Langley Mill Church of England Infant School and Nursey





Record Retention and Deletion Policy

Always our best for God, Each Other and Ourselves

Langley Mill Church of England Infant School and Nursery

Last Reviewed	April 2025
Reviewed By (Name)	Karen Downing
Job Role	School Business Manager
Next Review Date	April 2026
Version produced Spring 2025	 Minor amendments indicated in green text. 4. Disposal of Data- amended some wording from 'disposed of' to destroyed 5. Transfer to Archives – this section has been re-written Added a paragraph to section 6 regarding the transfer of paper copies to digital and the disposal of said paper copes 8. Management Information System (MIS) section updated

11. Academisation- this section has been re-written
Updated 'The Education (Pupil Registration) (England) Regulations 2006' to 'The School Attendance (Pupil Registration) (England) Regulations 2024'
Wording and abbreviations updated throughout:
KCSiE 2024 (also updated paragraph references and hyperlinks)
Where it states governors, this has been updated to state "Governors/Trustees [delete as appropriate]".
Where it states school, this has been updated to state "School/ Trust/ Academy [delete as appropriate]"
Updated the words 'must' and 'should' to 'will' where necessary throughout.
13. Retention Tables:
Amended Retention table throughout regarding when to offer certain information to the Local Authority Record Office at the end of use or when school closes.
5. School Communications- added 5.2 section which covers Pupil emails.
8.6. Directors – disqualification (MATs only) added to retention table
10.11. Fire Assessments added to retention table
11.4. Records relating to school vehicles (records that are not required anywhere else e.g. health and safety, litigation etc) added to retention table
Updated info for 15.1.
15. Financial Management – School Meals, added a new section (15.4) which covers retention in relation to the breakfast club grant.
19.3- Added in retention guidance for unauthorized absence
20. Special Educational Needs (SEN) updated

document will be reviewed annually and sooner when significant changes are made to the law

Guidance from the Department for Education about school policies can be found here: <u>https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts</u>

This

1 Contents

1.	How to use this document	5
2.	Introduction	5
3.	Purpose	6
4.	Disposal of Data	6
5.	Transfer of Records to Archives	7
a)) Storage archives, for school business purposes	7
b) Historic archives, for school heritage	7
6.	Transfer of Records to other Media	
7.	Transfer of Records to other Settings & 'Last Known School'	
8.	Management Information System (MIS)	
9.	Records relating to Child Sexual Abuse	
10.	Retention of Records relating to Staff	11
11.	Academisation	
12.	Responsibility and Monitoring	
13.	Retention tables	Error! Bookmark not defined.
1.	. Governing Body	Error! Bookmark not defined.
2.	. Headteacher & Senior Management/Leadership Team	Error! Bookmark not defined.
3.	. Admissions	Error! Bookmark not defined.
4	. Operational Administration	Error! Bookmark not defined.
5.	. School Communications	Error! Bookmark not defined.
6	. HR – Recruitment	Error! Bookmark not defined.
7.	. HR – Operational Staff Management	Error! Bookmark not defined.
8	. HR - Management of Disciplinary and Grievance Processes	Error! Bookmark not defined.
9.	. HR – Payroll & Pensions	Error! Bookmark not defined.
1	0. Health and Safety	Error! Bookmark not defined.
1	1. Financial Management – Risk & Insurance, Asset Management	Error! Bookmark not defined.
	2. Financial Management – Accounts and Statements including Budge efined.	et Management Error! Bookmark not
1	3. Financial Management – Contract Management	Error! Bookmark not defined.
	4. Financial Management – School Fund [where one exists, or has dor ookmark not defined.	ne in the previous 7yrs] Error!
1	5. Financial Management – School Meals	Error! Bookmark not defined.

16.	Property Management Er	or! Book	mark not d	efined.
17.	Pupil Education Record (see s2 Education Record (Pupil Information) Regulation	ns 2005).	Error! Bo	okmark
not def	fined.			

18.	Child Protection (CP) / Safeguarding Records	Error! Bookmark not defined.
19.	Attendance	Error! Bookmark not defined.
20.	Special Educational Needs (SEN)	Error! Bookmark not defined.
21.	Curriculum Management	Error! Bookmark not defined.
22.	Implementation of Curriculum	Error! Bookmark not defined.
23.	Extra Curriculum Management	Error! Bookmark not defined.
24.	Family Liaison / Early Help / Alternative Provision	Error! Bookmark not defined.
25.	Local Authority	Error! Bookmark not defined.
26.	Central Government	Error! Bookmark not defined.
27.	Parent / Alumni Associations	Error! Bookmark not defined.
28.	Recordings (meetings, calls, online lessons)	Error! Bookmark not defined.
29.	Pupil Work Experience / Placement Records (Secondary schools)	Error! Bookmark not defined.
30.	Administration of Medication	Error! Bookmark not defined.
Appendix	A – List of School / Trust Records and Data safely destroyed	Error! Bookmark not defined.

1. How to use this document

This is a very big document. It can be read from front to back, but this will take time, alternatively you can select from an A-Z of relevant provisions.

A-Z

Admissions Attendance Central Government Child Protection (CP) / Safeguarding Records Curriculum (Implementation) Curriculum Management Extra Curriculum Management Family Liaison / Early Help / Alternative Provision Financial Management – Accounts and Statements including Budget Management Financial Management – Contract Management Financial Management – Risk & Insurance, Asset Management Financial Management – School Fund Financial Management – School Meals Governing Body Headteacher & Senior Management/Leadership Team Health and Safety HR - Management of Disciplinary and Grievance Processes HR – Operational Staff Management HR – Payroll & Pensions HR - Recruitment Local Authority Returns Medication (Administration Records) **Operational Administration** Parent / Alumni Associations Property Management Pupil Education Record inc SEN, Ed Psych reports Recording Meetings, calls, online lessons, training School Communications inc email & social media Special Educational Needs (SEN) Work Experience / Placement (pupil)

2. Introduction

This record retention and deletion policy contains recommended retention periods for the different record series created and maintained by Langley Mill Church of England Infant School and Nursery. The schedule refers to all information whether it is held in hard copy or electronic format including cloud and web based or on third party platforms.

Some of the retention periods are governed by statute. Others are guidelines, following best practice, employed by schools throughout the United Kingdom. Every effort has been made to ensure that these retention periods are compliant with the requirements of the UK General Data Protection Regulation 2018 (UK GDPR), the Data Protection Act 2018 (DPA), the Human Rights Act 1998, the Freedom of Information Act 2000 (FOI) and the Code of Practice on Records Management (under Section 46 of the FOI).

Managing records series using these retention guidelines will be deemed to be 'normal processing' under the terms of the legislation noted above. If those record series are to be kept for longer or shorter periods than the time scales held in this document, the reasons for any deviation will be recorded.

3. Purpose

This policy, for managing records at Langley Mill Church of England Infant School and Nursery has been drawn up in conformity with legislation, regulations affecting schools and best practice as promoted by the Information and Records Management Society (IRMS).

As well as containing Record Retention tables, this document sets out more general information and guidelines for recording, managing, storing and the disposal of data, whether they are held on paper or electronically (including online), in order to assist staff, and the school to comply with the General Data Protection Regulation (EU) 2016/679 (GDPR) including as adopted by the United Kingdom as a result of its exit from the European Union ("UK GDPR"), Data Protection Act 2018 and the FOI. It will be read and used in conjunction with all of our related policies.

It is expected that;

- All information held by (Langley Mill Church of England Infant School and Nursery) needs to be justifiable, by reference, to its purpose.
- Langley Mill Church of England Infant School and Nursery will be transparent and accountable as to what data they hold.
- Langley Mill Church of England Infant School and Nursery will understand and explain the reasons why they hold data.
- Langley Mill Church of England Infant School and Nursery will be able to respond to Subject Access Requests.
- Langley Mill Church of England Infant School and Nursery will be able to amend, delete or transfer data promptly upon any justified request.
- Langley Mill Church of England Infant School and Nursery will be able to audit how personal data was collected and when and why.
- Langley Mill Church of England Infant School and Nursery will hold sensitive data securely, accessed only by those with reason to view it and possess a policy as to why it is needed.
- Langley Mill Church of England Infant School and Nursery will have retention policies that reflect the importance of records relating to child sexual abuse to victims and survivors, and that they may take decades to seek access to such records.

