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**Benwick Primary School**

**Retention Record Management Policy**

**Induction**

Benwick Primary School together with the Governing Body recognises the necessity for the efficient management of its records to comply with its legal and regulatory obligations, and to contribute to the overall effective management of the school.

**Scope**

This policy applies to all records that are created, received or maintained by staff in 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 school’s records may be selected for permanent preservation as parts of the schools archives and for historical research.

**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 responsibilities for this policy is the Headteacher and Governing Body.

Karen Hill –School Business Manager will work alongside Clare Talbot to ensure good record managing practice will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely manner.

**Recording Systems**

Information created by the school must be managed against the same standards regardless of the media in which it is stored.

**Maintenance of Record Keeping systems**

1. It is important that filing information is properly resourced and is carried out on a regular basis. It is equally important that files are weeded of extraneous information where appropriate on a regular basis. Removing information from a file once a freedom of information request has been made will be a criminal offence (unless it is part of the normal processing).
2. Applying retention records is straightforward provided files are closed on a regular basis.
3. Once a file has been closed it should be removed out of the current filing system and stored either in the archive room in the school or in another appropriate place until it has reached the end of the retention period.
4. Information security is very important especially when dealing with personal information or sensitive policy information. There are a number of basic rules:
5. All personal information should be kept in lockable filing cabinets which are kept locked when the room is unattended
6. Personal information held on computers systems should be adequately password protected. Information should never be left up on the screen if the computer is unattended
7. Files containing personal or sensitive information should not be left out on desks overnight
8. Where possible sensitive personal information should not be sent via email unless replied to recipient explicitly.
9. If files or laptops need to be taken off the premises they should be secured in the car boot or lockable containers (not left on show).
10. Teachers may carry data on memory sticks or other removable data carriers in order to access their files both at home and at school. Any data carried in this way must be encrypted using appropriate software/sticks. Teachers have access to central hosted files and can access remotely from home with a fob.
11. All computer based information should be backed up regularly and the back-up should be stored off site
12. Information contained in email should be filed into the appropriate electronic or manual filing system once it has been dealt with.

**The Safe Disposal of Information Using the Retention Schedule**

Files will be disposed of annually usually in the month of July. All personal information will be shredded before disposal. Other files can be bundled up and put in to the refuse bin once thoroughly checked for personal details. Loose papers should not be put into a bin unless it is contained within a bag.

Electronic data should be archived on electronic media and deleted appropriately at the end of the retention period.

**Monitoring and Review**

This policy is to be reviewed and approved by the governing body annually in line with government legislation.

**Summary guidelines on record retention period for our school**

The guidelines that the school follows originate from ICO, Record Management and retention and disposal policy. <https://www.gov.uk/government/publications/hmrc-records-management-and-retention-and-disposal-policy/records-management-and-retention-and-disposal-policy>

It is the responsibility of our school to retain records for the appropriate retention period, or transfer their historical records to Cambridgeshire County Council.

Agreed and adopted by the Full Governing Body on:……………..July 2020

Signed................................................................................…………Chair of Governors

**Retention Guidelines for Schools (RGS)**

Now we detail the Retention Guidelines for Schools for 16 different document categories:

1. **Records relating to child protection**

|  | **Basic File Description** | **Data Protection Issue** | **Statutory Provisions** | **Retention Period** | **Action at End of Administrative Life of Record** |
| --- | --- | --- | --- | --- | --- |
| 1.1 | Child protection files | Yes | Education Act 2002, s175, related guidance "Safeguarding Children in Education", September 2017 | Date of birth + 25 years | Secure disposal |
| 1.2 | Allegation of child protection nature against a member of staff, including where the allegation is unfounded | Yes | Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance). Education Act 20011 Guidance "Dealing with Allegations of Abuse against Teachers and Other Staff" March 2012 | Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer | Secure disposal |

