Secure disposal

Curriculum Management: Implementation of Curriculum

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action	
6.2.1	Schemes of work	No	None	As long as the scheme is operational plus three years	Secure disposal	
6.2.2	Timetable	No		None		Until the student leaves the school
6.2.3	Class record books	No				
6.2.4	Mark books	Yes				
6.2.5	Record of homework set	No				
6.2.6	Student books	Yes				Where possible, returned within the academic year

Other Student Support Records: Educational Visits outside the Classroom

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the classroom	Yes	Outdoor Education Advisers' Panel National Guidance Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit plus ten years	Secure disposal
7.1.2	Parental consent forms for school trips where there has been no major incident	Yes	Limitation Act 1980 (Section 2)	Conclusion of the trip plus one month	Secure disposal
7.1.3	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	Students' 25 th birthday for all on the trip	Secure disposal

Other Student Support Records

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
7.2.1	Pastoral records e.g. behaviour logs, incident sheets	Yes	None	Student's 25 th birthday	Secure disposal
7.2.2	Reports for outside agencies	Yes	None	Student's 25 th birthday	Secure disposal
7.2.3	Referral forms	Yes	None	Student's 25 th birthday	Secure disposal
7.2.4	Permissions, minor medication consents and contact data sheets	Yes	None	Annually renewed with the previous year's disposed of	Secure disposal
7.2.5	Contact database entries e.g. CPOMS / SIMS	Yes	None	Student's 25 th birthday	Secure disposal
7.2.6	Group session register	Yes	None	Current year plus one year	Secure disposal
7.2.7	Minor temporary records e.g. behaviour reports	Yes	None	End of activity / reporting period plus six months then review or for incidental registers with no significant event, one week after the activity	Secure disposal

Local Authority Requirements

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
8.1.1	Attendance and other returns	Yes	None	Current year plus three years and then review	Secure disposal
8.1.2	School Census Returns	Yes	None	Current year plus six years	Secure disposal
8.1.3	Circulars and other information sent from the Local Authority	No	None	Operational Use	Standard disposal

Central Government Requirements

File description		Data Protection Issues	Statutory Provisions / Retention Basis	Retention Period	Action
8.2.1	Ofsted reports and papers	No	None	Life of the report and then review	Secure disposal
8.2.2	Returns made to central government	No	None	Current year plus six years	Secure disposal
8.2.3	Circulars and other information sent from the Central Government	No	None	Operational Use	Secure disposal

Appendix B: Secure Destruction Log

File reference or other unique identifier	File title or brief description	Number of files and date range	Name of the authorising officer	Date action taken

Appendix C: Digital Continuity Statement



Digital Continuity Statement: XXX

Statement of business purpose and statutory requirements for keeping records
Names of the staff or functions responsible for long term data preservation
Description of the information assets to be covered by the DCS
Description of when the record needs to be captured into the approved file formats
Description of the appropriate supported file formats for long term preservation

Retention of all software specification information and licence information

Description of where the information asset is to be stored

Description of how access to the information asset is to be managed within the data security protocols



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