4. Disposal of Data

Article 5(e) of the UK GDPR states that personal data will be 'kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes... in order to safeguard the rights and freedoms of the data subject ('storage limitation')'.

Not all data needs to be destroyed. The school will determine whether records are to be selected for permanent preservation, or for destruction or to be transferred into a different format.

When information is no longer required, it will be destroyed. For confidential, sensitive or personal information, to be considered securely disposed of, it will be in a condition where it cannot either be read or reconstructed.

Skips, 'regular' waste disposal and ribbon shredders are not secure.

Paper records will be cross-shredded, incinerated, or pulped.

CDs/DVDs/discs will be cut into pieces. Hard copy images, AV recordings and hard disks will be dismantled and destroyed. Where third party disposal companies are employed, a certificate of destruction will be obtained. Staff working for external provider will have been trained in the handling and destruction of confidential data.

If the school receives a request for records that have not yet been destroyed, even if they should have been destroyed, that record will still be made available to the requestor.

The FOI requires the school to maintain a list of all records that have been destroyed and who authorised their destruction. This record will be retained for 15 years. The appropriate members of staff (Data Lead) will record:

- File reference and/or unique identifier
- File title or brief description of contents
- Number of files
- Name of the authorising officer

An example is contained in Annex A.

5. Transfer of Records to Archives

a) Storage archives, for school business purposes

Little-used records can clutter up the work environment. Some schools and trusts relieve pressure by moving records to a storage space until the retention period runs out. A school or trust lacking room to keep its records safe from harm (such as fire, flood, unauthorised access) may transfer them to a commercial storage service with credentials such as certification to the ISO 27001 information security standard. The school or trust remains legally responsible for the records.

b) Historic archives, for school heritage

Usually, disposal means securely destroying the documents after the retention period. But if there is an enduring historical value in the records, disposal need not mean destruction. Instead, the school or trust may offer to transfer them to the care of a dedicated archival repository, such as the relevant local authority record office (see Find an archive | The National Archives). Establishing a relationship with an archival repository is the standard method for preserving institutional heritage, as it allows the community to view historic information in a comfortable and supervised setting. Archivists are trained not just to care for the physical documents (using acid-free packaging, humidity-controlled storage, etc) but to manage requests for access in accordance with data protection legislation. They may also loan documents back to the school or trust for special occasions such as anniversary events.

To identify records of historic value, look out for "offer to local record office" in the guidance below. Other records may have obvious historic interest even if they are not mentioned (e.g. a World War II roll of honour). The school / trust should approach the record office with a list of files and agree on how and when to transfer them. It may help to set aside items for permanent preservation routinely, such as by filing a single signed copy of the minutes and key agenda papers after each meeting of the governing body, ready to offer to the repository every few years.

Attempting to set up an onsite alternative to a local record office would be a complex undertaking. A school or trust wishing to do so should consult its Data Protection Officer and approach the record office for advice on management and storage conditions. Remember that archives can include electronic data such as digital photographs, which can only be digitally preserved with the right technical interventions (see the Digital Preservation Handbook).

6. Transfer of Records to other Media

Where lengthy retention periods have been allocated to records, organisations will consider converting paper records to other media (e.g. digital or virtual, 'cloud' based). The lifespan of the media, and the ability to migrate data, will be documented in a Digital Continuity Policy. A scanning risk assessment is recommended to ensure the procedure is adequate. Further information about digital continuity can be found on the <u>National Archives</u> website who also provide guidance on assessing and managing <u>digital continuity risks</u> and a digital continuity <u>checklist</u>. Organisations that believe that they need to retain digital records over a long period on devices, software systems or in formats that may become inaccessible due to developments in technology will seek further advice from the Data Protection Officer and their IT support staff.

Once any paper records have been digitally converted, the paper copies of these records will then be securely and confidentially disposed of (see section 4. Disposal of Data). School will ensure that a record of destruction is held for these paper records (see Appendix A- example of how to create a destruction record). The only records that should always be retained as physical records are any original documents such as birth certificates, passports, marriage certificates etc (it is unlikely that schools will hold these types of documents). Documents of historical significance such as logbooks may also be retained as hard copies.

7. Transfer of Records to other Settings & 'Last Known School'

When a child leaves the school, all pupil records, including safeguarding/child protection records will be transferred in a secure manner, to the child's new school. If the records contain sensitive information (e.g. Child Protection records), proof of receipt will be obtained and logged by the school. Keeping Children Safe in Education 2024 (KCSiE) states that "where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file." All copies of data held by the school that the child has departed will then be deleted or retained in line with the retention schedule below, including all paper records and data stored electronically. Generally, a record will be kept for tracking and auditing purposes only. Schools will be aware that where electronic systems are used, sending a pupil file to the next setting does not mean that their own copy of the file is deleted, so action should be taken to delete or archive copies retained where they are no longer required by the school that the pupil has left.

There are four main categories of pupil records that need to be transferred to other settings:

• Management Information System (MIS) data

Data held on the MIS is extracted by the school using the Common Transfer File mechanism as specified in The Education (Pupil Information) (England) Regulations 2005 and subsequent amendments. The Department for Education specifies what data is to be included in the CTF in technical specification documentation. This will mean that the majority of information held on the MIS is transferred using the CTF method. However, it is important to note that **not all personal data is transferred, only the data sets specified in the CTF schema.** If the MIS has been used to store additional information (documents such as copies of end of year reports or letters) schools will take proactive action to ensure these are sent separately and securely. Traditionally, this sort of documentation was held in a pupil 'buff' file, but as organisations have turned to digital ways of working, these are frequently stored by attaching them to the digital MIS record.

• Safeguarding/Child Protection records

Schools frequently use vendor educational technology (edtech) products to hold and transfer these records. Many of these products include the functionality to electronically transfer a copy of (and obtain receipt for) pupil records directly to the next school, where the same product is also used by the receiving school. Where this is not possible, these products should have the functionality to download a pupil record for it to then be transferred electronically or printed out and delivered to the new school. Paper records will be dealt with carefully to ensure that these are safely received by the new school.

Some safeguarding edtech products enable schools to use the same system to record behavioural and other information in the same log. Schools will ensure that safeguarding/child protection records are clearly identified as such so that the receiving school can quickly identify this information. The school will consider if information such as behaviour notes needs to be transferred to the next setting, or whether it will be deleted if no longer required or relevant (e.g. a child's toileting routine may be very relevant when younger, or merits/demerits received but does not need to be part of a permanent safeguarding record).

• Special Educational Needs records

It is becoming more common for schools to use vendor edtech products to manage these records. Whether stored in such edtech products, on school IT systems/cloud storage or on paper, the SEND co-ordinator will ensure that a complete record is compiled and passed securely to the next school.

• Pupil 'buff' files

For many schools, in recent years, the traditional pupil buff files have dwindled in relevance and importance as organisations have increasingly moved to digital storage. Schools are left with either sending or receiving folders which are very light and seemingly irrelevant. However, there will be documentation, whether on paper or electronic (on the server, in emails, in the MIS) that will be sent to the next setting that the pupil will attend. The Education (Pupil Information) (England) Regulations 2005 state that this "Educational Record" will be transferred to the next setting within 15 school days of confirmation that a pupil is registered at another school. There may be a significant amount of material that is not contained in the CTF, safeguarding or SEND records that will be transferred to the next setting. Schools may have inadvertently not adapted their records transfer practices as management of these records have moved from a paper 'buff' file to digital format and so this will be noted where relevant on the retention schedule below.

Schools may wish to retain some minimal 'skeleton' data about pupils' admission, departure and next destination (where known) in order to respond to any requests for information about these pupils and for the historical archive. They may also wish to retain records relating to safeguarding/child protection or SEND records, even though there is no legislative requirement to do so (i.e. to have their own copy of evidence in case of any later legal action). If schools intend to create and maintain skeleton records or retain copies of records, this will be noted on the retention policy. In some instances, schools may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If the school does retain pupil records, then they will be prepared to justify this retention and will need to consider if a Data Protection Impact Assessment should be completed for any extended retention of records once a pupil has left the school. See section 17.5 below.

