Hazelwood Schools

Data Retention & Disposal Schedule

Reviewed: **Summer Term 2023**

Reviewed by: Resources Committee

Review Annually

1 Introduction

The school acknowledges that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to its effective overall management. Records provide evidence for protecting the legal rights and interests of the school and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

2 Scope of the Policy

2.1 This policy applies to all records that are created, received or maintained by staff of the school in the course of carrying out its functions.

2.2 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 or received and then stored in hard copy or electronically.

2.3 A small percentage of the schools' records may be selected for permanent preservation as part of the school's archives and for historical research.

3 Responsibilities

3.1 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.

3.2 The person responsible for records management in the school will give guidance about 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.

3.3 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.

4 Recording Systems

Information created by the school must be managed against the same standards regardless of the media in which it is stored

4.1 Maintenance of Record Keeping Systems

i. It is important that filing information is properly resourced and is carried out on a regular basis. It is equally important that the files are weeded of extraneous information where appropriate on a regular basis. Removing information from a file once a freedom of information request has been made will be a criminal offence (unless it is part of normal processing).

ii. Applying retention periods is straightforward provided files are closed on a regular basis.

iii. Once a file has been closed, it should be moved out of the current filing system and stored either in a locked room in the school until it has reached the end of the retention period.

iv. Information security is very important especially when dealing with personal information or sensitive policy information. There are a number of basic rules: ·

- All personal information should be kept in lockable filing cabinets which are kept locked when the room is unattended.
- Personal information held on computer systems should be adequately password protected.
- Information should never be left up on a screen if the computer is unattended.
- Files containing personal or sensitive information should not be left out on desks overnight.
- Where possible sensitive personal information should not be sent by e-mail.
- If files need to be taken off the premises they should be secured in the boot of a car or in lockable containers.
- Teachers have been advised not to use data on memory sticks or other removable data carriers in order to access their files both at home and at school. Instead they should use the remote access.
- All computer information should be backed up regularly and the back-up should be stored off the site.

v. Information contained in emails should be filed into the appropriate electronic or manual filing system once it has been dealt with.

5 The Safe Disposal of Information Using the Data Retention Schedule

5.1 Files should be disposed of in line with the Data Retention Schedule. This is a process which should be undertaken on an annual basis.

5.2 Paper records containing personal information should be shredded using a cross-cutting shredder. Other files can be disposed of in the paper recycling bins. Loose papers should not be put in skips unless the skip has a lid. CD s/DVD s/Floppy disks should be cut into pieces. Audio/Video tapes and fax rolls should be dismantled and shredded.

5.3 Electronic data should be archived on electronic media and deleted appropriately at the end of the retention period.

The purpose of the retention schedule

Under the Freedom of Information Act 2000, schools are required to maintain a retention schedule listing the records which the school creates in the course of its business. The retention schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use. Members of staff are expected to manage their current record keeping systems using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems.

If there is an administrative need to keep a certain record for longer than that shown in the retention schedule then the school may do so (documenting the reason for such further retention).

The retention schedule refers to all information, regardless of the media in which they are stored.

Benefits of a retention schedule

There are a number of benefits which arise from the use of a complete retention schedule:

- Managing records against the retention schedule is deemed to be "normal processing" under the Data Protection Act 1998 soon to be GDPR and the Freedom of Information Act 2000. Provided members of staff are managing record series using the retention schedule they cannot be found guilty of unauthorised tampering with files once a freedom of information request or a data subject access request has been made.
- Members of staff can be confident about destroying information at the appropriate time.
- Information which is subject to Freedom of Information and Data Protection Legislation will be available when required.
- The school is not maintaining and storing information unnecessarily.

