



# **Archers Brook SEMH Residential School**

## **Retention and Disposal Policy**







Signed: .....

Mrs Myers-Whittaker  
Headteacher

Date: .....

Signed: .....

Mr R Crompton  
Chairman of Governors

Date: .....



## Introduction

Our School is required by the [Lord Chancellor's Code of Practice on the Management of Records issued under Section 46](#)<sup>1</sup> of the Freedom of Information Act 2000 to have and to implement a records retention and disposal schedule. This document sets out details about all the records created and kept by us or our commissioned partners, in such a way that decisions can be made about identifying and disposing of them on a routine and timely basis.

This retention and disposal schedule has been produced in consultation with directorates and key stakeholders in the processes to establish the legal and regulatory requirements and business needs on which record retention and disposal policies are based.

## Scope

This retention and disposal schedule applies to all documents defined as records - 'Information created, received and maintained as evidence and information by an organisation or individual, in pursuance of legal obligations or in the transaction of business'

The retention requirements listed here apply to all records irrespective of media and format, or the system(s) in which the records are held, and should be applied to all copies including backups.

Divergence from the retention and disposal schedule may be appropriate in certain circumstances. For example, a pending or actual legal action, change of legislation or regulation, or legitimate business need. Any divergence requires liaison with the School's Data Guardian and Data Protection Officer.

## Responsibilities

Business Managers/ Heads of Year (Information Asset Owners), operational managers (Information Asset Administrators) and team leaders are responsible for ensuring:

- Record retention policies are implemented in their unit/team, supported by written procedures.
- Recordkeeping systems and arrangement of records enable identification of records due for disposal.
- Records due for disposal are routinely identified and reviewed to ensure they are no longer required.
- Divergence from Records Retention and Disposal Policy is authorised and the Data Guardian is notified of changes.
- Staff dispose of records only in accordance with policies set out in this document.

---

<sup>1</sup> <https://ico.org.uk/media/for-organisations/research-and-reports/1432475/foi-section-46-code-of-practice-1.pdf>

- Records are disposed of appropriately considering their sensitivity, security classification and the media and format(s) in which they are held in line.
- ICT Equipment and storage media are disposed of securely ensuring all records, data and information are removed in such a way that it is not recoverable.
- Records of potential historic interest or research value are identified and transferred with agreement to Cheshire Archive Service.
- Evidence of the disposal process is kept.

**All staff are responsible for:**

- Following procedures and guidance for managing, retaining and disposing of records.
- Only disposing of records in accordance with the requirements outlined in this document (if authorised to do so).
- Ensuring that any proposed divergence from the records retention and disposal policy is authorised

**Legal Requirements**

Each entry in the retention and disposal schedule details the specific legislation, regulations, guidelines or codes of practice that stipulate or recommend how long records must be kept before they are disposed of.

Some overarching legislation requires that records be kept for a certain amount of time and applies to all Schools. These include:

**General Data Protection Regulation (GDPR)**

[Principle](#)<sup>2</sup> states that personal information must be *“kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals”*

**The Freedom of Information Act 2000**

The Act requires us to make information available to the public unless specific exemption(s) apply. [The Code of Practice issued under 46](#) of the Act sets out rules on how we should manage records and information, including responsibilities on all staff to implement records retention and disposal schedules.

---

<sup>2</sup> <https://ico.org.uk/for-organisations/data-protection-reform/overview-of-the-gdpr/principles/>



## The Independent Inquiry into Child Sexual Abuse

On Thursday 12 March 2015 the Home Secretary established a [statutory inquiry](#)<sup>3</sup> under the 2005 Inquiries Act with the aim of conducting an overarching national review of the extent to which institutions in England and Wales have discharged their duty of care to protect children against sexual abuse.

The Inquiry is independent of government. It is supported by a Panel, Victims and Survivors Consultative Panel, and other expert advisers. The Inquiry will cover England and Wales. A wide range of public institutions will be investigated including local authorities, the police, the armed forces, schools, hospitals, children's homes, churches, and charities.