Responsibility for maintaining the pupil record passes to the 'last known school'.

The school is the final or last known school if:

- secondary phase and the pupil left at 16 years old or for post-16 or independent education, or;
- at any point the pupil left for elective home education, they are missing from education, or have left the UK, or have died.

Tertiary colleges are not included in this definition, therefore the school will retain the record. However, the college will receive a copy of the child protection file, as per the requirements of KCSiE above.

The Pupil Record will be retained as a whole for 25 years from the date of birth of the pupil, after which time, if no longer required, it can be deleted or destroyed.

SEN and other support service records can be retained for a longer period of 31 years to enable defence in a "failure to provide a sufficient education" case.

If a school wishes to retain data for analysis or statistical purposes, it will be done in an anonymised fashion.

8. Management Information System (MIS)

The majority of pupil records and some staff records are held on the school MIS. Managing data retention on the MIS can be complex because different data sets held on the MIS have different retention requirements. School staff have limited time and resources to manage these differing retention periods and will work with their MIS provider to request support on how to efficiently delete data sets from a record without deleting the entire record (or deleting all data sets except those that are required as part of the 'skeleton' record for long term retention). Where this is not possible, schools may make a policy decision to retain the entirety of a record for the longest applicable retention period for a data set within the MIS (usually current plus six years). The school will set out how records will be retained in the MIS in the relevant section of the Retention Table below.

9. Records relating to Child Sexual Abuse

Records relating to child sexual abuse will be retained for 75 years, in line with the recommendations arising from the outcome of the <u>Independent Inquiry into Child Sexual Abuse</u> (IICSA). The Inquiry stated that these records should be retained for such a long period in recognition of the importance of these records to victims, but that they should be regularly reviewed during that extended retention period. Organisations will particularly need to consider digital continuity where:

- they hold digital records for staff or governors, or
- they are the 'last known school' responsible for this long retention period for any relevant pupil records.

Where there is evidence, or allegations of child sexual abuse, then it will almost certainly be appropriate to retain the entire pupil, staff or other record as a whole, not just the parts of the record that pertain to the abuse. Staff whose duties include reviewing or digitising records will be trained to understand the importance of any evidence or allegations of child sexual abuse that they may happen to uncover, whether that was what they were looking for and the importance of them bringing these to the attention of school leadership and/or preserving these records.

The Inquiry report also recommends that the UK government directs the Information Commissioner's Office (ICO) to introduce a Code of Practice on retention of and access to records known to relate to child sexual abuse. This Policy will be updated in line with any Code of Practice from the ICO. The report states that such a code should set out that institutions should have:

- retention policies that reflect the importance of such records to victims and survivors, and that they may take decades to seek to access such records;
- clear and accessible procedures for victims and survivors of child sexual abuse to access such records;
- policies, procedures and training for staff responding to requests to ensure that they recognise the long-term impact of child sexual abuse and engage with the applicant with empathy.

10. Retention of Records relating to Staff

As stated above regarding the long-term retention of minimal pupil records, schools may wish to retain very basic 'skeleton' records about staff beyond the normal retention of the whole personnel/HR file. This information may include the staff name, role, contract start and end dates. This may be useful for schools who may need to respond to requests for information from/regarding staff, in the event of it being needed for litigation or other legal purpose and as part of their historical archive. If schools intend to create and maintain these records, this will be noted on the retention policy (at section 7.11 below)

11. Academisation

When a maintained school becomes an academy, it is legally a new organisation. However, it can still have an operational need for the records of the original school, including files relating to former pupils and employees. The Commercial Transfer Agreement that created the academy may include a section assigning responsibility for these old records, so the rights of the academy and the local authority are formally established. For instance, the agreement might direct the academy to keep the school records on trust until the retention period runs out, and to offer historically valuable documents to the local record office (see 5. Transfer of Records to Archives).

For further information regarding academy record keeping and retention information from the DfE, please see the following link:

Record keeping and retention information for academies - GOV.UK

12. Responsibility and Monitoring

The Head Teacher and/or Data Lead, hold primary and day to day responsibility, for implementing this policy. The Data Protection Officer, in conjunction with the school is responsible for monitoring its use and effectiveness and resolving any queries with regards the interpretation of the policy.

All permissions to access data are granted by the Head Teacher and recorded in the member of staff's personnel file.

All teaching and office staff are given training and guidance on accessing and managing on school records, to ensure compliance with the time scales laid out under the retention schedule. All members of staff, with access to records, are expected to;

- Manage their current record keeping systems using the Retention Policy.
- Only dispose of records in accordance with the requirements outlined in this policy, if authorised to do so.
- Ensure that any proposed divergence from the records retention schedule and disposal policies is authorised and documented by the Head Teacher.

This policy does not form part of any employee's contract of employment and is not intended to have a contractual effect. However, it does reflect the school's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the school but any changes will be notified to employees within one month of the date on which the change is intended to take effect. The school also vary any parts of the procedure, including time limits, as appropriate.

13. Retention tables

	File description	Format /	Responsible Role	Retention				
Reference		How / Where this file is held		Period	Trigger	Basis	Action at end of use	
1. Govern	ing Body			·	·			
1.1	Instruments of Government including Articles of Association	Paper – School Office and secure school archive cupboard Electronic – office documents	Clerk	Permanent	Closure of school	Common practice	Offer to the Local Authority Record Office, when the school closes	
1.2	Trusts and Endowments managed by the Governing Body	None	N/A	Permanent	End of operational use	Common practice	Offer to the Local Authority Record Office, when the school closes	
1.3	Scheme of delegation and terms of reference for committees	Paper – School Office and secure school archive cupboard	Clerk	Until superseded or whilst relevant (schools may wish to retain these records for reference purposes in case decisions need to be justified)	Expiration of terms	Common practice	If the school is unable to store these, they will be offered to the Local Authority	

	File description	Format /		Retention				
Reference		How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use	
		Electronic – office documents					Record Office	
1.4	Governor's Code of Conduct	Paper – School Office and secure school archive cupboard Electronic – office documents	Clerk	One copy of each version should be kept for the life of the school.		Common practice		
1.5	Records relating to the election of chair and vice chair	Paper – School Office and secure school archive cupboard Electronic – office documents	Clerk	Once the designation has been recorded in the minutes, the records relating to the election can be destroyed	Date of appointment	Common practice	Secure disposal	
1.6	Appointment of a clerk to the governing body	Paper – School Office and secure school archive cupboard	Clerk	Date of end of appointment + 6 years (note HR records may require different retention)	Date of appointment	Common practice	Secure disposal	

	File description	Format /		Retention			
Reference		How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
		Electronic – office documents					
1.7	Records relating to the appointment of parent and staff governors, not appointed by the governors	Paper – School Office and secure school archive cupboard Electronic – office documents	Clerk	Date of election + 6 months	Date of election	Common practice	Secure disposal
1.8	Records relating to the appointment of co- opted governors	Paper – School Office and secure school archive cupboard Electronic – office documents	Clerk	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, or for allegations involving child sexual abuse for 75 years in line with the IICSA recommendations for extended retention of	Date of appointment	Common practice	Secure disposal

	File description	Format /		Retention				
Reference		How / Resp	Responsible Role	Period	Trigger	Basis	Action at end of use	
				records relating to child sexual abuse.				
1.9	Application forms – successful candidates	Paper – School Office and secure school archive cupboard	Clerk	End of term in office + 1year	End of period of office	Common practice	Secure disposal	
		Electronic – office documents						
1.10	 Appointment documentation: Terms of office of serving governors, including evidence of appointment Governor declaration against disqualification criteria Register of business interests Training required, and received, by governors Induction programme for new governors DBS checks carried out on the clerk and members of the governing body Governor personnel files. 	Paper – School Office and secure school archive cupboard Electronic – office documents	Clerk	End of term of office + 6 years (note HR records may require different retention)	Date of appointment	Common practice	Secure disposal	
1.11	Annual Reports	Paper – School Office and secure school archive cupboard	Clerk	Date of the report + 10 years	End of the calendar year that the record was created in	Education (Governor's Annual Reports) (England)	If the school is unable to store these, they will be offered to	

