

Pinewood School Academy Trust
Records Retention and Disposal Policy

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Description of Policy

The governing body of Pinewood School recognises that efficient management of school records is vital to ensure compliance with its legal and regulatory obligations.

It contributes to effective overall management of the school.

School records, including staff and pupil data, provide evidence for the protection of legal rights and interests of the school and provide appropriate evidence of performance and accountability.

This policy provides a framework through which effective management can be achieved and audited.

Policy scope

- This policy applies to all records that have been
 - (a) created by the school
 - (b) received by the school and/or
 - (c) maintained by staff of the school while carrying out its functions and discharging its duties.
- The definition of **records** is any document which facilitates the business of the school and then retained for a defined period, to provide evidence of activity.
- Records may be in paper format or held electronically, or a combination of both.
- A small percentage of records may be selected for preservation as part of Pinewood School's archives for historical research.

Responsibilities

- The school has a corporate responsibility to maintain records and ensure all record keeping systems are compliant with the regulatory environment.
- The headteacher has overall responsibility for ensuring that this policy is adhered to.
- The person or persons responsible for management of records must provide guidance on good practice and promote compliance.
- The person or persons responsible for management of records will ensure that access is appropriate, easy and sufficient to do so in a timely manner.
- The person or persons responsible for records management will monitor compliance with this policy and associated data protection policies, for example by inspecting records held by staff members.
- All employees are responsible for ensuring records for which they are responsible are accurate and are maintained and disposed of in accordance with the school's records management guidelines.

Associated policies

Other relevant policies include:

- Freedom of information policy
- Data protection policy
- Privacy notices
- Data Security policy
- Data Breach policy
- Other legislation and regulations, including audit, equal opportunities and school ethos.

1. Managing pupil records

Pupil records are the core records that document the progress of individual pupils throughout their time in education. Pupil records accompany each pupil to every school they attend and must contain information that is accurate and easy to access.

Access rights

Pupils and parents have a right to access their personal educational record under the Education (Pupil Information) (England) Regulations 2005. They also have the right to see information held about them under the Data Protection Act 1998. These rights exist until the point that the records are destroyed.

Creating pupil records

Pupil records, electronic and paper, start when a record is created for new pupils as they start school. This is the record that will accompany the child for the rest of their school life.

At our school, the following information is included on file:

- Full name
- Date of birth
- Unique pupil number (UPN).
- Address
- Emergency telephone number
- Parent/carer telephone numbers and email address
- Name and address of any persons with consent to collect the child from school
- Pupil admission number
- Date of entry
- Date of leaving.
- Records of transfer from early years provision or other institutions
- Application form
- Consent forms
- Information relating to any major incidents concerning the child
- Annual reports
- Information about any Educational Health Care Plans (ECHPs) that may be in place
- Relevant medical information
- Child protection reports and disclosures (maintained on a secure portal)
- Information relating to fixed-term or permanent exclusions
- Specific correspondence with parents or external agencies
- Behaviour Records
- Medical Incident Records
- Attendance Records
- Any complaints made by the pupil and/or parents

Transfer of pupil records to alternative provision

The school does not retain paper pupil files once the child leaves our school unless there is ongoing legal action. Custody of, and responsibility for, the records will pass to the school to which the pupil transfers.

Files will not be sent by post wherever possible but, if no other means of passing the file over is available, files will be sent by registered post. The receiving school is asked to contact our school to confirm receipt of file.

Storage of pupil files

Pupil records are held securely at our school. Paper files are stored in locked cabinets and electronic records are held securely on the school's management information system (MIS). Access to the MIS is set in accordance with job role.

Pupil file access is carried out in a manner that ensures information to be viewed while maintaining confidentiality.

2. Disposal of pupil records

Our school is committed to complying with requirements of data protection legislation and protection of pupil data. Records that are no longer required are reviewed as soon as possible to ensure that they are disposed of in accordance with the [records retention schedule](#).

Safe destruction of records

Records that contain personal or sensitive data are shredded to ensure that reconstruction of the record is not possible. If any record identified for destruction but not yet destroyed must be made available to any person requesting access, the employee with responsibility for file destruction must receive authorisation from the headteacher.

