St John the Baptist RC Primary School

RECORDS MANAGEMENT POLICY

September 2025 Version

INTRODUCTION

1. St John the Baptist RC Primary School ("the School" / "we" / "us") processes a significant amount of personal information about its pupils, parents, staff, volunteers and other individuals that we come into contact with. This can include sensitive information ("Special Category Data").

2. The UK General Data Protection Regulation (the retained EU law version of the General Data Protection Regulation (EU) 2016/679) ("GDPR") requires that we keep personal information for no longer than it is necessary for the purposes that it was processed. This is known as the principle of 'Storage Limitation'. This Policy has been implemented to ensure that we meet this important requirement.

3. This procedure applies to all School staff, governors, volunteers and contractors.

THE IMPORTANCE OF STORAGE LIMITATION

4. It is important to understand why we must not keep personal information for longer than is necessary.

5. Where the School holds personal information, it will always do so for a purpose that is necessary for it to function effectively. Once it becomes unnecessary to hold personal information, it creates risks that the data will become irrelevant, excessive or inaccurate. This can create risks to individuals because using their data could have negative consequences for them. Holding information for longer than necessary can also create operational inefficiencies for the School, for example, unnecessary costs associated with storage and security of data, or increased time spent responding to subject access requests due to the time spent reviewing records unnecessarily.

6. When this policy operates correctly, the School will be meeting its legal obligations under the UK GDPR, but also operating efficiently.

THE PROCEDURE

7. Our Procedure is designed to be user friendly and easy to follow. There are 3 specific

stages which are as follows:

A. Review
B. Destruction

8. Each step is set out below.

A. REVIEW

Retention Periods

9. Review both manual and electronic records, and determine whether they have met the date for destruction set out in the **Retention Schedule at Appendix A.** The purpose of the Retention Schedule is to set out how long we will hold different categories of personal information for before it can be destroyed.

10. There is little use in having a Retention Schedule if no steps are taken to review these data sets, and to destroy those that have reached or surpassed the stated retention date. Our Policy is that we will carry out a review of records annually. We have determined this review period based on our available resources and taking into account privacy risks to individuals.

11. Accordingly, on an annual basis, the School will review the records that it holds against the Retention Schedule. The Principal will delegate this task to an individual and/or team. The Headteacher may delegate different parts of the Retention Schedule to the most appropriate individual(s) for review e.g. the SENCo may be best placed to review SEN records, the DSL may be best placed to review safeguarding records.

B. DESTRUCTION

12. Where it is determined that a particular data set is “no longer necessary”, then it must be deleted or destroyed in accordance with the guidelines below:

(a) **Hard copy records** – Shredded or placed in approved confidential waste bins. No other form of destruction should be used without first obtaining approval from Kathleen McKeating (Headteacher).

(b) **Electronic records** –Irretrievably delete records from systems where it is possible to do so. Whereit is not possible to irretrievably delete records, for example, because deleting a particular set of personal information will result in other personal information that remains necessary also being deleted, this personal information must be 'put beyond use'. This means that the School:

(a) will be unable, or will not attempt, to use the personal data to inform any decision in respect of any individual or in a manner that affects the individual in any way;
(b) does not give any other organisation access to the personal data;
(c) surrounds the personal data with appropriate technical and organisational security; and
(d) commits to permanent deletion of the information if, or when, this becomes possible.

13. A record of the records deleted should be entered into the destruction log, a copy of which can be found at **Appendix B.**

APPENDIX A

RECORDS RETENTION SCHEDULE

1. Governance

1.1	Governance of the School				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
1.1.1	Appointment Governors	Yes		Life of appointment + 6 years	SECURE DISPOSAL
1.1.2	Accessibility Plan	There may be if the plan refers to specific pupils	Limitation Act 1980 (section 2)	Life of plan + 6 years	SECURE DISPOSAL

1.2	Governing Body				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
	Governors				
1.2.1	Agenda for Governing Body meetings	May be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL
1.2.2	Minutes of, and papers considered at, meetings of the Governing Body and its committees	May be data protection issues if the meeting is dealing with confidential issues relating			

		to staff			
	Principal set (signed)			Life of School	
	Inspection copies			Date of meeting + 3 years	SECURE DISPOSAL
1.2.3	Reports presented to the Governing Body	May be data protection issues if the meeting is dealing with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the School	SECURE DISPOSAL or retain with the signed set of minutes
1.2.4	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL
	Declarations				
1.2.5	Declaration of Interests Statements Governors			Life of the School + 6 years	SECURE DISPOSAL

1.3 Funding and Finance					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
	Payroll and Pensions				
1.3.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
1.3.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes (Information Powers)	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL

			Regulations 1995 (SI1995/3103)		
1.3.3	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.4	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	SECURE DISPOSAL
1.3.5	Payroll records	Yes		Date of payroll run + 6 years	SECURE DISPOSAL
1.3.6	School Fund - Invoices	No		Current year + 6 years	SECURE DISPOSAL
1.3.7	School Fund - Receipts	No		Current year + 6 years	SECURE DISPOSAL
1.3.8	School Fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
	School Meals				
1.3.9	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.10	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL

2. Human Resources

2.1 Recruitment					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL

2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Proofs of identity collected as part of the process of checking "portable" enhanced DBS 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 added to the Staff Personal File	SECURE DISPOSAL
2.1.5	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom[1]	Yes	An employer's guide to right to work checks [Home Office May 2015]	Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.6	Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	SECURE DISPOSAL
2.1.7	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

[1] Employers are required to take a "clear copy" of the documents which they are shown as part of this process.

