

Records Management and Retention Policy

“Through the love of God, we protect our school community. Together we trust, hope, persevere and flourish on life’s great adventure.”

Approved by:	Governing Body	Date: 6 th May 2026
Date:	May 2026	
Review date:	May 2027	

1. Introduction

- 1.1 St Paul's recognises that by efficiently managing its records and reviewing retention, it will comply with its legal and regulatory obligations and contribute to the effective overall management of the school. Records provide evidence for protecting legal rights and interests of the school as well as evidence for demonstrating performance, compliance and accountability. Record keeping is an essential part of the school's administrative function and this policy provides a framework through which this effective management and retention can be achieved and audited.

This policy covers the following:

- The scope of the policy;
- The responsibilities of the school and its staff;
- Pupil Record Management;
- Information Audits;
- Email Records;
- Retention;
- Safe Disposal of Records/Data;
- Appendix One – table of retention information

2. Scope of Policy

- 2.1 This policy applies to all records created, received or maintained by the staff of the school in the course of carrying out its functions.
- 2.2 Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period - see the retention schedule at Appendix 1 of this policy) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.
- 2.3 A small percentage of the school's records will be selected for permanent preservation as part of the school's archives and for historical research. This will be done in liaison with the County Archives Service and will contain the minimum amount of personal data required in compliance with the GDPR and data protection laws currently in force.

3. The Responsibility of the School and its staff

- 3.1 The school has a responsibility to maintain its records and record keeping in systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher.

- 3.2 The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- 3.3 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines (also see the safe disposal or records/date section of this policy).
- 3.4 The data protection officer for the school will provide guidance on ensuring that the school complies with the General Data Protection Regulations (GDPR) and data protection laws in respect of the records and recording keeping and the retention and disposal referred to within this policy.

4. Relationship with existing policies

- 4.1 This policy should be read in conjunction with the following:
 - 4.1.1 The Freedom of Information Policy;
 - 4.1.2 The Data Protection Policy;
 - 4.1.3 The School's Privacy Notice

5. Pupil Record Management

- 5.1 This part of the policy relates to the type of information which should be included in pupil records and sets out information about how pupil records should be managed and should be read in conjunction with the Data Protection Policy and the Privacy Notice.
- 5.2 The pupil record is the core record for charting the pupil's progression through the education system and should accompany the pupil to every school they attend. The information contained in the pupil record should be accurate and up to-date.
- 5.3 The central pupil record is kept in electronic form on Arbor but other pupil records may be taken from this and stored in other locations (such as attendance records, registers, class lists etc...). Further details on this can be found in the Privacy Notice.
- 5.4 Pupils (and parents) have a right to see their educational record, please refer to the Privacy Notice for details on this.

- 5.5 Pupil records include information obtained from the admission form and local authority at the point the pupil enters school and includes personal, medical and any special educational needs information. The pupil record may also contain information regarding pupil attainment, annual written reports to parents and any information relating to exclusions (fixed or permanent).
- 5.6 Pupil records will be transferred to any new school which the pupil attends, this includes instances where the pupil moves to another primary school or where the pupil leaves primary school to join high school.
- 5.7 The school do not need to keep copies of any records in the pupil record once this has been transferred to a pupil's new school, except if there is an ongoing legal action when the pupil leaves the school. Custody of and responsibility for the records passes to the school the pupil transfers to.
- 5.8 Pupil records will be transferred to the new school electronically by CPOMS and a CTF transfer.
- 5.9 The information which should be included on the pupil record and provided to the secondary school (or new primary school) can be found in the Information Management Toolkit for Schools.
- 5.10 The school which the pupil attended until statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25 years.
- 5.11 The pupil record will be disposed of in accordance with the safe disposal of records/data section later in this policy.
- 5.12 If the school is requested to transfer a pupil's record outside the EEA because the pupil has moved into that area then we will do so in accordance with the data protection laws and will ensure that the country is compliant with GDPR prior to the transfer. If the institution outside the EEA is unable to show that they are compliant with the GDPR then the school will require parental consent to the transfer.
- 5.13 All pupil records are kept securely on an encrypted and password protected electronic system. Where paper copies of pupil records are held, these are kept securely in accordance with the Privacy Notice and Data Protection Policy.