On 2nd July 2015 Justice Goddard wrote to every Head Teacher of Schools and Chief Executive of a Local Authority in England and Wales, requesting that the organisation :

*“retain any and all documents; correspondence; notes; emails and all other information – however held – which contain or may contain content pertaining directly or indirectly to the sexual abuse of children or to child protection and care. For the purposes of this appendix, the word “children” relates to any person under the age of 18.”*

- We must not destroy, and must make available for inspection, all reports, reviews, briefings, minutes, notes and correspondence in relation to –
- allegations (substantiated or not) of individuals, organisations, institutions, public bodies or otherwise who may have been involved in, or have knowledge of, child sexual abuse, or child sexual exploitation
- allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children
- institutional failures to protect children from sexual abuse or other exploitation
- statutory responsibilities for the care of children in public or private care
- the development of policy on child protection
- the development of legislation on child protection
- the determination of the award of Honours to persons who are now demonstrated to have had a sexual interest in children or are suspected of having had such an interest.

***All of these document types – in whatever format – must be “retained pending further requests from the Inquiry”***

---

<sup>3</sup> <https://www.iicsa.org.uk/>

Although the School's records retention schedule is very clear on the destruction dates of files, the instructions received by the Inquiry constitute a legal hold as defined by section 12.3 of the code of practice issued under Section 46 of the Freedom of Information Act which states that

*“Records should not be kept after they have ceased to be of use to the authority unless:*

*a) They are known to be the subject of litigation or a request for information. If so, destruction should be delayed until the litigation is complete or, in the case of a request for information, all relevant complaint and appeal provisions have been exhausted”*

As such all records that fall within the above categories are retained, and not destroyed, until we are directed otherwise.

For any advice on clarification on whether records can be destroyed or are covered by the Inquiry retention hold, consult the School's Data Guardian

### **Disposal of Records**

Provided records are not needed to comply with legal, financial or audit requirements, at the end of the retention period the records will be assessed to ensure changes in legislation, disputes and/or case reviews/enquiries/appeals do not require extended retention. Any changes in retention or appeals legislation should be reflected in this document. If there is no reason to extend the retention period, records must be confidentially destroyed.

The disposal of records requires the authorisation of two members of staff, typically the member of staff with operational responsibility for the records and their strategic manager. These are referred to as the Information Asset Administrator (IAA) and the Information Asset Owner (IAO). Record disposals need to be authorised by the Data Guardian prior to their disposal.

When records are being disposed of, summary information should be noted in a disposal certificate which provides evidence that the disposal has actually been carried out. This information should be in summary form at record series level in most cases (i.e. case files of pupils aged 25 years or over as of 1st April 2011).

Information held within IT systems will also be covered by the requirements of this schedule, however, the archiving and/or disposal will have to be carried out in accordance with procedures on redundant IT systems and/or electronic data.

On this point, it is important that procedures around the archiving or disposal of documents which are linked to electronic data have built in mechanisms whereby both sources are handled in parallel. This will ensure electronic data is disposed of at the same time as the linked paper source and vice versa.

## **Retention and Disposal Schedule for Schools**

Retention policies contained within this schedule give details of record retention periods, criteria triggering the start of the retention period or disposal action, disposal action and the retention legal authority. For example, legislation, regulation, codes of practice or guidance requiring or forming the basis for keeping records.

Divergence from the retention and disposal schedule may be appropriate in certain circumstances. For example, a pending or actual legal action, investigation or inquiry, change of legislation or regulations, or to support legitimate business need.

Any divergence from the information contained in this schedule requires liaison with the School's Data Guardian and Data Protection Officer.