**2. Records relating to governors**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 2.1 | Minutes - |  |  |  |  |
| 2.1a | Principal set (signed) | No |  | Permanent | Must be available in school for 6 years from the meeting. Can then be archived/stored elsewhere. |
| 2.1b | Inspection copies | No |  | Date of meeting + 3 years | Secure disposal |
| 2.2 | Agendas | No |  | Date of meeting | Secure disposal |
| 2.3 | Reports | No |  | Date of report + 6 years | Retain in school for 6 years from report date. Can consider archiving/storing anything important. |
| 2.4 | Instruments of Government | No |  | Permanent | Retain in school whilst school open. Can then be archived/stored elsewhere. |
| 2.5 | Action plans | No |  | Date of action plan + 3 years | Secure disposal |
| 2.6 | Policy documents | No |  | Expiry of policy | Retain in school whilst policy operational (this includes if the expired policy is part of a past decision making process). |
| 2.7 | Complaints files | Yes |  | Date of resolution of complaint + 6 years | Review for further retention in the case of contentious disputes. Secure disposal. |
| 2.8 | Annual reports required by Department of Education | No | Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI2002 No1171 | Date of report + 10 years | Secure disposal |
| 2.9 | Proposals for schools to become or be established as Specialist Status schools | No |  | Current year + 3 years | Secure disposal |

3**. Records relating to school management**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 3.1 | Log books | Yes |  | Date of last entry in book + 6 years | Secure disposal |
| 3.2 | Minutes of the senior management team and other internal administrative bodies | Yes |  | Date of meeting + 5 years | Retain in school for 5 years from meeting date. Can consider archiving/storing anything important. |
| 3.3 | Reports made by the head teacher or management team | Yes |  | Date of report + 3 years | Retain in school for 3 years from report date. Can consider archiving/storing anything important. |
| 3.4 | Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | Yes |  | Closure of file + 6 years | Secure disposal |
| 3.5 | Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | No/Yes |  | Date of correspondence + 3 years | Secure disposal |
| 3.6 | Professional development plans | Yes |  | Closure + 6 years | Secure disposal |
| 3.7 | School development plans | No |  | Closure + 6 years | Review for further retention. Secure disposal. |
| 3.8 | Admissions - if the admission is successful | Yes |  | Admission + 1 year | Secure disposal |
| 3.9 | Admissions - if the appeal is unsuccessful | Yes |  | Resolution of case + 1 year | Secure disposal |
| 3.10 | Proof of address supplied by parents as part of the admissions process | Yes |  | As the corresponding admission record | Secure disposal |
| 3.11 | Supplementary information form including additional information such as religion, medical conditions supplied as part of the admissions process | Yes |  | As the corresponding admission record | Secure disposal |

