



The Robert Carre Trust

Records Management Policy

INTRODUCTION

Under the Freedom of Information Act 2000, schools, including Academies and Multi-Academy Trusts, 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 for which the records need to be retained and the action to be taken when any are of no further administrative use.

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

The Retention Schedule refers to all information, regardless of the media in which it is stored.

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 and the Freedom of Information Act 2000. Provided members of staff are managing records 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 subject to Freedom of Information and Data Protection legislation will be available when required.
- The Trust is not maintaining and storing information unnecessarily.

AIM

The aim of this Policy is to ensure that the Trust maintains and manages the records required to meet statutory legislation in the most cost effective manner.

IMPLEMENTATION

The Schedule below lists the records kept by the Trust and its schools, the retention period and the means by which they can be destroyed at the end of their retention period. The Schedule will be reviewed periodically to include or remove records as appropriate.

Destruction of Records

Where records have been identified for destruction they should be disposed of in an appropriate way. All records containing personal information or sensitive policy information should be shredded before disposal (if possible). Any other records should be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways.

The Freedom of Information Act 2000 requires the Trust to maintain a list of records which have been destroyed and who authorised their destruction. Members of staff should record:

- File reference (or other unique identifier);
- File title (or brief description);
- Number of files;
- The name of the Authorising Officer.

A database will be maintained for this purpose.

Transfer of Records to the Archives

Where records have been identified as being worthy of permanent preservation arrangements should be made to transfer the records to the Archives.

Transfer of Information to Other Media

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as microform or digital media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

RESPONSIBILITIES

All Staff

All staff are responsible for maintaining the records required by Statutory Regulations and those required by the Executive Headteacher and/or Head of School for the management of the Trust/school. In addition all staff are responsible for managing the records for which they are responsible in accordance with this Policy including destroying or archiving as appropriate.

RETENTION SCHEDULE SECTIONS

1. Members / Trustees / Governors
2. Management
3. Students
4. Curriculum
5. Personnel
6. Health and Safety
7. Administrative
8. Finance
9. Property
10. Local Authority
11. DfE
12. Work Experience
13. School Meals

Adopted at the meeting of the Board on 28 September 2020

Next Review Due: September 2021 (annually)

RETENTION SCHEDULE

1. <u>Members/ Trustees/ Governors</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Minutes					
<ul style="list-style-type: none"> • Principal set (signed) 	No		Permanent	Retain in school for 6 years from date of meeting	Transfer to Archives
<ul style="list-style-type: none"> • Inspection copies 	No		Date of meeting + 3 years	DESTROY [If these minutes contain any sensitive personal information they should be shredded]	
Agendas	No		Date of meeting	DESTROY	
Reports	No		Date of report + 6 years	Retain in school for 6 years from date of meeting	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Instruments of Government	No		Permanent	Retain in school whilst school is open	Transfer to Archives when the school has closed
Trusts and Endowments	No		Permanent	Retain in school whilst operationally required	Transfer to Archives
Action Plans	No		Date of action plan + 3 years	DESTROY	It may be appropriate to offer to the Archives for a sample to be taken if the school has been through a difficult period
Policy documents	No		Expiry of Policy	Retain in school whilst Policy is operational (this includes if the expired policy is part of a past decision making process)	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Complaints files	Yes		Date of resolution of complaint + 6 years	Retain in school for the first 6 years Review for further retention in the case of contentious disputes Destroy routine complaints	

1. <u>Members/ Trustees/ Governors</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Annual Reports required by the DfE	No	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI 2002 No 1171	Date of report + 10 years		Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Proposals for schools to become, or be established as Specialist Status schools	No		Current year + 3 years		Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]

2. <u>Management</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Log Books	Yes ¹		Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry	Transfer to the Archives
Minutes of the Senior Management Team and other internal administrative bodies	Yes ¹		Date of meeting + 5 years	Retain in the school for 5 years from meeting	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]

¹ From January 1st 2005 subject access is permitted into unstructured filing systems and log books and other records created within the school containing details about the activities of individual Students and members of staff – this is subject to the Data Protection Act 1998.