Function	Activity	Transaction	Transaction Description	Retention Period	Retention Action	Retention legal authority	Protective Marking	Disposal
School	Admissions Process	School Admissions Policy and Process	All records relating to the creation and implementation of the School Admissions' Policy	3	Review	Life of policy plus 3 years based on: <ul style="list-style-type: none"> <li>• <a href="https://www.gov.uk/government/publications/school-admissions-code--2">School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014</a><sup>4</sup></li> </ul>	Official Sensitive	Secure Disposal
School	Admissions Process	School Admissions and Transfers	Primary, secondary school admissions and transfers, excluding appeals processing	1	Destroy	Date of admission +1 year. Based on <ul style="list-style-type: none"> <li>• <a href="https://www.gov.uk/government/publications/school-admissions-code--2">School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014</a><sup>5</sup></li> </ul>	Official Sensitive	Secure Disposal
School	Admissions Process	School Admission Appeals	Administration of appeals panels and council case preparation including school exclusions, admissions, statementing and home-school transport appeals Excluding advocacy and parental support relating to appeals processes	1	Destroy	Date of resolution of case +1 year. Based on <ul style="list-style-type: none"> <li>• <a href="https://www.gov.uk/government/publications/school-admissions-code--2">School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014</a><sup>6</sup></li> </ul>	Official Sensitive	Secure Disposal
School	Admissions Process	Admissions Register	Register of Admissions	3	Review	Review annually to remove entries after 3 years.  Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. 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	Official Sensitive	Secure Disposal
School	Admissions Process	Admissions Proof of Address	Proof of address supplied by parents as part of the admissions process	1	Destroy	Destroy current year +1 year. Based on <ul style="list-style-type: none"> <li>• <a href="https://www.gov.uk/government/publications/school-admissions-code--2">School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014</a><sup>7</sup></li> </ul>	Official Sensitive	Secure Disposal
School	Asset Management	Inventories of furniture and equipment		6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	Asset Management	Burglary, theft and vandalism report forms		6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	Central Government and Local Authority	School Census Returns		5	Review	Current year plus 5 years	Official Sensitive	Secure Disposal
School	Central Government and Local Authority	Attendance Returns		1	Destroy	Current year plus 1 year	Official Sensitive	Secure Disposal
School	Central Government and Local Authority	Secondary School Transfer Sheets (Primary)		2	Destroy	Current year plus 2 years	Official Sensitive	Secure Disposal
School	Central Government and Local Authority	Ofsted Reports		3	Review	Current life of report then review	Official Sensitive	Secure Disposal
School	Central Government and Local Authority	Central Government Returns		6	Destroy	Destroy after 6 years	Official Sensitive	Secure Disposal

<sup>4</sup> School Admission Code - <https://www.gov.uk/government/publications/school-admissions-code--2>

<sup>5</sup> School Admission Code - <https://www.gov.uk/government/publications/school-admissions-code--2>

<sup>6</sup> School Admission Code - <https://www.gov.uk/government/publications/school-admissions-code--2>

<sup>7</sup> School Admission Code - <https://www.gov.uk/government/publications/school-admissions-code--2>

## Archers Brook SEMH Residential School

School	Child Protection	Child Protection Primary School Case Files	Child Protection Information held on a pupil file - 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.	25	Destroy	Destroy after the child / your persons 25th birthday. Based on: <ul style="list-style-type: none"> <li>• <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf">Keeping children safe in education Statutory guidance for schools and colleges September 2016</a><sup>8</sup></li> <li>• <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/592101/Working_Together_to_Safeguard_Children_20170213.pdf">Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015</a><sup>9</sup></li> </ul>	Official Sensitive	Transfer to Secondary School
School	Child Protection	Child Protection Secondary School Case Files	Child Protection Information held on a pupil file - 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.	30		To be reviewed (due to the nature of our pupils) after the child / young persons 30th birthday (due to recent experiences). Based on: <ul style="list-style-type: none"> <li>• <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf">Keeping children safe in education Statutory guidance for schools and colleges September 2016</a><sup>10</sup></li> <li>• <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/592101/Working_Together_to_Safeguard_Children_20170213.pdf">Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015</a><sup>11</sup></li> </ul>	Official Sensitive	See note on the Independent Enquiry into Sexual Abuse. Secure Disposal - These records must be shredded
School	Curriculum Management	Curriculum Management Administration	Process involved in: <ul style="list-style-type: none"> <li>• Curriculum Returns</li> <li>• Examination Results</li> <li>• SATs Records</li> <li>• SATS 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.</li> <li>• Examination Papers</li> <li>• Published Admission Number Reports</li> <li>• Value Added and Contextual Data</li> <li>• Self Evaluation Forms</li> </ul>	6	Destroy	Current year + 6 years. Based on <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf">section 6 IRMS</a> <sup>12</sup>	Official Sensitive	Secure Disposal
School	Curriculum Management	implementation of Curriculum	Process involved in: <ul style="list-style-type: none"> <li>• Schemes of work</li> <li>• Timetables</li> <li>• Class Record Books</li> <li>• Mark books</li> <li>• Record of Homework set</li> <li>• Pupils' work - Where possible pupils' work should be returned to the pupil at the end of the academic year</li> </ul>	1	Destroy	Current year + 1 year, It may be appropriate to review these records at the end of each year and allocate a further retention period	Official Sensitive	Secure Disposal
School	Educational Visits outside the Classroom	Parent Permission Slips	Parental permission slips for school trips where there has not been a major incident	0	Destroy	Destroy on the conclusion of the trip	Official Sensitive	Secure Disposal
School	Educational Visits outside the Classroom	Parent Permission Slips - Accident	Parental permission slips for school trips where there has been a major incident	25	Destroy	Keep until the pupils 25th birthday.	Official Sensitive	Secure Disposal
School	Educational Visits outside the Classroom	Educational Visits - Primary Schools	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	14	Destroy	Outdoor Education Advisers' Panel National Guidance website specifically <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf">Section 3 - "Legal Framework and Employer Systems"</a> and <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf">Section 4 - "Good Practice"</a> <sup>13</sup> .	Official Sensitive	Secure Disposal
School	Educational Visits outside the Classroom	Educational Visits - Secondary Schools	Records created by schools to obtain approval to run an Educational Visit outside the Classroom –Secondary Schools	10	Destroy	Outdoor Education Advisers' Panel National Guidance website specifically <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf">Section 3 - "Legal Framework and Employer Systems"</a> and <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf">Section 4 - "Good Practice"</a> <sup>14</sup> .	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Complaints - Children's general complaints		25	Review	Until the child reaches the age of 25. Based on a 6 year timescale in which an action can be brought in the case of tort under <a href="https://www.legislation.gov.uk/ukpga/1980/58/section/2">Limitation Act 1980 s.2</a> <sup>15</sup>	Official Sensitive	Secure Disposal

