

# DENBIGH PRIMARY SCHOOL



## DATA PROTECTION POLICY

Policies at Denbigh Primary School are designed to support the ethos, aims and vision of the school as outlined in the School Development Plan (SDP). We strive for excellence in all that we do and everyone expects the best from everyone else. In partnership with parents and the wider community, we provide a safe, caring and active learning environment in which all pupils enjoy their education and achieve their full potential.

### British Values

At Denbigh Primary School we value the diverse ethnic backgrounds of our pupils and their families. We undertake a variety of events and lessons to celebrate the diversity within our community. Underpinning this is a range of curriculum topics which have strong links to British values. We have found this approach to be enriching for all parties as it teaches tolerance and respect for the differences in our community and the wider world.

Our policies are designed to be inclusive and to eliminate discrimination. We take action to ensure that nobody is treated less favourably than anyone else because of their colour, race, ethnic or national origin, religion, gender, sexual orientation, disability or age.

### **STATUTORY POLICY**

**Policy reviewed and adopted by Full Governing Body Committee – September 2020**

**Review date: September 2022**

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# 1. Aims

Our school aims to ensure that all personal data collected about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the [General Data Protection Regulation \(GDPR\)](#) and the provisions of the Data Protection Act 2018 (DPA 2018). This policy applies to all personal data, regardless of whether it is in paper or electronic format.

# 2. Legislation and guidance

This policy meets the requirements of the GDPR and provisions of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the [GDPR](#) and the ICO's [code of practice for subject access requests](#).

It also reflects the ICO's [code of practice](#) for the use of surveillance cameras and personal information.

In addition, this policy complies with regulation 5 of the [Education \(Pupil Information\) \(England\) Regulations 2005](#), which gives parents the right of access to their child's educational record.

# 3. Definitions

Term	Definition
<b>Personal data</b>	Any information relating to an identified, or identifiable, individual.  This may include the individual's: <ul style="list-style-type: none"><li>• Name (including initials)</li><li>• Identification number</li><li>• Location data</li><li>• Online identifier, such as a username</li></ul> It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.
<b>Special categories of personal data</b>	Personal data which is more sensitive and so needs more protection, including information about an individual's: <ul style="list-style-type: none"><li>• Racial or ethnic origin</li><li>• Political opinions</li><li>• Religious or philosophical beliefs</li><li>• Trade union membership</li><li>• Genetics</li><li>• Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes</li><li>• Health – physical or mental</li><li>• Sex life or sexual orientation</li></ul>
<b>Processing</b>	Anything done to personal data, such as

	collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing can be automated or manual.
<b>Data subject</b>	The identified or identifiable individual whose personal data is held or processed.
<b>Data controller</b>	A person or organisation that determines the purposes and the means of processing of personal data.
<b>Data processor</b>	A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.
<b>Personal data breach</b>	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

## 4. The data controller

Our school processes personal data relating to parents, pupils, staff, governors, visitors and others, and therefore is a data controller.

The school is registered as a data controller with the ICO and will renew this registration annually or as otherwise legally required.

## 5. Roles and responsibilities

This policy applies to **all staff** employed by our school, and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

### 5.1 Governing board

The governing board has overall responsibility for ensuring that our school complies with all relevant data protection obligations.

### 5.2 Data protection officer

The data protection officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable.

They will provide an annual report of their activities directly to the governing board and, where relevant, report to the board their advice and recommendations on school data protection issues.

The DPO is also the first point of contact for individuals whose data the school processes, and for the ICO.

Full details of the DPO's responsibilities are set out in their job description.

Our DPO is Chris Beeden and is contactable via [contact@school-dpo.co.uk](mailto:contact@school-dpo.co.uk)

### 5.3 Headteacher

The headteacher acts as the representative of the data controller on a day-to-day basis.

### 5.4 All staff

Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy

- Informing the school of any changes to their personal data, such as a change of address
- Contacting the DPO in the following circumstances:
  - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
  - If they have any concerns that this policy is not being followed
  - If they are unsure whether or not they have a lawful basis to use personal data in a particular way
  - If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area
  - If there has been a data breach
  - Whenever they are engaging in a new activity that may affect the privacy rights of individuals
  - If they need help with any contracts or sharing personal data with third parties

## 6. Data protection principles

The GDPR is based on data protection principles that our school must comply with.

The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary for the purposes for which it is processed
- Processed in a way that ensures it is appropriately secure

This policy sets out how the school aims to comply with these principles.

## 7. Collecting personal data

### 7.1 Lawfulness, fairness and transparency

We will only process personal data where we have one of 6 'lawful bases' (legal reasons) to do so under data protection law:

- The data needs to be processed so that the school can **fulfil a contract** with the individual, or the individual has asked the school to take specific steps before entering into a contract
- The data needs to be processed so that the school can **comply with a legal obligation**
- The data needs to be processed to ensure the **vital interests** of the individual e.g. to protect someone's life
- The data needs to be processed so that the school, as a public authority, can perform a task **in the public interest**, and carry out its official functions
- The data needs to be processed for the **legitimate interests** of the school or a third party (provided the individual's rights and freedoms are not overridden)
- The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear **consent**

For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the GDPR and Data Protection Act 2018.

