

POLICY TYPE: PRESCRIBED
ACTION: FOR SCHOOL ADOPTION

Approval Body: SDBEMAT BOARD
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**Southwark Diocesan
Board of Education
Multi-Academy Trust**
Developing Church of England Education

GDPR POLICY HANDBOOK

RECORD RETENTION POLICY

1. Child Protection

These retention periods should be used in conjunction with the document "Keeping Children Safe in Education" which can be downloaded from:
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>.

| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record | |
|-----|--|-----------|---|---|--|---|
| 1.1 | Child Protection files | Yes | Education Act Keeping Children Safe in Education | DOB + 25 years | SHRED | Child Protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (i.e. the information does not need to be sent to a university for example). Where a child is removed from roll to be educated at home, the file should be copied to the Local Education Authority. |
| 1.2 | Allegation of a child protection nature against a member of staff, including where the allegation is unfounded | Yes | Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance); Keeping Children Safe in Education | Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer | SHRED | The following is an extract from 'Safeguarding Children and Safer Recruitment in Education' <i>Record keeping</i> 171. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should 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. |

2. Governors

| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record | |
|-------------|---|-----------|--|---|---|---|
| 2.1 | Minutes | | | | | |
| | Principal set (signed) | No | | Permanent | Retain in school for 6 years from date of meeting | Transfer to Archives |
| | Inspection copies | No | | Date of meeting + 3 years | SHRED | [If these minutes contain any sensitive personal information they should be shredded] |
| 2.2 | Agendas | No | | Date of meeting | Retain in school for 6 years from date of meeting | Transfer to Archives |
| 2.3 | Reports | No | | Date of meeting + 6 years | Retain in school for 6 years from date of meeting | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| 2.4 | Annual Parents' meeting papers | No | | Date of meeting + 6 years | Retain in school for 6 years from date of meeting | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| 2.5 | Instruments of Government | No | | Permanent | Retain in school whilst school is open | Transfer to Archives when the school has closed |
| 2.6 | Trusts and Endowments | No | | Permanent | Retain in school whilst operationally required | Transfer to Archives |
| 2.7 | Action Plans | No | | Date of action plan + 3 years | SHRED | It may be appropriate to offer to the Archives for a sample to be taken if the school has been through a difficult period |
| 2.8 | 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) | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| 2.9 | Complaints files | Yes | | Date of resolution of complaint + 6 years | Retain in school for the first six years | Review for further retention in the case of contentious disputes SHRED routine complaints |
| 2.10 | Annual Reports required by the Department for Education | No | Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI 2002 No 1171 | Date of report + 10 years | | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |

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| 2.11 | Proposals for schools to become, or be established as Specialist Status schools | No | | Current year + 3 years | | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
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3. Management

| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record | |
|------|--|-----------|----------------------|--|---|--|
| 3.1 | Log Books | Yes | | Date of last entry in the book + 6 years | Retain in the school for 6 years from the date of the last entry. | Transfer to the Archives |
| 3.2 | 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 [The appropriate archivist will then take a sample for permanent preservation] |
| 3.3 | Reports made by the head teacher or the management team | Yes | | Date of report + 3 years | Retain in the school for 3 years from meeting | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| 3.4 | Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | Yes | | Closure of file + 6 years | SHRED | |
| 3.5 | Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | No | | Date of correspondence + 3 years | SHRED | |
| 3.6 | Professional development plans | Yes | | Closure + 6 years | SHRED | |
| 3.7 | School development plans | No | | Closure + 6 years | Review | Offer to the Archives |
| 3.8 | Admissions – if the admission is successful | Yes | | Admission + 1 year | SHRED | |
| 3.9 | Admissions – if the appeal is unsuccessful | Yes | | Resolution of case + 1 year | SHRED | |
| 3.10 | Admissions – Secondary Schools – Casual | Yes | | Current year + 1 year | SHRED | |
| 3.11 | Proofs of address supplied by parents as part of the admissions process | Yes | | Current year + 1 year | SHRED | |