<sup>8</sup> Keeping Children Safe - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550511/Keeping\\_children\\_safe\\_in\\_education.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf)

<sup>9</sup> Working Together to Safeguard Children - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/592101/Working\\_Together\\_to\\_Safeguard\\_Children\\_20170213.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/592101/Working_Together_to_Safeguard_Children_20170213.pdf)

<sup>10</sup> Keeping Children Safe - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550511/Keeping\\_children\\_safe\\_in\\_education.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf)

<sup>11</sup> Working Together to Safeguard Children - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/592101/Working\\_Together\\_to\\_Safeguard\\_Children\\_20170213.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/592101/Working_Together_to_Safeguard_Children_20170213.pdf)

<sup>12</sup> IRMS Retention Schedule - [https://cdn.ymaws.com/irms.site-ym.com/resource/collection/8BCEF755-0353-4F66-9877-CCDA4BFEEAC4/2016\\_IRMS\\_Toolkit\\_for\\_Schools\\_v5\\_Master.pdf](https://cdn.ymaws.com/irms.site-ym.com/resource/collection/8BCEF755-0353-4F66-9877-CCDA4BFEEAC4/2016_IRMS_Toolkit_for_Schools_v5_Master.pdf)

<sup>13</sup> OEAP Guidance - <http://oeapng.info>

<sup>14</sup> OEAP Guidance - <http://oeapng.info>

<sup>15</sup> Section 2 Limitation Act - <http://www.legislation.gov.uk/ukpga/1980/58/section/2>