### 7.2 Limitation, minimisation and accuracy

We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data.

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If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary.

Staff must only process personal data where it is necessary in order to do their jobs.

When staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in accordance with the school's retention policy that is being developed. This will be in line with [Information and Records Management Society's toolkit for schools](#)

## 8. Sharing personal data

We will not normally share personal data with anyone else, but may do so where:

- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk
- We need to liaise with other agencies – we will seek consent as necessary before doing this
- Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT companies. When doing this, we will:
  - Only appoint suppliers or contractors which can provide sufficient guarantees that they comply with data protection law
  - Establish a data sharing agreement with the supplier or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of any personal data we share
  - Only share data that the supplier or contractor needs to carry out their service, and information necessary to keep them safe while working with us

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

## 9. Subject access requests and other rights of individuals

### 9.1 Subject access requests

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. This includes:

- Confirmation that their personal data is being processed
  - Access to a copy of the data
  - The purposes of the data processing
  - The categories of personal data concerned
  - Who the data has been, or will be, shared with
  - How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
  - The source of the data, if not the individual
  - Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual
-

Subject access requests must be submitted in writing, either by letter, email or fax to the DPO. They should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

If staff receive a subject access request they must immediately forward it to the DPO.

## **9.2 Children and subject access requests**

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

Children below the age of 12 are generally not regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at our school may be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

## **9.3 Responding to subject access requests**

When responding to requests, we:

- May ask the individual to provide 2 forms of identification
- May contact the individual via phone to confirm the request was made
- Will respond without delay and within 1 month of receipt of the request
- Will provide the information free of charge
- May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month, and explain why the extension is necessary

We will not disclose information if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual
- Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests
- Is contained in adoption or parental order records
- Is given to a court in proceedings concerning the child

If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which takes into account administrative costs.

A request will be deemed to be unfounded or excessive if it is repetitive, or asks for further copies of the same information.

When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.

## **9.4 Other data protection rights of the individual**

In addition to the right to make a subject access request (see above), and to receive information when we are collecting their data about how we use and process it (see section 7), individuals also have the right to:

- Withdraw their consent to processing at any time
  - Ask us to rectify, erase or restrict processing of their personal data, or object to the processing of it (in certain circumstances)
  - Prevent use of their personal data for direct marketing
  - Challenge processing which has been justified on the basis of public interest
  - Request a copy of agreements under which their personal data is transferred outside of the European Economic Area
  - Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect them)
  - Prevent processing that is likely to cause damage or distress
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- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

Individuals should submit any request to exercise these rights to the DPO. If staff receive such a request, they must immediately forward it to the DPO.

## 10. Parental requests to see the educational record

Parents, or those with parental responsibility, have a legal right to free access to their child's educational record (which includes most information about a pupil) within 15 school days of receipt of a written request.

## 11. CCTV

We use CCTV in various locations around the school site to ensure it remains safe. We will adhere to the ICO's [code of practice](#) for the use of CCTV.

We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.

Any enquiries about the CCTV system should be directed to [admin@denbigh.primaryluton.co.uk](mailto:admin@denbigh.primaryluton.co.uk)

## 12. Photographs and videos

As part of our school activities, we may take photographs and record images of individuals within our school.

We will obtain written consent from parents/carers to use photographs and videos in school publications, school display boards, the school website and the school Twitter feed.

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

## 13. Data protection by design and default

We will put measures in place to show that we have integrated data protection into all of our data processing activities, including:

- Appointing a suitably qualified DPO, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge
  - Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law (see section 6)
  - Completing privacy impact assessments where the school's processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies (the DPO will advise on this process)
  - Integrating data protection into internal documents including this policy, any related policies and privacy notices
  - Regularly training members of staff on data protection law, this policy, any related policies and any other data protection matters; we will also keep a record of attendance
  - Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant
  - Maintaining records of our processing activities, including:
    - For the benefit of data subjects, making available the name and contact details of our school and DPO and all information we are required to share about how we use and process their personal data (via our privacy notices)
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- For all personal data that we hold, maintaining an internal record of the type of data, data subject, how and why we are using the data, any third-party recipients, how and why we are storing the data, retention periods and how we are keeping the data secure

## 14. Data security and storage of records

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage. This operates in line with our Online Safety policy.

In particular:

- Papers containing confidential personal data must not be left on office and classroom desks, on staffroom tables, pinned to notice/display boards, or left anywhere else where there is general access
- That users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed.
- Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices
- Staff, pupils or governors who store personal information on their personal devices are expected to follow the same security procedures as for school-owned equipment set out in the Online safety policy.
- Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected (see section 8)

## 15. Disposal of records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

For example, we will shred paper-based records, and overwrite or delete electronic files. We may also use a third party to safely dispose of records on the school's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.

## 16. Personal data breaches

The school will make all reasonable endeavours to ensure that there are no personal data breaches.

