



# **St. Margaret's-at-Cliffe Community Primary School**

## **Records Management Policy**

**Date: January 2017**

**Reviewed and Ratified By: Governing body on 17<sup>th</sup> January 2017**

**Review Date: Every Three Years – January 2020**

**Signed : \_\_\_\_\_ Jane Nightingale, Chair of Governors**

**Signed : \_\_\_\_\_ Helen Comfort, Headteacher**

## **Records Management Policy**

### **Equality**

We recognise our duty and responsibility to establish equality for all pupils, staff, other members of the school community and service users regardless of their ethnicity, gender, disability, sexual orientation, age or beliefs as defined within existing equalities legislation (please see 'Single Equality Scheme').

### **Introduction**

The school recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. This document provides the policy framework through which this effective management can be achieved and audited. It covers scope, responsibilities and relationships with existing policies.

### **1. Scope of Policy**

1.1 This Policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.

1.2 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 electronically.

1.3 A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives and for historical research.

### **2. Responsibilities**

2.1 The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher of the School.

2.2 The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and timely.

2.3 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines.

### **3. Relationship with existing Policies**

This Policy has been drawn up within the context of:

Freedom of Information Policy,  
Data Protection Policy and

with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

## Recommended Retention Periods

### Business Critical Definition:

Business critical information is the information without which the school cannot continue its business. It is probable that these will be the principal copies of information which could not be replaced if they were to be lost or damaged. Loss of the information could result in serious consequences either in the loss of life or in the school's inability to fulfil its statutory obligations or in the school's inability to defend itself in a legal case. The loss of the information could also lead to serious reputational damage.

### Protective Marking:

**NOT PROTECTIVELY MARKED** All information which could be disclosed

**OFFICIAL** All information which is politically and commercially sensitive

**OFFICIAL SENSITIVE** All information which contains personal/sensitive personal data

## Governors

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Minutes - Principal set (signed)		Permanent	YES	OFFICIAL
Minutes - Inspection copies		Date of meeting + 3 years	NO	NOT PROTECTIVELY MARKED
Agendas – Principal copy		Permanent	YES	NOT PROTECTIVELY MARKED
Agendas – Additional Copies		Date of meeting	NO	NOT PROTECTIVELY MARKED
Reports		Date of report + 6 years	YES	OFFICIAL
Annual Parents' meeting papers		Date of meeting + 6 years	YES	NOT PROTECTIVELY MARKED
Instruments of Government		Permanent	YES	NOT PROTECTIVELY MARKED
Trusts and Endowments		Permanent	YES	NOT PROTECTIVELY MARKED

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Action Plans		Date of action plan + 3 years	YES	NOT PROTECTIVELY MARKED
Policy documents		Expiry of policy Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)	YES	NOT PROTECTIVELY MARKED
Complaints files		Date of resolution of complaint + 6 years then review for further retention in the case of contentious disputes	YES	OFFICIAL SENSITIVE
Annual Reports required by the Department for Education and Skills	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI	Date of report + 10 years	YES	NOT PROTECTIVELY MARKED
Proposals for schools to become, or be established as Specialist Status schools		Current year + 3 years	YES	NOT PROTECTIVELY MARKED

## Management

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Log Books		Date of last entry in the book + 6 years	Yes	NOT PROTECTIVELY MARKED
Minutes of the Senior Management Team and other internal administrative bodies		Date of meeting + 5 years	Yes	OFFICIAL
Reports made by the head teacher or the management team		Date of report + 3 years	Yes	OFFICIAL
Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities		Closure of file + 6 years	Yes	OFFICIAL
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities		Date of correspondence + 3 years	Yes	OFFICIAL

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Professional development plans		Closure + 6 years	Yes	NOT PROTECTIVELY MARKED
School development plans		Closure + 6 years then review	Yes	NOT PROTECTIVELY MARKED
Admissions – if the admission is successful		Admission + 1 year	Yes	OFFICIAL SENSITIVE
Admissions – if the appeal is unsuccessful		Resolution of case + 1 year	Yes	OFFICIAL SENSITIVE
Admissions – Secondary Schools – Casual		Current year + 1 year	Yes	OFFICIAL SENSITIVE
Proofs of address supplied by parents as part of the admissions process		Current year + 1 year	Yes	OFFICIAL SENSITIVE

