Hope School and College

Records Management Policy

Ratified On :

Review Date: September 2026

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Statement of intent

Hope School and College is committed to maintaining the confidentiality of its information and ensuring that all records within the Trust and its schools are only accessible by the appropriate individuals. In line with the requirements of the UK General Data Protection Regulation (UK UK 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.

School has created this policy to outline how records are stored, accessed, monitored, retained and disposed of, in order to meet the School's statutory requirements.

This document complies with the requirements set out under UK UK GDPR under the Data Protection Act 2018.

Signed by:

_____ Head teacher Date: _____

1. ***Legal framework***

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

- UK General Data Protection Regulation
- Data Protection Policy 2018
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)

1.2. This policy also has due regard to the following guidance:

- Information Records Management Society 'Information Management Toolkit for Schools' 2019

1.3. This policy will be implemented in accordance with the following School policies and procedures:

- Data Protection Policy
- Freedom of Information Policy
- Breach Response Policy & Procedure

2. ***Responsibilities***

2.1. Hope School and College as a whole has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.

2.2. The **Head teacher** holds overall responsibility for this policy and for ensuring it is implemented correctly.

2.3. The **Data Protection Officer** will advise on the management of records for Hope School and College.

2.4. The **DPO** is responsible for promoting compliance with this policy and reviewing the policy on an **annual** basis, in conjunction with the **Head teacher**.

2.5. The **DPO** 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.

2.6. 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. ***Management of pupil records***

3.1. 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, e.g. date of birth, home address, as well as their progress and achievement.

3.2. 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

3.3. 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, including their home address(es) and telephone number(s)
- Name of the School, admission number, the date of admission and the date of leaving, where appropriate
- Any other agency involvement, e.g. speech and language therapist

3.4. The following information is stored in a pupil record, and will be easily accessible:

- Admissions form
- Details of any 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 education and healthcare (EHC) plan and support offered in relation to the EHC plan
- 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

3.5. 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 and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
- Correspondence with parents about minor issues, e.g. behaviour

3.6. Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in a securely locked filing cabinet in the **Head teachers office** – a note indicating this is marked on the pupil's file.

3.7. Hard copies of complaints made by parents or pupils are stored in a file in the **Head teachers office** – a note indicating this is marked on the pupil's file.

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

3.9. The School will ensure that no pupil records are altered or amended before transferring them to the next School that the pupil will attend.

3.10. The only exception to the above is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, **the DPO** responsible for disposing records, will remove these records.

3.11. Electronic records relating to a pupil's record will also be transferred to the pupils' next School. Section 9 of this policy outlines how electronic records will be transferred.

3.12. The School will not keep any copies of information stored within a pupil's record, unless there is ongoing 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.

3.13. The School will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The School it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the School.

4. Retention periods connected to work and responsibilities of the governing body

For further information about governing body records please see: "The constitution of governing bodies of maintained schools' Statutory guidance

for governing bodies of maintained schools and local authorities in England August 2017"

4.1. The table below outlines the School's retention periods for work and responsibilities of the governing body and the action that will be taken after the retention period, in line with any requirements.

4.2. Electronic copies of any information and files will be destroyed in line with the retention periods below.

Management of Governing Body				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Instruments of government		For the life of the school	Consult local archives before disposal	
Trusts and endowments		For the life of the school	Consult local archives before disposal	
Records relating to the election of parent and staff governors not appointed by the governors		Date of election + 6 months	SECURE DISPOSAL	Yes
Records relating to the appointment of co-opted governors		Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children). In this case retain for 25 years	SECURE DISPOSAL	Yes

Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Records relating to the election of chair and vice chair		Once the decision has been recorded in the minutes, the records relating to the election can be	SECURE DISPOSAL	Yes

		destroyed		
Scheme of delegation and terms of reference for committees		Until superseded or whilst relevant [Schools may wish to retain these records for reference purposes in case decisions need to be justified]	These could be offered to the archives if appropriate.	
Meetings schedule		Current year	STANDARD DISPOSAL	
Agendas - principal copy		Where possible the agenda should be stored with the principal set of the minutes	Consult local archives before disposal	Potential
Minutes - principal set (signed)		Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting	Consult local archives before disposal	Potential

Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Reports made to the governors' meeting which are referred to in the minutes		Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting	Consult local archives before disposal	Potential
Register of attendance at Full governing board meetings		Date of last meeting in the book + 6 years	SECURE DISPOSAL	Yes
Papers relating to the management of the annual parents' meeting		Date of meeting + 6 years	SECURE DISPOSAL	Yes
Agendas - additional copies		Date of meeting	STANDARD DISPOSAL	

Records relating to Governor Monitoring Visits		Date of the visit + 3 years	SECURE DISPOSAL	Yes
Annual Reports required by the DoE		Date of report + 10 years	SECURE DISPOSAL	
All records relating to the conversion of schools to Academy status		For the life of the organisation	Consult local archives before disposal	

Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Records relating to complaints made to and investigated by the governing body or head teacher		Major complaints: current year + 6 years. If negligence involved then: current year + 15 years If child protection or safeguarding issues are involved then: current year + 40 years	SECURE DISPOSAL	Yes
Correspondence sent and received by the governing body or head teacher		General correspondence should be retained for current year + 3 years	SECURE DISPOSAL	Potential
Action plans created and administered by the governing body		Until superseded or whilst relevant	SECURE DISPOSAL	
Policy documents created and administered by the governing body		Until superseded [The school should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the IICSA has issued its		

		recommendations.]		

Governor Management				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Records relating to the appointment of a clerk to the governing body		Date on which clerk appointment ceases + 6 years	SECURE DISPOSAL	Yes
Records relating to the terms of office of serving governors, including evidence of appointment		Date appointment ceases + 6 years		Yes
Records relating to governor declaration against disqualification criteria		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes
Register of business interests		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes
Governors Code of Conduct		This is expected to be a dynamic document; one copy of each version should be kept for the life of the organisation		
Records relating to the training required and received by Governors		Date Governor steps down + 6 years	SECURE DISPOSAL	Yes

Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Records relating to the induction programme for new governors		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes

Records relating to DBS checks carried out on clerk and members of the governing body		Date of DBS check + 6 months	SECURE DISPOSAL	Yes
Governor personnel files		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes

5. ***Retention of senior leadership and management records***

5.1. The table below outlines the School's retention period connected to the processes involved in managing the school, including Human Resources, Financial Management, Payroll and Property Management, and the action that will be taken after the retention period, in line with any requirements.

5.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Head Teacher and Senior Management Team				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Log books of activity in the school maintained by the Head Teacher		Date of last entry in the book + mini-mum of 6 years, then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate	Potential
Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies		Date of the meeting + 3 years then review annually, or as required if not destroyed	SECURE DISPOSAL	Potential
Reports created by the Head Teacher or the Management Team		Date of the report + a minimum of 3 years then review annually or as required if not destroyed	SECURE DISPOSAL	Potential

Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities which do not fall under any other category		Current academic year + 6 years then review annually, or as required if not destroyed	SECURE DISPOSAL	Potential
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities		Current year + 3 years	SECURE DISPOSAL	Potential
Professional development plans		These should be held on the individual's personnel record. If not then termination of employment + 6 years	SECURE DISPOSAL	Potential
School development plans		Life of the plan + 3 years	SECURE DISPOSAL	

Operational Administration				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
General file series which do not fit under any other category		Current year + 5 years, then review	SECURE DISPOSAL	Potential
Records relating to the creation and publication of the school brochure or prospectus		Current academic year + 3 years	The school could preserve a copy for their archive otherwise STANDARD DISPOSAL	
Records relating to the creation and distribution of circulars to staff, parents or pupils		Current academic year + 1 year	STANDARD DISPOSAL	
School Privacy Notice which is sent to parents as part of UK UK GDPR compliance		Until superseded + 6 years		

Consents relating to school activities as part of UK UK GDPR compliance (for example, consent to be sent circulars or mailings)		Consent will last whilst the pupil attends the school, it can therefore be destroyed when the pupil leaves	SECURE DISPOSAL	Yes
Newsletters and other items with a short operational use		Current academic year + 1 year [Schools may decide to archive one copy]	STANDARD DISPOSAL	
Visitor management systems (including electronic systems, visitors books and signing-in sheets)		Last entry in the visitors book + 6 years (in case of claims by parents or pupils about various actions).	SECURE DISPOSAL	Yes
Walking bus registers		Date of register + 6 years	SECURE DISPOSAL	Yes