	File description	Format / How / Responsi Where this Role file is held			Retention	1	
Reference			Responsible Role	Period	Trigger	Basis	Action at end of use
		Electronic – office documents				(Amendment) Regulations 2002 and the Limitation Act 1980	the Local Authority.
1.12	Annual reports required by the Department of Education	Paper – School Office and secure school archive cupboard Electronic – office	Clerk	Date of report + 10 years	Date of report	Common practice	Secure disposal
1.13	Meetings schedule	documents Paper – School Office and secure school archive cupboard Electronic – office documents	Clerk	Current year	Date of meeting	Common practice	Secure disposal
1.14	Agendas for Governing Body meetings	Paper – School Office and secure school archive cupboard	Clerk	One copy to be retained with the master set of minutes - all other copies can be disposed of	Conclusion of meeting	Common practice	Secure disposal

	File description	Format /		Retention				
Reference		How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use	
		Electronic – office documents						
1.15	Register of attendance at Full Governing Board meetings	Paper – School Office and secure school archive cupboard Electronic – office documents	Clerk	Date of meeting + 6 years	Date of meeting	Common practice	Secure disposal	
1.16	Minutes of Governing Body meetings (Principal Set signed)	Paper – School Office and secure school archive cupboard Electronic – office documents	Clerk	Permanent to be held at school	Date of meeting	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office	
1.17	Action plans created and administered by the Governing Body	Paper – School Office and secure school archive cupboard	Clerk	Until superseded or whilst relevant	Expiration of action plan	Common practice	Secure disposal	

	File description	Format /		Retention			
Reference		How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
		Electronic – office documents					
1.18	Reports presented to the Governing Body	Paper – School Office and secure school archive cupboard Electronic – office documents	Clerk	Reports will be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently	Date of report	Common practice	If the school is unable to store they will be offered to the Local Authority Record Office.
1.19	Policy documents created and/or administered by the Governing Body	Electronic – Staff Share Paper Copies	HT/SBM/ STAFF	A copy of each policy will create a time line of policy development OR a robust version control which allows a snapshot of a policy at any given date. Keep all policies relating to safeguarding and child protection for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Expiration of the policy	Common practice	Secure disposal
1.20	Records relating to complaints made to, and investigated by the Governing Body and/or Head Teacher	School Office or	HT/ Clerk	Date of the resolution of the complaint + a minimum of 6 years.	Resolution of complaint		

		Format /			Retention		
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
		Headteacher's Office		If negligence or child protection/safeguarding is involved then current year + 15 years. If child sexual abuse issues are involved then for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.			
1.21	Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies	None	N/A	For the life of the organisation	Date proposal accepted or declined	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office
1.22	Records relating to Governor Monitoring Visits	Paper – School Office and secure school archive cupboard Electronic – office documents	Clerk	Date of visit + 3 years	Date of visit	Common practice	Secure disposal

		Format /			Retention		
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
1.23	Meeting papers relating to the annual parents' meeting	None	N/A	Date of the meeting + a minimum of 6 years	Date of meeting	Common practice	Secure disposal
2. Headte	acher & Senior Management/Leadership	Team		I			
2.1	Log books of activity in the school maintained by the Head Teacher (Legislation no longer requires the completion of a school log book)	Secure Office Archive Cupboard	SBM	Date of the last entry in the log book + a minimum of 6 years and then review	Date of last entry in the log book	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office
2.2	Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies	Electronic – HT documents Paper – H/T office	HT	Date of the meeting + 3 years	Date of the meeting	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office
2.3	Correspondence created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities – <u>not</u> principally concerning pupils, staff or complaints. In those cases,	Electronic – H/T documents Paper – H/T office	HT	Date of correspondence + 3 years and then review	Date of correspondence	Common practice	Secure disposal

		Format /			Retention		
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
	correspondence will be immediately transferred to the relevant file.						
2.4	Professional Development Plans	Email (see email retention period in section 5)	HT/AHT	Life of plan + 6 years	Date plan commences	Common practice	Secure disposal
		Paper – HT office/School Office					
2.5	School Development Plans	Paper H/T Office Electronic H/T	HT	Life of plan + 3 years	Date plan commences	Common practice	Secure disposal
2.6	Other records created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities outside of Business as Usual tasks	documents Paper H/T Office Electronic H/T documents	HT	Current academic year + 6 years then review	Date of record	Common practice	Secure disposal
3. Admiss	ions						
3.1	All records relating to the creation and implementation of the School's Admission's Policy	Paper H/T Office Staffshare	HT	Life of the policy + 7 years then review		The School Admissions (Admission Arrangements	Secure disposal
3.2	Admissions – if the admission is successful	Paper – School Office	SBM	Added to the pupil file	Date of admission	and Co- ordination of	

		Format /			Retention		
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
	Proofs of address, supplied by parents, as part of the admissions process Supplementary information forms to include; religion, medical conditions etc.	Electronic – RM/Office Documents				Admission Arrangements) (England) Regulations 2012	
3.3	Admissions – if the admission is unsuccessful (where no appeal is made)	Applications are co- ordinated by the LA	N/A	Date of applied for admission + 1 year	Date of applied for admission	and School	Secure disposal
3.4	Admissions – if the admission is unsuccessful (where an appeal is made)	Applications are co- ordinated by the LA	N/A	Resolution of case + 1 year	Resolution of case	Admissions Code Statutory Guidance 2021	Secure disposal
3.5	Register of Admissions	Electronic – Supplied by the LA	N/A	Every entry in the School admission and attendance register is to be preserved for 6 years beginning with the day on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates.	Last entry in register	School Attendance (Pupil Registration) (England) Regulations 2024 Regulations 5, 7 (which comes into force on 19	Offer to the Local Authority Record Office
3.6	Proofs of address, supplied by parents, as part of the admissions process	Electronic – Supplied by the LA	N/A	Current year + 1 year	Date of admission	August 2024) and	Secure disposal

Langley Mill Church of England Infant School and Nursery

		Format /			Retention		
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
						School Admissions Code Statutory Guidance 2021	
3.7	Admissions (Secondary School – Casual)	N/A	N/A	6 years from the date of admission	Date of admission	The School Attendance (Pupil Registration) (England) Regulations 2024	Secure disposal
3.8	Supplementary information forms to include; religion, medical conditions etc. For successful admissions	N/A	N/A	This information will be added to the pupil file	Date of admission/annual data check	The Limitation Act 1980	Secure disposal
3.9	Supplementary information forms to include; religion, medical conditions etc. For unsuccessful admissions	N/A	N/A	Until the appeal process is completed	Date of admission		Secure disposal
4. Operat	ional Administration						
4.1	Records relating to the creation and publication of the school brochures or prospectus	Electronic Office documents	HT/SBM	Current year + 3 years	Expiration of current publication	Common practice	Offer to the Local Authority Record Office
4.2	Records relating to the creation and distribution of circulars to staff, parents or pupils	Admissions are co-	N/A	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority

		Format /			Retention		
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
		ordinated by the LA					Record Office
4.3	Newsletters and other items with short operational use	H/T Office – Paper Electronic – HT – Documents	HT	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office
4.4	Visitor management systems (including electronic systems, visitors' books and signing in sheets)	Sign In App – electronic Paper – Archive Cupboard	SBM	Current year + 6 years then review	End of calendar year	Common practice	Secure disposal
4.5	Pupil & Family Privacy Notice which is made available via the school website as part of UK GDPR compliance	Electronic – Staffshare	SBM	Date of issue + 6 years	When policy is superseded	Common practice	Secure disposal
4.6	Consents relating to school activities as part of UK GDPR compliance (e.g. consent for photographs to be published, social media / website etc as well as for mailings)	School Office Electronic – Office Docs/RM	SBM	This information will be added to the pupil file	Date of admission	Common practice	
4.7	Security breach logs	GDPRIS	SBM	Date of issue + 25 years (pupils) and 6 years (staff)	Date of implementation	Common practice	Secure disposal
4.8	Digital Continuity Plans which may include: -Digital Strategy -IT Disaster Recovery Procedure and Plan	Electronic Staff Share	SBM	Date of issue + 6 years	Expiration of current plan	Common practice	Secure disposal
4.9	Call Recordings (including VOIP messages and recordings)	Phone System - CC	SBM	1 week	Date of call recording	Common practice	Secure disposal

		Format /			Retention	-	
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
4.10	CCTV Recordings (retention for all 'ordinary' footage- any footage retained for specific purposes e.g. accident will need to be considered individually regarding how long it will be retained- please see CCTV policy)	N/A	NA/	N/A	Date of footage recording	Common practice	Secure disposal
5. School	Communications						
5.1	School staff/governor emails and other platforms such as Microsoft Teams/ Google Meet containing personal data – inbox, sent items, deleted items	Electronic	Staff	 1 Year – All staff to delete as part of annual ICT housekeeping. Where forming part of a record, information in these will be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. The Code of Practice states that there is no need to retain ephemeral material and this may be destroyed on a routine basis. 	In line with guidance in Acceptable use policy	Common practice	Full deletion
5.2	Pupil emails and other platforms such as Microsoft Teams/ Google Meet containing personal data – inbox, sent items, deleted items			School to determine and document here.			