Archers Brook SEMH Residential School

School	Enquiries, Advice and Complaints Handling	Complaints - Routine Stage 1 and Stage 2 complaints	Processing, investigation of and response to routine complaints against CWAC concerning decision making, service provision or staff, including statutory, ombudsman, and non-statutory complaints processes and legal defence case preparation	2	Destroy	Based on CWAC best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Complaints - Complex Stage 2 complaints and investigations	Processing, investigation of and response to routine complaints against CWAC concerning decision making, service provision or staff, including statutory, ombudsman, and non-statutory complaints processes and legal defence case preparation	6	Destroy	Based on a 6 year timescale in which an action can be brought in the case of tort under <a href="#">Limitation Act 1980 s.2</a> <sup>16</sup>	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Complaints - resulting in a change of policy	Complaints which result in significant changes of policy: - Reports, - Correspondence	999	Archive	Based on LGCRS RGLA 2.14	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Complaints - Register / Log	Summary log / register of complaints	999	Archive	Based on LGCRS RGLA 2.13	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Advice and enquiries	Enquiry or advice about a council service	12	Destroy	Destroy twelve months after enquiry. Based on CWAC best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Customer Satisfaction	Feedback on council performance in relation to services or other aspects of council business: - Customer satisfaction surveys	3	Destroy	Based on best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Individual Rights requests	All correspondence relating to: <ul style="list-style-type: none"> <li>• The right of access (subject access requests)</li> <li>• The right to rectification</li> <li>• The right to erasure</li> <li>• The right to restrict processing</li> <li>• The right to data portability</li> <li>• The right to object</li> <li>• Rights in relation to automated decision making and profiling.</li> </ul>	2	Review	Based on best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Data Protection exemption requests	All correspondence relating to requests for access to information under a data protection exemption for the purpose of: <ul style="list-style-type: none"> <li>• Crime and Taxation - Schedule 2 Para 2</li> <li>• Immigration - Schedule 2 Para 4</li> <li>• Information required to be disclosed by law etc or in connection with legal proceedings - Schedule 2 Para 5</li> <li>• Functions designed to protect the public etc - Schedule 2 Para 7</li> <li>• Regulatory functions relating to legal services, the health service and children's services - Schedule 2 Para 8</li> <li>• Regulatory functions of certain other bodies - Schedule 2 Para 9</li> <li>• Protection of the rights of others - Schedule 2 Para 14</li> </ul>	0.1	Destroy	Keep for one calendar month and then destroy - Based on best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Data Breach Complaints	All correspondence relating to complaints from clients, employees over the handling of their data	3	Destroy	Based on best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and	FOI and EIR Requests	Case file records detailing the Requests for Information (EIR, FOI), the consideration of possible exemptions and subsequent appeals:	2	Destroy	Based on best practice	Official Sensitive	Secure Disposal

<sup>16</sup> Section 2 Limitation Act - <http://www.legislation.gov.uk/ukpga/1980/58/section/2>

Archers Brook SEMH Residential School

	Complaints Handling							
School	Enquiries, Advice and Complaints Handling	Routine requests for information	Case file records detailing the routine requests for Information	1	Destroy	Based on CWAC best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	FOI, EIR statistics and disclosure logs	<ul style="list-style-type: none"> <li>Statistical data about the number of requests you answered and their outcomes etc.</li> <li>Requests for Information disclosure logs</li> </ul>	10	Destroy	Based on best practice	Official Sensitive	Secure Disposal
School	Enquiries, Advice and Complaints Handling	Publication Scheme	The publication scheme that is required under the Freedom of Information Act 2000: - Publication scheme	9999	Archive	Based on good practice	Official Sensitive	Secure Disposal
School	Family Liaison Officers and Home School Liaison Assistants	Family Liaison Officers and Home School Liaison Assistants Administration	Records relating to Family Liaison Officers and Home School Liaison Assistants process, including but not limited to: <ul style="list-style-type: none"> <li>Day Books</li> <li>Reports for outside agencies</li> <li>Referral forms</li> <li>Contact data sheets</li> <li>Group registers</li> </ul>	5	Review	Until they leave our School, due to complex needs.	Official Sensitive	Secure Disposal
School	Finance	Loans and Grants	Identification of funding opportunities and resources, development and submission of bids, management of funding resources, monitoring and reporting of outcomes to funding body Excluding grant funding administration	12	Review	Date of last payment on the loan + 12 years then Review	Official Sensitive	Secure Disposal
School	Finance	Student Grants	Processing and assessment of applications for grant funding, administration of funding payments, financial and outcome monitoring and reporting	6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	Finance	Annual Budget Statement		6	Destroy		Official Sensitive	Secure Disposal
School	Finance	Income Processing	Processing income received for supply of goods and services, posting slips, tabulations, income records, receipt books, debtor accounts, cash books, till rolls	6	Destroy	<ul style="list-style-type: none"> <li><a href="#">Companies Act 2006</a><sup>17</sup></li> <li><a href="#">Value Added Tax Act 1994 s.6</a><sup>18</sup></li> <li><a href="#">Finance Act 1998 Sch.18 pt. 3</a><sup>19</sup></li> </ul>	Official Sensitive	Secure Disposal
School	Finance	Debt Management		6	Destroy	<ul style="list-style-type: none"> <li><a href="#">Companies Act 2006</a><sup>20</sup></li> <li><a href="#">Value Added Tax Act 1994 s.6</a><sup>21</sup></li> <li><a href="#">Finance Act 1998 Sch.18 pt. 3</a><sup>22</sup></li> </ul>	Official Sensitive	Secure Disposal
School	Finance	Expenditure Processing	Records relating to the purchasing of goods, works and services	6	Destroy	<ul style="list-style-type: none"> <li><a href="#">Companies Act 2006</a><sup>23</sup></li> <li><a href="#">Value Added Tax Act 1994 s.6</a><sup>24</sup></li> <li><a href="#">Finance Act 1998 Sch.18 pt. 3</a><sup>25</sup></li> </ul>	Official Sensitive	Secure Disposal
School	Governing Body	Instruments of Government including Articles of Association		9999	Archive	These should be retained in the school whilst the school is open and then offered to Council Record Archives Service when the school closes.	Official Sensitive	Secure Disposal
School	Governing Body	Trusts and Endowments managed by the Governing Body		9999	Archive	These should be retained in the school whilst the school is open and then offered to Council Record Archives Service when the school closes. Based on <a href="#">IRMS 1.1.6</a>	Official Sensitive	Secure Disposal

