



RECORDS RETENTION AND DISPOSAL PROTOCOL

The IRMS [Information Management Toolkit for Schools](#) provides core guidance for a records retention policy. This protocol was developed with reference to the toolkit.

The Board of Trustees Newent Community School and Sixth Form Centre 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 student data, provide evidence for the protection of legal rights and interests of the school and provide appropriate evidence of performance and accountability. This protocol provides a framework through which effective management can be achieved and audited.

The Board of Trustees of Newent Community School and Sixth Form Centre have accepted this protocol. It will be reviewed annually.

Protocol scope

- This protocol 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 Newent Community School and Sixth Form Centre'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 Principal has overall responsibility for ensuring that this protocol 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
- Other legislation and regulations, including audit, equal opportunities and school ethos.



Managing student records

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

Access rights

Students 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 student records

Student records, electronic and paper, start when a record is created for new student 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 in the hard-copy student record:

- Full name
- 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
- Student admission number
- Date of entry
- Records of transfer from early years provision or other institutions
- Application form
- Consent forms
- Relevant medical information
- Child protection reports and disclosures (stored in a sealed envelope)
- Date of leaving

Contents of the student file

The hard-copy student record file includes documents completed by parents / carers when the student joins the school:

- Admission form
- Medical form

Other information such as general correspondence and minor accident reports are not stored in the student file.

Transfer of student records to alternative provision

The school does not retain student 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 student 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.



Electronic documents held by Newent Community School and Sixth Form Centre are destroyed once the student leaves.

Storage of student files

Student records are held securely at our school. Paper files are stored in the Data Office 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.

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

Disposal of student records

Our school is committed to complying with requirements of data protection legislation and protection of student 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 the appropriate authorisation.

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

Monitoring and review

The Senior Leadership Team shall review this protocol from time to time to ensure that it meets legal requirements and reflects best practice. If you have any questions about this protocol please contact the Principal or Business Manager.

The School will continue to review the effectiveness of this Protocol to ensure it is achieving its stated objectives.



RECORDS RETENTION SCHEDULE

1. School management

1.1 Board of Trustees					
	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 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 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
1.1.3	Reports presented to the Board of Trustees	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 Board of Trustees	No		Life of the action plan + 3 years	Secure disposal
1.1.6	Policy documents created and administered by the Board of Trustees	No		Life of the policy + 3 years	Secure disposal
1.1.7	Records relating to complaints dealt with by the Board of Trustees	Yes		Date of the resolution of the complaint + a minimum of 6 years	Secure disposal



1.1 Board of Trustees					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
				then review for 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 Principal	There may be data protection issues if the logbook refers to individual students or members of staff		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
1.2.2	Minutes of senior leadership team meetings and other internal administrative bodies	There may be data protection issues if the minutes refer to individual students or members of staff		Date of the meeting + 3 years then review	Secure disposal
1.2.3	Reports created by the Principal or senior leadership team	There may be data protection issues if the report refers to individual students or members of staff		Date of report + a minimum of 3 years then review	Secure disposal
1.2.4	Records created by the Principal, Vice Principal, Assistant Principal, middle management and others	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
	with administrative responsibilities	individual students or members of staff			
1.2.5	Correspondence created by the Principal, Vice Principal, Assistant Principal, middle management and others with administrative responsibilities	There may be data protection issues if the correspondence refers to individual students 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
1.3.4	Register of admissions	Yes	School attendance: Departmental advice	Every entry in the admissions register must be retained for a period of 3 years after the date the entry was made	Secure disposal
1.3.5	Proof of address supplied by parent on admission	Yes	School Admission Code statutory guidance	Current year + 1 year	Secure disposal



1.3 Admissions process					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
1.3.6	Supplementary information such as religion, medical notes etc.	Yes		Added to student file and retained in accordance with student file	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
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or students	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 Student 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 Principal	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	Termination of employment + 6 years	Secure disposal
2.1.5	Proofs of identity collected as part of the process of checking ‘portable’ enhanced DBS	Yes		Termination of employment + 6 years	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)	Termination of employment + 6 years	Secure disposal



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		Termination of employment + 6 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 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	Secure disposal
2.3.2	Disciplinary proceedings	Yes			
	Oral warning			Date of warning + 6 months	Secure disposal
	Written warning level 1			Date of warning + 6 months	
	Written warning level 2			Date of warning + 12 months	
	Final warning			Date of warning + 18 months	
	Case not found			If the incident is child protection-related 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 serious accidents, apply a further retention period	Secure disposal
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
2.4.6	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 Health and safety					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
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 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	Secure disposal
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 + 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
3.5.1	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
3.5.5	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 + 3 years	Secure disposal
3.6.3	School meals summary sheets	Yes		Current year + 3 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. Student management

5.1 Student's education record					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
5.1.1	Student'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 student when they leave primary school, whether to another primary school, a secondary school or a pupil referral unit. If the student 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



5.1 Student's education record					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
					statutory retention period
5.1.2	Child protection information held on student file	Yes	Keeping Children Safe in Education; Working Together to Safeguard Children	If any records relating to child protection issues are placed on the student file, they should be in a sealed envelope and retained for the same period as the student 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.	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	3 years after the date on which the entry was made	Secure disposal
5.2.2	Correspondence relating to authorised absences	Yes	Education Act 1996 Section 7	Current academic year + 2 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 child + 25 years then review.	Secure disposal unless the document is subject to a legal hold



5.3 Special educational needs (SEN)					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the student + 25 years	Secure disposal unless the document 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 student + 25 years	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 student + 25 years	Secure disposal unless the document is subject to a legal hold

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	Students' work	No		Where possible, return to the student 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	Yes	Limitation Act 1980 (Section 2)	Date of birth of the student involved in the incident + 25	



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
	there has been a major incident			years. Retain permission slips for all the student on the trip to show that the rules had been followed for all students	

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
8.2.2	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