| 4. Pupils | | | | | | |
|-----------|---|-----------|----------------------|--|--|--|
| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record | |
| 4.1 | 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 |
| 4.2 | Attendance registers | Yes | | Date of register + 3 years | SHRED [If these records are retained electronically any back up copies should be destroyed at the same time] | |
| 4.3 | Pupil record cards | Yes | | | | |
| 4.3a | Primary | | | Retain for the time which the pupil remains at the primary school | Transfer to the secondary school (or other primary school) when the child leaves the school. In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service | |
| 4.3b | Secondary | | Limitation Act 1980 | DOB of the pupil + 25 years | SHRED | In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service |
| 4.4 | Pupil files | Yes | | | | |
| 4.4a | Primary | | | Retain for the time which the pupil remains at the primary school | Transfer to the secondary school (or other primary school) when the child leaves the school. | In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service |
| 4.4b | Secondary | | Limitation Act 1980 | DOB of the pupil + 25 years | SHRED | In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service |
| 4.5 | Special Educational Needs files, reviews and Individual Education Plans | Yes | | DOB of the pupil + 25 years then review NOTE: This retention period is the minimum period that any pupil file should be kept. | Some authorities choose to keep SEN files for a longer period of time 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. | |

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| 4.6 | Letters authorising absence | No | | Date of absence + 2 years | SHRED | |
| 4.7 | Absence books | | | Current year + 6 years | SHRED | |
| 4.8 | Examination results | Yes | | | | |
| 4.8a | Public | No | | Year of examinations + 6 years | SHRED | Any certificates left unclaimed should be returned to the appropriate Examination Board |
| 4.8b | Internal examination results | Yes | | Current year + 5 years | SHRED | If these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary. |
| 4.9 | Any other records created in the course of contact with pupils | Yes/No | | Current year + 3 years | Review at the end of 3 years and either allocate a further retention period or SHRED | |
| 4.10 | Statement maintained under The Education Act 1996 - Section 324 | Yes | Special Educational Needs and Disability Act 2001 Section 1 | DOB + 30 years | SHRED unless legal action is pending | |
| 4.11 | Proposed statement or amended statement | Yes | Special Educational Needs and Disability Act 2001 Section 1 | DOB + 30 years | SHRED unless legal action is pending | |
| 4.12 | Advice and information to parents regarding educational needs | Yes | Special Educational Needs and Disability Act 2001 Section 2 | Closure + 12 years | SHRED unless legal action is pending | |
| 4.13 | Accessibility Strategy | Yes | Special Educational Needs and Disability Act 2001 Section 14 | Closure + 12 years | SHRED unless legal action is pending | |
| 4.14 | 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 | SHRED unless legal action is pending | |
| 4.15 | Parental permission slips for school trips – where there has been no major incident | Yes | | Conclusion of the trip | SHRED | |

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|------|---|-----|--|--|--------------------------|---|
| 4.16 | 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 | SHRED | The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils |
| 4.17 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Primary Schools | No | 3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) (1998) | Date of visit + 14 years | SHRED or delete securely | This retention period has been set in agreement with the Safeguarding Children's Officer |
| 4.18 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Secondary Schools | No | 3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) (1998) | Date of visit + 10 years | SHRED or delete securely | This retention period has been set in agreement with the Safeguarding Children's Officer |
| 4.19 | Walking Bus registers | Yes | | Date of register + 3 years This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting | SHRED | [If these records are retained electronically any back up copies should be destroyed at the same time] |

| 5. Curriculum | | | | | |
|---------------|------------------------|-----------|----------------------|--------------------------------|--|
| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record |
| 5.1 | Curriculum development | No | | Current year + 6 years | SHRED |
| 5.2 | Curriculum returns | No | | Current year + 3 years | SHRED |
| 5.3 | School syllabus | No | | Current year + 1 years | It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED |
| 5.4 | Schemes of work | No | | Current year + 1 years | It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED |
| 5.5 | Timetable | No | | Current year + 1 years | It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED |
| 5.6 | Class record books | No | | Current year + 1 years | It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED |
| 5.7 | Mark books | No | | Current year + 1 years | It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED |
| 5.8 | Record of homework set | No | | Current year + 1 years | It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED |
| 5.9 | Pupils' work | No | | Current year + 1 years | It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED |
| 5.10 | Examination results | Yes | | Current year + 6 years | SHRED |
| 5.11 | SATS records | Yes | | Current year + 6 years | SHRED |
| 5.12 | PAN reports | Yes | | Current year + 6 years | SHRED |
| 5.13 | Value Added records | Yes | | Current year + 6 years | SHRED |

