

Records Management Policy and Record Retention Schedule



Updated by: Alastair Heath-Robinson / Pip Price

Version Number: V1.1

Signed

Ruth Slater

Chair of Trustees

Ruth Slater

Date:

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Review:

Annual

Trust Address:

**Halifax Primary School
Prince of Wales Drive
Ipswich
IP2 8PY**

Registered in England and Wales, Company Number: 10650092

Policy Updates

Version	Date	Description of Changes	Initials
V1.0	18/03/26	Page 4 – policy drawn up within context of Data Protection Complaints process (new). Records relating to data protection complaints retention period added to page 6	ES
V1.1	2.7.26	Page 6 - Clarification of how long identity records relating to visitors should be retained. Page 7 – Clarification to include CPOMS in Child Protection Files retention. Page 11- Clarification of how volunteers records are retained in line with staff	AHR/ PP

Introduction

Orwell Multi Academy Trust recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the Trust and its schools. Records provide evidence for protecting the legal rights and interests of the school and provide evidence for demonstrating performance and accountability.

1. Scope of the Policy

This policy applies to all records created, received or maintained by permanent and temporary staff of the school in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school.

Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronic format e.g. paper documents, scanned documents; emails which document business activities and decisions; audio and video recordings; text messages; notes of telephone, Zoom, Skype conversations; spreadsheets; Word documents; presentations etc.

2. Responsibilities

- 2.1 The Trust Board of Orwell MAT has a statutory responsibility to maintain the school records and record keeping systems in accordance with the regulatory environment specific to the school. The responsibility is delegated to the Headteacher.
- 2.2 The person responsible for day-to-day operational management in the school will give guidance on good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- 2.3 The school will manage and document its records disposal process in line with the Records Retention Schedule. This will help to ensure that it can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (subject access requests 'SARS').

- 2.4 Individual staff and employees must ensure, with respect to records for which they are responsible, that they:
- 2.4.1 manage the school's records consistently in accordance with the school's policies and procedures;
 - 2.4.2 properly document their actions and decisions;
 - 2.4.3 hold personal information securely;
 - 2.4.4 only share personal information appropriately and do not disclose it to any unauthorised third party; and
 - 2.4.5 dispose of records securely in accordance with the school's Record Retention Schedule.

3. Relationship with Existing Policies

This policy has been drawn up within the context of:

- Freedom of Information Policy
- Data Protection Policy
- Data Protection Complaints Process

4. Document Retention Schedule

Extract from the Information Management Toolkit for schools 2016 expanded to include additional staff records.

Governance		
Instruments of government including Articles of Association	N/A	For the life of the school
Records relating to the election of parent and staff governors not appointed by the Trustees	Personal data	Date of election + 6 months
Records relating to the terms of office of serving Trustees and local governors including evidence of appointment	Personal data	Date appointment ceases + 6 years
Records relating to Trustee and governor declaration against disqualification criteria	Personal data	Date appointment ceases + 6 years
Records relating to the election of chair and vice chair	N/A	Once the decision has been recorded in the minutes, the records relating to the election can be destroyed.
Records relating to the appointment of a clerk to the Board and local governing committees	Personal data	Date on which clerk appointment ceases + 6 years