## Pupils

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Admission Registers		Permanent	Yes	OFFICIAL SENSITIVE
Attendance registers		Date of register + 3 years	Yes	OFFICIAL SENSITIVE
Pupil record cards - Primary		Retain for the time which the pupil remains at the primary school Transfer to the secondary school (or other primary school) when the child leaves the school <sup>1</sup>	Yes	OFFICIAL SENSITIVE
Pupil record cards - Secondary		DOB of the pupil + 25 years <sup>1</sup>	Yes	OFFICIAL SENSITIVE
Pupil Files - Primary		Retain for the time which the pupil remains at the primary school Transfer to the secondary school (or other primary school) when the child leaves the school <sup>1</sup>	Yes	OFFICIAL SENSITIVE
Pupil Files - Secondary		DOB of the pupil + 25 years <sup>1</sup>	Yes	OFFICIAL SENSITIVE
Special Educational Needs files, reviews and Individual Education Plans		DOB of the pupil + 25 year <sup>1</sup>	Yes	OFFICIAL SENSITIVE
Letters authorising absence		Date of absence + 2 years	Yes	OFFICIAL SENSITIVE
Absence books		Current year + 6 years	Yes	OFFICIAL SENSITIVE
Examination results - Public		Year of examinations + 6 years <sup>2</sup>	No	NOT PROTECTIVELY MARKED

<sup>1</sup> In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service

<sup>2</sup> Any certificates left unclaimed should be returned to the appropriate Examination Board

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Examination results - Internal examination results		Current year + 5 years If these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary	No	NOT PROTECTIVELY MARKED
Any other records created in the course of contact with pupils		Current year + 3 years then review	Yes	OFFICIAL SENSITIVE
Statement maintained under The Education Act 1996 - Section 324	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years Unless legal action is pending	Yes	OFFICIAL SENSITIVE
Proposed statement or amended statement	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years Unless legal action is pending	Yes	OFFICIAL SENSITIVE
Advice and information to parents regarding educational needs	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12 years Unless legal action is pending	No	OFFICIAL SENSITIVE
Accessibility Strategy	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years Unless legal action is pending	Yes	OFFICIAL SENSITIVE
Pupil SEN Files		DOB of pupil + 25 years then review – it may be appropriate to add an additional retention period in certain cases Unless legal action is pending	Yes	OFFICIAL SENSITIVE
Parental permission slips for school trips – where there has been no major incident		Conclusion of the trip	Yes	OFFICIAL SENSITIVE
Parental permission slips for school trips – where there has been a major incident	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils	Yes	OFFICIAL SENSITIVE
Primary Schools Records created by schools to obtain approval to run an Educational Visit outside the Classroom <sup>3</sup>	3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) (1998)	Date of visit + 14 years <sup>4</sup>	Yes	OFFICIAL SENSITIVE

<sup>3</sup> including GOF1 and GOF2 and data entered on the e-go system

<sup>4</sup> This retention period has been set in agreement with the Safeguarding Children's Officer



Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Secondary Schools Records created by schools to obtain approval to run an Educational Visit outside the Classroom <sup>3</sup>	3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) (1998)	Date of visit + 10 years <sup>4</sup>	Yes	OFFICIAL SENSITIVE
Walking Bus registers		Date of register + 3 years <sup>5</sup>	Yes	OFFICIAL SENSITIVE

### Personnel Records Held in Schools

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Timesheets, sick pay	Financial Regulations	Current year + 6 years	Yes	OFFICIAL SENSITIVE
Staff Personal files		Termination + 7 years <sup>6</sup>	Yes	OFFICIAL SENSITIVE
Interview notes and recruitment records		Date of interview + 6 months	Yes	OFFICIAL SENSITIVE
Pre-employment vetting information (including CRB checks)	CRB guidelines	Date of check + 6 months	Yes	OFFICIAL SENSITIVE
Disciplinary proceedings: case not found		Take advice from Personnel if the proceedings were child protection related otherwise destroy immediately at the conclusion of the case	Yes	OFFICIAL SENSITIVE
Disciplinary proceedings: written warning – level two		Date of warning + 12 months <sup>7</sup>	Yes	OFFICIAL SENSITIVE
Disciplinary proceedings: written warning – level one		Date of warning + 6 months <sup>7</sup>	Yes	OFFICIAL SENSITIVE

