Newbridge Learning Community

Data Retention & Records Management Policy

Subject Leader: Ashley Martindale – School Business Manager

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To be reviewed: March 2027

1. Introduction

The school is committed to achieving the highest standards of information governance and ensuring that all records, paper and electronic, are managed in line with statutory and regulatory requirements. This policy outlines the standards and procedures for the creation, storage, protection, retention, archiving, and disposal of records, based on the structure and logic of the IRMS Information Management Toolkit for Schools (2019), and in compliance with:

- UK GDPR
- Data Protection Act 2018
- Freedom of Information Act 2000 (Section 46 Code of Practice)
- Statutory safeguarding obligations
- Education Acts and Inspection legislation

This policy applies to all staff, governors, contractors, and volunteers and covers all information formats and systems used within the school.

2. Scope of the Policy

This policy covers:

2.1 All record formats

- Paper documents
- Electronic files, databases, MIS
- Emails, messaging platforms, and internal communications
- Photographs, audio, video, CCTV
- Archived or legacy formats
- Hybrid systems (paper + digital)

2.2 All personnel

- Employees
- Governors
- Volunteers
- Contractors
- External service providers handling school data

2.3 All information locations

- On-site storage (classrooms, offices, archive rooms)
- Off-site secure storage (LA or third-party)
- Cloud platforms
- Portable devices and removable media

3. Records Management Principles

The school follows recognised records management principles:

Availability

Records must be accessible to authorised users.

Integrity

Records must be accurate, authoritative, and complete.

Confidentiality

Access to personal data must be controlled and protected.

Retention

Records must be kept no longer than necessary.

Accountability

Record-keeping decisions must be documented and auditable.

Security

Records must be protected from unauthorised access, loss, or damage.

4. Roles and Responsibilities

4.1 Governing Board

- Ensures legal compliance
- Approves and reviews policy

4.2 Headteacher

- Overall operational responsibility
- Ensures staff are aware of and follow policy

4.3 Data Protection Officer (DPO)

- Oversees compliance with GDPR
- Maintains retention schedule
- Manages information audits, SARs, breaches, training

4.4 All Staff

- Follow retention periods and secure disposal rules
- Maintain accuracy and confidentiality
- Report incidents promptly

5. Information Lifecycle

The lifecycle involves:

1. **Creation/Receipt** – identify whether the material is a record
2. **Classification** – establish category and access controls
3. **Storage & Use** – ensure accessibility and security
4. **Retention** – maintain as long as business/legal requirements dictate
5. **Review** – periodically identify records due for destruction or archiving
6. **Disposal** – secure destruction or transfer to archive

6. Information Audits

The school conducts an annual audit to document:

- What information exists
- Where it is stored
- What the retention period is
- Who owns it
- Legal basis for retention
- Associated risks
- Sharing arrangements

The audit populates the **Information Asset Register (IAR)** and **Record of Processing Activities (RoPA)**.

7. Data Security

7.1 Physical Security

- Locked storage for confidential and sensitive documents
- Safeguarding files kept double-locked
- Room access restricted
- Protection from fire, water, pests, humidity

7.2 Digital Security

- Role-based access controls
- Multi-factor authentication where possible
- Encrypted devices and secure networks
- Staff prohibited from storing sensitive data on personal devices

- Approved cloud platforms only

7.3 Remote Access

- Controlled through secure portals
- No saving locally on non-encrypted devices

8. Email and Electronic Communications

- Email is **not** a record-keeping system
- Records must be transferred from email to appropriate storage
- Sensitive data must not be transmitted unencrypted
- Staff leaving the school have email accounts reviewed and securely closed
- Messaging apps (Teams, WhatsApp, SMS) must not store personal data

9. Breach Reporting

All breaches or suspected breaches:

- Must be reported immediately to the DPO
- Must be documented
- May require reporting to ICO within 72 hours
- Must be investigated with actions taken to mitigate harm

10. Business Continuity & Digital Continuity

The school ensures:

Business Continuity

- Critical systems identified
- Backups maintained
- Disaster recovery tested

Digital Continuity

- Long-term records stored in interoperable formats (PDF/A, TIFF, CSV)
- Migration schedules maintained
- Metadata preserved

11. School Archives

Some records may be preserved permanently for historical or cultural purposes. The school:

- Maintains archives separately from operational records
- Works with Local Record Office when needed

- Documents archival holdings in privacy notices

12. Record Disposal

12.1 Key principles

- No record destroyed before its retention period expires
- Disposal stops immediately if a record is subject to:
    - SAR
    - FOI request
    - Legal proceedings
    - Safeguarding inquiry
    - IICSA relevance

12.2 Methods

- **Paper**: cross-cut shredding or certified contractor
- **Electronic**: secure erasure, overwriting, or physical destruction
- **Systems beyond use**: where deletion is not possible

12.3 Disposal Logging

Disposal must be logged with:

- Record description
- Retention rule
- Disposal date
- Method used
- Contractor details (if applicable)

13. Reviewing the Policy

This policy is reviewed annually or earlier if:

- Legislation changes
- IRMS guidance changes
- Organisational changes occur

Appendix A – Comprehensive Records Retention Schedule

This schedule provides a complete, IRMS-aligned retention framework covering all record categories across governance, management, HR, health & safety, finance, property, pupils, curriculum, educational visits, support services, and interactions with local/central government. It must be applied alongside the main Data Retention & Records Management Policy, legal holds, and safeguarding obligations.

Global notes:
• Do not destroy any record subject to a legal hold, subject access request (SAR), freedom of information (FOI) request, ongoing complaint, litigation, or safeguarding inquiry (including IICSA).
• 'Secure dispose' means cross-cut shredding for paper and certified erasure/physical destruction for digital media.
• Where entries state 'transfer to archives', consult the Local Record Office for permanent preservation.

1. Governing Body

Record Type	Description	Retention Period	Disposal Action	Notes
Instrument of governance	Foundational document establishing the governing body.	Retain for life of the school	Review on closure / transfer to archives	May be of permanent historical value
Trusts and endowments	Records setting out trusts or endowment arrangements.	Retain for life of the school	Consult local archives before disposal	Legal/heritage value
Parent/staff governor elections	Election notices, nominations, ballots not otherwise required in minutes.	Date of election + 6 months	Secure dispose	Contains personal data
Appointment of co-opted governors	Supporting documentation where decision appears in minutes.	End of term of office (retain longer if safeguarding allegations)	Secure dispose	Keep 25 years if child-protection allegations relate
Election of chair/vice-chair	Papers for the election where outcome recorded in minutes.	Destroy once decision is minuted	Secure dispose	N/A
Scheme of delegation / committee ToR	Approved scheme and committee terms of reference.	Until superseded (retain for reference)	Review / archive copy	Useful for decision audit
Meeting schedule	Annual calendar of governing board meetings.	Current year	Standard disposal	Administrative convenience
Agendas – principal copy	Signed or principal set aligning to minutes.	Keep with minutes	Consult archives before disposal	Archival potential
Minutes – signed principal set	Approved and signed minutes of full board/committees.	Life of organisation (LA duty to make available 10 years)	Consult archives before disposal	Permanent record in practice
Reports to governors referred to in minutes	Papers submitted to meetings and referenced in minutes.	Life of organisation (pragmatically 10 years minimum)	Consult archives before disposal	Archival potential
Attendance register – governing board	Attendance of governors at meetings.	Date of last entry + 6 years	Secure dispose	Contains personal data
Annual parents' meeting papers (where held)	Arrangements and papers supporting statutory meeting.	Date of meeting + 6 years	Secure dispose	Contains personal data
Governor monitoring visits	Visit reports and notes.	Date of visit + 3 years	Secure dispose	Contains personal data
Annual reports to DfE (if applicable)	Formal annual returns.	Date of report + 10 years	Secure dispose	N/A
Conversion to academy status records	Records of process and decisions.	Life of organisation	Consult archives before disposal	Significant historical value

