St Oswald's CE Primary School

Learning for all, caring for each other, preparing for the future

Let us encourage one another – Hebrews 10.25

Records Management Policy

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Introduction and Scope

St Oswald's CE Primary School recognises records management as a core corporate function that supports the effective management of the organisation. A records management programme improves accountability, transparency, continuity, decision-making, and compliance with relevant legislation and regulations.

This policy provides a framework for ensuring that we comply with the requirements of the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, and information access legislation, including the Freedom of Information Act and other associated guidance and codes of practice.

This policy applies to our entire workforce. This includes employees, governors or trustees, contractors, agents and representatives, volunteers and temporary staff working for or on our behalf. Individuals found to knowingly or recklessly infringe this policy may face disciplinary action.

The Records Management Policy applies to all records created, received or maintained by us while carrying out our functions, whether in paper or electronic format. It should be read alongside the other policies within our information governance policy framework.

Roles and Responsibilities

Overall responsibility for ensuring that we meet the statutory requirements of any legislation lies with the Board of Governors or Trustees. The following roles will have day-to-day responsibility for records management compliance and providing the necessary assurance to the Board.

Senior Information Risk Owner (SIRO)
The SIRO is responsible for overseeing the implementation of this policy and ensuring that effective records management practices are in place across the organisation. The SIRO is also responsible for operational management and will ensure that staff are appropriately trained in records management, supported by the SPOC and IAOs. In our organisation, this role lies with the Headteacher.

Single Point of Contact (SPOC)
The SPOC will support the SIRO in day-to-day operational management. This includes providing guidance on effective records management practices and promoting compliance with this policy so that information can be retrieved easily, appropriately, and in a timely way. In our organisation, this role lies with the School Business Manager.

Information Asset Owner (IAO)
The IAO is responsible for the security and maintenance of a particular record during its lifecycle. IAOs need to understand how information is created, amended, or added over time, who has access to the records, and why. They are also responsible for the appropriate disposal of information when it is no longer required. A record of IAOs is included in our Information Asset Register.

All staff
All staff, including governors or trustees, contractors, agents and representatives, volunteers, and temporary staff working for or on our behalf, will be responsible for managing records consistently in accordance with this policy. Complete and accurate records must be held that adequately document their work.

Records Management

A record is 'information created, received, and maintained as evidence and an asset by an organisation in pursuit of legal obligations or in the transaction of business.' Records are retained for a period determined by legal, regulatory, and functional requirements.

A programme will be developed to manage our records throughout their lifecycle. This will include using methods such as version control, naming conventions, and file plans to ensure that records can be easily searched and accessed in the event of an information request.

We will ensure that our records are authentic, reliable, usable and have integrity to fulfil and retain their evidentiary value. Regular reviews of the records management programme will be conducted to ensure compliance and check that records are stored securely and can be accessed appropriately.

Pupil Records

We are required to maintain records for each pupil. This record is the core evidence of an individual's progress through the education system and will accompany them throughout their school career.

Pupil records are held electronically within our management information system (MIS) whenever possible. Information not forming part of the core record may be held outside the MIS in either electronic or paper format. This includes information with shorter retention periods, such as attendance registers, consent forms, medical forms, accident forms, absence notes, and pupil work.

Records relating to pupils involved with child protection or safeguarding are held securely in a designated system accessible to the Designated Safeguarding Lead and designated staff members. These records are stored separately from the core pupil record to ensure confidentiality and restricted accessibility. They may be retained for longer than the core pupil file.

We will ensure that the information in the pupil file is accurate, objectively recorded, expressed in a professional manner, and kept up to date.

Pupil records will be transferred electronically to any new setting the pupil attends. Once securely transferred, we will not keep copies of the pupil record unless there is ongoing legal action. The setting the pupil attends until the statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25.

Staff Records

Records relating to our workforce will be held securely electronically, wherever possible, or in paper format. Appropriate security measures are in place to ensure confidentiality and restricted access.

Information related to child protection allegations against staff will be held separately from the core employee record to ensure confidentiality and restricted accessibility. This information may be held for longer than the core employee file.