Retention periods

Retention periods vary according to the type of record. The [Records retention schedule](#) details retention periods and has been divided into sections:

1. [School management](#)
 2. [Human resources](#)
 3. [School financial management](#)
 4. [Property management](#)
 5. [Pupil management](#)
 6. [Curriculum management](#)
 7. [Extra-curricular activities](#)
 8. [Central government and local authority](#)
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Records retention schedule

1. School management

1.1 Governing body					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
1.1.1	Agendas of meetings of the board of governors / trustees	Personal data should not be included on agendas		One copy to be retained along with supporting signed minutes and papers (see 1.1.2). Additional copies to be disposed of	Secure disposal
1.1.2	Minutes of governing body/ trustee meetings – principle set signed by the chair	There may be data protection issues if the meeting is dealing with confidential issues relating to staff	School Governance (Roles, Procedures and Allowances) Regulations 2013	To be kept permanently if referring to individual reports. If not, six years	Secure disposal if appropriate

1.1 Governing body					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
1.1.3	Reports presented to the governing body	There may be data protection issues if the meeting is dealing with confidential issues relating to staff	School Governance (Roles, Procedures and Allowances) Regulations 2013	Permanent	N/A
1.1.4	Instrument of Government and Articles of Association	No		Permanent	N/A
1.1.5	Action plans created and administered by the governing body	No		Life of the action plan + 3 years	Secure disposal
1.1.6	Policy documents created and administered by the governing body	No		Life of the policy + 3 years	Secure disposal
1.1.7	Records relating to complaints dealt with by the governing body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for	Secure disposal

1.1 Governing body					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
				further retention in case of contentious disputes	
1.1.8	Proposals concerning the change of status of the school, including specialist status and academies	No		Date of proposal accepted or declined + 3 years	Secure disposal

1.2 Headteacher and the senior management team					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
1.2.1	Logbooks of activity in the school maintained by the headteacher	There may be data protection issues if the logbook refers to individual pupils		Date of last entry of book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the local archives

1.2 Headteacher and the senior management team					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
		or members of staff			
1.2.2	Minutes of senior leadership team meetings and other internal administrative bodies	There may be data protection issues if the minutes refer to individual pupils or members of staff		Date of the meeting + 3 years then review	Secure disposal
1.2.3	Reports created by the headteacher or senior management team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of report + a minimum of 3 years then review	Secure disposal
1.2.4	Records created by the headteacher, assistant headteacher, middle	There may be data protection issues if the records refer to		Current academic year + 6 years then review	Secure disposal

1.2 Headteacher and the senior management team					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
	management and others with administrative responsibilities	individual pupils or members of staff			
1.2.5	Correspondence created by the headteacher, assistant headteacher, middle management and others with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then review	Secure disposal
1.2.7	School development plans	No		Life of the plan + 3 years	Secure disposal

1.3 Admissions process					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
1.3.1	All records relating to the creation and implementation of the school's admissions policy	No	School Admission Code statutory guidance	Life of the policy + 3 years then review	Secure disposal
1.3.2	Admissions if the admission is successful	Yes	School Admission Code statutory guidance	Date of admission + 1 year	Secure disposal
1.3.3	Admissions if the appeal is unsuccessful	Yes	School Admission Code statutory guidance	Resolution of case + 1 year	Secure disposal

1.4 Operational administration					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
1.4.1	General files	No		Current year + 5 years then review	Secure disposal
1.4.2	Records relating to the creation and publication of the school prospectus	No		Current year + 3 years	Standard disposal

1.4 Operational administration					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	Standard disposal
1.4.4	Newsletters and other items with a short operational use	No		Current year + 1 year	Standard disposal
1.4.5	Visitors' books and signing in sheets	Yes		Current year + 6 years then review	Secure disposal
1.4.6	Records relating to creation and management of Parent Teacher Associations and/or Pupil Associations	Yes		Current year + 6 years then review	Secure disposal

2. Human resources

This section deals with all human resources management within the school.