| 6. Personnel Records held in Schools | | | | | |
|--------------------------------------|--|-----------|--|--|--|
| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record |
| 6.1 | Timesheets, sick pay | Yes | Financial Regulations | Current year + 6 years | SHRED |
| 6.2 | Staff Personal files | Yes | Limitation Act 1980 | Termination + 6 years | SHRED |
| 6.3 | Interview notes and recruitment records | Yes | Limitation Act 1980 | Date of interview + 6 months | SHRED |
| 6.4 | Pre-employment vetting information (including DBS checks) | No | DBS guidelines | Date of check + 6 months | SHRED [by the designated member of staff] |
| 6.5 | Disciplinary proceedings: | Yes | Where the warning relates to child protection issues see 1.2. If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice. | | |
| 6.5a | Oral warning | | | Date of warning + 12 months | SHRED [If this is placed on a personal file it must be weeded from the file] |
| 6.5b | Written warning | | | Date of warning + 12 months | SHRED |
| 6.5c | Final warning | | | Date of warning + 24 months | SHRED |
| 6.5d | Case not found | | If child protection related please see 1.2 otherwise SHRED immediately at the conclusion of the case | | SHRED |
| 6.6 | Records relating to accident/injury at work | Yes | | Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied | SHRED |
| 6.7 | Annual appraisal/assessment records | No | | Current year + 5 years | SHRED |
| 6.8 | Maternity pay records | Yes | Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567) | Current year + 3 years | SHRED |
| 6.9 | Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Yes | | Current year + 6 years | SHRED |
| 6.10 | Proofs of identity collected as part of the process of checking “portable” enhanced CRB disclosure | Yes | Where possible these should be checked and a note 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 personal file. | | |

| 7. Health & Safety | | | | | |
|--------------------|---|-----------|--|---|--|
| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record |
| 7.1 | Accessibility Plans | | Disability Discrimination Act | Current year + 6 years | SHRED |
| 7.2 | Accident Reporting | | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 | | |
| 7.2a | Adults | Yes | | Date of incident + 7 years | SHRED |
| 7.2b | Children | Yes | | DOB of child + 25 years - A child may make a claim for negligence for 7 years from their 18th birthday. To ensure that all records are kept until the pupil reaches the age of 25 this retention period has been applied. | SHRED |
| 7.3 | COSHH | | | Current year + 10 years [where appropriate an additional retention period may be allocated] | SHRED |
| 7.4 | Incident reports | Yes | | Current year + 20 years | SHRED |
| 7.5 | Policy Statements | | | Date of expiry + 1 year | SHRED |
| 7.6 | Risk Assessments | | | Risk Assessments | SHRED |
| 7.7 | Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos | | | Last action + 40 years | SHRED |
| 7.8 | Process of monitoring of areas where employees and persons are likely to have come in contact with radiation | | | Last action + 50 years | SHRED |
| 7.9 | Fire Precautions log books | | | Current year + 6 years | SHRED |

8. Administrative

| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record | |
|-----|--|-----------|----------------------|----------------------------------|--|--|
| 8.1 | Employer's Liability certificate | | | Closure of the school + 40 years | SHRED | |
| 8.2 | Inventories of equipment and furniture | | | Current year + 6 years | SHRED | |
| 8.3 | General file series | | | Current year + 5 years | Review to see whether a further retention period is required | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| 8.4 | School brochure or prospectus | | | Current year + 3 years | | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| 8.5 | Circulars (staff/parents/pupils) | | | Current year + 1 year | SHRED | |
| 8.6 | Newsletters, ephemera | | | Current year + 1 year | Review to see whether a further retention period is required | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| 8.7 | Visitors book | | | Current year + 2 years | Review to see whether a further retention period is required | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| 8.8 | PTA/Old Pupils Associations | | | Current year + 6 years | Review to see whether a further retention period is required | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |

| 9. Finance | | | | | | |
|------------|--|-----------------------|----------------------|---|--|--|
| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record | |
| 9.1 | Annual Accounts | Financial Regulations | | Current year + 6 years | | Offer to the Archives |
| 9.2 | Loans and grants | Financial Regulations | | Date of last payment on loan + 12 years | Review to see whether a further retention period is required | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| 9.3 | Contracts | | | | | |
| 9.3a | Under seal | | | Contract completion date + 12 years | SHRED | |
| 9.3b | Under signature | | | Contract completion date + 6 years | SHRED | |
| 9.3c | Monitoring records | | | Contract completion date + 2 years | SHRED | |
| 9.4 | Copy orders | | | Current year + 2 years | SHRED | |
| 9.5 | Budget reports, budget monitoring etc | | | Current year + 3 years | SHRED | |
| 9.6 | Invoice, receipts and other records covered by the Financial Regulations | Financial Regulations | | Current year + 6 years | SHRED | |
| 9.7 | Annual Budget and background papers | | | Current year + 6 years | SHRED | |
| 9.8 | Order books and requisitions | | | Current year + 6 years | SHRED | |
| 9.9 | Delivery documentation | | | Current year + 6 years | SHRED | |
| 9.10 | Debtors' Records | | | Current year + 6 years | SHRED | |
| 9.11 | School Fund – Cheque books | | | Current year + 3 years | SHRED | |
| 9.12 | School Fund – Paying in books | | | Current year + 6 years then review | SHRED | |
| 9.13 | School Fund – Ledger | | | Current year + 6 years then review | SHRED | |
| 9.14 | School Fund – Invoices | | | Current year + 6 years then review | SHRED | |
| 9.15 | School Fund – Receipts | | | Current year + 6 years | SHRED | |
| 9.16 | School Fund – Bank statements | | | Current year + 6 years then review | SHRED | |
| 9.17 | School Fund – School Journey books | | | Current year + 6 years then review | SHRED | |