Records relating to the training required and received by Trustees and governors	N/A	Date governor steps down + 6 years
Records relating to the induction programme for new Trustees and governors	N/A	Date appointment ceases + 6 years
Records relating to DBS checks carried out on clerk, Trustees and members of the governing body	Personal data	Date appointment ceases + 6 years
Trustee / Governor personnel files	Personal data	Date appointment ceases + 6 years
Scheme of delegation and terms of reference for committees	N/A	Until superseded or whilst relevant
Meetings schedule	N/A	Current year
Register of Interests (Trustees, governors and staff)	Personal data	6 years + current
Agendas for Trust Board / committee meetings (one copy to be retained with master set of minutes)	Special categories of personal data	PERMANENT
Minutes of Trust Board / committee meetings – principal signed set (including confidential minutes/reports)	Special categories of personal data	PERMANENT
Minutes of local Governing committee meetings – public inspection set (not to include confidential minutes/reports)	N/A	Date of the meeting + 3 years
Records relating to Local Governor Monitoring Visits	N/A	Date of the visit + 4 years
Management		
Minute/notes of meetings of SLT	Special categories of personal data	Date of the meeting + 3 years
Correspondence sent and received by the Governing Committee or Head	N/A	General correspondence should be retained for current year + 3 years
Correspondence sent and received by the Trust Board or CEO	N/A	General correspondence should be retained for current year + 3 years
Reports created by SLT	N/A	Date of the report + 3 years
Records created by SLT	N/A	Current year + 6 years
Correspondence created by SLT	N/A	Date of the correspondence + 3 years
Policy documents and action plans	N/A	Until superseded or whilst relevant. All policies relating to safeguarding, child protection or other pupil related issues

		such as exclusion to be kept + 3 years.
School Development Plan	N/A	Life of the report/policy + 3 years
Proposals relating to the change of status of a maintained school	N/A	Date proposal accepted or declined + 3 years
Records of complaints dealt with by the Governing Committee	Special categories of personal data	Date of the resolution of the complaint plus a minimum of 6 years
Records of complaints dealt with by the Trust Board	Special categories of personal data	Date of the resolution of the complaint plus a minimum of 6 years
Records relating to data protection complaints	Special categories of personal data	Date complaint resolved + 6 years
Records relating to creation of school or Trust brochures/websites	N/A	Current year +3
Records relating to circulars to staff, parents or pupils	N/A	Current year + 1
Privacy notices	N/A	Until superseded + 6 years
Subject Access Requests	Special categories of personal data	Response and data - 12 months from completion. Details of request retained on GDPR portal until the point of transfer.
Newsletters	N/A	Current year + 1
Visitors' signing in book/management system	Personal data	Current year + 6 years
Visitor ID and SCR records	Personal data	3 months from last visit
Records relating to creation and management of Friends of School / PTA	N/A	Current year + 6 years
Pupils		
All records relating to the creation and implementation of the Trust Admissions' Policy	N/A	Life of the policy + 3 years
Admissions paperwork	Special categories of personal data	Date of admission + 1 year
Unsuccessful admissions	Special categories of personal data	Resolution of case + 1 year
Supplementary Information form	Special categories of personal data	Retain until point of transfer. For unsuccessful applicants – resolution of case + 1 year
Register of Admissions	Personal data	PERMANENT
Pupil's Educational Record (Curriculum blue file)	Personal data	Retained until point of transfer. If pupil dies whilst at primary school file should be returned to Local Authority.

		If pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the Local Authority.
Pupil's electronic record (Management Information System)	Special categories of personal data	Retained until point of transfer + 6 years.
Special Educational Needs data (EHCP)	Special categories of personal data	Retained until point of transfer.
Child Protection files (Including CPOMS)	Special categories of personal data	Retained until point of transfer.
Parent/carers contact details	Personal data	Deleted as soon as child leaves the school
Consent forms - residential off-site activities	Special categories of personal data	Conclusion of the trip – except where there has been a major incident – DOB + 25 years
Educational visit paperwork (risk assessments)	N/A	Date of visit + 14 years
Accident reports	Personal data	Adults: Date of the incident + 6 years Children: DOB of the child + 25 years
Attendance registers	Personal data	6 years after the date on which the entry was made (School Attendance (Pupil Registration) (England) Regulations 2024 effective from 19th August 2024.)
Authorised absence records (Holiday forms)	Personal data	Current academic year + 2 years
SATS results	Personal data	Individual pupils retained until point of transfer.
Curriculum Management		
Curriculum returns	N/A	Current year + 1
SATS results (composite record)	N/A	Current year + 6
Schemes of work	N/A	Current year + 1
Timetables	N/A	Current year + 1
Class record books	N/A	Current year + 1
Mark books	N/A	Current year + 1
Record of homework set	N/A	Current year + 1
Pupils work	N/A	Current year + 1