In the unlikely event of a suspected data breach, we will follow the procedure set out in appendix 1.

When appropriate, we will report the data breach to the ICO within 72 hours. Such breaches in a school context may include, but are not limited to:

- A non-anonymised dataset being published on the school website which shows the exam results of pupils eligible for the pupil premium
- Safeguarding information being made available to an unauthorised person
- The theft of a school laptop containing non-encrypted personal data about pupils

## 17. Training

All staff and governors are provided with data protection training as part of their induction process.

Data protection will also form part of continuing professional development, where changes to legislation, guidance or the school's processes make it necessary.

## 19. Monitoring arrangements

The DPO is responsible for monitoring and reviewing this policy.

This policy will be reviewed **every 2 years** and shared with the full governing board.

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## Appendix 1: Personal data breach procedure

This procedure is based on [guidance on personal data breaches](#) produced by the ICO.

- On finding or causing a breach, or potential breach, the staff member or data processor must immediately notify the Head Teacher.
- The Headteacher will notify the DPO and investigate the report, and determine whether a breach has occurred. To decide, the Headteacher and the DPO will consider whether personal data has been accidentally or unlawfully:
  - Lost
  - Stolen
  - Destroyed
  - Altered
  - Disclosed or made available where it should not have been
  - Made available to unauthorised people
- The Headteacher will alert the chair of governors
- The Headteacher and DPO will make all reasonable efforts to contain and minimise the impact of the breach, assisted by relevant staff members or data processors where necessary. (Actions relevant to specific data types are set out at the end of this procedure)
- The DPO will assess the potential consequences, based on how serious they are, and how likely they are to happen
- The DPO will work out whether the breach must be reported to the ICO. This must be judged on a case-by-case basis. To decide, the DPO will consider whether the breach is likely to negatively affect people's rights and freedoms, and cause them any physical, material or non-material damage (e.g. emotional distress), including through:
  - Loss of control over their data
  - Discrimination
  - Identify theft or fraud
  - Financial loss
  - Unauthorised reversal of pseudonymisation (for example, key-coding)
  - Damage to reputation
  - Loss of confidentiality
  - Any other significant economic or social disadvantage to the individual(s) concerned

If it's likely that there will be a risk to people's rights and freedoms, the DPO must notify the ICO.

- The Headteacher and DPO will document the decision (either way), in case it is challenged at a later date by the ICO or an individual affected by the breach. Documented decisions are stored in GDPR.co.uk
- Where the ICO must be notified, the DPO will do this via the ['report a breach' page of the ICO website](#) within 72 hours. As required, the DPO will set out:
  - A description of the nature of the personal data breach including, where possible:
    - The categories and approximate number of individuals concerned
    - The categories and approximate number of personal data records concerned
  - The name and contact details of the DPO
  - A description of the likely consequences of the personal data breach
  - A description of the measures that have been, or will be taken, to deal with the breach and mitigate any possible adverse effects on the individual(s) concerned
- If all the above details are not yet known, the DPO will report as much as they can within 72 hours. The report will explain that there is a delay, the reasons why, and when the DPO expects to have further information. The DPO will submit the remaining information as soon as possible

- The DPO will also assess the risk to individuals, again based on the severity and likelihood of potential or actual impact. If the risk is high, the DPO will promptly inform, in writing, all individuals whose personal data has been breached. This notification will set out:
  - The name and contact details of the DPO
  - A description of the likely consequences of the personal data breach
  - A description of the measures that have been, or will be, taken to deal with the data breach and mitigate any possible adverse effects on the individual(s) concerned
- The DPO will notify any relevant third parties who can help mitigate the loss to individuals – for example, the police, insurers, banks or credit card companies
- The DPO will document each breach, irrespective of whether it is reported to the ICO. For each breach, this record will include the:
  - Facts and cause
  - Effects
  - Action taken to contain it and ensure it does not happen again (such as establishing more robust processes or providing further training for individuals)

Records of all breaches will be stored in [GDPR.co.uk](https://www.gdpr.co.uk)

- The DPO and headteacher will meet to review what happened and how it can be stopped from happening again. This meeting will happen as soon as reasonably possible
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## Appendix 2:

### Information and Records Management Society Retention Guidelines for Schools

#### Version 4

This retention schedule contains recommended retention periods for the different record series created and maintained by schools in the course of their business. The schedule refers to all information regardless of the media in which it is stored.

Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the Data Protection Act 1998 and the Freedom of Information Act 2000.

Managing record series using these retention guidelines will be deemed to be “normal processing” under the legislation mentioned above. If record series are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented.

This schedule should be reviewed on a regular basis.

This document is a guideline only and liability is the liability of the end user and not of the IRMS.



# Records Management Toolkit for Schools

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1. ChildProtection					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
1.1	Child Protection files	Yes	Education Act 2002, s175, related guidance "Safeguarding Children in Education", September 2004	DOB + 25 years <sup>1</sup>	SECURE DISPOSAL
1.2	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance) Education Act 2002 guidance "Dealing with Allegations of Abuse against Teachers and Other Staff" November 2005	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer	SECURE DISPOSAL

<sup>1</sup> This amendment has been made in consultation with the Safeguarding Children Group.