Information Asset Register (IAR)

In accordance with Article 30 of UK GDPR, we will have an Information Asset Register (IAR) that maintains a record of our processing activities. The IAR will document what records we hold, where they are stored, who has access to the information, and the retention periods in place. It will be reviewed, at least annually, to ensure it remains accurate.

Email Management

We will have a process in place to ensure that emails are managed in accordance with this policy and our retention schedule. Emails discussing business or reflecting significant actions or decisions concerning our pupils or staff will not be stored in personal email inboxes. These emails must be filed into an appropriate electronic filing system, and the original email deleted.

Where possible, emails are automatically deleted in accordance with our retention schedule. Where this is not possible, staff review personal email inboxes manually to ensure any unnecessary emails are deleted.

Security and Access

All records, especially those containing personal data, will be stored securely to maintain confidentiality while keeping the information accessible to those authorised to see it. Electronic records will have appropriate security and access controls, and systems will have robust audit functionality wherever possible.

Paper records will be stored in secure, lockable storage areas with restricted access to key roles.

When sharing or transferring records containing personal information, we will ensure appropriate transmission security controls are in place and align with our Information Security Policy.

Information Requests and Data Subject Rights

Requests for information under Data Protection, Freedom of Information, Environmental Information, or other legislation will be handled in line with our Data Protection Policy.

Retention and Disposal

Retention is the period a record is kept after it stops being actively used but before it is destroyed. It is a vital part of records management as it allows organisations to retain records only for as long as needed and discourages records being held for long periods 'just in case'.

Legal, regulatory, or functional requirements determine the retention period for particular types of records. We have implemented a Retention Schedule (Appendix One) that outlines our specified retention periods. This schedule will be reviewed at least annually to ensure accuracy.

We will ensure that any records containing personal or confidential information are disposed of appropriately and securely in line with our retention schedule.

Records held in databases or electronic management systems, with the functionality to automatically destroy records after a specified period, will be used wherever possible. A review of the records will be carried out before destruction, where practical.

Where automatic disposal is not in place, for example, for paper records, we will conduct a manual review annually to ensure they are destroyed in line with retention guidelines.

The disposal of all information is documented to ensure that we maintain a record of when it has been deleted and by whom. This allows us to evidence that a record no longer exists or has been transferred to another setting in the event of an information request being received.

Archiving

A small percentage of our records may be selected for permanent preservation. This is maintained as a resource to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging, and shared heritage; to prompt memories of school life among many generations; and to serve as a research resource for all interested in the history of the school and the community it serves.

Records containing personal information will only be selected for archive with appropriate safeguards in place to protect the rights and freedoms of individuals. This will include anonymisation or pseudonymisation wherever possible.

Where we retain records for archiving purposes on-site, we will ensure that we have an archiving policy in place setting out how this operates.

Appendix One – Retention Schedule

Where an entry is marked with this symbol ⚠ consideration should be given to the potential for legal challenges. Where a legal challenge is possible or pending at the end of the initial retention period, records may be retained for an additional six years, in line with the Limitations Act 1980.

Pupil Records

Records in this section contain those that the Department for Education (DfE) considers as part of a pupil's file. Please refer to the 'Safeguarding and Child Protection Records' section for retention periods relating to safeguarding.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Primary school pupil file	Yes	Pupil data should be retained on the MIS system for a maximum of one year after the pupil leaves the school for census reporting purposes.	Statutory	The Education (Pupil Information) (England) Regulations 2005 DfE Guidance	Securely transfer to the onward setting.
Formal academic attainment (e.g. coursework/ exam results)	Yes	Subject to the pupil file retention.	Statutory	The Education (Pupil Information) (England) Regulations 2005	Secure disposal May wish to anonymise and retain results for comparison purposes
Pupil work (e.g. exercise books, homework, learning app data, etc.)	Yes	Given to pupils at the end of each year. Where not possible, retain for the current year + 1.	Business Need		Secure disposal

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Special educational needs and disabilities (SEND) ▲ (Inc. reviews and education, health, and care (EHC) plans)	Yes	End of EHCP + 6 years or until the pupil's 25th birthday.	Statutory	The Special Educational Needs and Disability Regulations 2014	Secure disposal If a pupil leaves, transfer the records to the onward setting
Personal Education Plans (PEPS) (For looked after children)	Yes	Date of birth of the pupil + 25 years.	Statutory	Children and Young Persons Act 2008 Children and Social Work Act 2017	Secure disposal
Medical administration records ▲	Yes	Retained in pupil file or until the pupil's 25th birthday.	Best Practice	NHS Records Management Code of Practice	Secure disposal

