



Data Retention Policy

Adopted On:	November 2021
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Review Frequency:	Annually
Approved By:	FGB

Records Management

Introduction

Moss Lane School recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the overall successful management of our school.

Scope of the policy

This policy applies to all records that are created, received or maintained by staff of the school in the course of carrying out its functions.

- Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.
- Some of the school's records may be selected for permanent preservation as part of the institutions archives and for historical research.

Responsibilities

The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment.

- The person with overall responsibility for this policy is the Headteacher
- The School Business Manager will give guidance on good records management practice and will promote compliance with this policy so that information can be retrieved easily, appropriately and in a timely manner.
- Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines.

Recording systems

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

Maintenance of Record Keeping Systems

- It is important that filing information is properly resourced and is carried out on a regular basis. It is equally important that the files are weeded of extraneous information where appropriate on a regular basis. Removing information from a file once a freedom of information request has been made will be a criminal offence (unless it is part of normal processing.)
- Applying retention periods is straightforward provided files are closed on a regular basis.
- Once a file has been closed, it should be moved out of the current filing system and stored either in a record room in the school or in another appropriate place until it has reached the end of the retention period.
- Information security is very important especially when dealing with personal information or sensitive policy information.

There are a number of basic rules:

- All personal information should be kept in lockable filing cabinets which are kept locked when the room is unattended.

- Personal information held on computer systems should be adequately password protected. Information should never be left up on a screen if the computer is unattended.
- Files containing personal or sensitive information should not be left out on desks overnight.
- Where possible sensitive personal information should not be sent via email.
- If files need to be taken off premises they should be secured in the boot of a car or in lockable containers.
- All computer information should be backed up regularly and the back-up should be stored off site.
- Information contained in email should be filed into the appropriate electronic or manual filing system once it has been dealt with.

The safe disposal of information using the retention schedule

Files should be disposed of in line with the attached retention schedule (see appendix 1). This is a process which should be undertaken on an annual basis during the month of July. All personal information should be SECURELY DISPOSED before disposal for pulping. Other files can be bundled up and put in a skip. Loose papers should not be put in skips unless the skip has a lid. Electronic data should be archived on electronic media and 'deleted' appropriately at the end of the retention period.

Appendix 1

Governors					
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Minutes <ul style="list-style-type: none"> Principle Set (Signed) Inspection Copies 	<p>There may be DP issues if the meeting is dealing with confidential issues relating to staff.</p> <p>There may be DP issues if the meeting is dealing with confidential issues relating to staff.</p>	The School Governance (Roles and Procedures and Allowances) (England) Regulations 2013	<p>Permanent</p> <p>Date of meeting + 3 years</p>	<p>Retain in School for 6 years from the date of the meeting</p> <p>Secure disposal</p>	<p>Transfer to archives</p>
Agendas <ul style="list-style-type: none"> Principle Copy Additional Copies 	<p>There may be DP issues if the meeting is dealing with confidential issues relating to staff.</p> <p>There may be DP issues if the meeting is dealing with confidential issues relating to staff.</p>	The School Governance (Roles and Procedures and Allowances) (England) Regulations 2013	<p>Permanent</p> <p>Date of meeting</p>	<p>Retain in School for 6 years from the date of the meeting</p> <p>Secure disposal</p>	<p>Transfer to archives</p>
Reports	There may be DP issues if the meeting is dealing with confidential issues relating to staff.	The School Governance (Roles and Procedures and Allowances) (England) Regulations 2013	Minimum of 6 years. If the minutes refer directly to the individual report, then the reports should be kept permanently	Secure disposal or retain in school for 6 years from the date of the meeting with the signed set of minutes	Transfer to archives.
Annual Parents' meeting papers	No	Education Act 2002 Section 33	Date of meeting + 6 years	Retain in school for 6 years from date of meeting	Secure disposal
Instruments of Government, including Articles of Association	No		Permanent	Retain in school whilst it is open	Transfer to archives when school is closed.
Trusts and Endowments	No		Permanent	Retain in school whilst operationally required	Transfer to archives

