

Gen 028 A Records Management Policy Outline and Full Retention Schedule (210224)

Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their Data Protection Officer.

FILE DESCRIPTION	RETENTION PERIOD
4.11.1 Employment Records	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference. In this case, application forms will give applicants the opportunity to object to their details being retained
Job applications and interview records of successful candidates	DO NOT DESTROY (Refer to note on front page) then 6 years after employment ceases
Written particulars of employment, contracts of employment and changes to terms and conditions	DO NOT DESTROY (Refer to note on front page) then 6 years after employment ceases
Right to work documentation including identification documents	DO NOT DESTROY (Refer to note on front page) then 2 years after employment ceases
Immigration checks	DO NOT DESTROY (Refer to note on front page) then 2 years after the termination of employment
DBS checks and disclosures of criminal records forms	The school does not have to keep copies of the DBS certificates.
Change of personal details notifications	No longer than 6 months after receiving this notification
Emergency contact details	Destroyed on termination
Personnel and training records	DO NOT DESTROY (Refer to note on front page) then, while employment continues and up to six years after employment ceases

Annual leave records	Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards
Working Time Regulations: · Opt out forms · Records of compliance with WTR	Two years from the date on which they were entered into Two years after the relevant period
Disciplinary and training records	DO NOT DESTROY (Refer to note on front page) then 6 years after employment ceases
Allegations of a child protection nature against a member of staff including where the allegation is founded	DO NOT DESTROY (Refer to note on front page) then until the person's normal retirement age or 10 years from the date of allegation, whichever is longer, then review. NB – allegations that are found to be malicious should be removed from personnel files, from the date they are proven to be unfounded.
4.11.2 Financial and Payroll Records	
Pension records	Current year + 6 years
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	Current year + 6 years
Payroll and wage records	Current year + 6 years
Maternity/Adoption/Paternity Leave records	Current year + 3 years
Statutory Sick Pay	Current year + 3 years
4.11.3 Agreements and Administration Paperwork	
School Development Plans	Life of plan + 6 years
Professional Development Plans	Life of the plan + 6 years

Visitor management systems (including electronic systems, visitors books and signing in sheets)	Current year + 6 years
Newsletters and circulars to staff, parents and pupils	Current year + 1 year
4.11.4 Health and Safety Records	
Health and Safety Policy Statements	Life of the policy + 3 years
Health and Safety Risk Assessments	Life of the assessment + 3 years
Any reportable accident, death or injury in connection with work	Date of the incident + 3 years
Accident reporting	Adults – Retain for 7 years from the date of the accident Children – Retain for 25 years from the child's date of birth
Fire precaution log books	Current year + 3 years
Process of monitoring: - · radiation · asbestos · records specified by the Control of Substances Hazardous to Health Regulations (COSHH)	40 years from the date of the last entry made in the record
Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made
4.11.5 Pupil Records	
Admissions records	1 year from the date of admission
Register of Admissions	Entries to be preserved for three years from date of entry

School Meals Registers	Current year + 3 years
Free School Meals Registers	Current year + 6 years
Pupil Record	DO NOT DESTROY (Refer to note on front page) then retain whilst the child remains at school/Date of birth of the pupil + 25 years
Attendance Registers	3 years from the date of entry
Special Educational Needs files, reviews and individual education plans (this includes any statement and all advice and information shared regarding educational needs)	DO NOT DESTROY then retain from date of birth of the pupil + 31 years

4.12 Full Retention Schedule

1. Management of the School. This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Head Teacher and the Senior Management Team, the admissions process and operational administration.

1.1 Governing Body									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
1.1.1	Agendas for Governing Body meetings	There may be data protection issues, if the meeting relates to confidential concerns around staff or pupils	Conclusion of meeting	One copy to be retained with the master set of minutes - all other copies can be disposed of	Secure disposal	Common practice			
1.1.2	Minutes of Governing Body meetings	There may be data protection issues, if the meeting relates to confidential concerns around staff or pupils	Date of meeting		If the school is unable to store these, they should contact the DPO to discuss.	Common practice			
	Principal Set (signed)			Permanent to be held at school		Common practice			
	Inspection Copies			Date of meeting + 3 years	Secure disposal	Common practice			
1.1.3	Reports present to the Governing Body	There may be data protection issues, if the meeting	Date of report	Reports should be kept for a minimum of 6	Secure disposal or retain with the signed	Common practice			

		relates to confidential concerns around staff or pupils		years. However, if the minutes refer directly to individual reports then the reports should be kept permanently	set of minutes				
1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	None	Date of meeting	Date of the meeting + a minimum of 6 years	Secure disposal	Common practice			
1.1.5	Instruments of Government including Articles of Association	None	Closure of school	Permanent	These should be retained in the schools whilst the school is open and then discuss with the DPO if the school is closing.	Common practice			
1.1.6	Trusts and Endowments managed by the Governing Body	None	End of operational use	Permanent	These should be retained by the school, whilst the school is open and then discuss with the DPO if the school is to close.	Common practice			
1.1.7	Action plans created and administered by the Governing Body	None	Expiration of action plan	Until superseded or whilst relevant	Secure disposal	Common practice			

1.1.8	Policy documents created and/or administered by the Governing Body	None	Expiration of the policy	Until superseded. The school should consider keeping all policies relating to safeguarding and child protection or other pupil related issues, such as exclusion, until the IICSA has issued its recommendations	Secure disposal	Common practice			
1.1.9	Records relation to complaints made to, and investigate by the Governing Body and/or Head Teacher	Yes	Resolution of complaint	Date of the resolution of the complaint + a minimum of 6 years; if negligence is involved then current year + 5 years. If child protection or safeguarding issues are involved then current year + 40 years	Secure disposal	Common practice			
1.1.10	Annual Reports created under the requirements of the Education	No	End of the calendar year that the	Date of the report + 10 years	Secure disposal	Education (Governor'			