1.2 Governor Management

Record Type	Description	Retention Period	Disposal Action	Notes
Clerk appointment records	Recruitment/appointment documentation for clerk.	End of appointment + 6 years	Secure dispose	Personal data
Governor term of office / appointment evidence	Appointment letters and acceptance forms.	End of appointment + 6 years	Secure dispose	Personal data
Disqualification declarations	Self-declarations against statutory criteria.	End of appointment + 6 years	Secure dispose	Personal data
Register of interests	Declarations of pecuniary and other interests.	End of appointment + 6 years	Secure dispose	Personal data
Code of conduct versions	Historic copies of agreed governor codes.	Keep one copy of each version for life of organisation	Review/Archive	Reference history
Governor training/induction and DBS (meta)	Evidence of training completed; DBS outcome info (not certificate).	Training: end of appointment + 6 years; DBS: certificate not retained, outcome metadata per policy	Secure dispose	Use outcome/date only, not certificate
Governor personnel file	Administrative file for each governor.	End of appointment + 6 years	Secure dispose	Personal data

2.1 Headteacher & Senior Leadership

Record Type	Description	Retention Period	Disposal Action	Notes
Headteacher log books	Chronological record of significant school events.	Last entry + minimum 6 years then review	Consider transfer to archives	Often historically significant
SLT/management minutes	Minutes of SLT and other internal administrative bodies.	Date of meeting + 3 years then review	Secure dispose / archive if significant	May contain personal data
HT/SLT reports	Reports produced for internal leadership use.	Date of report + 3 years then review	Secure dispose / archive if significant	Contextual value
Administrative correspondence (HT/SLT)	Operational correspondence not covered elsewhere.	Current year + 3 years	Secure dispose	Personal data possible
Professional development plans (leadership)	Plans not kept on personnel file.	End of employment + 6 years	Secure dispose	If on personnel file, follow HR retention
School development plans	Strategic plan and reviews.	Life of plan + 3 years	Secure dispose	Reference use

2.2 Operational Administration

Record Type	Description	Retention Period	Disposal Action	Notes
General administrative files	Files not covered by other categories.	Current year + 5 years then review	Secure dispose	May be weeded routinely
Prospectus/website prospectus	Published school prospectus.	Current academic year + 3 years	Archive one copy; otherwise standard disposal	Public material
Circulars to staff/parents/pupils	Routine communications.	Current academic year + 1 year	Standard disposal	Non-record once superseded
Privacy notices (issued)	Versions provided to parents/staff.	Until superseded + 6 years	Secure dispose	Proof of compliance
GDPR consents (e.g., photos/communications)	Consent records for optional processing.	For duration of enrolment/employment; delete on leaving unless legal hold	Secure dispose	Manage withdrawals promptly
Newsletters and bulletins	General updates and notices.	Current academic year + 1 year	Standard disposal (retain one for archive if desired)	Public material
Visitor management records	Visitor books, electronic logs.	Last entry + 6 years	Secure dispose	Contains personal data
Walking bus registers	Daily/route registers for walking bus.	Date of register + 6 years	Secure dispose	Personal/safeguarding context

2.3 Human Resources – Recruitment & Employment

Record Type	Description	Retention Period	Disposal Action	Notes
Recruitment – unsuccessful candidates	Applications, interview notes, scoring for unsuccessful candidates.	Appointment of successful candidate + 6 months	Secure dispose	Data minimisation
Recruitment – successful candidate (to personnel file)	Offer, references, checks; move into personnel file.	Follow personnel file retention	Secure dispose	N/A
Right to work evidence	Proof retained in line with Home Office requirements.	End of employment + at least 2 years	Secure dispose	Follow current Home Office guidance
DBS outcome record (not certificate)	Record of check date/level/clearance reference.	In line with safer recruitment policy (certificate not kept)	Secure dispose	Keep metadata only
Personnel file (all staff)	Comprehensive employment record.	End of employment + 6 years (longer if legal hold/IICSA)	Secure dispose	Legal limitation period
Appraisal/performance records	Annual appraisal and objectives.	Current year + 6 years	Secure dispose	Personal data
Sickness absence records	Absence logs and fit notes.	Current year + 3 years (or 6 if linked to pay)	Secure dispose	Special category data
Training – child-related (e.g., safeguarding)	Certificates/records for child-related	Date of training + 40 years	Secure dispose	IICSA/safeguarding context

