

Spring 2023

Rhodes Avenue Primary School needs to create and maintain accurate records in order for it to function. The policy for managing records at Rhodes Avenue has been drawn up in conformity with legislation, regulations affecting schools and best practice as outlined within the Retention Guidelines for Schools (RGS) by the Records Management Society of Great Britain.

This policy sets out guidelines for recording, managing, storing and disposing of data, whether they are held on paper or electronically in order to assist staff, and the School, to comply with the General Data Protection Regulation (2018) and the Freedom of Information Act (2000). It should be read and used in conjunction with the following school policies and documents:

- General Data Protection Regulation
- Privacy Notices
- Freedom of Information
- Data Asset Register

Members of staff are expected to manage their current record keeping systems using the Retention Policy and to take account of the different kinds of retention periods when they are creating new record keeping systems.

Benefits of the Retention Policy

There are a number of benefits which arise from the use of a complete Retention Policy:

- Managing records against the Retention Policy is deemed to be 'normal processing' under the GDPR (2018) and the Freedom of Information Act 2000. Provided members of staff are managing record series using the Retention Policy they cannot be found guilty of unauthorised tampering with files once a Freedom Of Information request or Subject Access Request (SAR) has been made.
- Members of staff can be confident about destroying information at the appropriate time and in a secure manner.
- Information which is subject to Freedom Of Information and GDPR legislation will be available when required.
- The school is not maintaining and storing information unnecessarily.

Table of Data/Document Retention Periods (to be regularly updated)

1. Records relating to child protection			
Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record
1.1 Child Protection files	Yes	Date of birth + 25 years	Transfer a copy to the new education provider if child leaves Rhodes Avenue to attend another nursery/primary school before the end of the Year 6 academic year. Transfer a copy to the new education provider when child transitions to secondary school. Where child is registered as

			missing in education transfer a copy to the Local Education Authority. Secure disposal of paper copies. Manual deletion of electronic copies.
1.2 Allegation of child protection nature against a member of staff, including where the allegation is unfounded.	Yes	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is longer.	Summary record to be retained on confidential personnel file.

2. Governors + School Committee Meetings

Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record
2.1 Minutes			
2.1a Principal set (signed)	No	Permanent	Must be available in school for 6 years from the meeting. Can then be archived/stored elsewhere.
2.1b Inspection copies	No	Date of meeting + 3 years	Secure disposal.
2.2 Agendas	No	Date of meeting	Secure disposal.
2.3 Reports	No	Date of report + 6 years	Retain in school for 6 years from report date. Secure disposal.
2.4 Annual parents' meeting papers	No	Date of meeting + 6 years	Retain in school for 6 years from meeting date.
2.5 Instruments of Government	No	Permanent	Retain in school whilst school open.
2.6 Trusts and Endowments	No	Permanent	Retain in school whilst operationally required.
2.7 Action plans	No	Date of action plan + 3 years	Secure disposal.
2.8 Policy documents	No	Expiry of policy	Retain in school whilst policy operational (this includes if the expired policy is part of a past decision making process).
2.9 Complaints File	Yes	Date of resolution of complaint + 6 years	Review for further retention in the case of contentious disputes. Secure disposal.
2.10 Annual reports required by the Department of Education	No	Date of report + 10 years	Secure disposal.
2.11 Proposals for schools to become	No	Current year + 3 years	Secure disposal.

or be established as Specialist Status schools			
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3. Records relating to school management			
Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.
3.1 Log books	Yes	Date of last entry in book + 6 years	Secure disposal.
3.2 Minutes of the senior management team and other internal administrative bodies	Yes	Date of meeting + 5 years	Retain in school for 5 years from meeting date. Can consider archiving/storing anything important.
3.3 Reports made by the head teacher or management team	Yes	Date of report + 3 years	Retain in school for 3 years from report date. Can consider archiving/storing anything important.
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	Secure disposal.
3.5 ? Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	No/Yes	Date of correspondence + 3 years	Secure disposal.
3.6 Professional development plans	Yes	Closure + 6 years	Secure disposal.
3.7 School development plans	No	Closure + 6 years	Review for further retention. Secure disposal.
3.8 Admissions – if the admission is successful	Yes	Admission + 1 year	Secure disposal.
3.9 Admissions – if the appeal is unsuccessful	Yes	Resolution of case + 1 year	Secure disposal.