	(Governor's Annual Reports)(England)(Amendment) Regulations 2002		record was created in			s Annual Reports) (England) (Amendment) Regulations 2002			
1.1.11	Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies	No	Date proposal accepted or declined	For the life of the organisation	If the school is unable to store these, they should discuss this with the DPO.	Common practice			
1.1.12	Records relating to the appointment of parent and staff governors, not appointed by the governors	Yes	Date of election	Date of election + 6 months	Secure disposal	Common practice			
1.1.13	Records relating to the appointment of co-opted governors	Yes	Date of appointment	Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning	Secure disposal	Common practice			

				children – in this case, retain for 25 years)					
1.1.14	Records relating to the election of chair and vice chair	Yes	Date of appointment	Once the design has been recorded in the minutes, the records relating to the election can be destroyed	Secure disposal	Common practice			
1.1.15	Scheme of delegation and terms of reference for committees	Yes	Expiration of terms	Until superseded or whilst relevant (schools may wish to retain these records for reference purposes in case decisions need to be justified)	If the school is unable to store these, they should discuss this with the DPO.	Common practice			
1.1.16	Meetings schedule	No	Date of meeting	Current year	Secure disposal	Common practice			
1.1.17	Register of attendance at Full Governing Board meetings	Yes	Date of meeting	Date of meeting + 6 years	Secure disposal	Common practice			
1.1.18	Papers relating to the management of the annual Parent's Evening	Yes	Date of meeting	Date of meeting + 6 years	Secure disposal	Common practice			
1.1.19	Records relating to Governor Monitoring Visits	Yes	Date of visit	Date of visit + 3 years	Secure disposal	Common practice			

1.1.20	Annual reports required by the Department of Education	Yes	Date of report	Date of report + 10 years	Secure disposal	Common practice			
<p>The revised IRMS Retention Guidelines for Schools (2019) has included a new section relating to the Governor Management. In all the following cases, the file should be retained from the date of appointment + 6 years, and disposed of securely;</p> <ul style="list-style-type: none"> • Appointment of a clerk to the governing body • Terms of office of serving governors, including evidence of appointment • Governor declaration against disqualification criteria • Register of business interests • Training required, and received, by governors • Induction programme for new governors • DBS checks carried out on the clerk and members of the governing body • Governor personnel files. <p>The Governor's Code of Conduct is 'expected to be a dynamic document; one copy of each version should be kept for the life of the school.</p>									
1.2 Head Teacher									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
1.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection concerns if the log book refers to individual pupils or members of staff	Date of last entry in the log book	Date of the last entry in the log book + a minimum of 6 years and then review (NB Legislation no longer requires the completion of a school log book)	These could be of permanent historical value and should be discussed with the DPO.	Common practice			
1.2.2	Minutes of Senior Management Team meeting and the meetings of other internal administrative bodies	There may be data protection concerns if the minutes refers to individual pupils or	Date of the meeting	Date of the meeting + 3 years	Secure disposal	Common practice			

		members of staff							
1.2.3	Reports created by the Head Teacher or the Senior Management Team	There may be data protection concerns if the report refers to individual pupils or members of staff	Date of report	Date of report + 3 years	Secure disposal	Common practice			
1.2.4	Records created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities	There may be data protection concerns if the records refers to individual pupils or members of staff	Date of record	Current academic year + 6 years then review	Secure disposal	Common practice			
1.2.5	Correspondence created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities	There may be data protection concerns if the correspondence refers to individual pupils or members of staff	Date of correspondence	Date of correspondence + 3 years and then review	Secure disposal	Common practice			
1.2.6	Professional Development Plans	Yes	Date plan commences	Life of plan + 6 years	Secure disposal	Common practice			
1.2.7	School Development Plans	No	Date plan commences	Life of plan + 3 years	Secure disposal	Common practice			

1.3 Admissions Process									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
1.3.1	All records relating to the creation and implementation of the School's Admission's Policy	No	Expiration of the policy	Life of the policy + 3 years then review	Secure disposal	School Admissions Code Statutory Guidance 2014			
1.3.2	Admissions – if the admission is successful	Yes	Date of admission	Date of admission + 1 year	Secure disposal	School Admissions Code Statutory Guidance 2014			
1.3.3 A	Admissions – if the admission is unsuccessful (where no appeal is made)	Yes	Resolution of case	Resolution of case + 1 year	Secure disposal	School Admissions Code Statutory Guidance 2014			
1.3.3 B	Admissions – if the admission is unsuccessful (where an appeal is made)	Yes	Resolution of case	Resolution of case + 1 year	Secure disposal	School Admissions Code Statutory Guidance 2014			
1.3.4	Register of Admissions	Yes	Last entry in register	Every entry in the admission register must be preserved for a period of 3 years after the date on	Discuss with the DPO.	School Admissions Code Statutory Guidance 2014			

				which the entry was made *					
1.3.5	Admissions (Secondary School – Casual)	Yes	Date of admission	Current year + 1 year	Secure disposal	The Limitations Act 1980			
1.3.6	Proofs of address, supplied by parents, as part of the admissions process	Yes	Date of admission	Current year + 1 year	Secure disposal	School Admissions Code Statutory Guidance 2014			
1.3.7	Supplementary information forms to include; religion, medical conditions etc.								
	For successful admissions	Yes	Date of admission/annual data check	This information should be added to the pupil file	Secure disposal	The Limitations Act 1980			
	For unsuccessful admissions		Date of admission	Until the appeal process is completed	Secure disposal	The Limitations Act 1980			

