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Records Management Policy

Review Date:

Signed:

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Records Management Policy (GDPR compliant)

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Statement of intent

Binstead Primary School is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulation (GDPR), the school also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The school has created this policy to outline how it manages the data it obtains in order to meet the school's statutory requirements.

This document complies with the requirements set out in the GDPR, which will come into effect on 25 May 2018. The government has confirmed that the UK's decision to leave the EU will not affect the commencement of GDPR

1. Scope of the Policy

- 1.1. This policy applies to all records, created, received or maintained by staff of the school in the course of carrying out its functions.
- 1.2. Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained for a set period to provide evidence of its transactions or activities. These records may be created or received and then stored, in hard copy or electronically.
- 1.3. 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. Legal framework

2.1. This policy has due regard to statutory legislation including, but not limited to, the following:

- General Data Protection Regulation (2016)
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)

2.2 This policy also has due regard to the following guidance:

- Information Records Management Society 'Information Management Toolkit for Schools' 2016

2.3 This policy will be implemented in accordance with the following school policies and procedures:

- **Data Protection Policy**
- **Freedom of Information Policy**
- **E-security Policy (Or E-safety)**
- **Security Breach Management Plan / Emergency Management Plan**

3. Responsibilities

3.1. The Governing Body is the main Data Controller for the school for all pupil, staff and parent data. It will ensure that:

- 3.1.1. all personal data is processed fairly and legally
- 3.1.2. data is only collected for legitimate reasons and used accordingly
- 3.1.3. data is relevant, adequate and not excessive in relation to the reason for its collection.
- 3.1.4. data is regularly updated to ensure accuracy
- 3.1.5. any data which identifies an individual will not be kept longer than necessary
- 3.1.6. any personal information is protected against accidental, unlawful destruction, alteration and disclosure - especially when processing over networks.
- 3.1.7. Appropriate security measures are in place to ensure the correct level of protection for all data stored and processed.

- 3.2. The Governing Body will ensure an appropriate Data Protection Officer is in place for the school to oversee data management and provide feedback to the Governing Body on its systems and processes.
- 3.3. All staff have a responsibility for maintaining the school's records and record-keeping systems in line with statutory requirements.
- 3.3.1 The **headteacher** holds overall responsibility for this policy and for ensuring it is implemented correctly.
 - 3.3.2 The **school business manager/headteacher** is responsible for promoting compliance with this policy, and reviewing the policy on an **annual** basis
 - 3.3.3 The **school business manager** is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of correctly.
 - 3.3.4 All staff members are responsible for ensuring that any records for which they are responsible for are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.
- 3.4 Any complaints about how school data is managed will be dealt with under the school's complaints policy.

4 Records

Records in this school are identified to be part of one of the categories indicated below. This categorisation assists the school with managing the records held; ensuring they are only available to the appropriate individuals as well as fulfilling the requirement to ensure records are only kept for as long as necessary to fulfil the purpose for which they were intended. The management of records is outlined below. The retention period for records within each section as well as the action that will be taken after the retention period is covered in Appendix A – G.

4.1 Pupil Records

- 4.1.1 Pupil records are specific documents that are used throughout a pupil's time in the education system, they are passed to each school that a pupil attends and includes all personal information relating to them, as well as their progress and achievement. Details of information stored in pupil files can be found in *Appendix A*. Details on retention periods of pupil records and pupil related information can be found in *Appendix B*.
- 4.1.2 The school will publish a Privacy Notice for Pupils to ensure its record management is in line with legislation and will review this document according to the detail set out in the Data Protection Policy.
- 4.1.3 The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.
- 4.1.4 The only exception to the above is any records placed on the pupil's file that have a shorter retention period and may need to be removed. In such cases, **The office manager** will remove these records.

4.1.5 Hard copy and electronic records relating to the pupil's record will be transferred. *Appendix C* of this policy outlines the procedures on how hard copy and electronic records will be dealt with.

4.1.6 The school will not keep any copies of information stored within a pupil's record, unless there is potential legal action at the time during which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.

4.1 Staff Records

4.2.1 Staff records are specific documents that have been obtained during recruitment processes as well as during the period of employment at the school.

4.2.2 Details on retention periods of staff records and related information in both hard copy and electronic format can be found in *Appendix D*.

4.3 Senior Leadership and Management Records

4.3.1 Senior Leadership and Management Records are those records relating to the governance of the school as well as those records created by the Senior Leaders in the process of managing the school.