6 Information Audits

- 6.1 An information audit is a map of all of the personal data which is held by the school both electronically and in paper form. The information audit is designed to assist schools to know what information they hold, what legal basis they have for holding this information, where the information is held and what it is used for.
- 6.2 The information audit is an ongoing process that assists the school with managing the personal data they hold and ensuring compliance with the General Data Protection Regulations and data protection laws in force.
- 6.3 The school will regularly review and update the information audit and this will be monitored by the Data Protection Officer at least once per academic year.

7 Email Records

- 7.1 Whilst emails may be used to send information, this should be done in compliance with the Data Protection Policy and any personal data should be sent via encrypted messaging to ensure compliance with the GDPR.
- 7.2 Emails should not be used as a means of recording and storing information; if information or attachments from the email are required to be stored or recorded then these should be saved in the appropriate place and then the email should be deleted.
- 7.3 Where it is necessary to keep the content of an email this should be done by saving the email in the .msg format and storing this in an appropriate place electronically. The location for storage and the appropriate retention period will depend on the class of record the content of the email comes under e.g., pupil record, part of a contract, school financial information etc... Please refer to the retention information later in this policy.

8 Retention of Records and Personal Data

- 8.1 In compliance with the Freedom of Information Act 2000 and the GDPR and Data Protection laws, the school keeps a retention schedule listing the records it keeps, the period of retention for each record and the action to be taken when it is of no further administrative use. The retention schedule can be found at Appendix One to this policy.
- 8.2 Members of staff are expected to manage their current record keeping systems using the retention schedule and to take account of the different

kinds of retention periods when they are creating new record keeping systems.

- 8.3 Where appropriate the retention schedule should be reviewed and amended to include any new record series created and remove any obsolete record series. A review of the schedule should be carried out as and when these amendments are required and at least once per academic year.
- 8.4 The 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.
- 8.5 Some of the retention periods are governed by Statute whilst others follow the guidelines on best practice. Every effort has been made to ensure that these retention periods are compliant with the GDPR and Data Protection Laws.
- 8.6 If a record series are to be kept for longer or shorter periods than laid out in the retention schedule then the reasons for this need to be documented.

9 Safe Disposal of Records/Data

- 9.1 This policy relates to all types of records whether they are paper copies or electronically held.
- 9.2 The GDPR and data protection laws stipulate that personal data should not be held for longer than is necessary for the purpose(s) for which it was held.
- 9.3 The school must ensure that records that are no longer required for business use are reviewed as soon as possible so that only the appropriate records are destroyed. The school will review to determine whether records are to be selected for permanent preservation (if this is the case then the personal data contained therein should be kept to an absolute minimum), destroyed, converted into an electronic format or retained for research or litigating purposes.
- 9.4 All records containing personal information or sensitive policy information should be made either unreadable or unreconstructable.
 - 9.4.1 Paper records will be shredded using a cross-cutting shredder.
 - 9.4.2 All electronic records will be permanently deleted/destroyed.
- 9.5 The school will keep a list of records which have been destroyed and who authorized their destruction in line with the Freedom of Information Act 2000.

- 9.6 Where there is a need for permanent preservation of records the school should ensure that any personal data is kept to a minimum required for the preservation and that the arrangements should be made to transfer the records to the County Archives Service.
- 9.7 Where lengthy retention periods have been allocated to records, it may be appropriate to consider converting the paper records into electronic records for storage. If this is to be done then care should be taken to ensure that the school can prove that the electronic version is a genuine copy of the original.

Appendix 1: Data Retention Periods

1. Pupil Records

Document type	Retention period	Action at the end of retention period	Further information
Primary school pupil records	Until the pupil leaves the school. See the schools census guidance for details on reporting data after pupils leave. You should keep the pupil's data on your management information system (MIS) for 2 terms after the pupil leaves the school.	Transfer to secondary school or other primary school when the pupil leaves.	See The Education (Pupil Information) (England) Regulations 2005 for details of what to keep in the pupil record. There is guidance on how to transfer information to another school.