1.4 Operational Administration									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
1.4.1.	General file series	No	End of calendar year	Current year + 5 years then review	Secure disposal	Common practice			
1.4.2	Records relating to the creation and publication of the school brochures or prospectus	No	Expiration of current publication	Current year + 3 years	Discuss with the DPO.	Common practice			

1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No	Date of record	Current year + 1 year	Discuss with the DPO.	Common practice			
1.4.4	Newsletters and other items with short operational use	No	Date of record	Current year + 1 year	Discuss with the DPO.	Common practice			
1.4.5	Visitor management systems (including electronic systems, visitors books and signing in sheets)	Yes	End of calendar year	Current year + 6 years then review	Secure disposal	Common practice			
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupil Associations	No	Date of record	Current year + 6 years then review	Secure disposal	Common practice			
1.4.7	School Privacy Notice which is sent to parents as part of GDPR compliance	No	When policy is superseded	Date of issue + 6 years	Secure disposal	Common practice			
1.4.8	Consents relating to school activities as part of GDPR compliance (e.g. consent to be sent circulars or mailings)	No	Date of admission	This information should be added to the pupil file	Secure disposal	Common practice			
1.4.9	Security breach logs	Yes	Date of implementation	Date of issue + 25 years (pupils) and 6 years (staff)	Secure disposal	Common practice			
1.4.10	Digital Continuity Plans	Yes	Expiration of current plan	Date of issue + 6 years	Secure disposal	Common practice			

2. Human Resources. This section deals with all matters relating to Human Resources management within the school.

2.1 Recruitment									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes	Date of appointment	Unsuccessful attempts - Date of appointment + 6 months. This information should be added to the staff personnel file and retained until the end of the appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years (see below)	DO NOT DESTROY (Refer to note on front page)	Common practice, Immigration , Asylum and Nationality Act 2006			
2.1.2	All records leading up to the appointment of a new member of staff (successful candidate)	Yes	Date of appointment	Date of appointment + 6 years. This information should be added to the staff personnel file (see below)	DO NOT DESTROY (Refer to note on front page)	Common practice, Immigration , Asylum and Nationality Act 2006			
2.1.3	All records leading up to the appointment of a new member of staff/governor (unsuccessful candidate)	Yes	Date of interview	Date of interview + 12 months	Secure disposal	Common practice			
2.1.4	Pre-employment vetting information	Yes	Date of receipt	Application forms, references and other documents – for the	Secure disposal	DBS guidelines (Service			

	of successful candidates – DBS			duration of their employment + 6 years		Employer Guide 2014), Keeping Children Safe in Education 2018			
2.1.5	Proofs of identity collected as part of the process of checking 'portable' enhanced DBS disclosure	Yes	Date of receipt	To be added to the member of staff's personal folder	DO NOT DESTROY (Refer to note on front page)	DBS guidelines			
2.1.6	Pre-employment vetting information of successful candidates – evidence proving the right to work in the United Kingdom	Yes	Date of receipt	Where possible, these documents should be added to the member of staff's personal folder. If they are kept separately, the Home Office requires that the documents are kept until termination of employment plus not less than 2 years.	DO NOT DESTROY (Refer to note on front page)	An Employer's Guide to Right to Work Checks (Home Office 2015)			
2.1.7	Pre-employment vetting information of successful candidates – for the purposes of ensuring school staff are adequately qualified	Yes	Date of receipt	To be added to the member of staff's personal folder	DO NOT DESTROY (Refer to the note on front page)	Common practice			

2.2 Operational Staff Management

Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
2.2.1	Staff Personnel File	Yes	Date of appointment	Termination of employment + 6 years	DO NOT DESTROY (Refer to the note on front page)	Limitations Act 1980			
2.2.2	Timesheets	Yes	Date of appointment	Current year + 6 years	DO NOT DESTROY (Refer to the note on front page)	Common practice			
2.2.3	Annual appraisal/assessment records	Yes	End of calendar year that the record was created in	Current year + 6 years	DO NOT DESTROY (Refer to the note on front page)	Common practice			
2.2.4	Sickness absence monitoring	Yes	Date of absence	Sickness records are categorised as 'sensitive data'. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring. Sickness records should be	Secure disposal	Common practice			

				kept separate from accident records. Current practice recommends that sickness records should be held for the current year + 3 years.					
2.2.5	<p>The revised IRMS Retention Guidelines for Schools (2019) has included a new section relating to staff training. In all the following cases, the file should be retained from the date of appointment and disposed of securely as follows;</p> <ul style="list-style-type: none"> • Where training leads to continuing professional development – for the length of time required by the professional body • All training except where dealing with children e.g. First Aid or Health and Safety – to be retained on the personnel file (as per 2.1.1) • All training where the training relates to children e.g. safeguarding – DO NOT DESTROY (Refer to the note on the front page). The IRMS now advises a retention period of 40 years, reflecting that IICSA may wish to see training records as part of an investigation. 								