4.3.2 Details on retention periods of Senior Leadership and Management records and related information in both hard copy and electronic format can be found in *Appendix E*.

4.4 Health and Safety Records

4.4.1 Health and Safety Records are the specific documents relating to accident records and reporting, asbestos management, radiation management, COSHH, Health and Safety risk assessments and policies.

4.2.1 Details on retention periods of Senior Leadership and Management records and related information in both hard copy and electronic format can be found in *Appendix F*.

4.5 Financial Records

4.5.1 Financial Records are the documents that are created or received during the life of the school in relation to its financial management covering accounts and budget management, asset management, contract management and school meals.

4.5.2 Details on retention periods of Senior Leadership and Management records and related information in both hard copy and electronic format can be found in *Appendix G*.

4.6 Other school Records

4.6.1 These are other records held by the school relating to operational and property management.

4.6.2 Details on retention periods of Senior Leadership and Management records and related information in both hard copy and electronic format can be found in *Appendix H*.

5 Storing and Protecting Information

- 5.1 The Headteacher/School Business Manager will undertake a risk analysis to identify which records are vital to school management.
- 5.2 The Headteacher/School Business Manager is responsible for continuity, and recovery measures are in place to ensure the security of protected data.
- 5.3 The **school business manager** will ensure the most vital documents are stored in the most secure manner.
- 5.4 The **school business manager** will ensure paper records are managed appropriately and stored in accordance with their sensitivity.
- 5.5 The **school business manager** and **IT Manager** will ensure that:
 - 5.5.1 Appropriate backup systems are in place for the electronic information held in school to ensure this data can still be accessed in the event of a security breach, e.g. a virus and prevent any loss or theft of data.
 - 5.5.2 All members of staff are provided with their own secure login and password.
 - 5.5.3 Digital data is coded, encrypted or password-protected.
 - 5.5.4 Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.
 - 5.5.5 Staff and governors do not use their personal laptops or computers for school purposes.
 - 5.5.6 All electronic devices are password-protected to protect the information on the device in case of theft.
 - 5.5.7 Email communication is operated and managed in the most secure manner available.
 - 5.5.8 Personal information is only taken off the premises in exceptional circumstances following approval from the Headteacher.
- 5.6 All staff members will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information.
- 5.7 Before sharing data, all staff always ensure that:
 - They are allowed to share it.
 - Adequate security is in place to protect it.
 - Who will receive the data has been outlined in a privacy notice.
- 5.7 Visitors will not be allowed access to confidential or personal information and will be supervised in areas containing sensitive information.
- 5.8 The physical security of the school's buildings and storage systems, and access to them, is reviewed **annually** by the **site manager in conjunction with the DPO**. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the **headteacher** and extra measures to secure data storage will be put in place.
- 5.9 The school takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.
- 5.10 Any damage to or theft of data will be managed in accordance with the school's **Security Breach Management Plan**.

6. Accessing information

- 6.1 The school is transparent with data subjects, the information we hold and how it can be accessed.
- 6.2 All members of staff, parents of registered pupils and other users of the school, e.g. visitors and third-party clubs, are entitled to:
- Know what information the school holds and processes about them or their child, and why.
 - Understand how to gain access to it.
 - Understand how to keep it up-to-date.
 - Understand what the school is doing to comply with its obligations under the GDPR.
- 6.3 All members of staff, parents of registered pupils and other users have the right, under the GDPR, to access certain personal data being held about them or their child.
- 6.4 Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs, although this information can still be shared with parents.
- 6.5 Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.
- 6.6 The school will adhere to the provisions outlined in the school's **Data Protection Policy** when responding to requests seeking access to personal information.