<sup>2</sup> From January 1st 2005 subject access is permitted into unstructured filing systems and logbooks and other records created within the school containing details about the activities of individual pupils and members of staff will become subject to the Data Protection Act 1998.



2. Governors					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
2.1	Minutes				
	• Principal set (signed)	No		Permanent	Retain in school for 6 years from date of meeting
	• Inspection copies	No		Date of meeting + 3 years	SECURE DISPOSAL [If these minutes contain any sensitive personal information they should be shredded]
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 date of meeting
2.4	Annual Parents' meeting papers	No		Date of report + 6 years	Retain in school for 6 years from date of meeting
2.5	Instruments of Government	No		Permanent	Retain in school whilst school is 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 is operational (this includes if the expired policy is part of a past decision making process)

2. Governors					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
2.9	Complaints files	Yes		Date of resolution of complaint + 6 years	Retain in school for the first six years Review for further retention in the case of contentious disputes SECURED IS POSAL routine complaints
2.10	Annual Reports required by the Department for Education	No	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002. SI 2002 No 1171	Date of report + 10 years	
2.11	Proposals for schools to become, or be established as Specialist Status schools	No			Current year + 3 years

3. Management					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
3.1	Log Books	Yes		Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry
3.2	Minutes of the Senior Management Team and other internal administrative bodies	Yes		Date of meeting + 5 years	Retain in the school for 5 years from meeting
3.3	Reports made by the head teacher or the management team	Yes		Date of report + 3 years	Retain in the school for 3 years from meeting
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		Date of correspondence + 3 years	SECURE DISPOSAL
3.6	Professional development plans	Yes		Closure + 6 years	SECURE DISPOSAL
3.7	School development plans	Yes		Closure + 6 years	Review
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. Management					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
3.10	Admissions - Secondary Schools - Casual	Yes		Current year + 1 year	SECURE DISPOSAL
3.11	Proofs of address supplied by parents as part of the admissions process	Yes		Current year + 1 year	SECURE DISPOSAL
3.12	Supplementary Information form including additional information such as religion, medical conditions etc.				

4. Pupils					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
4.1	Admission Registers	Yes		Date of last entry in the book (or file) + 6 years Reconsider Retention Period. Feedback from Teaching Relative was thought to be 7 Year Retention. These records are no longer generated in paper but electronically held using SIMS BROCON software.	Retain in the school for 6 years from the date of the last entry then consider transfer to the Archives
4.2	Attendance registers	Yes		Date of register + 3 years	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]

4. Pupils					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
4.3	Pupil Files Retained in Schools	Yes			
4.3a	• 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. In the case of exclusion it may be appropriate to transfer the record to the Pupil Referral Unit
4.3b	• Secondary		Limitation Act 1980	DOB of the pupil + 25 years <sup>3</sup>	SECURE DISPOSAL
4.4	Pupil files	Yes			
4.4a	• 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. In the case of exclusion it may be appropriate to transfer the record to the Pupil Referral Unit
4.4b	• Secondary		Limitation Act 1980	DOB of the pupil + 25 years <sup>4</sup>	SECURE DISPOSAL
4.5	Special Educational Needs files, reviews and Individual Education Plans	Yes		DOB of the pupil + 25 years the review NOTE: This retention period is the minimum period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period.	SECURE DISPOSAL

<sup>3</sup> 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.

<sup>4</sup> As above

4. Pupils					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
4.6	Correspondence Relating to Authorised Absence and Issues	No		Date of absence + 2 years	SECURE DISPOSAL
4.7	Examination results	Yes			
4.7a	• Public	No		Year of examinations + 6 years	SECURE DISPOSAL
4.7b	• Internal examination results	Yes		Current year + 5 years <sup>5</sup>	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 either allocate a further retention period or SECURE DISPOSAL
4.9	Statement maintained under The Education Act 1996- Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SECURE DISPOSAL unless legal action is pending
4.10	Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SECURE DISPOSAL unless legal action is pending
4.11	Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12 years	SECURE DISPOSAL unless legal action is pending
4.12	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	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

<sup>5</sup> 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.

4. Pupils					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
4.14	Parental permissions slips for school trips - where there has been a major incident	Yes	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	SECURE DISPOSAL
4.15	Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Primary Schools	No	3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) (1998).	Date of visit + 14 years <sup>6</sup>	N
4.16	Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Secondary Schools	No	3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) (1998).	Date of visit + 10 years	N
4.17	Walking Bus registers	Yes		Date of register + 3 years 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	SECURE DISPOSAL [If these records are retained electronically any backup copies should be destroyed at the same time]

<sup>6</sup>This retention period has been set in agreement with the Safeguarding Children's Officer.