		Format /			Retention		
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
				Where forming part of a record, information in these will be transferred to appropriate record keeping (eg staff file, pupil record, MIS/safeguarding/behaviour log) as soon as possible. The Code of Practice states that there is no need to retain ephemeral material and this may be destroyed on a routine basis.			
5.3	Social media platforms	Electronic	HT	6 months	End of academic yr	Common practice	Posts deleted
5.4	Website – pictures / news stories	Electronic	HT	Annual	End of academic yr	Common practice	Posts deleted

6. HR – Recruitment

Information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2024 para 424).

6.1	All records leading up to the appointment	H/T Office	HT/SBM	Unsuccessful attempts -	Date of	Common	Secure
	of a new Head Teacher	School Office		date of appointment + 6	appointment	practice. Right	disposal
				months. Successful		to work -	
				attempts - add to the staff		Immigration,	
				personnel file and retain		Asylum and	
				until the end of the		Nationality Act	
				appointment + 6 years,		2006	
				except in cases of			

		Format /			Retention		
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
				negligence or claims of child abuse then at least 15 years or information containing allegations of sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.			
6.2	All records leading up to the appointment of a new member of staff (successful candidate)	H/T Office School Office	HT/SBM	This information will be added to the staff personnel file	Date of appointment	Common practice. Right to work - Immigration, Asylum and Nationality Act 2006	
6.3	All records leading up to the appointment of a new member of staff (unsuccessful candidate)	School Office	SBM	Date of appointment + 6 months	Date of appointment	Common practice	Secure disposal
6.4	Pre-employment vetting information of successful candidates	School Office	HT/ SBM	Application forms, references and other documents – for the duration of their employment + 6 years. Note there is no requirement to keep a copy of DBS once the details have been entered into the Single Central	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2024	Secure disposal

Langley Mill Church of England Infant School and Nursery

		Format /			Retention		
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
				Record. At the end of employment, information contained in the Single Central Record will be transferred to the personnel file.			
6.5	Proofs of identity	School Office	HT/SBM	To be kept only as proof of right to work. Not kept for any other purpose. These documents will be added to the personal folder. Home Office requires that the documents are kept until termination of employment plus not less than 2 years.	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2024	Secure disposal
6.6	Pre-employment vetting information of successful candidates – for the purposes of ensuring school staff are adequately qualified	School Office	H/T SBM	To be added to the member of staff's personal folder	Date of receipt	KCSIE 2024	Secure disposal

7. HR – Operational Staff Management

Information containing allegations of sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2024 para 424)

7.1	Staff Personnel File	School Office	HT/SBM	Termination of employment	Date of	Limitation Act	Secure
				+ 6 years	appointment	1980	disposal
		Secure					
		Archive Office					

		Format /	Responsible Role	Retention				
Reference	File description	How / Where this file is held		Period	Trigger	Basis	Action at end of use	
		– Staff that have left						
7.2	Timesheets	School Office	SBM	Current year + 6 years	Date of appointment	Common practice	Secure disposal	
7.3	Annual appraisal/assessment records	Paper – H/T Office Electronic – H/T documents	H/T	Current year + 6 years	End of calendar year that the record was created in	Common practice	Secure disposal	
7.4	Sickness absence monitoring	School Office	SBM	Sickness records are categorised as 'sensitive data'. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring. Sickness records will be kept separate from accident records. Current practice recommends that sickness records will be held for the current year + 3 years.	Date of absence	Common practice & Statutory Sick Pay Act 1994	Secure disposal	
7.5	Staff training records	Paper – HT Office Electronic HT – documents	HT	Keep on personnel file (see above).	Date of appointment	Common practice (unless dictated by a professional body)	Secure disposal	

		Format /			Retention				
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use		
7.6	Annual leave records	N/A	N/A	6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year	End of relevant tax year	Common practice	Secure disposal		
7.7	 Working Time Regulations: Opt out forms Records of compliance with WTR 	N/A	N/A	2 years from the date on which they were entered into 2 years after the relevant period	End of relevant tax year	Common practice	Secure disposal		
7.8	Maternity/Adoption/Paternity Leave records	School Office	HT/SBM	Current year + 3 years	End of relevant tax year	Common practice	Secure disposal		
7.9	Consents for the processing of personal and sensitive data (this will be rare as the majority of staff data is processed due to: -contract (UK GDPR A9 (1) (b) -public task (UK GDPR A9 (1) (e) -legal obligation (UK GDPR A9 (1) (c) Consent (UK GDPR A9 (1) (a) is only required where one of the above is not relevant.)	School Office	HT/SBM	For as long as the data is being processed and up to 6 years afterwards	End of employment	Common practice	Secure disposal		
7.10	Staff policy acknowledgement	Electronic – My Concern/MS Forms	HT/SBM	Life of the policy + 3 years	Implementation of the policy	Common practice (unless otherwise dictated eg KCSIE, H&SWA)	Secure disposal		

		Format /		Retention				
Reference	File description	-	Responsible Role	Period	Trigger	Basis	Action at end of use	
7.11	Staff 'skeleton' record (which would include a brief record of name, job role, contract start and end dates (and any information that would be needed to be included in a reference)	SAP/ Office - Docs	SBM	Permanent. These form part of the historical archives of the school.	Archive on closure of the school.	Common Practice.	Offer to the Local Authority Record Office	
7.12	Register of business interests	School Office	Clerk	Date of appointment + 6 years	Date of appointment	Common practice	Secure disposal	
δ.1	against a member of staff, including where the allegation is unfounded	HT – Office	Π1/USL	retirement age or 10 years from the date of allegation,	Date of referral	Working Together to	disposal	
		e allegation if tha My Concern		E 2024 para 424) Until the person's normal retirement age or 10 years	tained at least until Date of referral	KCSIE 2024 and Working	Secure	
				preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse NB – allegations that are found to be malicious will be removed from personnel				

proven to be unfounded.

		Format /		Retention				
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use	
8.2	Disciplinary proceedings: Verbal warning	HT – Office Paper files	НТ	Date of warning + 6 months	Date of warning	KCSIE 2024	Secure disposal	
		Electronic – HT documents						
8.3	Disciplinary proceedings: Written warning (level 1)	Office Paper files	HT	Date of warning + 6 months	Date of warning	KCSIE 2024	Secure disposal	
		Electronic – Office Documents						
8.3	Disciplinary proceedings: Written warning (level 2)	Office Paper files	HT	Date of warning + 12 months	Date of warning	KCSIE 2024	Secure disposal	
		Electronic – Office Documents						
8.4	Disciplinary proceedings: Final Warning	Office Paper files	HT	Date of warning + 18 months	Date of warning	KCSIE 2024	Secure disposal	
		Electronic – Office Documents						
8.5	Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings)	Office Paper files	HT	If the incident is child protection related then see above; otherwise dispose	Date of resolution	KCSIE 2024	Secure disposal	
		Electronic – Office Documents		following the conclusion of the case				