2.1 Recruitment					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
2.1.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years	Secure disposal
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	Secure disposal
2.1.3	All records leading up to the appointment of a new member of staff – successful candidates	Yes		All relevant information added to staff file (see below)	Secure disposal
2.1.4	Pre-employment vetting information – DBS checks	Yes	DBS Update Service Guidance; Keeping Children Safe in Education	Do not keep DBS certificates. In exceptional cases,	Secure disposal

				keep for no more than 6 months	
2.1.5	Proofs of identity collected as part of the process of checking 'portable' enhanced DBS	Yes		Where possible, check and keep a note of what was seen and what has been checked (on the SCR). Securely destroy paper copies	Secure disposal
2.1.6	Pre-employment vetting information – evidence providing the right to work in the UK	Yes	An Employer's Guide to the Right to Work Checks (Home Office 2015)	Kept on the personnel file. If kept separately, retain for termination of employment + no less than 2 years	

2.2 Operational staff management					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
2.2.1	Staff personnel file	Yes	Limitation Act 1980 (Section 2)	Termination of employment + 6 years	Secure disposal
2.2.2	Timesheets	Yes		Current year + 6 years	Secure disposal
2.2.3	Annual appraisal records	Yes		Current year + 5 years	Secure disposal

2.3 Management of disciplinary and grievance processes					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
2.3.1	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Keeping Children Safe in Education; Working Together to Safeguard Children	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is the longer, then	Secure disposal

2.3 Management of disciplinary and grievance processes					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
				review. Allegations that are found to be malicious are removed from personnel files. If upheld, keep on file and provide a copy to the person concerned	
2.3.2	Disciplinary proceedings	Yes			
	Oral warning			Date of warning + 6 months	Secure disposal
	Written warning			Date of warning + 12 months	
	Final warning			Date of warning + 18 months	
	Case not found			If the incident is child protection-related	

2.3 Management of disciplinary and grievance processes					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
				then see 2.3.1; otherwise, dispose of at the conclusion of the case	
					Secure disposal

2.4 Health and safety					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
2.4.1	Health and safety policy statements	No		Life of policy + 3 years	Secure disposal
2.4.2	Health and safety risk assessments	No		Life of risk assessment + 3 years	Secure disposal
2.4.3	Records relating to accident/injury at work/school	Yes		Date of incident + 12 years. In the case of	Secure disposal

2.4 Health and safety					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
				serious accidents, apply a further retention period	
2.4.4	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25; Social Security Administration Act 1992 Section 8; Limitation Act 1980	Date of accident + 3 years after date of last entry in accident book	Secure disposal
	Adults				
	Children				
2.4.5	Control of Substances Hazardous to Health (COSHH) records	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	Current year + 40 years	Secure disposal

2.4 Health and safety					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
2.4.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	Secure disposal
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		Current year + 50 years	Secure disposal
2.4.8	Fire precaution logbooks	No		Current year + 6 years	Secure disposal

2.5 Payroll and pensions					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
2.5.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986	Current year + 3 years	Secure disposal

2.5 Payroll and pensions					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
			(SI1986/1960), revised 1999 (SI1999/567)		
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	Secure disposal

3. Financial management of the school

This section deals with all aspects of the financial management of the school, including the administration of school meals.

3.1 Risk management and insurance					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
3.1.1	Employer's liability insurance certificate	No		Current year + 6 years	Secure disposal

3.2 Asset management					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	Secure disposal
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years	Secure disposal

3.3 Accounts and statements including budget management					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
3.3.1	Annual accounts	No		Current year + 6 years	Standard disposal
3.3.2	All records relating to the creation and management of budgets, including the annual budget statement and background papers	No		Life of the budget + 3 years	Secure disposal
3.3.3	Invoices, receipts, order books, requisitions and delivery notes	No		Current financial year + 6 years	Secure disposal
3.3.4	Records relating to the collection and banking of monies	No		Current financial year + 6 years	Secure disposal
3.3.5	Records relating to the identification and collection of debt	No		Current financial year + 6 years	Secure disposal

3.4 Contract management					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
3.4.1	Records relating to the management of contracts	No		Current year + 2 years	Secure disposal

3.5 School fund					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
3.5.1	School fund cheque books	No		Current year + 6 years	Secure disposal
3.5.2	School fund paying in books	No		Current year + 6 years	Secure disposal
3.5.3	School fund invoices	No		Current year + 6 years	Secure disposal
3.5.4	School fund receipts	No		Current year + 6 years	Secure disposal

3.5 School fund					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
3.5.5	School fund bank statements	No		Current year + 6 years	Secure disposal

3.6 School meals management					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
3.6.1	Free school meals registers	Yes		Current year + 6 years	Secure disposal
3.6.2	School meals registers	Yes		Current year + 6 years	Secure disposal
3.6.3	School meals summary sheets	Yes		Current year + 6 years	Secure disposal

4. Property management

This section covers the management of the buildings and property.