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Action Plans	No		Life of action plan + 3 years	Secure disposal	
Policy Documents	No		Life of policy + 3 years	Secure disposal	
Records relating to complaints	Yes		Date of resolution of complaint + 6 years then review for further retention in the case of contentious disputes	Secure disposal	
Annual reports required by the Department for Education	No	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI 2020 No 1171	Date of report + 10 years	Transfer to Archives [take a sample for permanent preservation]	
Proposals for schools to become, or be established as Specialist Status Schools	No		Current year + 3 years	Transfer to Archives [take a sample for permanent preservation]	
Records relating to the election of parent and staff governors not appointed by the Governors	Yes		Date of election + 6 months	Secure disposal	
Records relating to the appointment of co-opted Governors	Yes		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 in office.	Secure disposal	
Records relating to the election of the chair and vice chair(s)	Yes		Once the decision has been recorded in the minutes the records relating to the election can be destroyed	Secure disposal	
Meetings Schedule	No		Current Year	Secure disposal	
Register of attendance at Full Governing Board Meetings	Yes	The School Governance (Roles and Procedures and Allowances) (England) Regulations 2013	Date of last meeting in the book + 6 years	Secure disposal	
Records relating to Governor Monitoring Visits	Yes		Date of the visit + 3 years	Secure disposal	

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Correspondence sent and received by the governing body	Yes		Current year + 6 years	Secure disposal	

Management					
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Log Books	Yes		Date of entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry	Transfer to the archives
Minutes of the Senior Management Team and other internal administrative bodies	Yes		Date of meeting + 5 years	Retain in the school for 5 years from meeting	Transfer to archives [take a sample for permanent preservation]
Reports made by the Headteacher or the management team	Yes		Date of report + 3 years	Retain in the school for 3 years from meeting	Transfer to archives
Records created by Headteachers, deputy head teachers, heads of year groups and other members of staff with administrative responsibilities	Yes		Closure of file + 6 years	Secure disposal	
Correspondence created by Headteachers, deputy head teachers, heads of year groups and other members of staff with administrative responsibility	No		Date of correspondence + 3 years	Secure disposal	
Professional development plan	Yes		Closure + 6 years	Secure disposal	
School development plans	No		Closure + 6 years	Review	Offer to the archives
Admissions –if the admission is successful	Yes		Admission + 1 year	Secure disposal	
Admissions if the appeal is unsuccessful	Yes		Resolution of case + 1 year	Secure disposal	
Proofs of address supplied by parents as part of the admissions process	Yes		Current year + year	Secure disposal	
Policy Documents	No		Expiry of policy Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)		

Personnel Records held in School					
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Timesheets, Sick Pay	Yes	Financial Regulation	Current year + 6 years	Secure disposal	
Staff personal files	Yes		Termination + 7 years	Secure disposal	
Interview notes and recruitment records	Yes		Date of interview + 6 months	Secure disposal	
Pre-employment vetting information (including DBS checks)	No	DBS Guidelines	Date of check + 6 months	Secure disposal [by the designated member of staff]	
Disciplinary Proceedings	Yes	Where the warning refers to child protection issues see 1.2. If the disciplinary proceedings relate to a child protection matter please contact your safeguarding officer for further advice.			
• Oral Warning			Date of warning + 6 months	Secure disposal	
• Written warning – level 1			Date of warning + 6 months	Secure disposal	
• Written warning - level 2			Date of warning + 12 months	Secure disposal	
• Final warning			Date of warning + 18 months	Secure disposal	
• Case not found			If child protection related, please see 1.2 otherwise secure disposal immediately at the end of the case.	Secure disposal	
Records relating to accident / injury at work	Yes		Date of injury + 12 years In the case of serious accidents a further retention period will need to be applied		
Annual appraisal / assessment records	No		Current year + 5 years	Secure disposal	
Salary Cards	Yes		Last date of employment + 85 years	Secure disposal	
Maternity Pay Records	Yes	See latest statutory maternity pay (General) Regulations	Current year + 3 years	Secure disposal	
Records held under Retirement Benefits schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	Secure disposal	

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Proofs of identity collected as part of the process of DBS checks	Yes		A note should be kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's personnel file.	Secure disposal	
Personal files – records relating to an individual's employment history	Yes		Termination + 6 years then review	Secure disposal	
Pre-employment vetting information (including DBS checks)	No	DBS guidelines	Date of check + 6 months	Secure disposal	
Staff training records – general	Yes		Current year + 2 years	Secure disposal	
Training (proof of completion such as certificates, awards, exam results)	Yes		Last action + 7 years	Secure disposal	

Administrative					
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Employer's liability certificate			Closure of the school + 4 years	Secure disposal	
Insurance policies – Employer's Liability	No	Employers Liability Financial Regulations	The policies are kept for a minimum of 6 years and a maximum of 40 years depending on the type of policy		
Claims made against insurance policies – damage to property	Yes		Case concluded + 3 years		
Claims made against insurance policies – personal injury	Yes		Case concluded + 6 years		
Inventories of equipment and furniture			Current year + 6 years	Secure disposal	
General file series			Current year + 5 years	Review to see whether a further retention period is required	Transfer to archives [take a sample for permanent preservation]
School Prospectus			Current year + 3 years		Transfer to archives [take a sample for permanent preservation]
Circulars (staff/ parents/ pupils)			Current year + 1 year	Secure disposal	
Newsletters, ephemera			Current year + 1 year	Review to see whether a further retention period is required	Transfer to archives [take a sample for permanent preservation]
Visitors Books	Yes		Current year + 2 years	Review to see whether a further retention period is required	Transfer to archives [take a sample for permanent preservation]
PTA / Old Pupils Associations			Current year + 6 years	Review to see whether a further retention period is required	Transfer to archives [take a sample for permanent preservation]