2. Child protection records

Document type	Retention period	Action at the end of retention period	Further information
Child protection files	Until the child's 25th birthday. If the file relates to child sexual abuse, retain until the child's 75th birthday.	Dispose of records securely. Child protection files should be passed on to any new school a child attends. This should be transferred as separately from the main pupil file.	Should be stored either as a separate file or in a sealed envelope in the pupil file. Keeping children safe in education, sections 122 and 123. The Report of the Independent Inquiry into Child Sexual Abuse (IICSA) recommendation on access to records.
Allegations of child protection against a member of staff,	Until the staff member's normal retirement age, or 10 years from the date of the	Dispose of records securely.	Keeping children safe in education. Working together to safeguard children.

including unfounded allegations	allegation, whichever is later.		
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3. Finance records

Document type	Retention period	Action at the end of retention period	Further information
Contracts	6 years from the last payment on the contract.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
Debtor's records	6 years from end of the financial year.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
VAT records	6 years from finance year end.	Dispose of records securely.	May include invoices, budgets, bank statements and annual accounts. Record keeping (VAT Notice 700/21) .

4. Governance records

Document type	Retention period	Action at the end of retention period	Further information
Admissions	6 years from the admission date.	Dispose of records securely.	Regulation 7 of the School Attendance (Pupil Registration) (England) Regulations 2024 .
Attendance registers	6 years from the date of entry.	Dispose of records securely.	Regulation 7 of the School Attendance (Pupil Registration) (England) Regulations 2024 .
Annual governors' report	10 years.	Dispose of records securely.	The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002 . Retain as detailed in section 2 of the Limitation Act 1980 .

Curricular record	At least 1 year.	Dispose of records securely.	The Education (School Records) Regulations 1989. Regulation 3 of the Education (Pupil Information) (England) Regulations 2005.
Directors – disqualification	15 years from the date of disqualification.	Dispose of records securely.	The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England) Regulations 2004.
Records of educational visits	10 years from the date of the visit. If there was an incident on the visit, retain the permission slips for all pupils and the incident report in the pupil record .	Dispose of records securely.	Health and safety on educational visits. Retain as detailed in section 2 of the Limitation Act 1980 .
School vehicles	6 years from the disposal of the vehicle.	Dispose of records securely.	Section 2 of the Limitation Act 1980
Statutory registers and compliance	Retention periods vary, for example: Memorandums of understanding should be retained for the life of the academy plus 6 years. Annual reports should be retained for 10 years from the date of the report. Board meeting records should be retained for 10 years from the date of the meeting.	Dispose of records securely.	May include annual reports and governance records. Companies Act 2006 contains information on which statutory registers to keep. Compliance guidance in the maintained schools governance guide.

5. Health & Safety Records

Document type	Retention period	Action at the end of retention period	Further information
Accessibility plans	Life of plan plus 6 years.	Dispose of records securely.	Retain as detailed in section 2 of the Limitation Act 1980 .
Accident records	3 years from the date of the accident.	Dispose of records securely.	Accidents involving pupils should be retained in the pupil record . Regulation 25 of the Social Security (Claims and Payments) Regulations 1979 .
Monitoring exposure to substances hazardous to health, including asbestos	5 years.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002 .
Health surveillance records	40 years.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002 . Health surveillance - Record keeping .
Other health records of staff	While the worker is employed in your school.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002 . HSE guidance on Health surveillance - Record keeping .
Fire assessments	Life of the risk assessment plus 6 years	Dispose of records securely.	Fire Service Order 2005 . Retain as detailed in section 2 of the Limitation Act 1980 .

6. Property records

Document type	Retention period	Action at the end of retention period	Further information
Maintenance records	6 years from finance year end.	Dispose of records securely.	Record keeping (VAT Notice 700/21).
Title deeds	12 years from end of deed.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .

7. Staff records

Document type	Retention period	Action at the end of retention period	Further information
Copies of DBS certificates	6 months from date of recruitment.	Dispose of records securely.	Keeping children safe in education.
Maternity pay records	3 years after the end of the tax year in which the maternity pay period ends.	Dispose of records securely.	The Statutory Maternity Pay (General) Regulations 1986.
Pay records	3 years from the end of the tax year they relate to.		PAYE and payroll for employers: Keeping records.
Personnel files	6 years from termination of employment.		Section 2 of the Limitation Act 1980 .
Retirement benefits	A minimum of 6 years from the end of the year in which the accounts were signed.		Regulation 15 of the Retirement Benefits Schemes (Information Powers) Regulations 1995.