**4. Records relating to pupils**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 4.1 | Admission registers | Yes |  | Entry + 7 years | Retain in school for 7 years from entry. Can consider archiving these records if have the facility. |
| 4.2 | Attendance registers | Yes |  | Date of register + 3 years | Secure disposal |
| 4.3 | Pupil files retained in schools | Yes |  |  |  |
| 4.4 | Primary | Yes |  | Retain for time which the pupil remains at the primary school | Transfer to the secondary school (or other primary school) when the child leaves the school. |
| 4.5 | Pupil files | Yes |  |  |  |
| 4.6 | Primary | Yes |  | Retain for time which the pupil remains at the primary school | Transfer to the secondary school (or other primary school) when the child leaves the school. |
| 4.7 | Special Educational Needs files, reviews and individual education plans | Yes |  | Date of birth + 25 years | Secure disposal |
| 4.8 | Correspondence relating to authorised absence and issues | Yes |  | Date of absence + 2 years | Secure disposal |
| 4.9 | Examination results |  |  |  |  |
| 4.10 | Public | No |  | Year of examination + 6 years | Secure disposal |
| 4.11 | Internal examination results | Yes |  | Current year + 5 years | Secure disposal |
| 4.12 | Any other records created in the course of contact with pupils | Yes/No |  | Current year + 3 years | Review at the end of 3 years and retain with pupil file if necessary. Secure disposal |
| 4.13 | EHCP Statement maintained under the Education Act 1996 Section 324 | Yes | Special Educational Needs and Disability Act 2014 | Date of birth + 30 years | Secure disposal unless legal action is pending |
| 4.14 | Proposed EHCP or amended EHCP | Yes | Special Educational Needs and Disability Act 2014 | Date of birth + 30 years | Secure disposal unless legal action is pending |
| 4.15 | Advice and information to parents regarding educational needs | Yes | Special Educational Needs and Disability Act 2014 | Closure + 12 years | Secure disposal unless legal action is pending |
| 4.16 | Accessibility strategy | Yes | Special Educational Needs and Disability Act 2014 | Closure + 12 years | Secure disposal unless legal action is pending |
| 4.17 | Parental permission slips for school trips, where there has been no major incident | Yes |  | Conclusion of the trip | Secure disposal unless legal action is pending |
| 4.18 | Parental permission slips for school trips, where there has been a major incident | Yes | Limitation Act 1980 | Date of birth of pupil involved in the incident + 25 years | Secure disposal. Permission slips for all pupils on trip need to be retained for period to show that the rules had been followed for all pupils. |
| 4.19 | Records created by schools to obtain approval to run an educational visit outside the classroom, primary schools | No | Health and safety: advice for schools 2014 | Date of visit + 14 years | Secure disposal |

**5. Records relating to child Curriculum**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 5.1 | School development plan | No |  | Current year + 6 years | Secure disposal |
| 5.2 | Curriculum returns | No |  | Current year + 3 years | Secure disposal |
| 5.3 | Schemes of work | No |  | Current year + 1 year | It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal. |
| 5.4 | Timetable | No |  | Current year + 1 year | It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal. |
| 5.5 | Class record books | Yes/No |  | Current year + 1 year | It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal. |
| 5.6 | Mark books | Yes/No |  | Current year + 1 year | It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal. |
| 5.7 | Record of homework set | No |  | Current year + 1 year | It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal. |
| 5.8 | Pupils' work | Yes |  | Current year + 1 year | It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal. |
| 5.9 | Examination results | Yes |  | Current year + 6 years | Secure disposal |
| 5.10 | SATs records, examination papers and results | Yes |  | Current year + 6 years | Secure disposal |
| 5.11 | PAN reports | Yes |  | Current year + 6 years | Secure disposal |
| 5.12 | Value added and contextual data | Yes |  | Current year + 6 years | Secure disposal |
| 5.13 | Self evaluation forms | Yes |  | Current year + 6 years | Secure disposal |

**6. Records relating to personnel records**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 6.1 | Timesheets, sick pay | Yes | Financial Regulations | Current year + 6 years | Secure disposal |
| 6.2 | Staff personnel files | Yes |  | Termination + 25 years | Secure disposal |
| 6.3 | Interview notes and recruitment records | Yes |  | Date of interview notes + 6 months if unsuccessful. If successful place in personnel file. | Secure disposal |
| 6.4 | Pre-employment vetting information (including DBS checks) | Yes | DBS guidelines | Date of check + 6 months | Secure disposal |
| 6.5 | Disciplinary proceedings | Yes | Where the warning relates to child protection issues see 1.2 |  |  |
| 6.5a | Oral warning | Yes |  | Date of warning + 6 months | Secure disposal |
| 6.5b | Written warning - level one | Yes |  | Date of warning + 6 months | Secure disposal |
| 6.5c | Written warning - level one | Yes |  | Date of warning + 12 months | Secure disposal |
| 6.5d | Final warning | Yes |  | Date of warning + 18 months | Secure disposal |
| 6.5e | Case not found | Yes |  | If child protection see 1.2, otherwise destroy immediately | Secure disposal |
| 6.6 | Records relating to accident/injury at work | Yes |  | Date of incident + 12 years | In case of serious accidents a further retention period will need to be applied. Secure disposal |
| 6.7 | Annual appraisal and assessment records | Yes |  | Current year + 5 years | Secure disposal |
| 6.8 | Maternity pay records | Yes | The Statutory Maternity Pay (General) Regulations (1999 / 2055) | Current year + 3 years | Secure disposal |
| 6.9 | Proofs of identity collected as part of the process for checking "portable" enhanced DBS disclosure | Yes |  | Where possible these should be checked and a note/copy of what was checked placed on personnel file. If felt necessary to keep any documentation this should also be placed in personnel file. | Secure disposal of notes/copies and return of originals. |