5. Curriculum					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	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 ofwork	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 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 or SECURE DISPOSAL
5.5	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 SECURE DISPOSAL
5.6	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 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 or SECURE DISPOSAL
5.8	Pupils'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 SECURE DISPOSAL



5. Curriculum					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
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	PANreports	Yes		Current year + 6 years	SECURE DISPOSAL
5.12	Value Added & Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
5.13	Self Evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL

6. Personnel Records held in Schools					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
6.1	Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	SECURE DISPOSAL
6.2	Staff Personal files	Yes		Termination + 7 years	SECURE DISPOSAL
6.3	Interview notes and recruitment records	Yes		Date of interview + 6 months	SECURE DISPOSAL
6.4	Pre-employment vetting information (including CRB checks)	No	CRB guidelines	Date of check + 6 months	SECURE DISPOSAL [by the designated member of staff]
6.5	Disciplinary proceedings:	Yes	Where the warning relates to child protection issues see 1.2. If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice.		

6. Personnel Records held in Schools					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
6.5a	• oral warning			Date of warning + 6 months	SECURE DISPOSAL <sup>7</sup>
6.5b	• written warning - level one			Date of warning + 6 months	SECURE DISPOSAL
6.5c	• written warning - level two			Date of warning + 12 months	SECURE DISPOSAL
6.5d	• final warning			Date of warning + 18 months	SECURE DISPOSAL
6.5e	• case notfound			If child protection related please see 1.2 otherwise SECURE DISPOSAL immediately at the conclusion of the case	SECURE DISPOSAL
6.6	Records relating to accident/injuryat work	Yes		Date of incident + 12 years Inthe case of seriousaccidentsafurther retention period will need to be applied	SECURE DISPOSAL
6.7	Annual appraisal/assessment records	No		Current year + 5 years	SECURE DISPOSAL
6.8	Salarycards	Yes		Last date of employment + 85 years	SECURE DISPOSAL
6.9	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year +3yrs	SECURE DISPOSAL
6.10	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SECURE DISPOSAL

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

## 6. Personnel Records held in Schools

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
6.11	Proofs of identity collected as part of the process of checking "portable" enhanced CRB disclosure	Yes		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.	

Comment: CRB Guidelines all falls under the heading of Data Recruitment Polices. Consideration needs to be applied to adding a separate category maybe.

## 7. Health and Safety

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
7.1	Accessibility Plans		Disability Discrimination Act	Current year + 6 years	SECURE DISPOSAL
7.2	Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
7.2a	• Adults	Yes		Date of incident + 7 years	SECURE DISPOSAL
7.2b	• Children	Yes		DOB of child + 25 years <sup>8</sup>	SECURE DISPOSAL
7.3	COSHH			Current year + 10 years [where appropriate an additional retention period may be allocated]	
7.4	Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL

<sup>8</sup> A child may make a claim for negligence for 7 years from their 18th birthday. To ensure that all records are kept until the pupil reaches the age of 25 this retention period has been applied.

7. Health and Safety					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
7.5	Policy Statements			Date of expiry + 1 year	SECURE DISPOSAL
7.6	Risk Assessments	Yes		Current year + 3 years	SECURE DISPOSAL
7.7	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos			Last action + 40 years	SECURE DISPOSAL
7.8	Process of monitoring of 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 books			Current year + 6 years	SECURE DISPOSAL

8. Administrative					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
8.1	Employer's Liability certificate			Closure of the school + 40 years	SECURE DISPOSAL
8.2	Inventories of equipment & furniture			Current year + 6 years	SECURE DISPOSAL
8.3	General file series			Current year + 5 years	Review to see whether a further retention period is required
8.4	School brochure or prospectus			Current year + 3 years	
8.5	Circulars (staff/parents/pupils)			Current year + 1 year	SECURE DISPOSAL

8. Administrative					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
8.6	Newsletters, ephemera			Current year + 1 year	Review to see whether a further retention period is required
8.7	Visitors book			Current year + 2 years	Review to see whether a further retention period is required
8.8	PTA/Old Pupils Associations			Current year + 6 years	Review to see whether a further retention period is required

9. Finance					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
9.1	Annual Accounts		Financial Regulations	Current year + 6 years	
9.2	Loans and grants		Financial Regulations	Date of last payment on loan + 12 years	Review to see whether a further retention period is required
9.3	Contracts				
9.3a	• under seal			Contract completion date + 12 years	SECURE DISPOSAL
9.3b	• under signature			Contract completion date + 6 years	SECURE DISPOSAL
9.3c	• monitoring records			Current year + 2 years	SECURE DISPOSAL
9.4	Copy orders			Current year + 2 years	SECURE DISPOSAL
9.5	Budget reports, budget monitoring etc.			Current year + 3 years	SECURE DISPOSAL

9. Finance					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
9.6	Invoice, receipts and other records covered by the Financial Regulations		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		Limitation Act 1980	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 then review	SECURE DISPOSAL
9.13	School Fund - Ledger			Current year + 6 years then review	SECURE DISPOSAL
9.14	School Fund- Invoices			Current year + 6 years then review	SECURE DISPOSAL
9.15	School Fund - Receipts			Current year + 6 years	SECURE DISPOSAL
9.16	School Fund - Bank statements			Current year + 6 years then review	SECURE DISPOSAL
9.17	School Fund - School Journey books			Current year + 6 years then review	SECURE DISPOSAL
9.18	Student grant applications			Current year + 3 years	SECURE DISPOSAL
9.19	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
9.20	Petty cash books			Current year + 6 years	SECURE DISPOSAL