Safeguarding and Child Protection Records

Records in this section relate to safeguarding and child protection matters.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Primary school safeguarding & child protection files ▲	Yes	Until the pupil leaves the school.	Statutory	The Education (Pupil Information) (England) Regulations 2005. DfE Keeping Children Safe in Education	Securely transfer to the onward setting as a separate file or in a sealed envelope within the pupil's file
Secondary school safeguarding & child protection files ▲	Yes	Until the pupil's 25th birthday. (18 + 6 years as an adult)	Statutory	The Education (Pupil Information) (England) Regulations 2005 DfE Keeping Children Safe in Education	Secure disposal
Child sexual abuse files ▲	Yes	Until the child's 75th birthday.	Statutory	The Report of the Independent Inquiry into Child Sexual Abuse (IICSA) recommendation on access to records	We expect this information to be held by the Local Authority as the lead. If this is not the case, records should be held by the final school setting
Allegations concerning child protection against a member of staff ▲ (including unfounded)	Yes	Until the staff member's normal retirement age, or 10 years from the date of the allegation, whichever is later.	Statutory	DfE Keeping Children Safe in Education	Secure disposal
Complaints: negligence or safeguarding ▲ (dealt with by Governing Body)	Yes	Date the complaint resolved + 15 years.	Best Practice		Secure disposal

Complaints: child sexual abuse ⚠ (dealt with by Governing Body)	Yes	Date the complaint resolved + 75 years.	Best Practice		Secure disposal

Staff and HR Information

This section relates to data held about staff members. Where records are retained for a business need, please ensure you review the suggested retention period and amend it as required to meet your school requirements.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Personnel files	Yes	Termination date + 6 years	Statutory	Limitations Act 1980	Secure disposal
Appraisal records	Yes	Current year + 6 years	Business Need		Secure disposal
Professional development plans	Yes	Life of the plan + 6 years	Business Need		Secure disposal
Timesheets & pay records	Yes	End of the tax year + 3 years.	Statutory	PAYE and payroll for employers: Keeping records	Secure disposal
Maternity pay records	Yes	End of the tax year + 3 years.	Statutory	The Statutory Maternity Pay (General) Regulations 1986	Secure disposal
Sickness and leave of absence records	Yes	Current year + 3 years.	Best Practice		Secure disposal

Retirement benefits	Yes	End of the year in which the accounts were signed + 6 years.	Statutory	Retirement Benefits Schemes (Information Powers) Regulations 1995	Secure disposal
Appointment of Headteacher records	Yes	Date of appointment + 6 years.	Best Practice		Secure disposal
Successful candidates	Yes	Relevant information added to HR file, all other information held for date of appointment + 6 months.	Business Need		Secure disposal
Unsuccessful candidates	Yes	Date of appointment + 6 months.	Best Practice		Secure disposal
Copies of DBS certificates	Yes	Date of appointment + 6 months.	Statutory	DfE Keeping Children Safe in Education	Secure disposal
Pre-employment vetting information (Evidence proving the right to work in the United Kingdom)	Yes	Termination date + 2 years.	Statutory	An employer's guide to right to work checks [Home Office May 2015] Last updated 27 April 2022	Secure disposal
Access to work documentation	Yes	As per funding requirements, or in line with the Limitations Act.	Statutory	Limitations Act 1980	Secure disposal
Supply and agency staff	Yes	Date last worked in school + 6 years.	Best Practice		Secure disposal

Volunteers	Yes	Date last worked in school + 3 years.	Best Practice		Secure disposal
Governor/ trustee personnel file (including parent governors)	Yes	End of appointment + 6 years.	Statutory	Companies Act 2006	Secure disposal