7. Records relating to health and safety

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 7.1 | Accessibility plans | Yes | Disability Discrimination Act | Current year + 6 years | Secure disposal |
| 7.2 | Accident reporting |  | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 |  | Secure disposal |
| 7.2a | Adults | Yes | LGSS Report incident online | Date of incident + 7 years | Secure disposal |
| 7.2b | Children | Yes | LGSS Reporting incident online | Date of birth of child + 7 years | Secure disposal |
| 7.3 | COSHH |  |  | Current year + 10 years | Where appropriate an additional retention period may be allocated. Secure disposal |
| 7.4 | Incident reports | Yes |  | Current year + 20 years | Secure disposal |
| 7.5 | Policy statements |  |  | Date of expiry + 1 year | Secure disposal |
| 7.6 | Risk assessments |  |  | Current year + 3 years | Secure disposal |
| 7.7 | Process of monitoring areas where employees and persons are likely to have come in contact with asbestos |  | Asbestos Management Plan 2018 – Online asbestos management program | Last action + 40 years | Secure disposal |
| 7.8 | Process of monitoring areas where employees and persons are likely to have come in contact with radiation |  |  | Last action + 50 years | Secure disposal |
| 7.9 | Fire precautions log book |  |  | Current year + 6 years | Secure disposal |

**8. Administrative records**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 8.1 | Employer's liability certificate |  |  | Closure of school + 40 years | Secure disposal |
| 8.2 | Inventories of equipment and furniture |  |  | Current year + 6 years | Secure disposal |
| 8.3 | General file series |  |  | Current year + 5 years | Review to see if further retention period required. Secure disposal |
| 8.4 | School brochure or prospectus |  |  | Current year + 3 years | Disposal |
| 8.5 | Circulars (staff, parents, pupils) |  |  | Current year + 1 year | Review to see if further retention period required. Secure disposal |
| 8.6 | Newsletters, ephemera |  |  | Current year + 1 year | Review to see if further retention period required. Secure disposal |
| 8.7 | Visitors book |  |  | Current year + 2 year | Review to see if further retention period required. Secure disposal |
| 8.8 | PTA/Old Pupils Associations |  |  | Current year + 6 years | Review to see if further retention period required. Secure disposal |