10. Property					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
10.1	Title Deeds			Permanent	Permanent, these should follow the property unless the property has been registered at the Land Registry
10.2	Plans			Permanent	Retain in school whilst operational
10.3	Maintenance and contractors		Financial Regulations	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			Current year + 6 years	SECURE DISPOSAL
10.8	Contractors' Reports			Current year + 6 years	SECURE DISPOSAL

11. Local Authority					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
11.1	Secondary transfer sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
11.2	Attendance returns	Yes		Current year + 1 year	SECURE DISPOSAL
11.3	Circulars from LEA			Whilst required operationally	Review to see whether a further retention period is required

12. Department for Children, Schools and Families					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
12.1	HMI reports			These do not need to be kept any longer	
12.2	OFSTED reports and papers			Replace former report with any new inspection report	Review to see whether a further retention period is required
12.3	Returns			Current year + 6 years	SECURE DISPOSAL
12.4	Circulars from Department for Children, Schools and Families			Whilst operationally required	Review to see whether a further retention period is required

13. Connexions					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
13.1	Service level agreements			Until superseded	SECURE DISPOSAL
13.2	Work Experience agreement			DOB of child + 18 years	SECURE DISPOSAL

Are KPI's required? Consideration required as to whether this new item should be included.

14. Schools Meals					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	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. Family Liaison Officers and Home School Liaison Assistants					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
15.1	Day Books	Yes		Current year + 2 years then review	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 then destroy	SECURE DISPOSAL
15.3	Referral forms	Yes		While the referral is current	SECURE DISPOSAL
15.4	Contact datasheets	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
15.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	DELETE
15.6	Group Registers	Yes		Current year + 2 years	SECURE DISPOSAL

# Information and Records Management Society Retention Guidelines for Early Years Provision

## Version 4

This retention schedule contains recommended retention periods for the different record series created and maintained by schools in the course of their business. The schedule refers to all information regardless of the media in which it is stored.

Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the Data Protection Act 1998 and the Freedom of Information Act 2000.

Managing record series using these retention guidelines will be deemed to be “normal processing” under the legislation mentioned above. If record series are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented.

This schedule should be reviewed on a regular basis.

This document is a guideline only and liability is the liability of the end user and not of the IRMS.



# Records Management Toolkit for Schools

Version 4

Retention Guidelines - Summary of Contents

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16. Early Years Provision		16.1 Records to be kept by Registered Persons - All Cases		
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]
16.1.1	The name, home address and date of birth of each child who is looked after on the premises	Yes		Closure of setting + 50 years [These could be required to show whether or not an individual child attended the setting in a child protection investigation]
16.1.2	The name, home address and telephone number of a parent of each child who is looked after on the premises	Yes		If this information is kept in the same book or on the same form as in 16.1.1 then the same retention period should be used as in 16.1.1. If the information is stored separately, then destroy once the child has left the setting (unless the information is collected for anything other than emergency contact)
16.1.3	The name, address and telephone number of any person who will be looking after children on the premises	Yes		See 16.4.5 below
16.1.4	A daily record of the names of children looked after on the premises, their hours of attendance and the names of the persons who looked after them	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003	The regulations say that these records should be kept for 2 years (SI200319967(1b)). If these records are likely to be needed in a child protection setting (see 16.1.1 above) then the records should be retained for closure of setting + 50 years
16.1.5	A record of accidents occurring on the premises and incident books relating to other incidents	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003 <sup>1</sup>	DOB of the child involved in the accident or the incident + 25 years. If an adult is injured then the accident book must be kept for 7 years from the date of the incident
16.1.6	A record of any medicinal product administered to any child on the premises, including the date and circumstances of its administration, by whom it was administered, including medicinal products which the child is permitted to administer to himself, together with a record of parent's consent	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003 <sup>2</sup>	DOB of the child being given/taking the medicine + 25 years

<sup>1</sup>The regulations say that these records should be kept for 2 years (SI200319967(1b)). The Statute of Limitations states that a minor may make a claim for 7 years from their eighteenth birthday; therefore the retention should be for the longer period.

<sup>2</sup>The regulations say that these records should be kept for 2 years (SI200319967(1b)). The NHS records retention schedule states that any records relating to a child under the age of 18 should be retained until that child reaches the age of 25 years. Therefore, the retention should be DOB of the child being given/taking the medicine + 25 years

16. Early Years Provision		16.1 Records to be kept by Registered Persons - All Cases		
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]
16.1.7	Records of transfer	Yes		One copy is to be given to the parents, one copy transferred to the Primary School where the child is going
16.1.8	Portfolio of work, observations and so on	Yes		To be sent home with the child
16.1.9	Birth certificates	Yes		Once the setting has had sight of the birth certificate and recorded the necessary information the original can be returned to the parents.. There is no requirement to keep a copy of the birth certificate.