2.3 Management of Disciplinary and Grievance Processes

Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
2.3.1	Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded	Yes	Date of referral	Until the person's normal retirement age or 10 years from the date of allegation, whichever is longer, then review. NB – allegations that are found to be malicious	DO NOT DESTROY (Refer to the note on front page)	Keeping Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard			

				should be removed from personnel files, from the date they are proven to be unfounded.		children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018			
2.3.2	Disciplinary proceedings	Yes							
	Verbal warning	Yes	Date of warning	Date of warning + 6 months	DO NOT DESTROY (Refer to the note on front page)	Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018			
	Written warning (level 1)	Yes	Date of warning	Date of warning + 6 months	DO NOT DESTROY (Refer	Children Safe in Education;			

					to the note on front page)	Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018			
	Written warning (level 2)	Yes	Date of warning	Date of warning + 12 months	DO NOT DESTROY (Refer to the note on front page)	Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and			

						promote the welfare of children' 2018			
	Final warning	Yes	Date of warning	Date of warning + 18 months	DO NOT DESTROY (Refer to the note on the front page)	Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018			
2.3.3	Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings)	Yes	Date of resolution	If the incident is child protection related then see above; otherwise dispose following the conclusion of the case	DO NOT DESTROY (Refer to the note on front page)	Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard			

						children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018			
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N.B. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct at a later date, and then defend themselves by denying they would undertake such an action, reference to the earlier proceedings may show that they should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that they had e.g. "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim. Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.

2.4 Health and Safety									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
2.4.1	Accessibility Plans	No	End of the calendar year that the records was created in	Current year + 6 years	Secure disposal	Disability and Equality Act 2010			
2.4.2	Health and Safety Policy Statements	No	Implementation of the policy	Life of the policy + 3 years	Secure disposal	Common practice			
2.4.3	Health and Safety Risk Assessments	No	Implementation of the assessment	Life of the assessment + 3 years	Secure disposal	Common practice			

2.4.4	Records relating to accidents/injuries at work	Yes	Date of incident	Date of incident + 12 years	Secure disposal	Common practice			
2.4.5	Accident reporting								
	Adults	Yes	Date of incident	Retain for 7 years	Secure disposal	The Limitations Act 1980			
	Children	Yes	Date of birth	Retain for 25 years	Secure disposal	The Limitations Act 1980			
2.4.6	Control of Substances Hazardous to Health (COSHH)	No	Last action on file	Current year + 40 years	Secure disposal	The Control of Substances Hazardous to Health Regulations 2002			
2.4.7	Process of monitoring areas where employees/pupils are likely to come into contact with asbestos	No	Last action on file	Last action + 40 years	Secure disposal	The Control of Asbestos at Work Health Regulations 2012			
2.4.8	Process of monitoring areas where employees/pupils are likely to come into contact with radiation	No	Last action on file	Last action + 50 years	Secure disposal	The Ionising Radiations Regulation 2017			
2.4.9	Fire Precautions log books	No	End of calendar year	Current year + 3 years	Secure disposal	Common practice			

2.5 Payroll and Pensions

Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
2.5.1	Maternity Pay Records	Yes	End of the financial year in which the maternity pay period ends	Current year + 3 years	Secure disposal	Statutory Maternity Pay (General) Regulations 1986			

2.5.2	Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity	Yes	End of the financial year	Current year + 6 years	Secure disposal	Retirement Benefits Schemes (Information Powers) Regulations 1995			
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The revised IRMS Retention Guidelines for Schools (2019) has greatly expanded the section relating to payroll and pensions, with the inclusion of 37 new elements, some of which, depending on the size of the school, may not be relevant. They can be summarised as follows;

- Records to be maintained for the current year + 6 years (Under the Taxes and Management Act 1970, Income and Corporation Taxes 1988), for secure disposal – Batches, Bonus Sheets, Car Loans, Car Mileage Output, Insurance, Members Allowance Register, National Insurance (Schedule of payments), Part Time Fee claims, Payroll (gross/net, weekly or monthly), Payroll Reports, Payslips (copies), Pension Payroll, Superannuation adjustments and reports.
- As above but for the current year + 3 years – Bonus sheets, Car Allowance claims, Overtime
- Records to be maintained for the current year + 6 years (as Common practice) – Income Tax P60, Personal bank details (if employment ceases then end of employment + 6 years, otherwise until superseded + 3 years), Tax Forms P6/P11/P11D/P35/P45/P46/P48 (The minimum requirement, as stated in Inland Revenue Booklet 490, is for at least 3 years after the end of the tax year to which they apply. Originals must be retained in paper/electronic format. It is a corporate decision to retain for current year + 6 years. Employees should retain records for 22 months after current tax year)
- Records to be maintained for the current year + 3 years (as Common practice) – Absence records, Sickness records, Staff returns, Time Sheets/Clock Cards/Flexitime

3. Financial Management of the School. This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Head Teacher and the Senior Management Team, the admissions process and operational administration.

3.1 Risk Management and Insurance									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
3.1.1	Employer's Liability Insurance Certificate	No	Closure of school	Date of closure + 40 years	Discuss with the DPO.	Common practice			

3.2 Asset Management									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
3.2.1	Inventories of furniture and equipment	No	End of calendar year	Current year + 6 years	Secure disposal	Common practice			
3.2.2	Burglary, theft and vandalism report forms	No	End of calendar year	Current year + 6 years	Secure disposal	Common practice			

3.3 Accounts and Statements including Budget Management									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
3.3.1	Annual accounts	No	End of financial year	Current year + 6 years	Discuss with the DPO.	Common practice			
3.3.2	Loans and grants managed by the school	No	End of financial year	Date of last payment on the loan + 12 years then review	Secure disposal	Standard financial regulations			