3.10 Admissions – secondary schools – casual	n/a	n/a	n/a
3.11 Proof of address supplied by parents as part of the admissions process	Yes	As the corresponding admission record	Secure disposal.
3.12 Supplementary information form including additional information such as religion, medical conditions supplied as part of the admissions process	Yes	As the corresponding admission record	Secure disposal.

4. Records relating to pupils

Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.
4.1 Admission registers	Yes	Entry + 7 years	Retain in school for 7 years from entry. Can consider archiving these records if have the facility.
4.2 Attendance registers	Yes	Date of register + 3 years	Secure disposal.
4.3a Pupils files retained in schools (primary)	Yes	Retain for time which the pupil remains at the primary school	Transfer to the secondary school (or other nursery/primary school) when the child leaves the school.
4.3b Pupils files retained in schools (secondary)	n/a	n/a	n/a
4.4a Pupil files (primary)	Yes	Retain for time which the pupil remains at the primary school	Transfer to the secondary school (or other nursery/primary school) when the child leaves the school.
4.4b Pupil files (secondary)	n/a	n/a	n/a
4.5 Special Educational Needs files, reviews and individual education plans	Yes	Date of birth + 25 years	Secure disposal.
4.6 Correspondence relating to authorised absence and issues	Yes	Date of absence + 2 years	Secure disposal.

4.7a Public examination results	No	Year of examination + 6 years	Secure disposal.
4.7b Internal examination results	Yes	Current year + 5 years	Secure disposal.
4.8 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 retain with pupil file if necessary. Secure disposal.
4.9 Statement maintained under the Education Act 1996 Section 324	Yes	Date of birth + 30 years	Secure disposal unless legal action is pending.
4.10 Proposed statement or amended statement	Yes	Date of birth + 30 years	Secure disposal unless legal action is pending.
4.11 Advice and information to parents regarding educational needs	Yes	Closure + 12 years	Secure disposal unless legal action is pending.
4.12 Accessibility strategy	Yes	Closure + 12 years	Secure disposal unless legal action is pending.
4.13 Parental permission slips for school trips, where there has been no major incident	Yes	Conclusion of the trip	Secure disposal unless legal action is pending.
4.14 Parental permission slips for school trips, where there has been a major incident	Yes	Date of birth of pupil involved + 25 years	Secure disposal. Permission slips for all pupils need to be retained for period to show that the rules had been followed for all pupils.
4.15 Records created by schools to obtain approval to run an educational visit outside the classroom, primary school	No	Date of visit + 14 years	Secure disposal.
4.16 Records created by schools to obtain approval to run an educational visit outside the classroom, secondary school	n/a	n/a	n/a
4.17 Walking bus register	n/a	n/a	n/a

5. Records relating to child Curriculum			
Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.
5.1 School development plan	No	Current year + 6 years	Secure disposal.
5.2 Curriculum returns	No	Current year + 3 years	Secure disposal.
5.3 Schemes of work	No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period. Secure disposal.
5.4 Timetable	No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period. Secure disposal.
5.5 Class record books	Yes/No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period. Secure disposal.
5.6 Markbooks	Yes/No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period. Secure disposal.
5.7 Record of homework set	No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period. Secure disposal.
5.8 Pupils' work	Yes	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period. Secure disposal.
5.9 Examination results	Yes	Current year + 6 years	Secure disposal.
5.10 SATs records, examination papers and results	Yes	Current year + 6 years	Secure disposal.
5.11 PAN reports	Yes	Current year + 6 years	Secure disposal.
5.12 Value added and contextual data	Yes	Current year + 6 years	Secure disposal.
5.13 Self evaluation forms	Yes	Current year + 6 years	Secure disposal.