4.1 Property management					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
4.1.1	Records relating to letting out the school premises	No		Current financial year + 6 years	Secure disposal

5. Pupil management

5.1 Pupil's education record					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
5.1.1	Pupil's education record	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	Retain for as long as the child remains at the school	The file should follow the pupil when they leave primary school, whether to another primary school, a secondary school or

5.1 Pupil's education record					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
					a pupil referral unit. If the pupil dies while at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. If the pupil transfers to an independent school or to home schooling or leaves the country, the file should be returned to the Local Authority to be retained for the statutory retention period

5.1 Pupil's education record					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
5.1.2	Child protection information held on pupil file	Yes	Keeping Children Safe in Education; Working Together to Safeguard Children	If any records relating to child protection issues are placed on the pupil file, they should be in a sealed envelope and retained for the same period as the pupil file	Secure disposal – must be shredded
5.1.3	Child protection information held in separate files	Yes	Keeping Children Safe in Education; Working Together to Safeguard Children	Date of birth of the child + 25 years then review. The principal copy of this information is on the Local Authority Social Services record	Secure disposal – must be shredded

5.2 Attendance					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
5.2.1	Attendance registers	Yes	School attendance: Departmental advice	Date of birth of the pupil + 25 years*	Secure disposal
5.2.2	Correspondence relating to authorised absences	Yes	Education Act 1996 Section 7	Date of birth of the pupil + 25 years*	Secure disposal

5.3 Special educational needs (SEN)					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
5.3.1	SEN files, reviews and educational plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years*	Secure disposal unless the document is subject to a legal hold
5.3.2	Statement maintained under section 234 of the Education	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years	Secure disposal unless the document

5.3 Special educational needs (SEN)					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
	Act 1990 and any amendments made to the statement			[normally retained on the pupil file]	is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [normally retained on the pupil file]	Secure disposal unless the document is subject to a legal hold
5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [normally retained on the pupil file]	Secure disposal unless the document is subject to a legal hold

***Review note to 5.3.1:** *This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period to defend themselves in a 'failure to provide a sufficient education' case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.*

6. Curriculum management

6.1 Statistics and management information					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
6.1.1	Curriculum returns	No		Current year + 3 years	Secure disposal
6.1.2	Examination results (school's copy) SATS results	Yes		Current year + 6 years	Secure disposal
6.1.3	Published Admission Number (PAN) reports	Yes		Current year + 6 years	Secure disposal
6.1.4	Value added and contextual data	Yes		Current year + 6 years	Secure disposal
6.1.5	Self-evaluation forms	Yes		Current year + 6 years	Secure disposal

6.2 Implementation of curriculum					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
6.2.1	Schemes of work	No		Current year + 1 year	Secure disposal
6.2.2	Timetable	No		Current year + 1 year	
6.2.3	Class record books	No		Current year + 1 year	
6.2.4	Mark books	No		Current year + 1 year	
6.2.5	Record of homework set	No		Current year + 1 year	
6.2.6	Pupils' work	No		Where possible, return to the pupil at the end of the academic year. If kept at school, retain for current year + 1 year	

7. Extra-curricular activities

7.1 Educational Visits outside the classroom					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
7.1.1	Records created by schools to obtain approval to run an educational visit outside the classroom	No	Outdoor Education Advisers' Panel National Guidance website specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice"	Date of visit + 14 years	Secure disposal
7.1.2	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of trip	Secure disposal
7.1.3	Parental permission slips for school trips where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years. Retain permission slips for all the pupils on the trip to show that the rules had	

7.1 Educational Visits outside the classroom					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
				been followed for all pupils	

8. Central government and Local Authority

This section covers records created in the course of interaction between the school and the Local Authority

8.1 Local Authority					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
8.1.1	Secondary transfer sheets	Yes		Current year + 2 years	Secure disposal
8.1.2	Attendance returns	Yes		Current year + 1 year	Secure disposal
8.1.3	School census returns	No		Current year + 5 years	Secure disposal
8.1.4	Circulars and other information sent from the LA	No		Operational Use	Secure disposal

8.2 Central government					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
8.2.1	Ofsted reports and papers	No		Life of the report then review	Secure disposal

8.2 Central government					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
8.2.2	Returns made to central government	No		Current year + 6 years	Secure disposal
8.2.3	Circulars and other information sent from central government	No		Operational use	Secure disposal