		training.			
Training – other (e.g., first aid, H&S)	Non-child specific training records.	Keep on personnel file or as per statutory cycle	Secure dispose	Regulatory cycles apply
Safeguarding allegations (staff)	Records of allegations and outcomes.	Normal retirement age or 10 years from allegation (whichever longer); retain pending IICSA guidance	Secure dispose (shred)	Malicious allegations removed
Disciplinary – oral/written/final warnings	Warnings per policy once spent for disciplinary purposes.	Records retained per policy (e.g., 6/12/18 months); keep trace note for factual history	Secure dispose	Do not confuse expiry with erasure of history

2.3 Human Resources – Payroll & Pensions (examples)

Record Type	Description	Retention Period	Disposal Action	Notes
P60 and tax records	Annual tax forms and payroll summaries.	Current year + 6 years	Secure dispose	Financial records
National Insurance schedules	NI contribution schedules and reports.	Current year + 6 years	Secure dispose	Financial records
Insurance records (payroll related)	Payroll insurance and adjustments.	Current year + 6 years	Secure dispose	Financial records
Maternity/paternity pay records	Statutory pay calculations and evidence.	Current year + 3 years	Secure dispose	Financial records
Overtime/allowances/claims	Time sheets, overtime, mileage claims.	Current year + 3 years (or 6 years if paid)	Secure dispose	Financial records
Payroll registers and reports	Gross/net, summaries, outputs.	Current year + 6 years	Secure dispose	Financial records

2.4 Health & Safety

Record Type	Description	Retention Period	Disposal Action	Notes
H&S policy statements	Approved policy and updates.	Life of policy + 3 years	Secure dispose	Keep historical versions as needed
Risk assessments	Generic and activity-specific assessments.	Life of assessment + 3 years (attach to accidents)	Secure dispose	Retain with incident pack
Accident book – adults (BI510)	Entries for staff/visitors aged 18+.	3 years after last entry	Secure dispose	Personal data
Accident book – under 18s	Entries for pupils under 18.	3 years after last entry (pragmatically until age 21)	Secure dispose	Personal data
RIDDOR reportable incidents	Reportable death/injury/disease/dangerous occurrence.	Date of incident + 3 years (ensure personnel file holds related docs)	Secure dispose	Regulatory requirement
COSHH exposure monitoring	Substances hazardous to health.	Date of incident/exposure + 40 years	Secure dispose	Statutory long retention
Asbestos exposure monitoring	Monitoring and medical surveillance records.	Last action + 40 years	Secure dispose	Statutory long retention
Ionising radiation – dose/controls	Dose assessments; PPE/control maintenance.	Dose: until person is 75 or 30 years minimum; Controls: 2 years from exam	Secure dispose	Statutory retention
Fire precautions logbooks	Testing, drills, maintenance records.	Current year + 3 years	Secure dispose	Compliance evidence
Building H&S file	Current state of building including services and alterations.	Pass to new owner upon sale/transfer	Transfer	Must accompany building