6. Records relating to personnel records			
Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.
6.1 Timesheets, sick pay	Yes	Current year + 6 years	Secure disposal.
6.2 Staff	Yes	Termination +	Secure disposal.

personnel files		25 years	
6.3 Interview notes and recruitment records	Yes	Date of interview notes + 6 months is unsuccessful. If successful place in personnel file.	Secure disposal.
6.4 Pre-employment vetting information (including DBS checks)	Yes	Date of check + 6 months	Secure disposal.
6.5a Disciplinary proceedings – oral warning	Yes	Date of warning + 6 months	Secure disposal.
6.5b Disciplinary proceedings – written warning level one	Yes	Date of warning + 6 months	Secure disposal.
6.5c Disciplinary proceedings – written warning level one	Yes	Date of warning + 12 months	Secure disposal.
6.5d Disciplinary proceedings – final warning	Yes	Date of warning + 18 months	Secure disposal.
6.5e Disciplinary proceedings – case not found	Yes	If child protection see 1.2, otherwise destroy immediately	Secure disposal.
6.6 Records relating to accident/injury at work	Yes	Date of incident + 12 years	In case of serious accidents a further retention period will need to be applied. Secure disposal.
6.7 Annual appraisal and assessment records	Yes	Current year + 5 years	Secure disposal.
6.8 Salary cards	n/a	n/a	n/a
6.9 Maternity pay records	Yes	Current year + 3 years	Secure disposal.
6.10 Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	n/a	n/a	n/a
6.11 Proofs of identity collected as part of the process for checking 'portable'	Yes	Where possible these should be checked and a note/copy of what was checked placed	Secure disposal of notes/copies and return of originals.

enhanced DBS disclosure		on personnel file. If felt necessary to keep any documentation this should also be placed in personnel file.	
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7. Records relating to health and safety

Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record
7.1 Accessibility plans	Yes	Current year + 6 years	Secure disposal.
7.2a Accident reporting (adults)	Yes	Date of incident + 7 years	Secure disposal.
7.2b Accident reporting (children)	Yes	Date of incident + 7 years	Secure disposal.
7.3 COSHH		Current year + 10 years	Where appropriate an additional retention period may be allocated. Secure disposal.
7.4 Incident reports	Yes	Current year + 20 years	Secure disposal.
7.5 Policy statements		Date of expiry + 1 year	Secure disposal.
7.6 Risk assessments		Current year + 3 years	Secure disposal.
7.7 Process of monitoring areas where employees and persons are likely to have come in contact with asbestos.		Last action + 40 years	Secure disposal.
7.8 Process of monitoring areas where employees and persons are likely to have come in contact with radiation.		Last action + 50 years	Secure disposal.
7.9 Fire precautions log book		Current year + 6 years	Secure disposal.

8. Administrative records

Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.
8.1 Employer's	n/a	n/a	n/a

liability certificate			
8.2 Inventories of equipment and furniture		Current year + 6 years	Secure disposal.
8.3 General file series		Current year + 5 years	Review to see if further retention period required. Secure disposal.
8.4 School brochure or prospectus		Current year + 3 years	Disposal.
8.5 Circulars (staff, parents, pupils)		Current year + 1 year	Review to see if further retention period required. Secure disposal.
8.6 Newsletters, ephemera		Current year + 1 year	Review to see if further retention period required. Secure disposal.
8.7 Visitors book		Current year + 2 years	Review to see if further retention period required. Secure disposal.
8.8 PTA/Old Pupil Associations		Current year + 6 years	Review to see if further retention period required. Secure disposal.

9. Records relating to Finance			
Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.
9.1 Annual accounts		Current year + 6 years	Secure disposal.
9.2 Loans and grants		Date of last payment on loan + 12 years	Secure disposal.
9.3a Contracts – under seal		Contract completion date + 12 years	Secure disposal.
9.3b Contracts – under signature		Contract completion date + 6 years	Secure disposal.
9.3c Contracts – monitoring records		Current year + 2 years	Secure disposal.
9.4 Copy orders		Current year + 2 years	Secure disposal.
9.5 Budget records, budget monitoring etc		Current year + 3 years	Secure disposal.
9.6 Invoice, receipts and other records covered by the Financial Regulations		Current year + 6 years	Secure disposal.
9.7 Annual budget and background papers		Current year + 6 years	Secure disposal.
9.8 Order books and requisitions		Current year + 6 years	Secure disposal.
9.9 Delivery documentation		Current year + 6 years	Secure disposal.