School Operations and Governance

This section relates to the operational running and governance of the school.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Attendance records	Yes	Register – Date of entry + 6 years. Back-up – End of school year + 6 years.	Statutory	School Attendance (Pupil Registration) (England) Regulations 2024	Secure disposal
Admissions data	Yes	Date of admission + 6 years.	Statutory	School Attendance (Pupil Registration) (England) Regulations 2024	Consider for permanent preservation
Unsuccessful admission applications	Yes	Resolution of case + 1 year.	Statutory	School Admissions Code.	Secure disposal
School trips	Yes	Date of visit + 6 years. If an incident occurred, retain permission slips & incident report in the pupil file.	Best Practice	Health and safety on educational visits	Secure disposal

Consent forms (e.g school trip or photo consent)	Yes	Current year + 1 year.	Business Need		Secure disposal
List of pupils on free school meals	Yes	Current financial year + 3 years.	Business Need		Secure disposal
Photographs and videos – internal use (displays, ID, pupil work, etc.)	Yes	Current year + 1 year.	Business Need		Given to the pupil or secure disposal
Photographs and videos – external use (publications, marketing, social media etc.)	Yes	Current year + 3 years.	Business Need		Consider for permanent preservation
Annual governors' report	Possibly	Date of report + 10 years.	Statutory	The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002	Secure disposal
Governing board meeting minutes (maintained schools)	Yes	Principal set (signed) – retain for historical interest. Other copies - date of meeting + 3 years.	Business Need		Principal set - offer to archives Other copies - secure disposal

Trustee meeting minutes (Academy Trust)	Yes	Principal set (signed) – retain for historical interest. Other copies - date of meeting + 10 years.	Statutory	Companies Act 2006	Principal set - offer to archives Other copies - secure disposal
Memoranda of understanding	No	Life of the academy + 6 years.	Statutory	Companies Act 2006	Routine disposal
Complaint files	Yes	Date complaint resolved + 3 years.	Business Need		Secure disposal
Curriculum records	No	Current year + 1 year.	Statutory	Education (Pupil Information) (England) Regulations 2005	Routine disposal
Ofsted reports	No	Life of the report then review.	Business Need		Routine disposal
Policy documents	No	Until superseded + 3 years.	Business Need		Routine disposal
E-monitoring data	Yes	Non-actionable notifications + 1 month. Actionable notifications – retained in pupil or personnel file or with safeguarding records.	Business Need		Secure disposal
Visitor management	Yes	Academic year + 1 year.	Business Need		Secure disposal

Surveillance system footage (CCTV)	Yes	Date of recording + 7 days unless required for an investigation or access request.	Business Need		Secure disposal

Health and Safety
These records relate to the statutory health and safety obligations of the school.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Accessibility plans	Yes	Life of plan + 6 years.	Statutory	Limitations Act 1980	Secure disposal
Accident records	Yes	Date of accident + 3 years. (Serious accidents involving pupils should be retained in the pupil file).	Statutory	Social Security (Claims and Payments) Regulations 1979	Secure disposal

Risk assessments (for substances hazardous to health)	No	Date of assessment + 5 years.	Statutory	The Control of Substances Hazardous to Health Regulations 2002	Routine disposal
Health surveillance records (inc. exposure to hazardous substances)	Yes	Date of record + 40 years.	Statutory	The Control of Substances Hazardous to Health Regulations 2002	Secure disposal
Other staff health records	Yes	Held in line with the staff personnel file.	Statutory	HSE guidance on health surveillance - record keeping	Secure disposal
Fire assessments	No	Life of the risk assessment + 6 years.	Statutory	Fire Service Order 2005	Secure disposal

Property and Finance

Records in this section refer to the property, contracts, or financial transactions. Please ensure adherence to the correct retention period, as specified in the contract or funding agreement, where a longer retention period is required.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Maintenance records	No	End of year + 6 years.	Statutory	Record keeping (VAT Notice 700/21)	Routine disposal

Title deeds	No	End of deed + 12 years.	Statutory	Limitations Act 1980	Routine disposal
Contracts	No	Contract end + 6 years.	Statutory	Limitations Act 1980	Routine disposal
Debtor's records	Yes	End of financial year + 6 years.	Statutory	Limitations Act 1980	Secure disposal
Petty cash	No	End of financial year + 6 years.	Statutory	Limitations Act 1980	Routine disposal
VAT records	No	End of financial year + 6 years.	Statutory	Record keeping (VAT Notice 700/21)	Routine disposal