3.3.3	Student Grant applications	Yes	End of financial year	Current year + 3 years	Secure disposal	Standard financial regulations			
3.3.4	All records relating to the creation and managements of budgets, including the Annual Budget statement, and background papers	No	End of financial year	Current financial year + 3 years	Secure disposal	Common practice			
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No	End of financial year	Current financial year + 6 years	Secure disposal	Standard financial regulations			
3.3.6	Records relating to the collection and banking of monies	No	End of financial year	Current financial year + 6 years	Secure disposal	Standard financial regulations			
3.3.7	Records relating to the identification and collection of debt	Yes	End of financial year	Current financial year + 6 years	Secure disposal	Standard financial regulations			
3.3.8	Pupil Premium Fund records	Yes	End of financial year	Date pupil leaves the provision + 6 years					

3.4 Contract Management

Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
3.4.1	All records relating to the management of contracts under seal	No	End of contract	Current year + 12 years	Secure disposal	The Limitations Act 1980			

3.4.2	All records relating to the management of contracts under signature	No	End of contract	Current year + 6 years	Secure disposal	The Limitations Act 1980			
3.4.3	Records relating to the monitoring of contracts	No	End of calendar year	Current year + 6 or 12 years	Secure disposal	Common practice			

3.5 School Fund

Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
3.5.1	School Fund – cheque books	No	End of use	Current year + 6 years	Secure disposal	Financial Services Act, HMRC regulations Companies Act			
3.5.2	School Fund – paying in books	No	End of use	Current year + 6 years	Secure disposal	Financial Services Act, HMRC regulations Companies Act			
3.5.3	School Fund - ledger	No	End of use	Current year + 6 years	Secure disposal	Financial Services Act, HMRC regulations Companies Act			
3.5.4	School Fund – invoices	No	End of financial year	Current year + 6 years	Secure disposal	Financial Services Act, HMRC regulations Companies Act			

3.5.5	School Fund - receipts	No	End of financial year	Current year + 6 years	Secure disposal	Financial Services Act, HMRC regulations Companies Act			
3.5.6	School Fund – bank statements	No	End of financial year	Current year + 6 years	Secure disposal	Financial Services Act, HMRC regulations Companies Act			
3.5.7	School Fund – journey books	No	End of financial year	Current year + 6 years	Secure disposal	Financial Services Act, HMRC regulations Companies Act			

3.6 School Meals

Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
3.6.1	Free School Meals Register	Yes	End of calendar year	Current year + 6 years	Secure disposal	Common practice			
3.6.2	School Meals Register	Yes	End of calendar year	Current year + 3 years	Secure disposal	Common practice			
3.6.3	School Meals Summary Sheets	No	End of calendar year	Current year + 3 years	Secure disposal	Common practice			

4. Property Management. This section covers the management of buildings and property.

4.1 Management									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period (Operational)	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
4.1.1	Title deeds of properties belonging to the school	No	Archive upon closure	Permanent. These should follow the property unless the property has been registered with the Land Registry	Discuss with the DPO.	Common practice			
4.1.2	Plans of property belonging to the school	No	Transfer of asset	These should be retained whilst the building belongs to the school and should be passed onto any new owners, if the building is leased or sold.	Discuss with the DPO.	Common practice			
4.1.3	Leases of property leased by, or to, the school	No	Commencement of lease	Expiry of lease + 6 years	Secure disposal	Common practice			
4.1.4	Records relating to the letting of school premises	No	End of financial year that the record was created in	Current financial year + 6 years	Secure disposal	Common practice			

4.2 Maintenance									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
4.2.1	All records relating to the maintenance of the school, carried out by contractors	No	End of financial year that the record was created in	Current financial year + 6 years	Secure disposal	Common practice			
4.2.2	All records relating to the maintenance of the school, carried out by school employees, including maintenance log book	No	End of calendar year that the record was created in	Current calendar year + 6 years	Secure disposal	Common practice			

5. Pupil Management. This section includes all records which are created during the time a pupil spends at school. For information relating to accident reporting, please refer to the Health and Safety section above.

5.1 Pupil's Educational Record									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
5.1.1	Pupil's Educational Record required by the Education (Pupil Information) (England) Regulations 2005								
	Primary	Yes	Date pupil changes school	Retain whilst the child remains at the primary school	The file should follow the pupil when they leave the primary school *	Pupil's Educational Record required by the Education (Pupil Information) (England) Regulations 2005			
	Secondary	Yes	Pupil's date of birth	Date of birth of the pupil + 25 years	DO NOT DESTROY (refer to note on front page)	The Limitations Act 1980			
5.1.2	Examination Results - Pupil Copies								
	Public	Yes	Date of examination	This information should be added to the pupil file	Secure disposal All uncollected certificates to be returned to the examination	Common practice			

					board, after reasonable attempts to contact the pupil have failed				
	Internal	Yes	Date of examination	This information should be added to the pupil file	Secure disposal	Common practice			
5.1.3	Child Protection Information held on pupil file								
	Primary	Yes	Date pupil changes school (Where a child is removed from the roll to be educated at home/missing from education, see below)	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and retained for the same period of time as the pupil record. Where child protection information is held separately, retain for 25 years from the child's date of birth, then review.	Transfer to Secondary School	Keeping Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018)			