7. Digital continuity statement

- 7.1 Digital data that is retained for longer than six years will be named as part of a digital continuity statement.
- 7.2 The **DPO** will identify any digital data that will need to be named as part of a digital continuity statement.
- 7.3 The data will be archived to dedicated files on the school's server, which are password-protected – this will be backed-up in accordance this policy.
- 7.4 Memory sticks will never be used to store digital data, subject to a digital continuity statement.
- 7.5 The **IT Manager** will review new and existing storage methods **annually** and, where appropriate add them to the digital continuity statement.
- 7.6 The following information will be included within the digital continuity statement:
- A statement of purpose and requirements for keeping the records
 - The names of the individuals responsible for long term data preservation
 - A description of the information assets to be covered by the digital preservation statement
 - A description of when the record needs to be captured into the approved file formats
 - A description of the appropriate supported file formats for long-term preservation
 - A description of the retention of all software specification information and licence information

- A description of how access to the information asset register is to be managed in accordance with the GDPR

8. Information audit

- 8.1 The **school** conducts information audits on an **annual** basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the GDPR. This includes the following information:
- Paper documents and records
 - Electronic documents and records
 - Databases
 - Microfilm or microfiche
 - Sound recordings
 - Video and photographic records
 - Hybrid files, containing both paper and electronic information
- 8.2 The **Headteacher and School Business Manager** are responsible for completing the information audit. A sample audit is contained in *Appendix I*.
- 8.3 The **School (as Information Owners)** will record all details on the school's Information Asset Register.
- 8.4 The information displayed on the Information Asset Register will be shared with the **headteacher/FGB** to gain their approval.

9. Disposal of data

- 9.1 Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.
- 9.2 Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut. The **School Business Manager** will keep a record of all files that have been destroyed.
- 9.3 Where the disposal action is indicated as reviewed before it is disposed, the **Headteacher** will review the information against its administrative value – if the information should be kept for administrative value, the **School Business Manager** will keep a record of this.
- 9.4 If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.
- 9.5 Where information has been kept for administrative purposes, the **Headteacher/School Business Manager** will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.
- 9.6 Where information must be kept permanently, this information is exempt from the normal review procedures.

10. Monitoring and review

- 10.1 This policy will be reviewed as is deemed appropriate but no less frequently than every three years by the **Head Teacher** in conjunction with the **headteacher** – the next scheduled review date for this policy is December 2018.
- 10.2 Any changes made to this policy will be communicated to all members of staff and the governing board.

Appendix A

Information held in Pupil records:

The following information is stored on the front of a pupil record, and will be easily accessible:

- Forename, surname, gender and date of birth,
- Unique pupil number
- Note of the date when the file was opened
- Note of the date when the file was closed, if appropriate

The following information is stored inside the front cover of a pupil record, and will be easily accessible:

- Ethnic origin, religion and first language (if not English)
- Any preferred names
- Position in their family, e.g. eldest sibling
- Emergency contact details and the name of the pupil's doctor
- Any allergies or other medical conditions that are important to be aware of
- Names of parents and/or carers, including home addresses and telephone numbers
- Name of the school, admission number, the date of admission and the date of leaving
- Any other agency involvement, e.g. speech and language therapist

The following information is stored on a pupil record, and will be easily accessible:

- Admissions form
- Details of any special educational needs and disabilities (SEND)
- If the pupil has attended an early years setting, the record of transfer
- Fair processing notice – only the most recent notice will be included
- Annual written reports to parents
- National curriculum and agreed syllabus record sheets
- Notes relating to major incidents and accidents involving the pupil
- Any information about an SEN statement, and support offered in relation to the statement
- Any notes indicating child protection disclosures and reports are held
- Any information relating to exclusions
- Any correspondence with parents or external agencies relating to major issues, e.g. mental health
- Notes indicating that records of complaints made by parents or the pupil are held

The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the pupil in the **school office**:

- Absence notes
- Parental consent forms for educational visits and trips, photographs and videos, etc.
- Correspondence with parents about minor issues, e.g. behaviour

Actual copies of disclosures and reports relating to child protection are stored in the confidential Child Protection file held in the locked filing cabinet in the **Headteacher's Office**– a note indicating this is marked on the pupil's file.

Actual copies of complaints made by parents or the pupil are stored in a file in the **headteacher's office** – a note indicating this is marked on the pupil's file.

Actual copies of accident and incident information are stored separately on the school's management information system and held in line with the statutory retention periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed on the pupil's file in the event of a major accident or incident.

Appendix B

Transfer of Pupil Records

Where a pupil record is sent by post, it will be sent by registered post. A pupil record may also be hand delivered to the receiving organisation if this is deemed more appropriate by the Senior Leadership of the school.

In all cases the pupil records will have an accompanying list of files included. The receiving school is required to sign a form to indicate that they have received the files and return this to the school.

TRANSFER OF PUPIL RECORDS

Name of Pupil _____

I have received the pupil records from XXX School in relation to the above pupil.