2. Management

Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Reports made by the Headteacher or the management team	Yes ¹		Date of report + 3 years	Retain in the school for 3 years from meeting	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Records created by Headteachers, Deputy Headteachers, Heads of Year and other members of staff with administrative responsibilities	Yes ¹		Closure of file + 6 years	DESTROY If these records contain sensitive information they should be shredded	
Correspondence created by Headteachers, Deputy Headteachers, Heads of Year and other members of staff with administrative responsibilities	No		Date of correspondence + 3 years	DESTROY If these records contain sensitive information they should be shredded	
Professional Development Plans	Yes		Closure + 6 years	SHRED	
School Development Plans	No		Closure + 6 years	Review	Offer to the Archives

3. Students					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Admission Registers	Yes		Date of last entry in the book (or file) + 6 years	Retain in the school for 6 years from the date of the last entry	Transfer to the Archives
Attendance Registers	Yes		Date of register + 3 years	DESTROY [If these records are retained electronically any back-up copies should be destroyed at the same time]	
Student record cards	Yes		DOB of the Student + 25 years ²	SHRED	
Student files	Yes		DOB of the Student + 25 years ³	SHRED	
Special Educational Needs files, reviews and Individual Education Plans	Yes		DOB of the Student + 25 year ⁴	SHRED	
Letters authorising absence	No		Date of absence + 2 years	SHRED	
Absence books			Current year + 6 years	SHRED	
Public Examination results	No		Year of examinations + 6 years	DESTROY	Unclaimed certificates should be returned to the Examination Board
Internal examination results	Yes		Current year + 5 years ⁵	DESTROY	

² In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service

³ As above

⁴ As above

⁵ If these records are retained on the Student file or in their National Record of Achievement they need only be kept for as long as operationally necessary.

3. <u>Students</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Any other records created in the course of contact with Students	Yes/No		Current year + 3 years	Review at the end of 3 years and either allocate a further retention period or DESTROY	
Statement maintained under The Education Act 1996 - Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	DESTROY unless legal action is pending	
Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	DESTROY unless legal action is pending	
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	
Children SEN Files	Yes		Closure + 35 years	DESTROY unless legal action is pending	

4. <u>Curriculum</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Curriculum development	No		Current year + 6 years	DESTROY	
Curriculum returns	No		Current year + 3 years	DESTROY	
School syllabus	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 or DESTROY	
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 or DESTROY	
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 or DESTROY	
Class record books	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 or DESTROY	
Mark Books	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 or DESTROY	
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 or DESTROY	
Students' 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 or DESTROY	
Examination results	Yes		Current year + 6 years	DESTROY [These records should be shredded]	

4. <u>Curriculum</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
SATS records	Yes		Current year + 6 years	DESTROY [These records should be shredded]	
PANDA reports	Yes		Current year + 6 years	DESTROY [These records should be shredded]	
Value added records	Yes		Current year + 6 years	DESTROY [These records should be shredded]	

5. <u>Personnel</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	SHRED	
Staff Personal files	Yes ⁶		Termination + 7 years	SHRED	
Interview notes and recruitment records	Yes		Date of interview + 6 months	SHRED	
Pre-employment vetting information (including DBS checks)	No	DBS guidelines	Date of check + 6 months	SHRED [by the designates 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.		
<ul style="list-style-type: none"> Oral warning 			Date of warning + 6 months	SHRED If this is placed on a personal file, it must be weeded from the file.	

⁶ These files should be subject to KCC's open file policy where the employees are employed by the RECORDS MANAGEMENT SOCIETY OF GREAT BRITAIN as the Local Education Authority.