**9. Records relating to Finance**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 9.1 | Annual accounts |  | Financial Regulations | Current year + 6 years | Secure disposal |
| 9.2 | Loans and grants |  | Financial Regulations | Date of last payment on loan + 12 years | Secure disposal |
| 9.3 | Contracts |  |  | Contracts completion date +12 years | Secure disposal |
| 9.4 | Monitoring records |  |  | Current year + 2 years | Secure disposal |
| 9.5 | Copy orders |  |  | Current year + 2 years | Secure disposal |
| 9.6 | Budget reports, budget monitoring etc. |  |  | Current year + 3 years | Secure disposal |
| 9.7 | Invoice, receipts and other records covered by the Financial Regulations |  | Financial Regulations | Current year + 6 years | Secure disposal |
| 9.8 | Annual budget and background papers |  |  | Current year + 6 years | Secure disposal |
| 9.9 | Order books and requisitions |  |  | Current year + 6 years | Secure disposal |
| 9.10 | Delivery documentation |  |  | Current year + 6 years | Secure disposal |
| 9.11 | Debtors' records |  | Limitations Act | Current year + 6 years | Secure disposal |
| 9.12 | School fund - Cheque books |  |  | Current year + 3 years | Secure disposal |
| 9.13 | School fund - Paying in books |  |  | Current year + 6 years | Secure disposal |
| 9.14 | School fund - Ledger |  |  | Current year + 6 years | Secure disposal |
| 9.15 | School fund - Invoices |  |  | Current year + 6 years | Secure disposal |
| 9.16 | School fund - Receipts |  |  | Current year + 6 years | Secure disposal |
| 9.17 | School fund - Bank statements |  |  | Current year + 6 years | Secure disposal |
| 9.18 | Free school meals registers | Yes |  | Current year + 6 years | Secure disposal |
| 9.20 | Petty cash books |  |  | Current year + 6 years | Secure disposal |

**10. Records relating to property**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 10.1 | Title deeds |  |  | Permanent | These should follow the property |
| 10.2 | Plans |  |  | Permanent | Retain in school whilst operational. Can then be archived/stored elsewhere. |
| 10.3 | Maintenance and contractors |  | Financial Regulations | Current year + 6 years | Secure disposal |
| 10.4 | Leases |  |  | Expiry of lease + 6 years | Secure disposal |
| 10.5 | Lettings |  |  | Current year + 3 years | Secure disposal |
| 10.6 | Burglary, theft and vandalism report forms |  |  | Current year + 6 years | Secure disposal |
| 10.7 | Maintenance log books |  |  | Last entry + 10 years | Secure disposal |
| 10.8 | Contractors' reports |  |  | Current year + 6 years | Secure disposal |

**11. Records relating to local authorities**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 11.1 | Secondary transfer sheets (primary) | Yes |  | Current year + 2 years | Secure disposal |
| 11.2 | Attendance returns | Yes |  | Current year + 1 year | Secure disposal |
| 11.3 | Circulars from Local Authority | Yes |  | Whilst required operationally | Review to see if further retention period required. Disposal |

**12. Records relating to the Department of Education**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 12.1 | OFSTED reports and papers |  |  | Replace former report with new inspection report | Review to see if further retention period required. Secure disposal |
| 12.2 | Returns |  |  | Current year + 6 years | Secure disposal |
| 12.3 | Circulars from Department of Education |  |  | Whilst required operationally | Review to see if further retention period required. Disposal |

**13. Records relating to Optum**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 13.1 | Service level agreements |  |  | Until superseded | Secure disposal |
| 13.2 | Work experience agreement | Yes |  | Date of birth of child + 18 years | Secure disposal |

**14. Records relating to school meals**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 14.1 | Dinner register |  |  | Current year + 3 years | Secure disposal |
| 14.2 | School meals summary sheets |  |  | Current year + 3 years | Secure disposal |

**15. Records relating to Family Liaison Officers and Home School Liaison Assistants**

|  | Basic File Description | Data Protection Issue | Statutory Provisions | Retention Period | Action at End of Administrative Life of Record |
| --- | --- | --- | --- | --- | --- |
| 15.1 | Day books | Yes |  | Current year + 2 years | Review to see if further retention period required. Secure disposal |
| 15.2 | Reports for outside agencies - where the report has been included on the case file created by the outside agency | Yes |  | Whilst the child is attending the school | Secure disposal |
| 15.3 | Referral forms | Yes |  | While the referral is current | Secure disposal |
| 15.4 | Contact data sheets | Yes |  | Current year then review | If contact is no longer active secure disposal |
| 15.5 | Contact database entries | Yes |  | Current year then review | If contact is no longer active secure delete |
| 15.6 | Group registers | Yes |  | Current year + 2 years | Secure disposal |