2.5 Financial Management

Record Type	Description	Retention Period	Disposal Action	Notes
Employer's liability insurance certificate	Proof of cover over time.	Closure of school + 40 years (electronic acceptable)	Secure store / transfer to LA on closure	Evidence for latent claims
Asset inventories	Furniture and equipment lists.	Current year + 6 years	Secure dispose	Update annually
Burglary/theft/vandalism reports	Incident forms and outcomes.	Current year + 6 years	Secure dispose	Insurance linkage
Annual accounts	Approved annual financial statements.	Current year + 6 years	Standard disposal (archive summary)	Audit requirements
Loans and grants (managed by school)	Contracts, drawdowns, repayments.	Last payment + 12 years then review	Secure dispose	Under seal longer
Budgets and supporting papers	Annual budget and working papers.	Life of budget + 3 years	Secure dispose	Audit trail
Invoices/receipts/orders/delivery notes	Transactional documents.	Current FY + 6 years	Secure dispose	Financial records
Income collection and banking records	Till sheets, banking slips, reconciliations.	Current FY + 6 years	Secure dispose	Financial records
Debtor/arrears records	Evidence of debt recovery.	Final payment + 6 years	Secure dispose	Limitation period
Pupil premium evidence	Eligibility and deployment records.	Date pupil leaves + 6 years	Secure dispose	Contains personal data
Contracts – under seal	Procurement/contract management records.	Last payment + 12 years	Secure dispose	Limitation period
Contracts – under signature	As above where signed (not sealed).	Last payment + 6 years	Secure dispose	Limitation period
Contract monitoring records	KPIs, meeting notes, variations.	Life of contract + 6 (or 12) years	Secure dispose	Follow main contract type
School fund – cheque/paying-in/ledger/invoices/receipts/statements/journey books	School voluntary fund records.	Current FY + 6 years	Secure dispose	Financial records
School meals – FSM registers (funding basis)	Registers used to evidence funding.	Current FY + 6 years	Secure dispose	Contains personal data
School meals – daily registers/summary sheets	Operational meal counts/records.	Current FY + 3 years	Secure dispose	Personal data

2.6 Property Management

Record Type	Description	Retention Period	Disposal Action	Notes
Title deeds	Ownership documents.	Follow property; retain as long as held	Transfer to new owner	Land Registry may hold
Plans and drawings	Property plans and services drawings.	Retain whilst property held; pass on transfer	Transfer to new owner	Supports maintenance
Property leases (by or to school)	Lease agreements and renewals.	Lease expiry + 6 years	Secure dispose	Contractual evidence
Letting of premises records	Hires and lettings documentation.	Current FY + 6 years	Secure dispose	Financial records
Maintenance by contractors	Job sheets, warranties, certificates.	Retain whilst property held; pass on transfer	Transfer/secure dispose	Building history
Maintenance by employees/logs	In-house maintenance logs.	Retain whilst property held; pass on transfer	Transfer/secure dispose	Building history

3.1 Admissions

Record Type	Description	Retention Period	Disposal Action	Notes
Admissions policy and arrangements	Creation and implementation records.	Life of policy + 3 years then review	Secure dispose	Reference value
Successful admissions	Application and supporting documents.	Date of admission + 1 year (then on pupil file)	Secure dispose	Personal data
Unsuccessful admissions	Applications, decision and appeals.	Until conclusion of appeals + 1 year	Secure dispose	Personal data
Admissions register	Statutory register of admissions.	Each entry retained 3 years from date made (consider permanent archive)	Review/Archive	Often retained permanently
Casual admissions (secondary)	In-year admissions documentation.	Current year + 1 year	Secure dispose	Personal data
Proof of address	Evidence submitted with applications.	Current year + 1 year	Secure dispose	Personal data
Supplementary information forms	E.g., faith/medical information.	Successful: add to pupil file; Unsuccessful: retain until appeals complete	Secure dispose	Personal data

3.2 Pupil Educational Record

Record Type	Description	Retention Period	Disposal Action	Notes
Educational record – primary	Complete record held by primary school.	Retain while pupil on roll; transfer on leaving	Transfer securely to next school	Use CTF for electronic
Educational record – secondary	Complete record held by secondary school.	Date of birth + 25 years	Secure dispose after review	Legal limitation period
Exam results – pupil copy	Certificates/results given to pupil.	After attempts to distribute, return uncollected to board	Return to board	Record results in file
Child protection – filed within pupil record	Safeguarding items sealed within file.	As per pupil record retention	Secure dispose (shred)	Restricted access
Child protection – separate file	Standalone safeguarding record.	DOB + 25 years then review (subject to IICSA)	Secure dispose (shred)	DSL controlled

3.3 Attendance

Record Type	Description	Retention Period	Disposal Action	Notes
Attendance registers	Statutory attendance registers.	Preserve each entry for 3 years	Secure dispose	Personal data
Absence correspondence	Notes/emails re authorised/unauthorised absence.	Current academic year + 2 years	Secure dispose	Personal data