Human Resources				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Recruitment				
All records leading up to the appointment of a Head teacher		Unsuccessful attempts. Date of appointment plus 6 months. Add to personnel file and retain until end of appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years	SECURE DISPOSAL	Yes
All records leading up to the appointment of a member of staff/governor – unsuccessful candidates		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL	Yes
Pre-employment vetting	DBS Update	Application forms,	SECURE DISPOSAL	Yes

information – DBS Checks – successful candidates	Service Employer Guide 26 September 2018; Keeping Children Safe in Education. June 2023 (Statutory Guidance from DoE) Sections 73, 74	references and other documents – for the duration of the employee's employment + 6 years		
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Recruitment				
Forms of proof of identity collected as part of the process of checking "portable" enhanced DBS disclosure		Where possible this process should be carried out using the on-line system. If it is necessary to take a copy of documentation then it should be retained on the staff personal file.	SECURE DISPOSAL	Yes
Pre-employment vetting information – Evidence proving the right to work in the United Kingdom – successful candidates	An Employer's Guide to Right to Work Checks [Home Office, 28 March 2023]	Where possible these documents should be added to the staff personnel file [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of employment + not less than 2 years	SECURE DISPOSAL	Yes
Operational Staff Management				
Staff personnel file	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years, unless the member of staff is part of any case which falls	SECURE DISPOSAL	Yes

		under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete		
Annual appraisal/ assessment records		Current year + 6 years	SECURE DISPOSAL	Yes
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Operational Staff Management				
Sickness absence monitoring		Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records. It could be argued that where sickness pay is not paid then current year + 3 years is acceptable, whilst if sickness pay is made then it becomes a financial record and current year + 6 years applies. The actual retention may depend on the internal auditors. Most seem to accept cur- rent year + 3 years as being acceptable as this gives them, 'benefits' and Inland Revenue have time to investigate if they need to	SECURE DISPOSAL	Yes
Staff training – where the training leads to continuing professional development		Length of time required by the professional body	SECURE DISPOSAL	Yes
Staff training – except where dealing with children, e.g. first aid or		This should be retained on the personnel file	SECURE DISPOSAL	Yes

health and safety				

Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Operational Staff Management				
Staff training – where the training relates to children (e.g. safeguarding or other child related training)		Date of the training + 40 years [This retention period reflects that the IICSA may wish to see training records as part of an investigation]	SECURE DISPOSAL	Yes
Disciplinary and Grievance Processes				
Where schools are in any doubt as to which categories disciplinary records fall under, then HR or legal advice should be sought from the Local Authority.				
Records relating to any allegation of a child protection nature against a member of staff	"Keeping children safe in education Statutory guidance for schools and colleges June 2023"; "Working together to safeguard children. A guide to inter-agency working to safe-guard and promote the welfare of children 2018"	Until the person's normal retirement age or 10 years from the date of the allegation (whichever is the longer) then REVIEW. Note: allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned UNLESS the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete	SECURE DISPOSAL These records must be shredded	Yes
Disciplinary proceedings				Yes

Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Disciplinary and Grievance Processes				
Note: The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line, and them defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim. Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.				
Oral warning		Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file	
Written warning – level 1		Date of warning + 6 months		
Written warning – level 2		Date of warning + 12 months		
Final warning		Date of warning + 18 months		
Case not found		If the incident is related to child protection then see above, otherwise dispose of at the conclusion of the case	SECURE DISPOSAL	

Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Payroll and Pensions				
Absence record		Current year + 3 years	SECURE DISPOSAL	Yes

Batches	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
Bonus sheets	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL	Yes
Car allowance claims	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL	Yes
Car loans	Taxes Management Act 1970 Income and Corporation Taxes 1988	Completion of loan + 6 years	SECURE DISPOSAL	Yes
Car mileage output	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
Elements		Current year + 2 years	SECURE DISPOSAL	Yes
Income tax form P60		Current year + 6 years	SECURE DISPOSAL	Yes

Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Payroll and Pensions				
Insurance	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes

Maternity payment		Current year + 3 years	SECURE DISPOSAL	Yes
Members allowance register	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
National Insurance – schedule of payments	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
Overtime	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL	Yes
Part time fee claims	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
Pay packet receipt by employee		Current year + 2 years	SECURE DISPOSAL	Yes
Payroll awards		Current year + 6 years	SECURE DISPOSAL	Yes

Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Payroll and Pensions				
Payroll – gross/net weekly or monthly	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
Payroll reports	Taxes Management Act 1970 Income and Corporation	Current year + 6 years	SECURE DISPOSAL	Yes

	Taxes 1988			
Payslips – copies	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
Pension payroll	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
Personal bank details	If employment ceases then end of employment + 6 years	Until superseded + 3 years	SECURE DISPOSAL	Yes
Sickness records		Current year + 3 years	SECURE DISPOSAL	Yes
Staff returns		Current year + 3 years	SECURE DISPOSAL	Yes
Superannuation adjustments	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes

Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Payroll and Pensions				
Superannuation reports	Taxes Management Act 1970 Income and Corporation Taxes1988	Current year + 6 years	SECURE DISPOSAL	Yes

Tax forms P6/P11/ P11D/P35/P45/P46/ P48	The minimum requirement - as stated in Inland Revenue Booklet 490 -is for at least 3 years after the end of the tax year to which they apply. Originals must be retained in paper/ electronic format. It is a corporate decision to retain for current year + 6 years. Employees should retain records for 22 months after current tax year	Current year + 6 years	SECURE DISPOSAL	Yes
Time sheets/clock cards/flexitime		Current year + 3 years	SECURE DISPOSAL	Yes

Health and Safety				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Health and safety policy statements		Life of policy + 3 years	SECURE DISPOSAL	
Health and safety risk assessments		Life of risk assessment + 3 years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred.	SECURE DISPOSAL	

Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Ad-ministration Act 1992 Section 8. Limitation Act 1980 Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628 Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628 Social Security Administration Act 1992 Section 8. Social Security (Claims and Payments) Amendment (No 30 Regulations 1993 SI 1993 No 2113 Allows the information to be kept electronically	The Accident Book – BI 510 - 3 years after last entry in the book This includes the new format to be used from 1/1/04 This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry Completed pages must be kept se- cure with restricted access. Data Protection Act 2018 and UK GDPR	SECURE DISPOSAL	Yes

Health and Safety				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628	The Accident Book – BI 510 - 3 years after last entry in the book This includes the new format to be used from 1/1/04 This means that, if it takes 5 years to complete, the book must be retained	SECURE DISPOSAL	Yes

	Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628 Social Security Administration Act 1992 Section 8. Social Security (Claims and Payments) Amendment (No 30 Regulations 1993 SI 1993 No 2113 Allows the information to be kept electronically	for a further 3 years from the last entry Completed pages must be kept secure with restricted access. Data Protection Act 2018 and UK GDPR		
Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see http://www.hse.gov.uk/RIDDOR/	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2)	Date of incident + 3 years provided that all records relating to the incident are held on personnel file [see 2.4.2 above]	SECURE DISPOSAL	Yes

Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Control of Substances Hazardous to Health (COSHH)	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)	Date of incident + 40 years	SECURE DISPOSAL	
Process of monitoring of areas where employees and persons are likely to have come into con- tact with asbestos	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL	

Process of monitoring of areas where employees and persons are likely to have come into con- tact with radiation. Maintenance records or controls, safety features and PPE ---------- Dose assessment and recording	The Ionising Radiation Regulations 2017. SI 2017 No 1075 Regulation 11 As amended by SI 2018 No 390 Personal Protective Equipment (Enforcement) Regulations 2018	2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. ---------- To keep the records made and maintained (or a copy of these records) until the person to whom the record relates has or would have attained the age of 75 years, but in any event for at least 30 years from when the record was made	SECURE DISPOSAL	
Fire Precautions log books		Current year + 3 years	SECURE DISPOSAL	

Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Health and Safety				
Health and safety file to show current state of building, including all alterations (wiring, plumbing, building works, etc.), to be passed on in the case of change of ownership		Pass to new owner on sale or transfer of building		
Financial Management				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Risk Management and Insurance				
Employer's Liability Insurance Certificate		Closure of the school + 40 years [May be kept electronically]	SECURE DISPOSAL To be passed to the Local Authority if the school closes	
Asset Management				
Inventories of furniture and equipment		Current year + 6 years	SECURE DISPOSAL	
Burglary, theft and vandalism report forms		Current year + 6 years	SECURE DISPOSAL	
Accounts and Statements (including budget management)				
Annual accounts		Current year + 6 years	STANDARD DIS-POSAL	
Loans and grants managed by the school		Date of last payment on the loan + 12 years then review	SECURE DISPOSAL	

Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Accounts and Statements (including budget management)				
All records relating to the creation and management of budgets, including the annual budget statement and back- ground papers		Life of the budget + 3 years	SECURE DISPOSAL	
Invoices, receipts, order books and requisitions, delivery notices		Current financial year + 6 years	SECURE DISPOSAL	
Records relating to the collection and banking of monies		Current financial year + 6 years	SECURE DISPOSAL	
Records relating to the identification and collection of debt		Final payment of debt + 6 years	SECURE DISPOSAL	
Pupil Finance				
Student Grant applications		Current year + 3 years	SECURE DISPOSAL	Yes
Pupil Premium Fund records		Date pupil leaves the provision + 6 years	SECURE DISPOSAL	Yes
Contract Management				
All records relating to the management of contracts under seal	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL	
All records relating to the management of contracts under signature	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL	
Records relating to the monitoring of contracts		Life of contract + 6 or 12 years	SECURE DISPOSAL	

Financial Management				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
School Fund				
School Fund - Cheque books		Current year + 6 years	SECURE DISPOSAL	
School Fund - Paying in books		Current year + 6 years	SECURE DISPOSAL	
School Fund – Ledger		Current year + 6 years	SECURE DISPOSAL	
School Fund – Invoices		Current year + 6 years	SECURE DISPOSAL	
School Fund – Receipts		Current year + 6 years	SECURE DISPOSAL	
School Fund - Bank statements		Current year + 6 years	SECURE DISPOSAL	
School Fund – Journey Books		Current year + 6 years	SECURE DISPOSAL	
School Meals Management				
Free school meals registers (where the register is used as a basis for funding)		Current year + 6 years	SECURE DISPOSAL	Yes
School meals registers		Current year + 3 years	SECURE DISPOSAL	Yes
School meals summary sheets		Current year + 3 years	SECURE DISPOSAL	Yes

Property Management				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Property Management				
Title deeds of properties belonging to the school		These should follow the property unless the property has been registered with the Land Registry		
Plans of property belonging to the school		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold.		
Leases of property leased by or to the school		Expiry of lease + 6 years	SECURE DISPOSAL	
Records relating to the letting of school premises		Current financial year + 6 years	SECURE DISPOSAL	
Maintenance				
All records relating to the maintenance of the school carried out by contractors		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10	SECURE DISPOSAL	
All records relating to the maintenance of the school carried out by school employees, including maintenance log books		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10	SECURE DISPOSAL	

6. ***Retention of pupil management records***

6.1. The table below outlines the School's retention periods connected to the processes involved in managing a pupil's journey through school, including the admissions process, along with the action that will be taken after the retention period, in line with any requirements.

6.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Admissions Process				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
All records relating to the creation and implementation of the School Admissions Policy	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels September 2021	Life of the policy + 3 years then review	SECURE DISPOSAL	
Admissions – if the admission is successful	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels September 2021	Date of admission + 1 year	SECURE DISPOSAL	Yes
Admissions – if the appeal is unsuccessful	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels September 2021	Resolution of case + 1 year	SECURE DISPOSAL	Yes
Register of Admissions	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made	REVIEW Schools may wish to consider keeping the admission register permanently as an archive record as often	

	panels September 2021		schools receive enquiries from past pupils to confirm the dates they attended the school or to transfer these records to the appropriate County Archives Service	

Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Admissions – Secondary Schools – Casual		Current year + 1 year	SECURE DISPOSAL	Yes
Proofs of address supplied by parents as part of the admissions process	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels September 2021	Current year + 1 year	SECURE DISPOSAL	Yes
Supplementary information form including additional information such as religion, medical conditions etc.				Yes
For successful admissions		This information should be added to the pupil file	SECURE DISPOSAL	
For unsuccessful admissions		Until appeals process completed (UK GDPR)	SECURE DISPOSAL	

Pupil's Educational Record				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.				
Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 As amended by SI 2018 No 688			Yes
Primary		Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit	
Secondary	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	REVIEW	
Examination Results – pupil copies				Yes
Public		This information should be added to the pupil file	All uncollected certificates should be returned to the examination board after reasonable attempts to contact the pupil have failed	
Internal		This information should be added to the pupil file		

Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Child protection information held on pupil file	"Keeping children safe in education Statutory guidance for schools and colleges June 2023"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018"	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file. Note: These records will be subject to any instruction given by IICSA	SECURE DISPOSAL These records must be shredded	Yes
Child protection information held in separate files	"Keeping children safe in education Statutory guidance for schools and colleges June 2023"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018"	DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record Note: These records will be subject to any instruction given by IICSA	SECURE DISPOSAL These records must be shredded	Yes

Attendance				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.				
Attendance Registers	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities May 2022	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made.	SECURE DISPOSAL	Yes
Correspondence relating to any absence (authorised or unauthorised)	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL	Potential

Attendance					
	Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.					
Special Educational Needs files, reviews and Education, Health and Care Plan, including ad- vice and information provided to parents regarding educational needs and accessibility strategy		Children and Family's Act 2014; Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 31 years [Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act]	SECURE DISPOSAL	Yes

7. ***Retention of curriculum and extra-curricular activities management***

7.1. The table below outlines the School's retention periods connected to the processes involved in managing the curriculum and any extra-curricular activities, along with the action that will be taken after the retention period, in line with any requirements.

7.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Statistics and Management Information				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Curriculum returns		Current year + 3 years	SECURE DISPOSAL	No
Examination Results (school's copy)		Current year + 6 years	SECURE DISPOSAL	Yes
SATS records				Yes
Results		The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all of the whole year's SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL	
Examination Papers		The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL	

Published Admission Number (PAN) Reports		Current year + 6 years	SECURE DISPOSAL	Yes

Statistics and Management Information				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Value Added and Contextual Data		Current year + 6 years	SECURE DISPOSAL	Yes
Self-Evaluation Forms			SECURE DISPOSAL	Yes
Internal moderation		Academic year plus 1 academic year	SECURE DISPOSAL	Yes
External moderation		Until superseded	SECURE DISPOSAL	Yes
Implementation of Curriculum				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
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 home- work set		Current year + 1 year		

Pupil's work		Where possible, the pupil's work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	SECURE DISPOSAL	

School Trips				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Parental consent forms for school trips where there has been no major incident		Although the consent forms could be retained for Date of birth + 22 years, the school may wish to complete a risk assessment to assess whether the forms are likely to be required and could make a decision to dispose of the consent forms at the end of the trip (or at the end of the academic year). This is a pragmatic approach and if in doubt the school should seek legal advice	SECURE DISPOSAL	Yes
Parental permission slips for school trips – where there has been a major incident	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 Years. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	SECURE DISPOSAL	Yes

For information relating to records concerning the running of educational visits outside the classroom please see the guidance provided by https://oeapng.info/

School Support Organisations				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Family Liaison Officers and Home School Liaison Assistants				
Day books		Current year + 2 years then review	SECURE DISPOSAL	Yes
Reports for outside agencies - where the report has been included on the case file created by the outside agency		Whilst child is attending school and then destroy	SECURE DISPOSAL	Yes
Referral forms		While the referral is current	SECURE DISPOSAL	Yes
Contact data sheets		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL	Yes
Contact database entries		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL	Yes
Group registers		Current year + 2 years	SECURE DISPOSAL	Yes
Parent Teacher Associations and Old Pupils Associations				
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations		Current year + 6 years then review	SECURE DISPOSAL	

8. ***Retention of Central Government and Local Authority management records***

8.1. The table below outlines the School's retention periods connected to the records created in the course of interaction between the school and local authority, along with the action that will be taken after the retention period, in line with any requirements.

8.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Local Authority				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
Secondary Transfer Sheets (primary)		Current year + 2 years	SECURE DISPOSAL	Yes
Attendance returns		Current year + 1 year	SECURE DISPOSAL	Yes
School census returns		Current year + 5 years	SECURE DISPOSAL	
Circulars and other information sent from the local authority		Operational use	SECURE DISPOSAL	
Central Government				
Basic file description	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of the administrative life of the record**	**Personal Information**
OFSTED reports and papers where a physical copy is held		Life of the report then review	SECURE DISPOSAL	
Returns made to central government		Current year + 6 years	SECURE DISPOSAL	
Circulars and other information sent from central government		Operational use	SECURE DISPOSAL	

9. Storing and protecting information

9.1. The **DPO** will undertake a risk analysis to identify which records are vital to School management and these records will be stored in the most secure manner.

9.2. The **IT Provider** will conduct a back-up of information on a **termly** basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.