<sup>5</sup> This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting

<sup>6</sup> These files should be subject to KCC's NOT PROTECTIVELY MARKED file policy where the employees are employed by Kent County Council as the Local Authority

<sup>7</sup> If this is placed on a personal file it must be weeded from the file

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Disciplinary proceedings: oral warning		Date of warning + 6 months <sup>7</sup>	Yes	OFFICIAL SENSITIVE
Disciplinary proceedings: final warning		Date of warning + 18 months <sup>7</sup>	Yes	OFFICIAL SENSITIVE
Records relating to accident/injury at work		Date of incident + 12 years <sup>8</sup>	Yes	OFFICIAL SENSITIVE
Annual appraisal or assessment records		Current year + 5 years	Yes	OFFICIAL SENSITIVE
Salary cards		Last date of employment + 85 years	Yes	OFFICIAL SENSITIVE
Maternity pay records	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year +3yrs	Yes	OFFICIAL SENSITIVE
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995		Current year + 6 years	Yes	OFFICIAL SENSITIVE
Proofs of identity collected as part of the process of checking “portable” enhanced CRB disclosure		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file	Yes	OFFICIAL SENSITIVE
Records of allegations about workers who have been investigated and found to be without substance	Information Commissioner Code of Practice: Employment Records 2002 - “Child Protection Procedures for Managing Allegations Against Staff within Schools and Education Services” (September 2008) p17	These records should not normally be retained once an investigation has been completed <sup>9</sup> .	Yes	OFFICIAL SENSITIVE
Outcome of an allegation made against a staff member	Safeguarding Children in Education Guidelines: Dealing with Allegations of Abuse against Teachers and Other Staff Safeguarding Children in Education and Safer Recruitment 2007 Para 5.1	Until the person has reached normal retirement age or for a period of 10 years from the date of the allegation is that is longer	Yes	OFFICIAL SENSITIVE

<sup>8</sup> In the case of serious accidents a further retention period will need to be applied

<sup>9</sup> There are some exceptions to this where for its own protection the employer has to keep a limited record that an allegation was received and investigated, for example where the allegation relates to abuse and the worker is employed to work with children or other vulnerable adults

## Health and Safety

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Accessibility Plans	Disability Discrimination Act	Current year + 6 years	Yes	OFFICIAL SENSITIVE
Accident Reporting – Children	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of birth + 22 years where the injured person is a minor at the time of the accident	Yes	OFFICIAL SENSITIVE
Accident Reporting – Adults	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of the accident + 4 years where the injured person is an adult at the time of the accident;	Yes	OFFICIAL SENSITIVE
COSHH Risk Assessments		Date of creation + 40 years	Yes	NOT PROTECTIVELY MARKED
Incident reports		Current year + 20 years	Yes	OFFICIAL SENSITIVE
Policy Statements		Date of expiry + 1 year	Yes	NOT PROTECTIVELY MARKED
Risk Assessments		Current year + 3 years	Yes	NOT PROTECTIVELY MARKED
Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos		Last action + 40 years	Yes	NOT PROTECTIVELY MARKED
Process of monitoring of areas where employees and persons are likely to have come in contact with radiation		Last action + 50 years	Yes	NOT PROTECTIVELY MARKED
Fire Precautions log books		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED

## Administrative

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Employer's Liability certificate		Closure of the school + 40 year	Yes	NOT PROTECTIVELY MARKED
Inventories of equipment and furniture		Current year + 6 years	No	NOT PROTECTIVELY MARKED
School brochure/prospectus		Current year + 3 years	No	NOT PROTECTIVELY MARKED
General file series		Current year + 5 years	No	NOT PROTECTIVELY MARKED
Circulars (staff/parents/pupils)		Current year + 1 year	No	NOT PROTECTIVELY MARKED
Newsletters, ephemera		Current year + 1 year	No	NOT PROTECTIVELY MARKED
Visitors book		Current year + 2 years	No	NOT PROTECTIVELY MARKED
PTA/Old Pupils Associations		Current year + 6 years	No	NOT PROTECTIVELY MARKED