Name: _____

Signed: _____

School: _____

Date: _____

Appendix C

Retention of pupil records and other pupil-related information

The table below outlines the school's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.

Type of file	Retention period	Action taken after retention period ends
Admissions		
Register of admissions	Three years after the date on which the entry was made	Information is reviewed, and the register may be kept permanently
[Secondary schools only] Secondary school admissions	The current academic year, plus one year	Securely disposed of
Proof of address (supplied as part of the admissions process)	The current academic year, plus one year	Securely disposed of
Supplementary information submitted, including religious, medical information, etc. (where the admission was successful)	Added to the pupil's record	Securely disposed of
Supplementary information submitted, including religious, medical information, etc. (where the admission was not successful)	Until the appeals process has been completed	Securely disposed of
Pupils' educational records		
Pupils' educational records	Whilst the pupil remains at the school	Transferred to the destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period
Public examination results	Added to the pupil's record (<i>Primary transfer to Secondary</i>)	Uncollected certificates are returned to the examination board
Internal examination results	Added to the pupil's record (<i>Primary transfer to Secondary</i>)	Securely disposed of
Child protection information held on a pupil's record	Stored in a sealed envelope for the same length of time as the pupil's record (<i>Primary transfer to Secondary</i>)	Securely disposed of – shredded

Child protection records held in a separate file	25 years after the pupil's date of birth (<i>Primary transfer to Secondary</i>)	Securely disposed of – shredded
Attendance		
Attendance registers	Last date of entry on to the register, plus three years	Securely disposed of
Letters authorising absence	Current academic year, plus two years	Securely disposed of
SEND		
SEND files, reviews and individual education plans	25 years after the pupil's date of birth (as stated on the pupil's record) (<i>Primary transfer to Secondary</i>)	Information is reviewed, and the file may be kept for longer than necessary if it is required for the school to defend themselves in a 'failure to provide sufficient education' case
Statement of SEN maintained under section 324 of the Education Act 1996 or EHC plan maintained under section 37 of the Children and Families Act 2014 (and any amendments to the statement)	25 years after the pupil's date of birth (as stated on the pupil's record) (<i>Primary transfer to Secondary</i>)	Securely disposed of, unless it is subject to a legal hold
Information and advice provided to parents regarding SEND	25 years after the pupil's date of birth (as stated on the pupil's record) (<i>Primary transfer to Secondary</i>)	Securely disposed of, unless it is subject to a legal hold
Accessibility strategy	25 years after the pupil's date of birth (as stated on the pupil's record) (<i>Primary transfer to Secondary</i>)	Securely disposed of, unless it is subject to a legal hold
Curriculum management		
SATs results	25 years after the pupil's date of birth (as stated on the pupil's record) (<i>Primary transfer to Secondary</i>)	Securely disposed of
Examination papers	Until the appeals/validation process has been completed	Securely disposed of
Published Admission Number (PAN) Reports	Current academic year, plus six years	Securely disposed of

Valued added and contextual data	Current academic year, plus six years	Securely disposed of
Self-evaluation forms	Current academic year, plus six years	Securely disposed of
Pupils' work	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	Securely disposed of
Schemes of Work	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or secure disposal.
Timetable	Current year + 1 year	
Class Record Books	Current year + 1 year	
Mark Books	Current year + 1 year	
Record of homework set	Current year + 1 year	
Extra-curricular activities		
Records created by schools to obtain approval to run an Educational Visit outside the classroom – Primary Schools <i>(Outdoor Education Advisers Panel National Guidance Website: http://oeapng.info (section 3 re. Legal Framework and section 4 Good Practice))</i>	Date of visit + 14 years	Securely disposed of
Records created by schools to obtain approval to run an Educational Visit outside the classroom – Secondary Schools <i>(Outdoor Education Advisers Panel National Guidance Website: http://oeapng.info (section 3 re. Legal Framework and section 4 Good Practice))</i>	Date of visit + 10 years	Securely disposed of
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip	Securely disposed of
Parental consent forms for school trips where a major incident occurred	25 years after the pupil's date of birth, on the pupil's record (permission slips of all pupils on the trip will also be held to show	Securely disposed of

	that the rules had been followed for all pupils)	
Walking bus registers	Three years from the date of the register being taken	Securely disposed of
Family liaison officers and home-school liaison assistants		
Day books	Current academic year, plus two years	Reviewed, and destroyed if no longer required
Reports for outside agencies	Duration of the pupil's time at school	Securely disposed of
Referral forms	Whilst the referral is current	Securely disposed of
Contact data sheets	Current academic year	Reviewed, and destroyed if no longer active
Contact database entries	Current academic year	Reviewed, and destroyed if no longer required
Group registers	Current academic year, plus two years	Securely disposed of

Appendix D

Retention of staff records

The table below outlines the school's retention periods for staff records and the action that will be taken after the retention period, in line with any requirements.