5. <u>Personnel</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
<ul style="list-style-type: none"> written warning – level one 			Date of warning + 6 months	SHRED If this is placed on a personal file, it must be weeded from the file.	
<ul style="list-style-type: none"> written warning – level two 			Date of warning + 12 months	SHRED If this is placed on a personal file, it must be weeded from the file.	
<ul style="list-style-type: none"> final warning 			Date of warning + 18 months	SHRED If this is placed on a personal file, it must be weeded from the file.	
<ul style="list-style-type: none"> case not found 			DESTROY immediately at the conclusion of the case		
Records relating to accident/injury at work	Yes		Date of incident + 12 years	Review at the end of this period. In the case of serious accidents a further retention period will need to be applied	
Annual appraisal/assessment records	No		Current year + 5 years	SHRED	
Salary cards	Yes		Last date of employment + 85 years	SHRED	
Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 999/567)	Current year + 3 years	SHRED	

5. <u>Personnel</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SHRED	

6. <u>Health and Safety</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Accessibility Plans		Disability Discrimination Act	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			

6. <u>Health and Safety</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
• Adults	Yes		Current year + 3 years	SHRED	
• Children	Yes		DOB + 25 years ⁷	SHRED	
COSHH			Current year + 10 years	Review [where appropriate an additional retention period may be allocated]	
Incident reports	Yes		Current year + 20 years	SHRED	
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			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	

⁷ A child may make a claim for negligence for 7 years from their 18th birthday. To ensure that all records are kept until the Student reaches the age of 25 this retention period has been applied.

7. Administrative					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
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	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
School brochure /prospectus			Current year + 3 years		Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Circulars (staff/parents/Student)			Current year + 1 year	DESTROY	
Newsletters, ephemera			Current year + 1 year	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Visitors' Book			Current year + 2 years	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
PTA/Alumni Associations			Current year + 6 years	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]

8. Finance					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Annual Accounts		Financial Regulations	Current year + 6 years		Offer to the Archives
Loans and grants		Financial Regulations	Date of last payment on loan + 12 years	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Contracts					

8. <u>Finance</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
• under seal			Contract completion date + 12 years	SHRED	
• under signature			Contract completion date + 6 years	SHRED	
• monitoring records			Current year + 2 years	SHRED	
Copy orders			Current year + 2 years	SHRED	
Budget reports, budget monitoring etc			Current year + 3 years	SHRED	
Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	SHRED	
Annual Budget and background papers			Current year + 6 years	SHRED	
Order books and requisitions			Current year + 6 years	SHRED	
Delivery Documentation			Current year + 6 years	SHRED	
Debtors' Records		Limitation Act 1980	Current year + 6 years	SHRED	
School Fund – Cheque books			Current year + 3 years	SHRED	
School Fund – Paying in books			Current year + 6 years	SHRED	
School Fund – Ledger			Current year + 6 years	SHRED	
School Fund – Invoices			Current year + 6 years	SHRED	

8. Finance					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
School Fund – Receipts			Current year + 6 years	SHRED	
School Fund – Bank statements			Current year + 6 years	SHRED	
School Fund – School Journey books			Current year + 6 years	SHRED	
Applications for free school meals, travel, uniforms etc			Whilst child at school	SHRED	
Student grant applications			Current year + 3 years	SHRED	
Free school meals registers	Yes	Financial Regulations	Current year + 6 years	SHRED	
Petty cash books		Financial Regulations	Current year + 6 years	SHRED	

9. Property					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Title Deeds			Permanent	These should follow the property	Offer to Archives
Plans			Permanent	Retain in school whilst operational	Offer to Archives
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	SHRED	
Maintenance log books			Last entry + 10 years	DESTROY	

9. <u>Property</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Contractors' Reports			Current year + 6 years	DESTROY	

10. <u>Local Authority</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Secondary transfer sheets (Primary)	Yes		Current year + 2 years	SHRED	
Attendance returns	Yes		Current year + 1 year	DESTROY	
Circulars from LA			Whilst operationally required	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]

11. <u>DfE</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
HMI reports			These do not need to be kept any longer		Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
OFSTED reports and papers			Replace former report with any new inspection report	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]

11. <u>DfE</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Returns			Current year + 6 years	DESTROY	
Circulars from DfE			Whilst operationally required	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]

12. <u>Work Experience</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Service level agreements			Until superseded	SHRED	
Work Experience agreement			DOB of child + 18 years	SHRED	

13. <u>School Meals</u>					
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
Dinner Register			Current year + 3 years	SHRED	
School Meals Summary Sheets			Current year + 3 years	SHRED	