Staff & Volunteers

This schedule lists the principal documents held on an employee's file. The list is not exhaustive, and other documents relating to employment may be also held. Personnel files will be held for the length of employment + 6 years at which time they will be securely shredded. Documents relating to child protection or accidents at work may be held for a period of up to 25 years, in accordance with the DFE "Data protection: a toolkit for schools" and the employee will be advised of this.

This also relates to volunteers where applicable.

Application process

Application forms and interview notes (for unsuccessful candidates)	Special categories of personal data	Date of appointment of successful candidate + 6 months
Original job application form for successful candidate	Special categories of personal data	Termination + 6 years
Job vacancy register	Special categories of personal data	12 months from date of registering details or on receipt of an email to unsubscribe

Appointment process

Confirmation of pre-employment medical check clearance	Special categories of personal data	Termination + 6 years
DBS certificates/copies	Special categories of personal data	No requirement to retain If retained, maximum period six months and if, in very exceptional circumstances, it is considered necessary to retain a copy of the original certificate for longer than six months, consent should be sought from the applicant and retained on file.
Confirmation of DBS outcome and any associated docs (e.g. risk assessment or certificate of good conduct)	Special categories of personal data	Termination + 25 years <i>As recommended within the DFE guidance, 'Data Protection: a toolkit for schools', April 2018</i>
Barred list clearance	Special categories of personal data	Termination + 25 years <i>As recommended within the DFE guidance, 'Data Protection: a toolkit for schools', April 2018</i>
Prohibition check	Special categories of personal data	Termination + 25 years <i>As recommended within the DFE guidance, 'Data</i>

		Protection: a toolkit for schools' , April 2018
Copies of documents used for identity authentication for DBS and Asylum and Immigration Act purposes	Special categories of personal data	Termination + 2 years As recommended within Home Office ' An Employers Guide to Right to Work Checks ', August 2017
UK Border Agency Documentation (Work permit)	Special categories of personal data	Termination + 2 years As recommended within Home Office ' An Employers Guide to Right to Work Checks ', August 2017
Records relating to employees from outside of the UK e.g. visa, work permits, etc.	Special categories of personal data	Termination + 2 years As recommended within Home Office ' An Employers Guide to Right to Work Checks ', August 2017
Copies of qualifications certificates relevant to employment	Personal data	Termination + 6 years
Two original references	Personal data	Termination + 6 years
Original contract acceptance	Personal data	Termination + 6 years
Copy of Contract of employment and any variation letters or side letters	Personal data	Termination + 6 years
Sickness and maternity information		
Medical certificates/ Occupational Health reports and sickness absence record	Personal data	Current year + 6 years
SMP, SAP, SSPP records, calculations, certificates (Mat B1s) or other medical evidence, notifications, declarations and notices	Special categories of personal data	Three years after the end of the tax year in which the leave period ends <i>Statutory</i>
Statutory Sick Pay records, calculations, certificates, self-certificates	Special categories of personal data	Six years after the employment ceases
Parental leave records	Personal data	Eighteen from birth/adoption of the child or if the child receives a disability living allowance
Other special leave of absence including parental leave, maternity leave	Personal data	Current year + 6 years
Disciplinary Records		