Type of file	Retention period	Action taken after retention period ends
Operational		
Staff personal file	Termination of employment, plus six years	Securely disposed of
Timesheets	Current academic year, plus six years	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus five years	Securely disposed of
Recruitment		
Records relating to the appointment of a new headteacher	Date of appointment, plus six years	Securely disposed of
Records relating to the appointment of new members of staff (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of
Records relating to the appointment of new members of staff (successful candidates)	Relevant information added to the member of staff's personal file, and other information retained for six months	Securely disposed of
DBS certificates	Up to six months (if you keep it)	Securely disposed of
Proof of identify as part of the enhanced DBS disclosure	After identity has been proven	Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy this will be placed on the staff member's personal file, if not, securely disposed of
Evidence of right to work in the UK	Added to staff personal file or, if kept separately, termination of employment, plus no longer than two years	Securely disposed of

Disciplinary and grievance procedures

<p>Child protection allegations, including where the allegation is unproven</p>	<p>Added to staff personal file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer</p> <p>If allegations are malicious, they are removed from personal files</p>	<p>Reviewed and securely disposed of – shredded</p>
<p>Oral warnings</p>	<p>Date of warning, plus six months</p>	<p>Securely disposed of – if placed on staff personal file, removed from file</p>
<p>Written warning – level 1</p>	<p>Date of warning, plus six months</p>	<p>Securely disposed of – if placed on staff personal file, removed from file</p>
<p>Written warning – level 2</p>	<p>Date of warning, plus 12 months</p>	<p>Securely disposed of – if placed on staff personal file, removed from file</p>
<p>Final warning</p>	<p>Date of warning, plus 18 months</p>	<p>Securely disposed of – if placed on staff personal file, removed from file</p>
<p>Records relating to unproven incidents</p>	<p>Conclusion of the case, unless the incident is child protection related and is disposed of as above</p>	<p>Securely disposed of</p>

Appendix E

Retention of senior leadership and management records

The table below outlines the school's retention periods for Senior Leadership records and the action that will be taken after the retention period, in line with any requirements.

Type of file	Retention period	Action taken after retention period ends
Governing board		
Agendas for governing board meetings	One copy alongside the original set of minutes – all others disposed of	Securely disposed of
Original, signed copies of the minutes of governing board meetings	Permanent	If unable to store, these will be provided to the County Archives Service
Inspection copies of the minutes of governing board meetings	Date of meeting, plus three years	Shredded if they contain any sensitive, personal information
Reports presented to the governing board	Minimum of six years, unless they refer to individual reports – these are kept permanently	Securely disposed of or, if they refer to individual reports, retained with the signed, original copy of minutes
Meeting papers relating to the annual parents' meeting	Date of meeting, plus a minimum of six years	Securely disposed of
Instruments of government, including articles of association	Permanent	If unable to store, these will be provided to the County Archives Service
Trusts and endowments managed by the governing board	Permanent	Retained in the school whilst it remains open, then provided to the County Archives Service when the school closes
Action plans created and administered by the governing board	Duration of the action plan, plus three years	Securely disposed of
Policy documents created and administered by the governing board	Duration of the policy, plus three years	Securely disposed of
Records relating to complaints dealt with by the governing board	Date of the resolution of the complaint, plus a minimum of six years	Reviewed for further retention in case of contentious disputes, then securely disposed of
Annual reports created under the requirements of the Education (Governors' Annual Reports) (England)	Date of report, plus 10 years	Securely disposed of

(Amendment) Regulations 2002		
Proposals concerning changing the status of the school	Date proposal accepted or declined, plus three years	Securely disposed of
Headteacher and senior leadership team (SLT)		
Log books of activity in the school maintained by the headteacher	Date of last entry, plus a minimum of six years	Reviewed, and offered to the County Archives Service if appropriate
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus three years	Reviewed, and securely disposed of
Reports created by the headteacher or SLT	Date of the report, plus a minimum of three years	Reviewed, and securely disposed of
Records created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed, and securely disposed of
Correspondence created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Reviewed, and securely disposed of
Professional development plan	Duration of the plan, plus six years	Securely disposed of
School development plan	Duration of the plan, plus three years	Securely disposed of

Appendix F

Retention of Health and Safety records

The table below outlines the school's retention periods for Health and Safety records and the action that will be taken after the retention period, in line with any requirements.