Finance					
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Annual Accounts		Financial Regulations	Current year + 6 years		Offer to archives
Loans and Grants		Financial Regulations	Date of last payment on loan + 12years	Review to see whether a further retention period is required	Transfer to archives [take a sample for permanent preservation]
Contracts					
• Under seal			Contract completion date + 12 years	Secure disposal	
• Under signature			Contract completion date + 6 years	Secure disposal	
• Monitoring records			Current years + 2 years	Secure disposal	
Copy orders			Current year + 2 years	Secure disposal	
Budget Reports, budget monitoring etc			Current year + 3 years	Secure disposal	
Invoice, receipts and other records covered by the financial regulations		Financial Regulations	Current year + 6 years	Secure disposal	
Annual budget and background papers			Current year + 6 years	Secure disposal	
Order books and requisitions			Current year + 6 years	Secure disposal	
Delivery documentation			Current year + 6 years	Secure disposal	
Debtors' records		Limitation act 1980	Current year + 6 years	Secure disposal	
School Fund – cheque books			Current year + 3 years	Secure disposal	
School fund – paying in books			Current year + 6 years then review	Secure disposal	
School fund – ledger			Current year + 6 years then review	Secure disposal	
School fund – invoices			Current year + 6 years then review	Secure disposal	
School fund – receipts			Current year + 6 years	Secure disposal	
School fund – bank statements			Current year + 6 years then review	Secure disposal	
School fund – school journey books			Current year + 6 years then review	Secure disposal	
Applications for free school meals, travel, uniforms etc			Whilst child at school	Secure disposal	
Free School Meals Register	Yes	Financial Regulations	Current year + 6 years	Secure disposal	

Health and Safety					
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Accessibility Plans		Disability and discrimination act	Current year + 6 years	Secure disposal	
Accident Reporting	Social Security (Claims and payments) Regulations 1979 Regulation 25 Social Security Administration Act 1992 Section 8, Limitation Act 1980				
• Adults	Yes		Date of incident + 7 years	Secure disposal	
• Children	Yes		DOB of child + 25 years	Secure disposal	
COSHH			Current year + 10 years [where appropriate an additional retention period may be allocated]	Secure disposal	
Incident Reports	Yes		Current year + 20 years	Secure disposal	
Policy Statements			Date of expiry + 1 year	Secure disposal	
Risk Assessments			Current year + 3 years	Secure disposal	
Process of monitoring of areas where employees and persons are likely to have been in contact with asbestos			Last action + 40 years	Secure disposal	
Process of monitoring of areas where employees and persons are likely to have been in contact with radiation			Last action + 50 years	Secure disposal	
Fire safety records including fire safety audits			Current year + 6 years	Secure disposal	
Fire risk assessments	No		Date the fire risk assessment expires + 6 years	Secure disposal	
Fire Drill records	No		Date of fire drill + 6 years	Secure disposal	

Property					
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Title Deeds			Permanent	These should follow the property unless the property has been registered in the land registry	Offer to archives if the deeds are no longer needed
Plans			Permanent	Retain in school whilst operational	Offer to archives
Maintenance and contractors		Financial Regulations	Current year + 6 years	Secure disposal	
Leases			Expiry of lease + 6 years	Secure disposal	
Lettings			Current year + 3 years	Secure disposal	
Burglary, theft and vandalism report forms			Current year + 6 years	Secure disposal	
Maintenance Log Books			Last entry + 10 years	Secure disposal	
Contractor reports			Current year + 6 years	Secure disposal	
Premises Files (relating to maintenance)	No		Cessation of the use of the building + 7 years then review	Secure disposal	
Records relating to legionella and water checks	No		Current year + 3 years	Secure disposal	

Local Authority					
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	Secure disposal	
Attendance Returns	Yes		Current year + 1 year	Secure disposal	
Circulars from LEA			Whilst required operationally	Review to see whether a further retention period is required	Transfer to archives [the appropriate archivist will then take a sample for permanent preservation]

Department for Education					
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
HMI Reports			These do not need to be kept any longer		Transfer to Archives [take a sample for permanent preservation]
OFSTED reports and papers			Replace former report with any new inspection report	Review to see whether a further retention period is required	Transfer archives [take a sample for permanent preservation]
Returns			Current year + 6 years	Secure disposal	
Circulars from the Department for Education			Whilst operationally required	Review to see whether a further retention period is required	Transfer to archives [take a sample for permanent preservation]