9.10 Debtors' records		Current year + 6 years	Secure disposal.
9.11 School fund – cheque books		Current year + 3 years	Secure disposal.
9.12 School fund – paying in books		Current year + 6 years	Secure disposal.
9.13 School fund – ledger		Current year + 6 years	Secure disposal.
9.14 School fund – invoices		Current year + 6 years	Secure disposal.
9.15 School fund – receipts		Current year + 6 years	Secure disposal.
9.16 School fund - bank statements		Current year + 6 years	Secure disposal.
9.17 School fund – school journey books		Current year + 6 years	Secure disposal.
9.18 Student grant applications		Current year + 3 years	Secure disposal.
9.19 Free school meals registers		Current year + 6 years	Secure disposal.
9.20 Petty cash books		Current year + 6 years	Secure disposal.

10. Records relating to property

Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.
10.1 Title deeds		Permanent	These should follow the property
10.2 Plans		Permanent	Retain in school whilst operational. Can be archived/stored elsewhere.
10.3 Maintenance and contractors		Current year + 6 years	Secure disposal.
10.4 Leases		Expiry of lease + 6 years	Secure disposal.
10.5 Lettings		Current year + 3 years	Secure disposal.
10.6 Burglary, theft and vandalism report forms		Current year + 6 years	Secure disposal.
10.7 Maintenance log books		Last entry + 10 years	Secure disposal.
10.8 Contractors' reports		Current year + 6 years	Secure disposal.

11. Records relating to local authorities

Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.
11.1 Secondary	Yes	Current year +	Secure disposal.

transfer sheets (primary)		2 years	
11.2 Attendance returns	Yes	Current year + 1 year	Secure disposal.
11.3 Circulars from LEA	Yes	Whilst required operationally	Review to see if further retention period required. Disposal.

12. Records relating to the Department of Education

Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.
12.1 HMI reports		These do not need to be kept any longer.	Secure disposal.
12.2 OFSTED reports and papers		Replace former report with new inspection report.	Review to see if further retention period required. Secure disposal.
12.3 Returns		Current year + 6 years	Secure disposal.
12.4 Circulars from Department of Education		Whilst required operationally.	Review to see if further retention period required. Secure disposal.

13. Records relating to Optum

Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.
13.1 Service level agreements		Until superseded	Secure disposal.
13.2 Work experience		Date of birth of child + 18 years	Secure disposal.

14. Records relating to school meals

Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.
14.1 Dinner register		Current year + 3 years	Secure disposal.
14.2 School meals summary sheets		Current year + 3 years	Secure disposal.

15. Records relating to Family Liaison Officers and Home School Liaison Assistants

Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.

15.1 Day books	Yes	Current year + 2 years	Review to see if further retention period required. Secure disposal.
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.	Secure disposal.
15.3 Referral forms	Yes	While the referral is current.	Secure disposal.
15.4 Contact data sheets	Yes	Current year then review.	If contact is no longer active secure disposal.
15.5 Contact database entries	Yes	Current review then review	If contact is no longer active secure delete.
15.6 Group registers	Yes	Current year + 2 years.	Secure disposal.

16. CCTV			
Basic file description (where applicable)	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.
16.1 CCTV footage		20 days	Automatic deletion.

Data within e mail communication

The school must not keep personal data for longer than it is needed. Some data is collected and processed through the use of e mail communication. In order to ensure that personal data is not held for longer than is necessary according to our data retention policy and to reduce the risk that current and historical data within e mail communication is used in error and to reduce the risks of a data breach the school uses 'principle e) storage limitation' to justify why the school deletes e mail communication. The recommended retention period is to delete e mail communication as soon as the data is processed. Where appropriate to data which is related to aspects of our retention policy which requires retention staff will either print a hard copy of this data and file it in a pupil's file or copy and paste the data (including the details of the recipient, sender, date etc) into the relevant electronic pupil file. Individual staff will double check that data related to children in their class/es in the current academic year is deleted at the end of the academic year. Staff will ensure that deleted e mails moved into the Deleted Items folder are permanently deleted.

Equal Opportunities

This policy applies to all data subjects regardless of ability, gender, culture, religious or ethnic origin. Rhodes Avenue endeavours to comply with its duties under the Equality Act (2010) and all staff will have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the abovementioned Act. Rhodes Avenue Primary School celebrates diversity and encourages inclusion.