Type of file	Retention period	Action taken after retention period ends
Health and safety		
Health and safety policy statements	Duration of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years	Securely disposed of
Records relating to accidents and injuries at work	Date of incident, plus 12 years In the case of serious accidents, a retention period will need to be applied	Securely disposed of
Accident reporting – adults	Date of the incident, plus six years	Securely disposed of
Accident reporting – pupils	25 years after the pupil's date of birth, on the pupil's record	Securely disposed of
COSHH	Current academic year, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation	Date of last action, plus 50 years	Securely disposed of
Fire precautions log books	Current academic year, plus six years	Securely disposed of

Appendix G

Retention of financial records

The table below outlines the school's retention periods for financial records and the action that will be taken after the retention period, in line with any requirements.

Type of file	Retention period	Action taken after retention period ends
Payroll pensions		
Maternity pay records	Current academic year, plus three years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 (as amended)	Current academic year, plus six years	Securely disposed of
Risk management and insurance		
Employer's liability insurance certificate	Closure of the school, plus 40 years	Securely disposed of
Asset management		
Inventories of furniture and equipment	Current academic year, plus six years	Securely disposed of
Burglary, theft and vandalism report forms	Current academic year, plus six years	Securely disposed of
Accounts and statements including budget management		
Annual accounts	Current academic year, plus six years	Disposed of against common standards
Loans and grants managed by the school	Date of last payment, plus 12 years	Information is reviewed, then securely disposed of
Student Grant applications	Current year + 3 years	Securely disposed of
All records relating to the creation and management of budgets	Duration of the budget, plus three years	Securely disposed of
Invoices, receipts, order books and requisitions, delivery notices	Current financial year, plus six years	Securely disposed of
Records relating to the collection and banking of monies	Current financial year, plus six years	Securely disposed of
Records relating to the identification and collection of debt	Current financial year, plus six years	Securely disposed of
Contract management		

All records relating to the management of contracts under seal	Last payment on the contract, plus 12 years	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract, plus six years	Securely disposed of
All records relating to the monitoring of contracts	Current academic year, plus two years	Securely disposed of
School fund		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
School meals		
Free school meals registers	Current academic year, plus six years	Securely disposed of
School meals registers	Current academic year, plus three years	Securely disposed of
School meals summary sheets	Current academic year, plus three years	Securely disposed of

Appendix H

Retention of other school records

The table below outlines the school's retention periods for any other records held by the school, and the action that will be taken after the retention period, in line with any requirements.

Type of file	Retention period	Action taken after retention period ends
Property management		
Title deeds of properties belonging to the school	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the school	For as long as the building belongs to the school	Transferred to new owners if the building is leased or sold
Leases of property leased by or to the school	Expiry of lease, plus six years	Securely disposed of
Records relating to the letting of school premises	Current financial year, plus six years	Securely disposed of
Maintenance		
All records relating to the maintenance of the school carried out by contractors	Current academic year, plus six years	Securely disposed of
All records relating to the maintenance of the school	Current academic year, plus six years	Securely disposed of
Operational administration		
General file series	Current academic year, plus five years	Reviewed, and securely disposed of
Records relating to the creation and publication of the school brochure and/or prospectus	Current academic year, plus three years	Disposed of against common standards
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus one year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year plus one year	Disposed of against common standards
Visitors' books and signing-in sheets	Current academic year, plus six years	Reviewed, then securely disposed of
Records relating to the creation and management of parent teacher associations and/or old pupil associations	Current academic year, plus six years	Reviewed, then securely disposed of

Appendix I

Information Audit

The information audit will include the following (sample form to be included):

- The school's data needs
- The information needed to meet those needs
- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

The information audit may be completed in a number of ways, including, but not limited to:

- Interviews with staff members with key responsibilities – to identify information and information flows, etc.
- Questionnaires to key staff members to identify information and information flows, etc.
- A mixture of the above