				Common practice, following guidance from LA Safeguarding services, advises that the principal copy of this information will be held by the LA Children's Services.					
	Secondary	Yes	Pupil's date of birth (Where a child is removed from the roll to be educated at home/missing from education, see below)	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and retained for the same period of time as the pupil record. Where child protection information is held separately, retain for 25 years from the child's date of birth,	DO NOT DESTROY (refer to note on front page). Consider transfer to off-site storage on the child reaching school leaving age	Keeping Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018			

				then review. Common practice, following guidance from LA Safeguarding services, advises that the principal copy of this information will be held by the LA Children's Services.					
	Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths.	Yes	Date removed from roll	As above. NB – Scan all documents into one folder, use the naming convention as per guidance sent out (CME) and send via Perspective Lite Secure Portal, which can also be accessed via Derbyshire SchoolsNet	Discuss with the DPO.	Keeping Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018			
	Child is removed from the roll and is	Yes	Date removed from roll	As above. NB – Scan all documents	Discuss with the DPO.	Keeping Children Safe in Education;			

	Elective Home Educated			into one folder, use the naming convention as per guidance sent out (EHE) and send via Perspective Lite Secure Portal, which can also be accessed via Derbyshire SchoolsNet		Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018			
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5.2 Attendance

Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
5.2.1	Attendance Registers	Yes	Last entry in register	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	Secure disposal	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities 2014			
5.2.2	Correspondence relating to authorized absence	Yes	Date of absence	Date of absence + 2 years	Secure disposal	School attendance: Departmental advice for			

						maintained schools, Academies, independent schools and local authorities 2014			
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5.3 Special Educational Needs

Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
5.3.1	Special Educational Needs files, reviews and Individual Education Plans								
	Primary	Yes	Date pupil changes school	Retain for duration of attendance at school	Transfer to Secondary School	The Limitations Act 1980			
	Secondary	Yes	Pupil's date of birth	Date of birth of pupil + 35 years (This period is recommended by Derbyshire County Council)	DO NOT DESTROY (refer to note on front page)	Special Educational Needs and Disability Act 2001 Children and Family's Act 2014			
5.3.2	Statement maintained under Section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Pupil's date of birth	Date of birth of pupil + 25 years	DO NOT DESTROY (refer to note on front page)	Special Educational Needs and Disability Act 2001 Children and			

						Family's Act 2014 The Limitations Act 1980			
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6. Curriculum Management

6.1 Statistics and Management Information

Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
6.1.1	Curriculum returns	No	End of the calendar year that the record was created in	Current year + 3 years	Secure disposal	Common practice			
6.1.2	Curriculum development	No	End of the calendar year that the record was created in	Current year + 6 years	Secure disposal	Common practice			
6.1.3	Examination Results (School's copy)	Yes	Date of examination	Current year + 6 years	Secure disposal	Common practice			
	SATS								
	Results	Yes	Date that results are released	The SATS result should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the ages of 25 years. The school may wish to keep a composite record of all the whole year SATS results. These could be kept for the current year + 6 years to allow suitable comparison	Secure disposal	Common practice			

	Examination papers	Yes	Date of examination	The examination papers should be kept until any appeals/validation process is complete	Secure disposal	Common practice			
6.1.4	Published Admission Number (PAN) Reports	Yes	End of the calendar year that the record was created in	Current year + 6 years	Secure disposal	Common practice			
6.1.5	Value Added and Contextual Data	Yes	End of the calendar year that the record was created in	Current year + 6 years	Secure disposal	Common practice			
6.1.6	Self-Evaluation Forms	Yes	Date of completion	Current year + 6 years	Secure disposal	Common practice			
6.1.7	Internal Moderation	Yes	Date of commencement	Academic year + 1 academic year	Secure disposal	Common practice			
6.1.8	External Moderation	Yes	Date of commencement	Until superseded	Secure disposal	Common practice			

6.2 Implementation of Curriculum

Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
6.2.1	Schemes of Work	No	End of the calendar year that the record was created in	Current year + 1 year	Review these records at the end of each year and allocate a further retention period or secure disposal	Common practice			

6.2.2	Timetable	No	End of the calendar year that the record was created in	Current year + 1 year	Secure disposal	Common practice			
6.2.3	Class Record books	No	End of the calendar year that the record was created in	Current year + 1 year	Secure disposal	Common practice			
6.2.4	Mark books	No	End of the calendar year that the record was created in	Current year + 1 year	Secure disposal	Common practice			
6.2.5	Record Homework set	No	End of the calendar year that the record was created in	Current year + 1 year	Secure disposal	Common practice			
6.2.6	Pupil's work	No	Where possible, pupils' work should be returned to the pupil at the end of the academic year. If this is not, currently, the school's policy then it should be retained for the current year +1		Secure disposal (where applicable)	Common practice			

7. Extra Curriculum Management

7.1 Extra Curriculum Management									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Primary schools) where there has not been a Major Incident	No	Date of visit	Date of visit + 14 years	Secure disposal	The Health and Safety at Work Act 1974 (NB – Records created might include risk assessments)			
7.1.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Secondary schools) where there has not been a Major Incident	No	Date of visit	Date of visit + 10 years	Secure disposal	The Health and Safety at Work Act 1974 (NB – Records created might include risk assessments)			
7.1.3	Parental consent forms for school trips where there has been no Major Incident	Yes	Conclusion of trip	Although the consent forms could be retained for DOB of the pupil + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain each form for this period of time. Therefore no retention is required	Secure disposal	Common practice			

7.1.4	Records created by schools to obtain approval for to run an Educational Visit outside the Classroom, where there has been a Major Incident	Yes	Pupil's DOB	Retain for 21 years from the date of birth of the pupil/s involved in the incident	Secure disposal	The Limitations Act 1980 (NB – Records created might include risk assessments)			
7.1.5	Parental consent forms for school trips, where there has been a Major Incident	Yes	Pupil's DOB	Retain for 21 years from the date of birth of the pupil/s involved in the incident. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	Secure disposal	The Limitations Act 1980			

7.2 Walking Bus

Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
7.2.1	Walking Bus registers	Yes	Last entry in register	Date of register + 6 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 reporting (please	Secure disposal	Common practice			

refer to Section 2.4.4
Accident Reporting).