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|------|--|-----|-----------------------|------------------------|-------|--|
| 9.18 | Applications for free school meals, travel, uniforms etc | | | Whilst child at school | SHRED | |
| 9.19 | Student grant applications | | | Current year + 3 years | SHRED | |
| 9.20 | Free school meals registers | Yes | Financial Regulations | Current year + 6 years | SHRED | |
| 9.21 | Petty cash books | Yes | Financial Regulations | Current year + 6 years | SHRED | |

10. Property

| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record | |
|------|--|-----------|-----------------------|--------------------------------|---|---|
| 10.1 | Title Deeds | | | Permanent | Permanent - these should follow the property unless the property has been registered at the Land Registry | Offer to Archives if the deeds are no longer needed |
| 10.2 | Plans | | | Permanent | Retain in school whilst operational | Offer to Archives - If the property has been sold for private housing then the archives service will embargo these records for an appropriate period of time to prevent them being used to plan or carry out a crime. |
| 10.3 | Maintenance and contractors | | Financial Regulations | Current year + 6 years | SHRED | |
| 10.4 | Leases | | | Expiry of lease + 6 years | SHRED | |
| 10.5 | Lettings | | | Expiry of lease + 3 years | SHRED | |
| 10.6 | Burglary, theft and vandalism report forms | | | Expiry of lease + 6 years | SHRED | |
| 10.7 | Maintenance log books | | | Last entry + 10 years | SHRED | |
| 10.8 | Contractors' Reports | | | Current year + 6 years | SHRED | |

| 11. Local Authority | | | | | | |
|------------------------------|-------------------------------------|-----------|----------------------|--|--|--|
| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record | |
| 11.1 | Secondary transfer sheets (Primary) | Yes | | Current year + 2 years | SHRED | |
| 11.2 | Attendance returns | Yes | | Current year + 1 year | SHRED | |
| 11.3 | Circulars from LA | | | 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] |
| 12. Department for Education | | | | | | |
| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record | |
| 12.1 | HMI reports | | | These do not need to be kept any longer | | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| 12.2 | OFSTED reports and papers | | | Replace former report with any new inspection report | Review to see whether a further retention period is required | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| 12.3 | Returns | | | Current year + 6 years | SHRED | |
| 12.4 | Circulars from DfE | | | Whilst operationally required | Review to see whether a further retention period is required | Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] |
| 13. Connexions | | | | | | |
| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record | |
| 13.1 | Service level agreements | | | Until superseded | SHRED | |
| 13.2 | Work Experience agreement | | | DOB of child + 18 years | SHRED | |

| 14. School Meals | | | | | | |
|---|--|-----------|----------------------|---|--|--|
| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record | |
| 14.1 | Dinner Register | | | Current year + 3 years | SHRED | |
| 14.2 | School Meals Summary Sheets | | | Current year + 3 years | SHRED | |
| 15. Family Liaison Officers and Parent Support Assistants | | | | | | |
| | Basic file description | DP Issues | Statutory Provisions | Retention Period (Operational) | Action at the end of the administrative life of the record | |
| 15.1 | Day books | Yes | | Current year + 2 years then review | SHRED | |
| 15.2 | Reports for outside agencies – where the report has been included on the case file created by the outside agency | Yes | | Whilst the child is attending the school then destroy | SHRED | |
| 15.3 | Referral forms | Yes | | While the referral is current then | SHRED | |
| 15.4 | Contact data sheets | Yes | | Current year then review, if contact is no longer active then destroy | SHRED | |
| 15.5 | Contact database entries | Yes | | Current year then review, if contact is no longer active then destroy | DELETE | |
| 15.6 | Group Registers | Yes | | Current year + 2 years | SHRED | |