Reference	File description	Format /		Retention				
		How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use	
8.6	Directors – disqualification (MATs Only)	N/A	N/A	15 years from the date of disqualification	Date of disqualification	The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England) Regulations 2004.	Secure disposal	
However, the Any disciplin accused of si that they sho of unblemish Employers sh personnel fil "removed fro	AS code of practice on disciplinary and grievar is does not mean that the data itself should be ary proceedings data will be a record of an im imilar misconduct at a later date, and then de ould not be given credence. Alternatively, if the ned service", the record of the disciplinary pro- hould, therefore, be careful not to confuse the le. One danger is that the disciplinary procedu om the file". This or similar wording should be nat has occurred will be kept.	e destroyed at the portant event in t fend themselves b ne employee were ceedings would b e expiry of a warn re itself often give	e end of the set p the course of the by denying they w e to be dismissed be effective evide ing for disciplination the impression	eriod. employer's relationship with t would undertake such an action for some later offence and the nce to counter this claim. ry purposes with a requirement that, at the end of the effective	the employee. Shoul n, reference to the ea en claim at tribunal t t to destroy all refere ve period for the war	d the same employ arlier proceedings hat they had e.g. " ence to its existence rning, the warning	yee be may show fifteen years e in the will be	
9. HR – Pa 9.1	yroll & Pensions Maternity Pay Records	School Office	HT/SBM	Current year + 3 years	End of the	Statutory	Secure	

9.1	Maternity Pay Records	School Office	HT/SBM	Current year + 3 years	End of the	Statutory	Secure
					financial year in	Maternity Pay	disposal
		Secure			which the	(General)	
		Archive			maternity pay	Regulations	
		Cupboard			period ends	1986	

		Format /	Responsible Role	Retention				
Reference	File description	How / Where this file is held		Period	Trigger	Basis	Action at end of use	
9.2	Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity	School Office Secure Archive Cupboard	HT/SBM	Current year + 6 years	End of the financial year	Retirement Benefits Schemes (Information Powers) Regulations 1995	Secure disposal	
9.3	Batches, Bonus Sheets, Car Loans, Car Mileage Output, Insurance, Members Allowance Register, National Insurance (Schedule of payments), Part Time Fee claims, Payroll (gross/net, weekly or monthly), Payroll Reports, Payslips (copies), Pension Payroll, Superannuation adjustments and reports	School Office Secure Archive Cupboard	SBM	Current year + 6 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal	
9.4	Bonus sheets, Car Allowance claims, Overtime	School Office Secure Archive Cupboard	SBM	Current year + 3 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal	
9.5	Income Tax P60, Personal bank details. Tax Forms P6/P11/P11D/P35/P45/P46/P48	School Office Secure Archive Cupboard	SBM	Current year + 6 years	End of the financial year	Common practice	Secure disposal	
9.6	Absence records, Sickness records, Staff returns, Time Sheets/Clock Cards/Flexitime	School Office	SBM	Current year + 3 years	End of the financial year	Common practice	Secure disposal	

		Format /		Retention				
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use	
		Secure Archive Cupboard						
9.7	Statutory Sick Pay	School Office Secure Archive Cupboard	SBM	Current year + 3 years	End of the financial year	Common practice	Secure disposal	
10. Health	and Safety							
10.1	Accessibility Plans	H/T Office	HT Health and Safety Officer	Current year + 6 years	End of the calendar year that the records was created in	Equality Act 2010 and The Limitation Act 1980	Secure disposal	
10.2	Health and Safety Policy Statements	H/T Office	HT Health and Safety Officer	Life of the policy + 3 years	Implementation of the policy	Common practice	Secure disposal	
10.3	Health and Safety Risk Assessments	H/T Office	HT Health and Safety Officer	Life of the assessment + 3 years	Implementation of the assessment	Common practice	Secure disposal	
10.4	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable- incidents.htm) and https://www.hse.gov.uk/pubns/edis1.htm Adults	Secure cupboard FSW Office	HT Health and Safety Officer	Retain for 7 years	Date of incident	Common practice	Secure disposal	
10.5	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable- incidents.htm) and https://www.hse.gov.uk/pubns/edis1.htm	Secure cupboard FSW Office	HT Health and Safety Officer	Retain for 25 years	Date of birth	Common practice	Secure disposal	

		Format /		Retention				
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use	
	Children							
10.6	Minor incidents (non reportable in 10.4 & 10.5 above)accident book	Secure cupboard FSW Office Secure Archive Cupboard	HT Health and Safety Officer	Retain for 3 years	End of academic year	Common practice and The Social Security (Claims and Payments Regulations 1979) Regulation 25	Secure disposal	
10.7	Control of Substances Hazardous to Health (COSHH)	C/T Office	HT Health and Safety Officer/CT	Current year + 40 years	Last action on file	The Control of Substances Hazardous to Health Regulations 2002	Secure disposal	
10.8	Process of monitoring areas where employees/pupils are likely to come into contact with asbestos	Secure Cupboard FSW Office	HT Health and Safety Officer	Last action + 40 years	Last action on file	The Control of Asbestos at Work Health Regulations 2012	Secure disposal	
10.9	Process of monitoring areas where employees/pupils are likely to come into contact with radiation	N/A	N/A	Last action + 50 years	Last action on file	The Ionising Radiations Regulation 2017	Secure disposal	
10.10	Fire Precautions log books	Red Box	HT Health and Safety Officer	Current year + 3 years	End of calendar year	Common practice	Secure disposal	

		Format /			Retention		
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
10.11	Fire Assessments	Red Box	HT Health and Safety Officer	Life of risk assessment + 6 years	End of Calendar year	Fire Service Order 2005 and The Limitation Act 1980	Secure disposal
11. Financi	al Management – Risk & Insurance, Asset	Management					
11.1	Employer's Liability Insurance Certificate	School Office	SBM	Date of closure + 40 years	Closure of school	Common practice	Offer to Local Record Office
11.2	Inventories of furniture and equipment	Paper – School Office Electronic SAP	SBM	Current year + 6 years	End of calendar year	Common practice	Secure disposal
11.3	Burglary, theft and vandalism report forms	School Office	SBM	Current year + 6 years	End of calendar year	Common practice	Secure disposal
11.4	Records relating to school vehicles (records that are not required anywhere else e.g health and safety, litigation etc.	N/A	N/A	6 years from the disposal of the vehicle	End of calendar year	The Limitation Act 1980	Secure disposal
12. Financi	al Management – Accounts and Statemen	ts including Bud	dget Managem	ent			
12.1	Annual accounts	School Office	SBM	Current year + 6 years	End of financial year	Common practice	Offer to Local Record Office
12.2	Loans and grants managed by the school	Paper – School Office Electronic SAP	SBM	Date of last payment on the loan + 12 years then review	End of financial year	Standard financial regulations	Secure disposal

		Format /			Retention		
Reference	File description	How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
12.3	Student Grant applications	School Office	SBM	Current year + 3 years	End of financial year	Standard financial regulations	Secure disposal
12.4	All records relating to the creation and managements of budgets, including the Annual Budget statement, and background papers	School Office	SBM	Current financial year + 3 years	End of financial year	Common practice	Secure disposal
12.5	Invoices, receipts, order books and requisitions, delivery notices, VAT records	Paper – School Office Electronic SAP	SBM	Current financial year + 6 years	End of financial year	Standard financial regulations and Record Keeping (VAT Notice 700/21)	Secure disposal
12.6	Records relating to the collection and banking of monies	School Office	SBM	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.7	Records relating to the identification and collection of debt	School Office	SBM	Current financial year + 6 years	End of financial year	Standard financial regulations and The Limitation Act 1980	Secure disposal
12.8	Pupil Premium Fund records, including evidence of successful FSM eligibility checks	Paper – School Office Electronic SAP	SBM	Date pupil leaves the provision + 6 years	End of financial year	Common practice	Secure disposal

13.1	All records relating to the management of contracts under seal	School Office	SBM	Current year + 12 years	End of contract	The Limitation Act 1980	Secure disposal
		Secure					
		Archive					
		Cupboard					
13.2	All records relating to the management of	School Office	SBM	Current year + 6 years	End of contract	The Limitation	Secure
	contracts under signature					Act 1980	disposal
		Secure					
		Archive					
		Cupboard					
13.3	Records relating to the monitoring of contracts	School Office	SBM	Current year + 6 or 12 years	End of calendar year	The Limitation Act 1980	Secure disposal
		Secure					
		Archive					
		Cupboard					
14. Fina	ncial Management – School Fund						
14.1	School Fund:	School Office	SBM	Current year + 6 years	End of use	Financial	Secure
	 cheque books and paying in books 					Services Act	disposal
	ledger	Secure				2012, HMRC	
	invoices	Archive				regulations	
	receipts	Cupboard				Companies Act	
	bank statements					2006	
	journey books						
	ncial Management – School Meals						
15.1	Free School Meals Register, including	School Office	SBM	Date pupil leave the	End of calendar	Common	Secure
	evidence of successful SFM eligibility			provision + 6 years	year	practice	disposal
	checks	Secure					
		Archive					
		Cupboard					