16. Early Years Provision		16.2 Records to be kept by Registered Persons - Day Care		
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]
16.2.1	The name and address and telephone number of the registered person and every other person living or employed on the premises	Yes		See 16.4 below
16.2.2	A statement of the procedure to be followed in the event of a fire or accident	No		Procedure superseded + 7 years
16.2.3	A statement of the procedure to be followed in the event of a child being lost or not collected	No		Procedure superseded + 7 years
16.2.4	A statement of the procedure to be followed where a parent has a complaint about the service being provided by the registered person	No		Until superseded

16. Early Years Provision		16.2 Records to be kept by Registered Persons - Day Care		
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]
16.2.5	A statement of the arrangements in place for the protection of children, including arrangements to safeguard the children from abuse or neglect and procedures to be followed in the event of allegations of abuse or neglect	No		Closure of setting + 50 years [These could be required to show whether or not an individual child attended the setting in a child protection investigation]

16. Early Years Provision		16.3 Records to be kept by Registered Persons - Overnight provision - under 2's		
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]
16.3.1	Emergency contact details for appropriate adult to collect the child if necessary	Yes		Destroy once the child has left the setting (unless the information is collected for anything other than emergency contact)
16.3.2	Contract signed by the parent stating all there relevant details regarding the child and their care, including the name of the emergency contact and confirmation of their agreement to collect the child during the night	Yes		Date of birth of the child who is the subject of the contract + 25 years

16. Early Years Provision		16.4 Other Records-Administration		
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]
	<b>Financial Records</b>			
16.4.1	Financial records - accounts, statements, invoices, petty cash etc	No		Current year + 6 years

16. Early Years Provision		16.4 Other Records-Administration		
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]
	<b>Insurance</b>			
16.4.2	Insurance policies - Employers Liability	No	Employers Liability Financial Regulations	The policies are kept for a minimum of 6 years and a maximum of 40 years depending on the type of policy
16.4.3	Claims made against insurance policies - damage to property	Yes		Case concluded + 3 years
16.4.4	Claims made against insurance policies - personal injury	Yes		Case concluded + 6 years
	<b>Human Resources</b>			
16.4.5	Personal Files - records relating to an individual's employment history	Yes <sup>3</sup>		Termination + 6 years then review
16.4.6	Pre-employment vetting information (including CRB checks)	No	CRB guidelines	Date of check + 6 months
16.4.7	Staff training records - general	Yes		Current year + 2 years
16.4.8	Training (proof of completion such as certificates, awards, exam results)	Yes		Last action + 7 years
	<b>Premises and Health and Safety</b>			
16.4.9	Premises files (relating to maintenance)	No		Cessation of use of building + 7 years then review
16.4.10	Risk Assessments	No		Current year + 3 years

<sup>3</sup>For Data Protection purposes the following information should be kept on the file for the following periods :

- |  |                        |   |           |
|--|------------------------|---|-----------|
| • all documentation on the personal file         | Duration of employment | • records relating to disciplinary matters (kept on personal files) |           |
| • pre-employment and vetting information         | Start date + 6 months  | ◦ oral warning  | 6 months  |
| • records relating to accident or injury at work | Minimum of 12 years    | ◦ first level warning   | 6 months  |
| • annual appraisal/assessment records            | Minimum of 5 years     | ◦ second level warning  | 12 months |
|  |                        | ◦ final warning   | 18 months |



## Version Control

*The following changes were made to the Records Management Toolkit - 10th February 2006 in preparation for the consultation document which will become the Records Management Toolkit for Schools.*

- 1 Toolkit for schools Feb 06[1] withdrawn and issued as a number of individual documents (see below)
- 2 Part 1 of Toolkit for schools Feb 06[1] reissued as "Records Management Policy" [Records Management Toolkit RMS03.doc]
- 3 Part 2 of Toolkit for schools Feb 06[1] and Appendix B reissued as "Creating Information Management Systems" [Records Management Toolkit RMS04.doc]
- 4 Appendix C of Toolkit for schools Feb 06[1] reissued as "Managing E-mail" [Records Management Toolkit RMS05.doc]
- 5 Section 2.3.4 Toolkit for schools Feb 06[1] reissued as "Information Security" [Records Management Toolkit RMS06.doc] and "Business Continuity" [Records Management Toolkit RMS07]
- 6 Appendix A of Toolkit for schools Feb 06[1] reissued as "Managing E-mail" [Records Management Toolkit RMS08.doc]
- 7 New section "Managing Pupil Records" added [Records Management Toolkit RMS09.doc]
- 8 Sections 1-6 of Toolkit for schools retention schedule Feb 06 withdrawn and reissued as a number of individual documents (see below)
- 9 Sections 1-3, 5 of Toolkit for schools retention schedule Feb 06 withdrawn and reissued as "Introduction to the Retention Schedule" [Records Management Toolkit RMS11]
- 10 Section 4 of Toolkit for schools retention schedule Feb 06 withdrawn and reissued as "Safe disposal of records which have reached the end of their administrative life" [Records Management Toolkit RMS12]
- 11 New section "School Closures and Record Keeping" added [Records Management Toolkit RMS12]
- 12 Section 6 of Toolkit for schools retention schedule Feb 06 reissued as "Retention Guidelines for Schools" [Records Management Toolkit RMS10]. The following amendments have been made:
  - 12.1 Table of contents added using MS Word Heading function
  - 12.2 All entries given individual numbers
  - 12.3 Section 6.1 renumbered as section 1 and notes added to 1.2 relating to the provisions of the "Safeguarding Children and Safer Recruitment in Education" p60
  - 12.4 Section 6.2 renumbered as section 2