2.2	Operational Staff Management				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
2.2.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980 (section 2)	Termination of employment + 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal / assessment records	Yes		Current year + 5 years	SECURE DISPOSAL

2.3	Management of Disciplinary and Grievance Processes				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded[2]	Yes	"Keeping children safe in education Statutory guidance for schools and colleges 2024"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children July2018"	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	SECURE DISPOSAL These records must be shredded

[2] This review took place when the Independent Inquiry on Child Sexual Abuse was beginning. In light of this it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention.

	Disciplinary proceedings	Yes			
2.3.2	Oral warning			Date of warning + 6 months[3]	SECURE DISPOSAL[4]
2.3.3	Written warning – level 1			Date of warning + 6 months	SECURE DISPOSAL
2.3.4	Written warning – level 2			Date of warning + 12 months	SECURE DISPOSAL
2.3.5	Final warning			Date of warning + 18 months	SECURE DISPOSAL
2.3.6	Case not found			If the incident is child protection related then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL

2.4 Health and Safety					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
2.4.1	Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL
2.4.2	Accident reporting (i.e. accident resulting in injury or property damage)	Yes	Social Security (Claims and Payments) Regulations 1979 (regulation 25). Social Security Administration Act 1992 (section 8). Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format. The incident reporting form may be retained as below.	
	• Adults			Date of incident + 6 years	SECURE DISPOSAL

[3] Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice.
[4] If warnings are placed in personal files, then they must be weeded from the file.

	• Children			Date of birth of the child + 25 years	SECURE DISPOSAL
2.4.3	Incident reports (i.e. incident that does not result in injury or property damage, might be referred to as a 'near miss')	Yes		Current year + 20 years	SECURE DISPOSAL

3. Management of the School

3.1 Admissions					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
3.1.1	Admissions – if the admission is successful	Yes	School Admissions Code Mandatory requirements and statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels 2021	Date of admission + 1 year	SECURE DISPOSAL
3.1.2	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Mandatory requirements and statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels 2021	Resolution of case + 1 year	SECURE DISPOSAL

3.1.3	Register of admissions	Yes		Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	REVIEW Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates they attended the school
3.1.4	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
3.1.5	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Mandatory requirements and statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels 2021	Current year + 1 year	SECURE DISPOSAL
3.1.6	Supplementary information form, including additional information such as religion and medical conditions	Yes			
	• Successful admissions			This information should be added to the pupil file	SECURE DISPOSAL
	• Unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL

3.2	Head Teacher and Senior Management Team				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**

3.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the County Archives Service, if appropriate
3.2.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL
3.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL
3.2.4	Records created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then REVIEW	SECURE DISPOSAL
3.2.5	Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils		Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL

		or members of staff			
3.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL

3.3	Operational Administration				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
3.3.1	Management of complaints	Yes		Date of complaint resolved + 3 years	SECURE DISPOSAL
3.3.2	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL

4. Pupil Management

This section includes all records which are created during the time a pupil spends at the school. For information about accident reporting, see under Health and Safety above

4.1	Pupil's Educational Record				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
4.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 (SI 2005 No. 1437)		
	• Primary			Retain whilst the child remains at the primary school	The file should follow the pupil when they leave the primary school. This will

					include: • To another primary school • To a secondary school • To a pupil referral unit If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA.
	• Secondary		Limitation Act 1980 (section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL
4.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL
4.1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
4.1.4	Examination results –	Yes			

	pupil copies				
	• Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	• Internal			This information should be added to the pupil file	
4.1.5	Child protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges 2024"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children July 2018"	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file	SECURE DISPOSAL – these records MUST be shredded
4.1.6	Child protection information held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges 2024"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children July 2024"	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	SECURE DISPOSAL – these records MUST be shredded

Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule

4.2 Attendance					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
4.2.1	Attendance registers	Yes		Every entry in the attendance register must be preserved for a	SECURE DISPOSAL

				period of 3 years after the date on which the entry was made	
4.2.2	Correspondence relating to authorised absence		Education Act 1996 (section 7)	Current academic year + 2 years	SECURE DISPOSAL

4.3	Special Educational Needs				
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
4.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (section 2)	Date of birth of the pupil + 25 years	REVIEW Note: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time in order 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 – this should be documented
4.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 (section 1)	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
4.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 (section 2)	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold

4.3.4	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 (section 14)	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold

5. Curriculum Management

5.1 Statistics and Management Information					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
5.1.1	Examination results (schools copy)	Yes		Current year + 6 years	SECURE DISPOSAL
5.1.2	SATs records	Yes			
	• Results			The SATs results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL
	• Examination papers			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
5.1.3	Published Admission Number (PAN) reports	Yes		Current year + 6 years	SECURE DISPOSAL
5.1.4	Value added and contextual data	Yes		Current year + 6 years	SECURE DISPOSAL

5.1.5	Self-evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL

6. Extracurricular Activities

6.1 Educational Visits outside the Classroom					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
6.1.1	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time
6.1.2	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (section 2)	Date of birth of the pupil involved in the incident + 25 years. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	
6.1.3	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL

6.2 Walking Bus

	Basic file description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record
6.2.1	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 back up copies should be destroyed at the same time]

7. Central Government and Local Authority (LA)

This section covers records created in the course of interaction between the school and the LA

7.1 Local Authority					
	Basic file description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period [Operational]**	**Action at end of administrative life of the record**
7.1.1	Secondary transfer sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
7.1.2	Attendance returns	Yes		Current year +1 year	SECURE DISPOSAL
7.1.3	School census returns	Yes		Current year + 5 years	SECURE DISPOSAL

APPENDIX B

RECORD OF DESTRUCTION

Item reference (or other unique identifier)	Description of Item	No. of files/records destroyed	Person authorising destruction	Method	Date