Pupils					
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Admission Registers	Yes		Date of last entry in the book or file + 6 years	Retain in the school for 6 years from the date of the last entry	Transfer to the archives
Attendance Registers	Yes		Date of register + 3 years	Secure disposal [if these records are retained electronically any backup copies should be destroyed at the same time]	
Pupil Records	Yes				
<ul style="list-style-type: none"> Infant 	Yes		Retain for the time which the pupil remains at the school	Transfer to Junior School (or other infant school) when the child leaves the school. In the case of exclusion it may be appropriate to transfer the record to the behavioural service.	
Pupil Files	Yes				
<ul style="list-style-type: none"> Infant 			Retain for the time which the pupil remains at the school	Transfer to Junior School (or other infant school) when the child leaves the school. In the case of exclusion it may be appropriate to transfer the record to the behavioural service.	
Special Educational Needs & Disabilities files, reviews and Individual Educational Plans or Educational Health Care Plans	Yes		DOB of the pupil + 25 years for the review Note: this retention period is the minimum period that any pupil file should be kept.	Secure Disposal	
Letters Authorising Absence	No		Date of absence + 2 years	Transfer to Junior School (or other infant school) when the child leaves the school.	
Absence Books			Current year + 6 years	Secure disposal	
Examination Results	Yes				
<ul style="list-style-type: none"> Public 	No		Year of examinations + 6 years	Secure disposal	
<ul style="list-style-type: none"> Internal examination results 	Yes		Current year + 5 years	Secure disposal	
Any other records created in the course of contact with pupils	Yes		Retain for the time which the pupil remains at the school	Transfer to Junior School (or other infant school) when the child leaves the school.	

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Statement maintained under The Education Act 1996 – Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	Secure disposal unless legal action is pending	
Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	Secure disposal unless legal action is pending	
Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 1	Closure + 12 years	Secure disposal unless legal action is pending	
Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 1	Closure + 12 years	Secure disposal unless legal action pending	
Children's SEN Files	Yes		DOB of pupil + 25 years then review – it may be appropriate to add an additional retention period in certain cases	Secure disposal unless legal action is pending	
Parental Permissions Slips for school trips – where there has been no major incident	Yes		Conclusion of the trip	Secure disposal	
Parental Permission Slips for school trips – where there has been a major incident	Yes	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years. The permission slips for all pupils on the trip will need to be retained to show that the rules had been followed for all pupils	Secure disposal	
Records created by school to obtain approval to run an Educational Visit outside the classroom – Primary	No	3 part supplement to the Health and Safety of pupils on Educational Visits (HASPEV) (1998)	Date of visit + 14 Years	Secure disposal or delete securely	

Home School Link Workers and Parent Support Assistants					
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Day Books	Yes		Current year + 2 years then review		Secure disposal
Reports for outside agencies – where the report has been included in the case file created by the outside agency	Yes		Whilst the child is attending the school and then destroy	Secure disposal	
Referral Forms	Yes		While the referral is current then secure destroy	Secure disposal	
Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	Secure disposal	
Contact database entries	Yes		Current year then review if contact is no longer active then destroy	Delete	
Group Registers	Yes		Current year + 2 years	Secure disposal	

Curriculum					
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	
Curriculum Development	No		Current year + 6 years	Secure disposal	
Curriculum Returns	No		Current year + 3 years	Secure disposal	
School syllabus	No		Current year + 1	It may be appropriate to review these records at the end of each year and allocate a new retention period or secure disposal	
Schemes of work	No		Current year + 1	It may be appropriate to review these records at the end of each year and allocate a new retention period or secure disposal	
Timetable	No		Current year + 1	It may be appropriate to review these records at the end of each year and allocate a new retention period or secure disposal	
Class record books	No		Current year + 1	It may be appropriate to review these records at the end of each year and allocate a new retention period or secure disposal	
Mark Books	No		Current year + 1	It may be appropriate to review these records at the end of each year and allocate a new retention period or secure disposal	
Record of homework set	No		Current year + 1	It may be appropriate to review these records at the end of each year and allocate a new retention period or secure disposal	
Pupil's work	No		Current year + 1	It may be appropriate to review these records at the end of each year and allocate a new retention period or secure disposal	
Examination Results	Yes		Current year + 6 years	Secure disposal	
SATS Records	Yes		Current year + 6 years	Secure disposal	
PAN Reports	Yes		Current year + 6 years	Secure disposal	
Value added records	Yes		Current year + 6 years	Secure disposal	