- 12.6 Section 6.4 renumbered as section 4 and new items 4.15-16 added
- 12.7 Section 6.5 renumbered as section 5 and new item 6.11 added
- 12.8 Section 6.6 renumbered as section 6
- 12.9 Section 6.7 renumbered as section 7 and the retention periods in items 7.2a and 7.2b amended
- 12.10 Section 6.8 renumbered as section 8
- 12.11 Section 6.9 renumbered as section 9
- 12.12 Section 6.10 renumbered as section 10
- 12.13 Section 6.11 renumbered as section 11
- 12.14 Section 6.12 renumbered as section 12. All references to DfE S replaced with Department for Children, Schools & Families
- 12.15 Section 6.13 renumbered as section 13
- 12.16 Section 6.14 renumbered as section 14
- 12.17 New section 15 for Family Liaison Officers/Parent Support Assistants added
- 12.18 New section 16 for Early Years Provision added

*The following additional alterations were made as a result of the consultation process on 13th December 2007.*

- 1 "Managing E-mail" [Records Management Toolkit RMS05.doc]: contents of document replaced with more up to date content.
- 2 "Managing Pupil Records" added [Records Management Toolkit RMS09.doc]. The following text was added "The file cover should also contain a note of the date when the file was opened and the date when the file is closed if it is felt to be appropriate."
- 3 "Retention Guidelines for Schools" [Records Management Toolkit RMS10]. The following amendments have been made:
  - 3.1 Sections 4.17 and 4.18 added with retention periods for "Records created by school to obtain approval for an Educational Visit outside the Classroom"
  - 3.2 Clarification note added to section 4.5
- 4 "Safe disposal of records which have reached the end of their administrative life" [Records Management Toolkit RMS12]: "Date action taken" added to section 1

*The following alterations were made to the toolkit to form Version 3.1*

- 1 Item 4.19 added to the Retention Schedule (Walking Bus)

*The following changes were made to the Records Management Toolkit Version 3.1 in preparation for the consultation document which will become Version 4 of the Records Management Toolkit for Schools.*

- 1 Logo on all documents changed from the RMS logo to the IRMS logo.
  - 2 All instances of Records Management Society and RMS changed to Information and Records Management Society (IRMS).
  - 3 Fact sheet relating to the creation of Information Management Systems has been removed.
  - 4 Fact sheet relating to information audits revised.
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5 Factsheet on email management revised.

6 Retention Guidelines: Text "SHRED" replaced with "SECURE DISPOSAL"

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- 7 Retention Guidelines: Column relating to whether documents should be offered to Archives at the end of their administrative life removed.
  - 8 Retention Guidelines: 3.12 added as a new item
  - 9 Retention Guidelines: 4.7 removed from the retention schedule
  - 10 Retention Guidelines: 4.8-4.13 renumbered to 4.7-4.12
  - 11 Retention Guidelines: Early Years Retention Schedule separated from Schools' Retention Schedule
  - 12 Retention Guidelines: 4.14 removed from retention schedule
  - 13 Retention Guidelines: 4.15-4.19 renumbered to 4.13-4.17
  - 14 Retention Guidelines: 5.1 - Curriculum Development replaced with School Development Plan  
Retention Guidelines: 5.3 removed
  - 15 Retention Guidelines: 5.4-13 renumbered to 5:3-12  
Retention Guidelines: 5.11 [renumbered to 5.10] text added to read "examination papers and results"
  - 16 Retention Guidelines: 5.12 [renumbered to 5.11] text amended to read "Value Added & Contextual Data."
  - 17 Retention Guidelines: 5.13 added to retention schedule
  - 18 Retention Guidelines: 9.18 removed from the retention schedule
  - 19 Retention Guidelines: Text "Financial Regulations" removed from 9.20-9.21
  - 20 Retention Guidelines: 9.19-9.21 renumbered to 9.18-9.20
  - 21 Retention Guidelines: 11, Text "Local Education Authority" amended to read "Local Authority"
  - 22 Retention Guidelines: 15, Text "Parent Support Assistants" amended to read "Home School Liaison Assistants"
  - 23 Information Security factsheet and business continuity factsheet combined to create Information & Records Security and Continuity fact sheet
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information  
and records  
management  
**society**