3.4 SEND / EHC

Record Type	Description	Retention Period	Disposal Action	Notes
SEND & EHC plan records	Plans, reviews and supporting evidence.	DOB + 31 years	Secure dispose	Limitation period (post-25) + 6

4.1 Statistics & Management Information

Record Type	Description	Retention Period	Disposal Action	Notes
Curriculum/statistical returns	Returns and submissions.	Current year + 3 years	Secure dispose	N/A
Exam results – school copy	Internal copies for reference.	Current year + 6 years	Secure dispose	N/A
SATS – results & scripts	Results recorded on pupil file; scripts kept until appeals complete.	Scripts: until appeals complete; Summary: current year + 6 years	Secure dispose	Record results on file
Published Admission Number (PAN) reports	PAN calculations and reports.	Current year + 6 years	Secure dispose	N/A
Value-added/contextual data	Data sets and analyses.	Current year + 6 years	Secure dispose	N/A
Moderation (internal/external)	Records of moderation.	Internal: academic year + 1; External: until superseded	Secure dispose	N/A

4.2 Curriculum Implementation

Record Type	Description	Retention Period	Disposal Action	Notes
Schemes of work	Schemes and overviews.	Current year + 1 year (review annually)	Secure dispose	Keep exemplars if useful
Timetables	Whole-school and class timetables.	Current year + 1 year	Secure dispose	N/A
Class record books	Teacher/class records.	Current year + 1 year	Secure dispose	Personal data
Mark books/gradebooks	Assessment records kept by staff.	Current year + 1 year	Secure dispose	Personal data
Homework records	Records of homework set.	Current year + 1 year	Secure dispose	N/A
Pupil work (retained by school)	Work not returned to pupils.	Current year + 1 year	Secure dispose	Offer back to pupil where possible

4.3 Educational Visits / Trips

Record Type	Description	Retention Period	Disposal Action	Notes
Consent forms – no major incident	Parental consents for routine trips.	Risk-assessed retention; often dispose end of trip/year	Secure dispose	Pragmatic approach; document rationale
Consent forms – major incident occurred	All consents for cohort where incident occurred.	DOB of involved pupil + 25 years	Secure dispose	Evidence for diligence

4.4 Support Services / Associations

Record Type	Description	Retention Period	Disposal Action	Notes
Family liaison – day books	Daily contact logs.	Current year + 2 years then review	Secure dispose	Personal data
Reports to outside agencies (copy)	Copies of reports where master is on agency file.	Retain while case is active then destroy	Secure dispose	Personal data
Referral forms	Referrals to external support.	Retain while referral active	Secure dispose	Personal data
Contact data sheets	Contact details maintained by support services.	Current year then review; destroy if inactive	Secure dispose	Personal data
Contact databases	Databases of contacts.	Current year then review; destroy if inactive	Secure dispose	Personal data
Group registers	Registers for support groups.	Current year + 2 years	Secure dispose	Personal data
PTA / alumni association records	Creation and management records.	Current year + 6 years then review	Secure dispose	N/A

5.1 Local Authority

Record Type	Description	Retention Period	Disposal Action	Notes
Secondary transfer sheets (primary)	Pupil transfer sheets to LA/receiving school.	Current year + 2 years	Secure dispose	Personal data
Attendance returns to LA	Statutory attendance returns.	Current year + 1 year	Secure dispose	N/A
School census returns	Termly/annual census returns.	Current year + 5 years	Secure dispose	N/A
LA circulars and information	General guidance and circulars.	Retain for operational use only	Standard disposal	Superseded when updated

5.2 Central Government

Record Type	Description	Retention Period	Disposal Action	Notes
Ofsted reports and papers (hard copy)	Inspection reports and related papers.	Life of report then review	Secure dispose / archive	Public copies online
Returns to central government	Mandatory data returns.	Current year + 6 years	Secure dispose	N/A
Central government circulars	Guidance and bulletins.	Retain for operational use only	Standard disposal	Superseded when updated