Formal disciplinary warnings – child protection related	Personal data	Termination + 25 years <i>As recommended within the DFE guidance, 'Data Protection: a toolkit for schools', April 2018</i>
Formal disciplinary warnings – not child protection related	Personal data	Termination + 6 years
Leavers information		
Letter of resignation and acceptance of resignation or other documentation relating to the termination of employment.	Personal data	Termination + 7 years
Exit interview notes	Personal data	Termination + 7 years
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	Personal data	Six years from the date of redundancy
Retirement Benefits Schemes – records of notifiable events, for example, relating to incapacity	N/A	Six years from the end of the scheme year in which the event took place <i>Statutory</i>
Additional employee information		
Salary assessment forms – teachers	Personal data	Current year + 6 years
Appraisal information	Personal data	Current year + 6 years
Staff induction including ECT Induction	Personal data	Completion + 6 years <i>As recommended within DFE statutory guidance 'Induction for newly qualified teachers (England)', April 2018</i>
Working time records	Personal data	Two years from date on which they were made <i>Statutory</i>
Staff training – where the training leads to continuing professional development	N/A	Length of time required by the professional body
Staff training – except where dealing with children e.g. first aid or health and safety	N/A	Should be retained on personnel file
Staff training – where the training relates to children e.g. safeguarding or other child related training	N/A	Date of the training + 40 years

Health and Safety		
Incident Report Form – children	Special categories of personal data	DOB + 25 years
Incident Report Form – adults	Special categories of personal data	Date of incident + 12 years (longer for serious accidents)
HSE Accident reporting - Adults	Special categories of personal data	Date of incident + 6 years
HSE Accident reporting – children	Special categories of personal data	DOB + 25 years
Health and Safety Policy Statements	N/A	Life of policy + 3 years
Health and Safety Risk Assessments	N/A	Life of risk assessment + 3 years
Control of Substances Hazardous to Health (COSHH)	N/A	Current year + 40 years
Asbestos log book	N/A	Last action + 40 years
Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	N/A	Last action + 50 years
Fire precaution log books (including fire risk assessment)	N/A	Current year + 6 years
Financial Management of the School		
Employer's Liability Insurance Certificate	N/A	Closure of the school + 40 years
Inventories of furniture and equipment	N/A	Current year + 6 years
Burglary, theft and vandalism report forms	N/A	Current year + 6 years
Annual Accounts	N/A	Current year + 6 years
Loans and grants managed by the Trust	N/A	Last payment + 12 years
Budget plan and associated paperwork	N/A	Current financial year + 3 years
Cashless payment systems	Personal data	Deleted as soon as child leaves the school
Invoices, receipts, order books, requisitions and delivery notes	N/A	Current financial year + 6 years
Records relating to the collection and banking of monies	N/A	Current financial year + 6 years
Debt incurred, e.g. Dinner Money	Personal data	Current financial year + 6 years
Staff cost calculations for budget setting	Personal data	Current financial year + 6 years
School letting information	Personal data	Current year + 6 years

All records relating to management of contracts under seal	N/A	Last payment + 12 years
All records relating to management of contracts under signature	N/A	Last payment + 6 years
Contract monitoring records	N/A	Current year + 2 years
Student Grant applications	Personal data	Current year + 3 years
Free School Meals Registers	Personal data	Current year + 6 years
Pupil Premium Fund records	Personal data	Current year + 6 years
Records relating to the monitoring of contracts	N/A	Life of contract + 6 or 12 years
Property Management		
Title deeds of property	N/A	PERMANENT
Plans of property	N/A	PERMANENT
Leases of property leased by the Trust	N/A	Expiry of lease + 6 years
Records relating to letting of the school premises (lettings policy, booking form, insurance, safeguarding policy)	N/A	Current year + 6 years
Records relating to the maintenance of the school by contractors and employees (Premises Log Book)	N/A	Current year + 6 years
CCTV Footage	Personal data	28 days
Local Authority and Central Government		
Secondary Transfer Sheets	Personal data	Current year + 2 years
Attendance Returns	Personal data	Current year + 1 year
School Census Returns	No	Current year + 5 years
Circulars and other information sent from the Local Authority	No	Operational use
OFSTED reports and papers	No	Life of the report then REVIEW
Returns made to central government	No	Current year + 6 years
Circulars and other information sent from central government	No	Operational use