## Financial Records Held in Schools

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Annual Accounts	Financial Regulations	Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Loans and grants	Financial Regulations	Date of last payment on loan + 12 years then review to see whether a further retention period is required	Yes	NOT PROTECTIVELY MARKED
Contracts - under seal		Contract completion date + 12 years	Yes	NOT PROTECTIVELY MARKED
Contracts - under signature		Contract completion date + 6 years	Yes	NOT PROTECTIVELY MARKED
Contracts - monitoring records		Current year + 2 years	Yes	NOT PROTECTIVELY MARKED
Copy orders		Current year + 2 years	No	NOT PROTECTIVELY MARKED
Budget reports, budget monitoring etc		Current year + 3 years	Yes	NOT PROTECTIVELY MARKED
Invoice, receipts and other records covered by the Financial Regulations	Financial Regulations	Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Annual Budget and background papers		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Order books and requisitions		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Delivery Documentation		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Debtors' Records	Limitation Act 1980	Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
School Fund Records <sup>10</sup>		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Applications for free school meals, travel, uniforms etc		Whilst child at school	No	NOT PROTECTIVELY MARKED
Student grant applications		Current year + 3 years	Yes	NOT PROTECTIVELY MARKED
Free school meals registers	Financial Regulations	Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Petty cash books	Financial Regulations	Current year + 6 years	Yes	NOT PROTECTIVELY MARKED

<sup>10</sup> including cheque books, paying in books, ledgers, invoices, receipts, bank statements, school journey books

## Property Records Held in Schools

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Title Deeds		Permanent <sup>11</sup>	Yes	NOT PROTECTIVELY MARKED
Plans		Permanent Retain in school whilst operational	Yes	OFFICIAL <sup>12</sup>
Maintenance and contractors	Financial Regulations	Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Leases		Expiry of lease + 6 years	Yes	NOT PROTECTIVELY MARKED
Lettings		Current year + 3 years	Yes	NOT PROTECTIVELY MARKED
Burglary, theft and vandalism report forms		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Maintenance log books		Last entry + 10 years	Yes	NOT PROTECTIVELY MARKED
Contractors' Reports		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED

## Local Authority

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
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<sup>11</sup> these should follow the property unless the property has been registered at the Land Registry

<sup>12</sup> These records carry a OFFICIAL marking as there can be security issues about

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Secondary transfer sheets (Primary)		Current year + 2 years	No	OFFICIAL SENSITIVE
Attendance returns		Current year + 1 year	No	NOT PROTECTIVELY MARKED
Circulars from LA		Whilst required operationally then review to see whether a further retention period is required	No	NOT PROTECTIVELY MARKED



## DfE

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
OFSTED reports and papers		Replace former report with any new inspection report then review to see whether a further retention period is required	No	NOT PROTECTIVELY MARKED
Returns		Current year + 6 years	No	NOT PROTECTIVELY MARKED
Circulars from DfE		Whilst operationally required then review to see whether a further retention period is required	No	NOT PROTECTIVELY MARKED

## Connexions

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Service level agreements		Until superseded	Yes	NOT PROTECTIVELY MARKED
Work Experience agreement		DOB of child + 18 years	Yes	OFFICIAL SENSITIVE

## School Meals

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Dinner Register		Current year + 3 years	Yes	OFFICIAL SENSITIVE
School Meals Summary Sheets		Current year + 3 years	No	NOT PROTECTIVELY MARKED

## Family Liaison Officers and Parent Support Assistants

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Day Books		Current year + 2 years then review	No	OFFICIAL SENSITIVE
Reports for outside agencies – where the report has been included on the case file created by the outside agency		Whilst the child is attending the school then destroy	No	OFFICIAL SENSITIVE
Referral forms		While the referral is current then	No	OFFICIAL SENSITIVE
Contact data sheets		Current year then review, if contact is no longer active then destroy	No	OFFICIAL SENSITIVE
Contact database entries		Current year then review, if contact is no longer active then destroy	No	OFFICIAL SENSITIVE
Group Registers		Current year + 2 years	No	OFFICIAL SENSITIVE