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	Basic file description
Agendas	No		Date of meeting	DESTROY	
Reports	No		Date of report + 6 years	Retain in school for 6 years from date of meeting	DESTROY
Annual Parents' meeting papers	No		Date of meeting + 6 years	Retain in school for 6 years from date of meeting	DESTROY
Instruments of Government	No		Permanent	Retain in school whilst school is open	Transfer to Archives when the school has closed
Action Plans	No		Date of action plan + 3 years	DESTROY	
Policies	No		Expiry of policy	Retain in school whilst policy is operational (this includes if the expired policy is part of a decision-making process)	DESTROY
Complaints	Yes		Date of resolution of complaint + 6 years	DESTROY BY SHREDDING	
Annual Reports	No	Education (Governors' Annual Reports) (England)	Date of report + 10 years	Retain in school for 10 years from date of report	Transfer to archive/scan on to network

		(Amendment) Regulations 2002.SI 2002 No 1171			
Minutes of SLT and other internal administrative bodies	Yes		Date of meeting + 3 years	Retain in the school for 3 years from meeting	DESTROY
Reports made by the Headteacher or SLT	Yes		Date of report + 3 years	Retain in the school for 3 years from meeting	DESTROY
Records created by Headteacher, Deputy Headteacher and other members of staff with administrative responsibilities	Yes		Closure of file + 6 years	DESTROY	
Correspondence created by Headteacher, Deputy Headteacher and other members of staff with administrative responsibilities	No		Date of correspondence + 3 years	DESTROY	
Performance management plans	Yes		Completion of plan + 6 years	DESTROY	
School development plans	No		Completion of plan + 6 years	Retain in the school for 6 years from the date of completion of the plan	DESTROY
Pupil files	Yes		Retain for the time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school. In the case of exclusion, it may be appropriate to transfer the record to the Behaviour Service	
Children SEN Files (to include original	Yes		Closure + 35 years	DESTROY BY SHREDDING unless legal action is pending	

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Individual Education Plans, Reviews, All Statements (proposed, amended or maintained under The Education Act 1996 – Section 324)					
Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12 years	DESTROY unless legal action is pending	
Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years	DESTROY unless legal action is pending	
Letters authorising absence	No		Date of absence + 2 years	DESTROY	
Examination results	Yes		Current year + 5 years[5]	DESTROY	
Any other records created in the course of contact with pupils	Yes/No		Current year + 3 years	Review at the end of 3 years and either allocate a further retention period or DESTROY	
Curriculum development	No		Current year + 6 years	DESTROY	
Curriculum returns	No		Current year + 3 years	DESTROY	
Schemes of work	No		Current year + 1 year	DESTROY	
Timetable	No		Current year + 1 year	DESTROY	
Class record books	No		Current year + 1 year	DESTROY	
Mark Books	No		Current year + 1 year	DESTROY	
Record of homework set	No		Current year + 1 year	DESTROY	

Pupils' work	No		Current year + 1 year	DESTROY	
Examination results	Yes		Current year + 6 years	DESTROY	
SATS records	Yes		Current year + 6 years	DESTROY	
Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	DESTROY	
Staff Personal files	Yes		Termination + 7 years	DESTROY	
Interview notes and recruitment records	Yes		Date of interview + 6 months	DESTROY	
Pre-employment vetting information (including DBS checks)	No	DBS guidelines	Date of check + 6 months	DESTROY [by the designated member of staff]	
Disciplinary proceedings:	Yes		**Please note that all these retention periods where the warning relates to child protection issues may change in light of any recommendations made by the Bichard Inquiry**		
Informal			Date of warning + 6 months	DESTROY If this is placed on a personal file, it must be weeded from the file.	
Formal			Date of warning + 6 months	DESTROY If this is placed on a personal file, it must be weeded from the file.	
Written warning – level two			Date of warning + 12 months	DESTROY If this is placed on a personal file, it must be weeded from the file.	
Final warning			Date of warning + 18 months	DESTROY If this is placed on a personal file, it must be weeded from the file.	
Case not found			DESTROY immediately at the conclusion of the case		
Dismissal			Date of warning + 18 months	DESTROY	
Records relating to	Yes		Date of incident + 12 years	Review at the end of this period.	6

accident/injury at work				In the case of serious accidents, a further retention period will need to be applied	
Annual appraisal/assessment records	No		Current year + 5 years	DESTROY	
Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year, +3yrs	DESTROY	
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	DESTROY	
Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980			
Adults	Yes		Current year + 3 years	DESTROY	
Children	Yes		DOB + 25 years[1]	DESTROY	7