15.2	School Meals Register	School Office Secure Archive Cupboard	SBM	Current year + 3 years	End of calendar year	Common practice	Secure disposal
15.3	School Meals Summary Sheets	School Office Secure Archive Cupboard	SBM	Current year + 3 years	End of calendar year	Common practice	Secure disposal
15.4	Data for the purposes of the DfE breakfast club provision	N/A	N/A	Current year + 7 years	End of Academic year	Breakfast clubs early adopters: conditions of grant for the 2024 to 2025 academic year, beginning from 22 April 2025 – Gov.UK	
16. Prop	erty Management						
16.1	Title deeds of properties belonging to the school	Held by LA	N/A	Permanent. These will follow the property unless the property has been registered with the Land Registry	Archive upon closure	Common practice	Offer to Local Authority Record Office
16.2	All records relating to the maintenance of the school, carried out by contractors	Red Box	SBM/CT	Current financial year + 6 years Records relating to rewiring, major alterations etc will be retained in the health and safety file whilst the building belongs to the school and will be passed onto any new	End of financial year that the record was created in	Common practice and Record Keeping (VAT Notice 700/21)	Secure disposal

				owners if the building is leased or sold.			
16.3	All records relating to the maintenance of the school, carried out by school employees, including maintenance log book	Electronic – Staff Share	SBM/CT	Current calendar year + 6 years Records relating to rewiring, major alterations etc will be retained in the health and safety file whilst the building belongs to the school and will be passed onto any new owners if the building is leased or sold.	End of calendar year that the record was created in	Common practice and Record Keeping (VAT Notice 700/21)	Secure disposal
16.4	Plans of property belonging to the school	Paper – HT Office	HT	These will should be retained whilst the building belongs to the school and will be passed onto any new owners, if the building is leased or sold.	Transfer of asset	Common practice	Offer to Local Authority Record Office
16.5	Leases of property leased by, or to, the school	N/A	N/A	Expiry of lease + 6 years	Commencement of lease	Common practice	Secure disposal
16.6	Records relating to the letting of school premises	NONE	N/A	Current financial year + 6 years	End of financial year that the record was created in	Common practice	Secure disposal
Much of t	Education Record (see <u>s2 Education Record (F</u> bis information is stored in electronic form on th this with in section 20.		-			<u> </u>	
17.1	Primary	Electronic Interis	SBM	Records will be kept on the MIS in an archive or 'former roll' area) after a pupil has left the school – see <u>1.7 Last</u>	Date pupil changes school	Education (Pupil Information)	The file should follow the pupil when they leave

		School and 1.8 Management Information System		(England) Regulations 2005	the primary school (see <u>1.7 Last</u> <u>School.</u> If pupil does not attend a secondary school, or the child dies, then records
17.2	Secondary (or where the school is the 'last known school')	Date of birth of the pupil + 25 years	Pupil's date of birth	Education (Pupil Information) (England) Regulations 2005 and The Limitation Act 1980	should be retained as per 17.2 below_) Secure disposal
17.3	Examination Results - Pupil Copies Public	This information will be added to the pupil file and any certificates will be safely handed over to pupils.	Date of examination	Common practice	Contact the relevant exam board to obtain instructions regarding whether uncollected certificates to be returned to

Langley Mill Church of England Infant School and Nursery

							the examination board or destroyed after reasonable attempts to contact the pupil have failed.
17.4	Examination Results - Pupil Copies Internal	RM Integris	SBM	This information will be added to the pupil file	Date of examination	Common practice	Secure disposal
17.5	Pupil 'skeleton' record (which would include a brief record of pupil names, UPNs, date of birth, address, parent details, date of admission, date of departure and destination (if known))	RM Integris	SBM	Permanent. These form part of the historical archives of the school.	Archive on closure of the school.	Common Practice.	Offer to the Local Authority Record Office
	rotection (CP) / Safeguarding Records	Γ			Γ	1	
18.1	Child Protection Information - Primary	My Concern	DSL's	CP files will be transferred to the new school as soon as possible (5 days), to maintain continuity. Ensure secure transit, and a confirmation of receipt will be obtained. The CP file will be transferred separately from the main pupil file. An archived log will be retained My Concern once the child has left for secondary	Date pupil changes school (Where a child is removed from the roll to be educated at home/missing from education, see below)	<u>KCSIE 202</u> 4 & Annex C	Transferred to new or Secondary school. Duplicates must be securely disposed of.

18.2	Child Protection (CP) Information – Secondary (or where the school is the 'last known school')	N/A	N/A	Where a pupil moves between secondary schools – treat as primary above. Otherwise, retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse will be	Pupil's date of birth (Where a child is removed from the roll to be educated at home/missing from education, see below)	KCSIE 2024 & Annex C Common Practice	Secure disposal
				preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.			
18.3	Child Protection (CP) Information – Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths.	My Concern – Archived	DSL's	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Coordinator for Missing Children and Secure disposal
18.4	Child Protection (CP) Information – Child is removed from the roll and is Elective Home Educated	My Concern - Archived	DSL's	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Elective Home Education Coordinator and Secure disposal

18.5	Filtering & Monitoring Logs. Where these indicate a child protection/safeguarding	My Concern – Archived	НТ	records relating to child sexual abuse. Retained on My Concern. The DSL will request	Date of log	Common Practice	Deletion
	concern, the log will be added to the pupil CP Information and retained in line with the periods in 18.1-18.4.			deletion of erroneous logs as soon as is practically possible.			
19. Atte	ndance						
19.1	Attendance Registers	RM Integris	SBM/SBA/FSM	Every entry in the School admission and attendance register is to be preserved for 6 years beginning with the day on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates.	Last entry in register	School Attendance (Pupil Registration) (England) Regulations 2024 Regulations 5, 7 (which comes into force on 19 August 2024).	Secure disposal and transfer upon transfer of record to new school
19.2	Correspondence relating to authorised absence	RM Integris Staff Shared	SBA/FSM	Date of absence + 2 years	Date of absence	DfE School attendance Guidance for maintained schools, academies, independent schools and local authorities	Secure disposal

						August 2020	
19.3 20. Spec	Correspondence relating to unauthorised absence.	RM Integris Staff Shared	SBA/FSM	Date of absence + 3 years	Date of absence	Section 23 of the Anti-Social Behaviour Act 2003	Secure Disposal
20.1	Statements and Reviews of Special Educational Needs under <u>Section 324 and</u> <u>328 of the Education Act 1996</u> and any amendments made to the plan - Primary	SENDCO Office	SENDCO	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School
20.2	Statements and Reviews of Special Educational Needs under <u>Section 324 and</u> <u>328 of the Education Act 1996</u> and any amendments made to the plan – Secondary (or where the school is the 'last known school')	N/A	N/A	Date of birth of pupil + 35 years	Pupil's date of birth	Special Educational Needs and Disability Act 2001 & Children and Families Act 2014 & The Limitation Act	Secure disposal
20.3	Individual Education Plans and Education Health Care Plan (EHCP) and all other SEN files - Primary	SENDCO Office	SENDCO	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School
20.4	Individual Education Plans and Education Health Care Plan (EHCP) and all other SEN files – Secondary (or where the school is the 'last known school')	N/A	N/A	Date of birth of pupil + 35 years	Pupil's date of birth	Special Educational Needs and Disability Act 2001 & Children and Families Act 2014 & The Limitation Act	Secure disposal