7.3 Family Liaison Officers and Home School Liaison Assistants

Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
7.3.1	Day books	Yes	End of the calendar year that the record was created in	Current year + 2 years then review	Secure disposal	Common practice			
7.3.2	Reports for outside agencies – where the report has been included on the agency case file	Yes	Date of completion of report	Whilst the child is attending school and then destroy	DO NOT DESTROY (refer to note on front page)	Common practice			
7.3.3	Referral forms	Yes	Date of completion of form	While the referral is current	DO NOT DESTROY (refer to note on front page)	Common practice			
7.3.4	Contact data sheets	Yes	End of the calendar year that the record was created in	Current year then review – if contact is no longer active then destroy	Secure disposal	Common practice			
7.3.5	Contact data base entries	Yes	End of the calendar year that the record was created in	Current year then review – if contact is no longer active then destroy	Secure disposal	Common practice			
7.3.6	Group registers	Yes	Last entry in register	Current year + 2 years	Secure disposal	Common practice			

8. Central Government and Local Authority

8.1 Local Authority									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
8.1.1	Secondary Transfer sheets	Yes	Year of transfer	Current year + 2 years	Secure disposal	Common practice			
8.1.2	Attendance Returns	Yes	End of the calendar year that the record was created in	Current year + 1 year	Secure disposal	Common practice			
8.1.3	School Census Returns	No	Completion of return	Current year + 5 years	Secure disposal	Common practice			
8.1.4	Circulars and other information sent from the Local Authority	No	Date of issue	Operational use	Secure disposal	Common practice			

8.2 Central Government									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
8.2.1	OFSTED reports and papers	No	Date new report is issued	Retain whilst current	Discuss with the DPO.	Common practice			
8.2.2	Returns made to central government	No	End of the calendar year that the record was created in	Current year + 6 years	Secure disposal	Common practice			
8.2.3	Circulars and other information sent from central government	No	Date of issue	Operational use	Secure disposal	Common practice			



9. School Support Organisations

9.1 School Support Organisations									
Reference	Basic File Description	Data Protection Concerns	Trigger	Retention Period	Action upon end of use	Basis for Retention	Location	Access limited to (Role)	Annual Review Completed (Y/N)
9.1.1	Family Liaison Officers and Home School Liaison Assistant day books	Yes	Completion of book	Current year + 2 years	Secure disposal	Common practice			
9.1.2	As above – Reports for external agencies where the report has been included on the case file created by the external agency	Yes	Completion of report	Whilst pupil is attending school and then destroy	Secure disposal	Common practice			
9.1.3	As above – Referral forms	Yes	Completion of referral	Whilst the referral is current	Secure disposal	Common practice			
9.1.4	As above – Contact data sheets	Yes	Completion of sheet	Current year then review, if contact is no longer, then destroy	Secure disposal	Common practice			
9.1.5	As above – Contact database entries	Yes	Completion of entry	Current year then review, if contact is no longer, then destroy	Secure disposal	Common practice			
9.1.6	Group registers	Yes	Completion of register	Current year + 2 years	Secure disposal	Common practice			
9.1.7	Parent Teacher Associations and Old Pupil Associations – Records relating to the creation and management of PTA and Old Pupil Associations	Yes	Date of foundation	Current year + 6 years	Secure disposal	Common practice			



Appendix A – List of School Records and Data safely destroyed Specimen Checklist for Annual Review of School Records and Safe Data Destruction

The following sheet can be completed or, alternatively, document in a spreadsheet

Reference Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of Destruction	Confirm; (i) Safely Destroyed (ii) In accordance with Data Retention Guidelines Yes/No	Name of Authorising Officer
e.g.	School invoices	Copies of purchase invoices dated 2011/12	Folders marked 'Purchase Invoices 2011/13' 1-3	3 Folders	Cross shredded	Yes	J Smith (Head)
1.							
2.							
3.							
4.							
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15.							
16.							



Appendix B - Safe Retention of Records Information Security and Business Continuity

Information Security and Business Continuity are both important activities in ensuring good information management and are vital for compliance with Data Protection legislation. Taking measures to protect your records can ensure that:

- Your school can demonstrate compliance with the law and avoid data loss incidents;
- In the event of a major incident, your school should be able to stay open and will at least have access to its key administrative and teaching records.

An Information Security Policy should incorporate a Business Continuity Plan and should deal with records held in all media across all school systems:

- Electronic (including but not limited to databases, word processed documents and spreadsheets, scanned images)
- Hard copy (including but not limited to paper files, plans)

B1 Digital Information

In order to mitigate against the loss of electronic information a school needs to:

a. Operate an effective back-up system

You should undertake regular backups of all information held electronically to enable restoration of the data in the event of an environmental or data corruption incident. Where possible these backups should be stored in a different building to the servers and if possible off the main school site. This is to prevent loss of data, reduce risk in case of theft or the possibility of the backups becoming temporarily inaccessible. Options for the management of back-up facilities include:

- Use of an off-site, central back up service (usually operated by the local authority or other provider). This involves a back-up being taken remotely over a secure network (usually overnight) and stored in encrypted format in premises other than the school.
- Storage in a data safe in another part of the school premises

The back-up may be stored in a fireproof safe which is located in another part of the premises. These premises must also be physically secure and any hard copy supporting data regarding the location of records should also be stored in the safe.