9.3. Where possible, backed-up information will be stored off the School premises, using a central back-up service operated by the outsourced IT Provider.

9.4. Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.

9.5. Confidential paper records are not left unattended or in clear view when held in a location with general access.

9.6. Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site.

9.7. Where data is saved on removable storage or a portable device, the device is kept in a locked and fireproof filing cabinet, drawer or safe when not in use.

9.8. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.

9.9. All electronic devices are password-protected to protect the information on the device in case of theft.

9.10. Where possible, the School enables electronic devices to allow the remote blocking or deletion of data in case of theft.

9.11. Staff and governors do not use their personal laptops or computers for School purposes.

9.12. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

9.13. Emails containing sensitive or confidential information are password-protected to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email.

9.14. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

9.15. When sending confidential information by fax, members of staff always check that the recipient is correct before sending.

9.16. Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the UK GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the School premises accepts full responsibility for the security of the data.

9.17. Before sharing data, staff always ensure that:

- They have consent from data subjects to share it.
- Adequate security is in place to protect it.
- The data recipient has been outlined in a privacy notice.

9.18. All staff members will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential

information will be stored in a securely locked filing cabinet, drawer or safe with restricted access.

9.19. Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the School containing sensitive information are supervised at all times.

9.20. The physical security of the School's buildings and storage systems, and access to them, is reviewed **termly** by the **Caretaker** in conjunction with **the DPO**. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the **Head Teacher** and extra measures to secure data storage will be put in place.

9.21. The School takes its duties under the UK GDPR seriously and any unauthorised disclosure may result in disciplinary action.

9.22. The **DPO** is responsible for continuity and recovery measures are in place to ensure the security of protected data.

9.23. Any damage to or theft of data will be managed in accordance with the School's **Breach Response Procedure**.

10. ***Accessing information***

10.1. **Hope School and College** is transparent with data subjects, the information we hold and how it can be accessed.

10.2. 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 provide and withdraw consent to information being held.
- Understand what the School is doing to comply with its obligations under the UK GDPR.

10.3. All members of staff, parents of registered pupils and other users of the School and its facilities have the right, under the UK GDPR, to access certain personal data being held about them or their child.

10.4. 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.

10.5. 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.

10.6. The School will adhere to the provisions outlined in the School's **Data Protection Policy** when responding to requests seeking access to personal information.

11. ***Digital continuity statement***

11.1. Digital data that is retained for longer than six years will be named as part of a **digital continuity statement**.

11.2. The **DPO** will identify any digital data that will need to be named as part of a digital continuity statement.

11.3. The data will be archived to dedicated files on the School's server, which are password-protected – this will be backed-up in accordance with Section 9 of this policy.

11.4. Memory sticks will never be used to store digital data, subject to a digital continuity statement.

11.5. The IT Provider will review new and existing storage methods annually and, where appropriate add them to the **digital continuity statement**.

11.6. 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 UK GDPR

12. ***Information audit***

12.1. 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 UK GDPR. This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Sound recordings
- Video and photographic records

- Hybrid files, containing both paper and electronic information

12.2. 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

12.3. The **DPO** is responsible for completing the information audit. The information audit will include the following:

- 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

12.4. The **DPO** will consult with staff members involved in the information audit process to ensure that the information is accurate.

12.5. Once it has been confirmed that the information is accurate, **the DPO** will record all details on the School's **Record of Processing Activities**.

12.6. The information displayed on the **Record of Processing Activities** will be shared with the **Head teacher** to gain their approval.

13. ***Disposal of data***

13.1. 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.

13.2. Where disposal of information is outlined as secure disposal, this will be shredded and, where possible, cut. The **Office staff** will keep a record of all files that have been destroyed.

13.3. Where the disposal action is indicated as reviewed before it is disposed, the **Office Staff** will review the information against its administrative value – if the information should be kept for administrative value, the **office staff** will keep a record of this.

13.4. 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.

13.5. Where information has been kept for administrative purposes, the **DPO** 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.

13.6. Where information must be kept permanently, this information is exempt from the normal review procedures

14. ***Monitoring and review***

14.1. This policy will be reviewed on an annual basis by the DPO in conjunction with the Head teacher – the next scheduled review date for this policy is July 2025.

14.2. Any changes made to this policy will be communicated to all members of staff and the governing board.