21. Curr	iculum Management						
21.1	Curriculum returns	Paper – HT Office	HT	Current year + 3 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.2	Curriculum development	Paper HT office Electronic – Office documents	HT	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Offer to the Local Authority Record Office
21.3	Examination Results (School's copy)			Current year + 6 years	Date of examination	Common practice	Secure disposal
21.4	SATs Results	H/T Office	HT	The SATS result will be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the ages of 25 years. The school may wish to keep a composite record of all the whole year SATS results. These could be kept for the current year + 6 years to allow suitable comparison	Date that results are released	Common practice	Secure disposal
21.5	SATs Examination papers	HT Office	HT	The examination papers should be kept until any appeals/validation process is complete	Date of examination	Common practice	Secure disposal
21.6	Published Admission Number (PAN) Reports	HT Office	HT	Current year + 6 years	End of the calendar year	Common practice	Secure disposal

					that the record was created in		
21.7	Value Added and Contextual Data	HT Office	HT	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.8	Self-Evaluation Forms	HT Office	HT	Current year + 6 years	Date of completion	Common practice	Secure disposal
21.9	Internal Moderation	HT Office	HT	Academic year + 1 academic year	Date of commencement	Common practice	Secure disposal
21.10	External Moderation	HT Office	HT	Until superseded	Date of commencement	Common practice	Secure disposal
22. Impl	ementation of Curriculum						
22.1	Schemes of Work	Paper HT office Electronic – Office documents	HT	Current year + 1 year	End of the academic year that the record was created in	Common practice	Review these records at the end of each year and allocate a further retention period or secure disposal
22.2	Timetable	Classrooms	Teachers	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.3	Class Record books, mark books, homework records (eg teacher spreadsheets etc)	Classrooms	Teachers	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal

22.4	Pupil work	Classrooms	Teachers	Where possible, pupils'	End of the	Common	Secure
	- 1			work will be returned to the	academic year	practice	disposal
				pupil at the end of the	that the record		
				academic year. If this is not,	was created in		
				currently, the school's policy			
				then it will be retained for			
				the current year +1			
22.5	Online learning platforms	Dojo	Teacher	As above. Work will be	End of the	Common	Secure
	0,	- , -	responsible	cleared from platforms at	academic year	practice	disposal
			for each	the end of the following	that the record	p	
			platform	academic year	was created in		
22.6	Teacher diaries & Notebooks	Class Filing	Teachers	Contents will be transferred	Expiration of	Common	Secure
		Cabinets		to appropriate record	diary. Completion	practice	disposal
				keeping (eg staff file, pupil	of notebook		
				record, MIS safeguarding /			
				behaviour log) as soon as			
				possible. Destroyed within 3			
				months.			
23. Extra	Curriculum Management	•			·		
23.1	Records created by schools to obtain	Office	HT/SBM	Date of visit + 14 years	Date of visit	The Health and	Secure
	approval to run an Educational Visit outside					Safety at Work	disposal
	the Classroom (Primary schools) where	Secure				Act 1974	
	there has not been a Major Incident	Archive					
	(Records created might include risk assessments)	Cupboard					
23.2	Records created by schools to obtain	N/A	N/A	Date of visit + 10 years	Date of visit	The Health and	Secure
	approval to run an Educational Visit outside					Safety at Work	disposal
	the Classroom (Secondary schools) where					Act 1974	
	there has not been a Major Incident						
23.3	Parental consent forms for school trips	ParentPay or	SBM	No retention is required		Common	Secure
	where there has been no Major Incident	School Office				practice	disposal
23.4	Records created by schools to obtain	Office	HT/SBM	Retain for 25 years from the	Pupil's DOB	The Limitation	Secure
	approval for to run an Educational Visit			date of birth of the pupil/s		Act 1980	disposal
				involved in the incident			

	outside the Classroom, where there has	Secure					
	been a Major Incident	Archive					
	(Records created might include risk assessments)	Cupboard					
23.5	Parental consent forms for school trips,	Office	HT/SBM	Retain for 25 years from the	Pupil's DOB	The Limitation	Secure
	where there has been a Major Incident			date of birth of the pupil/s		Act 1980	disposal
		Secure		involved in the incident.			
		Archive		The permission slips for all			
		Cupboard		the pupils on the trip need			
				to be retained to show that			
				the rules had been followed			
				for all pupils			
24. Fam	ily Liaison / Early Help / Alternative Provision	on					
24.1	Day books	None		Current year + 2 years then	End of the	Common	Secure
				review	calendar year	practice	disposal
					that the record		
					was created in		
24.2	Reports for outside agencies – where the	Paper –	SENDCO/FRW	Whilst the child is attending	Date of	Common	Secure
	report has been included on the agency	Secure		school and then destroy	completion of	practice	disposal
	case file	cupboard			report		
		Electronic					
		Myconcern					
24.3	Referral forms	My Concern	FRW	While the referral is current	Date of	Common	Secure
2 110					completion of	practice	disposal
					form	practice	aisposai
24.5	Contact data sheets and database entries	Paper –	SENDCO/FRW	Current year then review – if	End of the	Common	Secure
		Secure		contact is no longer active	calendar year	practice	disposal
		cupboard		then destroy	that the record		
					was created in		
		Electronic					
		Myconcern					

24.6	Group registers	Paper – Secure cupboard	SENDCO/FRW	Current year + 2 years	Last entry in register	Common practice	Secure disposal
25. Loca	l Authority						
25.1	Secondary Transfer sheets			Current year + 2 years	Year of transfer	Common practice	Secure disposal
25.2	Attendance Returns	Paper – School Office Electronic – office documents	SBM	Current year + 1 year	End of the calendar year that the record was created in	Common practice	Secure disposal
25.3	School Census Returns	Paper – School Office	SBM	Current year + 5 years	Completion of return	Common practice	Secure disposal
25.4	Circulars and other information sent from the Local Authority	School Office	SBM	Operational use	Date of issue	Common practice	Secure disposal
26. Cent	ral Government						
26.1	OFSTED reports and papers	Paper – H/T Office Electronic – Office documents	H/T	Retain whilst current	Date new report is issued	Common practice	Offer to Local Authority Record Office
26.2	Returns made to central government, including Schools financial value standard (SFVS) and assurance statement	Paper – School Office and Secure School Archive cupboard	SBM	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
26.3	Circulars and other information sent from central government	School Office	SBM	Operational use	Date of issue	Common practice	Secure disposal

27. Parent	/ Alumni Associations						
27.1	Records relating to the creation and management of PTA and Old Pupil Associations	School Office	SBM	Current year + 6 years	Date of foundation	Common practice	Offer to the Local Authority Record Office
28. Recordi	ings (meetings, calls, online lessons)						
28.1	Incoming & Outgoing calls	N/A	N/A			Common practice	
28.2	Meetings	N/A	N/A			Common practice	
28.3	Online lessons	N/A	N/A			Common practice	
28.4	Staff training	N/A	N/A			Common practice	
29. Pupil W	Iork Experience / Placement Records (Sec	ondary schools)				
29.1	Records created by schools in relation of offsite pupil work experience where there has not been a Major Incident	N/A	N/A	Date of placement + 10 years	Date of placement	The Health and Safety at Work Act 1974	Secure disposal
29.2	Records created by schools in relation of offsite pupil work experience where there has been a Major Incident	N/A	N/A	Retain for 25 years from the date of birth of the pupil/s involved in the incident	Pupil's DOB	The Limitation Act 1980	Secure disposal
30. Adminis	stration of Medication						
30.1	Non-prescription medicines and remedies inc painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers	Paper – File in School Office Classroom File	SBM STAFF/TLA	Current year + 1 year	Date of administration	Limitation Act 1980	Secure disposal

		to office on completion of administration					
30.2	All other administration of medication not covered by 30.1 including, but not limited to: peg feeding, injections, treatments for serious conditions such as diabetes, ADHD or depression	Paper – File in School Office Classroom File to be returned to office on completion of administration School	SBM STAFF/TLA	Date of birth of the pupil + 25 years	Date of administration	Limitation Act 1980	Secure disposal
		Archive Cupboard	SBM				

Appendix A – List of School Records and Data safely destroyed

Specimen Checklist for Annual Review of School Records and Safe Data Destruction

The following is an example of how to create a destruction record – this could be a spreadsheet.

Reference Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of Destruction	Confirm; (i) (ii)	Safely Destroyed In accordance with Data Retention Guidelines Yes/No	Name of Authorising Officer
1.	School invoices	Copies of purchase invoices dated 2011/12	Folders marked 'Purchase Invoices 2011/13' 1-3	3 Folders	Cross shredded		Yes	J Smith (Head)