Where schools make use of cloud storage instead of, or alongside, physical onsite servers, they should ensure that the location of the cloud storage and the security offered are appropriate for the information and records stored.

b. Control the way data is stored within the school

Personal information should not be stored on the hard drive of any laptop or PC unless the device is running encryption software. Staff should be advised not to hold personal information about students or other staff on mobile storage devices including but not limited to memory sticks, phones, iPads, portable hard drives or even on CD.

c. Manage the location of server equipment

Ensure that the server environment is managed to prevent access by unauthorised people.

d. Ensure that business continuity plans are tested

Test restore processes on a regular basis to ensure that the first time you identify a problem with the backup is not the first time you need to retrieve data from it.



B2 Hard Copy Information and Records

Records which are not stored on the school's servers are at greater risk of damage by fire and flood as well as risk of loss and of unauthorised access. Wherever possible, and where appropriate, if information can be stored electronically rather than hard copy, then store it electronically.

a. Fire and flood

The cost of restoring records damaged by water can be high but a large percentage may be saved; a fire is much more destructive of records. In order to limit the amount of damage which a fire or flood can do to paper records, all vital information should be stored in filing cabinets, drawers or cupboards. Metal filing cabinets are a good first level barrier against fire and water. Where possible vital records should not be left on open shelves or on desks as these records will almost certainly be completely destroyed in the event of fire and will be seriously damaged (possibly beyond repair) in the event of a flood. The bottom shelves of a storage cupboard should be raised at least 2 inches from the ground. Physical records should not be stored on the floor.

b. Unauthorised access, theft or loss

Staff should be encouraged not to take personal data on staff or students out of the school unless there is no other alternative. Records held within the school should be in lockable cabinets. Consider restricting access to offices in which personal information is being worked on or stored. All archive or records storage areas should be lockable and have restricted access.

Where paper files are checked out from a central system, log the location of the file and the borrower, creating an audit trail.

c. Clear Desk Policy

A clear desk policy is the best way to avoid unauthorised access to physical records which contain sensitive or personal information and will protect physical records from fire and/or flood damage.

A clear desk policy involves the removal of the physical records which contain sensitive personal information to a cupboard or drawer (lockable where appropriate). It does not mean that the desk has to be cleared of all its contents.

B3 Risk Analysis

Individual schools should undertake a business risk analysis to identify which records are vital to school management and these records should be stored in the most secure manner. Reference materials or resources which could be easily replaced are more suitable for storage on open shelves or desks.

The development of an information asset/risk register can assist with this process.

B4 Responding to Incidents

In the event of an incident involving the loss of information or records the school should be ready to pull together an incident response team to manage the situation. Schools should have a process, which must be used by all members of staff, if there is a major data loss or information security breach. This will involve appointing a Data Protection Officer to liaise with the Information Commissioner's Office if an information security breach needs to be reported.

Please be aware – a loss of data e.g. accidental destruction of records, is a data breach just as if those records had been lost, stolen or wrongfully shared.

B5 Maintaining a School Archive

Schools generate a large amount of data that is not necessarily personal or sensitive, yet is worthy of retention as part of the setting's historical legacy; records, year photographs, fliers and ephemera for plays, dances or student elections, letters, issues of the school newspaper. These, and other items,



document not only the school's past, but also reflect its place within the greater community. Sometimes a school may be asked what historical records are still maintained within the setting. Often these requests come from former school pupils, when they need to provide proof of their attendance or educational record. Other requests come from family historians carrying out research on their family tree and about their ancestors.

A school archives is different from an official school records system – all schools will have an established record-keeping system for official records and a Management Information System, which includes record-keeping guidelines. A school archive preserves data, beyond the retention period, where there is a legitimate interest in holding that information e.g. to commemorate a significant event in the life of the school. It can take on many characteristics and serve many purposes--but it neither compliments nor replaces the official record-keeping systems. However, records held in an archive must be accessed the same way, as current school records, and it would be necessary for the school to prove the identity of anyone requesting historical information, in the same way they would a Subject Access Request. To comply with the General Data Protection Regulation, the schools should consider the following, if a request has been made to consult someone else's personal information in school archive that is not in the public domain.

- Entries for an individual who is (or would be) more than one hundred years old can be viewed without restriction.
- If the individual is less than one hundred years old you would need to provide proof that that person is now deceased, and to supply a death certificate for them.
- If the requester wishes to access information still held under the terms of the retention schedule, they would need to make a Subject Access Request.

When creating an archive, a school should be aware that it must serve the purpose of repository for the collection and preservation of historically valuable documents, relating to the history of the school or the community, which otherwise would be lost.

Where the decision has been made not to transfer data to the local Council Records Office, the school should consult with their Data Protection Officer to implement the following steps;

- Establish what information needs to be archived
- Select someone to serve as the archivist. This may be an additional function within an established role, to work alongside both the Data Protection Officer and Data Lead officer (where applicable).
- Select a physical location to house the collection, and determine what equipment and supplies are needed to accomplish the project for the first year and on a continuing basis e.g. safe storage, shelving
- Remember that archives can include electronic data e.g. schools may have digital photographs which are no longer displayed on their website or social media pages. Consider not only holding and cataloguing this data in a secure driver, but making potential requestors aware of its presence, through a dedicated website.
- Come to an agreement with the local Records Office, in order for the collected materials could be turned over if the school archives should be discontinued.