COSHH			Current year + 10 years	Review [where appropriate an additional retention period may be allocated]	
Incident reports	Yes		Current year + 20 years	DESTROY	
Policy Statements			Date of expiry + 1 year	DESTROY	
Risk Assessments			Current year + 3 years	DESTROY	
Process of monitoring of areas where employees and persons are likely to have come in contact with **asbestos**		Control of Asbestos at Work Regulations 1987	Last action + 40 years	DESTROY	
Process of monitoring of areas where employees and persons are likely to have come in contact with **radiation**			Last action + 50 years	DESTROY	
Fire Precautions log books			Current year + 6 years	DESTROY	
Employer's Liability certificate			Permanent whilst the school is open	DESTROY once the school has closed	
Inventories of equipment and furniture			Current year + 6 years	DESTROY	
General file series			Current year + 5 years	Retain in school for 5 years	
School brochure/prospectus			Current year + 3 years	DESTROY	
Circulars (staff/parents/pupils)			Current year + 1 year	DESTROY	
Newsletters, ephemera			Current year + 1 year	Retain in school for 1 year	DESTROY
Visitors' book			Current year + 2 years	DESTROY	
PTA/Old Pupils'			Current year + 6 years	Retain in school for 6 years	DESTROY

Associations					
Annual Accounts		Financial Regulations	Current year + 6 years	DESTROY	
Loans and grants		Financial Regulations	Date of last payment on loan + 12 years	DESTROY	
Contracts					
under seal			Contract completion date + 12 years	DESTROY	
under signature			Contract completion date + 6 years	DESTROY	
monitoring records			Current year + 2 years	DESTROY	
Copy orders			Current year + 2 years	DESTROY	
Budget reports, budget monitoring etc.			Current year + 3 years	DESTROY	
Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	DESTROY	
Annual Budget and background papers			Current year + 6 years	DESTROY	
Order books and requisitions			Current year + 6 years	DESTROY	
Delivery Documentation			Current year + 6 years	DESTROY	
Debtors' Records		Limitation Act 1980	Current year + 6 years	DESTROY	
School Fund – Cheque books			Current year + 3 years	DESTROY	
School Fund – Paying in books			Current year + 6 years	DESTROY	
School Fund – Ledger			Current year + 6 years	DESTROY	
School Fund – Invoices			Current year + 6 years	DESTROY	
School Fund – Receipts			Current year + 6 years	DESTROY	
School Fund – Bank statements			Current year + 6 years	DESTROY	
School Fund – School Journey books			Current year + 6 years	DESTROY	
Applications for free			Whilst child at school	DESTROY	9

school meals, travel, uniforms etc.					
Student grant applications			Current year + 3 years	DESTROY	
Free school meals registers	Yes	Financial Regulations	Current year + 6 years	DESTROY	
Petty cash books		Financial Regulations	Current year + 6 years	DESTROY	
Title Deeds			Permanent (i) Non-voluntary aided schools – held at Archives (ii) Voluntary aided schools – held by trustees	These should follow the property	
As-built plans			Permanent	Retain in school whilst operational then	Transfer to Archives
Draft plans			3 years	DESTROY	
Maintenance and contractors		Financial Regulations	Current year + 6 years	DESTROY	
Leases			Expiry of lease + 6 years	DESTROY	
Lettings			Current year + 3 years	DESTROY	
Burglary, theft and vandalism report forms			Current year + 6 years	DESTROY	
Maintenance log books			Last entry + 10 years	DESTROY	
Contractors' Reports			Current year + 6 years	DESTROY	
Secondary transfer sheets (Primary)	Yes		Current year + 2 years	DESTROY	
Attendance returns	Yes		Current year + 1 year	DESTROY	
Circulars from LEA			Whilst operationally required	1) pre-2001 2) post 2001 - DESTROY	1) DESTROY
HMI reports			These do not need to be kept any longer		Destroy
OFSTED reports and			Replace former report with any	Retain in school while	Destroy

papers			new inspection report	operationally required	
Returns			Current year + 6 years	DESTROY	
Circulars from DfE			Whilst operationally required	Retain in school while operationally required	Destroy
Dinner Register			Current year + 3 years	DESTROY	
School Meals Summary Sheets			Current year + 3 years	DESTROY	