<sup>17</sup> Companies Act - <http://www.legislation.gov.uk/ukpga/2006/46/section/388>

<sup>18</sup> Value Added Tax Act - <http://www.legislation.gov.uk/ukpga/1994/23/schedule/11>

<sup>19</sup> Finance Act - <http://www.legislation.gov.uk/ukpga/1998/36/schedule/18>

<sup>20</sup> Companies Act - <http://www.legislation.gov.uk/ukpga/2006/46/section/388>

<sup>21</sup> Value Added Tax Act - <http://www.legislation.gov.uk/ukpga/1994/23/schedule/11>

<sup>22</sup> Finance Act - <http://www.legislation.gov.uk/ukpga/1998/36/schedule/18>

<sup>23</sup> Companies Act - <http://www.legislation.gov.uk/ukpga/2006/46/section/388>

<sup>24</sup> Value Added Tax Act - <http://www.legislation.gov.uk/ukpga/1994/23/schedule/11>

<sup>25</sup> Finance Act - <http://www.legislation.gov.uk/ukpga/1998/36/schedule/18>

Archers Brook SEMH Residential School

School	Governing Body	Governing Body Action plans	Action plans created and administered by the Governing Body	3	Destroy	Life of the action plan + 3 years Based on <a href="#">IRMS 1.1.3</a>	Official Sensitive	Secure Disposal
School	Governing Body	Governing Body Policy Documents	Policy documents created and administered by the Governing Body	3	Destroy	Life of the policy + 3 years Based on <a href="#">IRMS 1.1.8</a>	Official Sensitive	Secure Disposal
School	Governing Body	Enquiries and Complaints Dealt with my Governing Body	Records relating to complaints dealt with by the Governing Body	6	Destroy	Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes. Based on <a href="#">IRMS 1.1.9</a>	Official Sensitive	Secure Disposal
School	Governing Body	Governing Body Annual Report	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	10	Destroy	Date of Report + 10 years. Based on <a href="#">IRMS 1.1.10</a>	Official Sensitive	Secure Disposal
School	Governing Body	School Status Changes	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	3	Destroy	Date Proposal accepted or declined plus 3 years. Based on <a href="#">IRMS 1.1.11</a>	Official Sensitive	Secure Disposal
School	Governing Body	School Governors Agendas and Meeting Papers		9999	Archive	Retain in School for 6 years then offer to Archivist	Official Sensitive	Secure Disposal
School	Head Teacher and Senior Management Team	Log Book	Log books of activity in the school maintained by the Head Teacher	6	Review	Based on Best Practice	Official Sensitive	Secure Disposal
School	Head Teacher and Senior Management Team	Senior Management Team Minutes	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	6	Review	Based on Best Practice	Official Sensitive	Secure Disposal
School	Head Teacher and Senior Management Team	Senior Management Reports	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	3	Review	Based on Best Practice	Official Sensitive	Secure Disposal
School	Head Teacher and Senior Management Team	Senior Management Development Plans		6	Destroy	Based on Best Practice	Official Sensitive	Secure Disposal
School	Health and Safety	Health and Safety Policy	Health and Safety Policy and supporting statements	3	Review	Life of Policy + 3 years, based on best practice	Official Sensitive	Secure Disposal
School	Health and Safety	Health and Safety Risk Assessments				Life of risk assessment + 3 years, based on best practice	Official Sensitive	Secure Disposal
School	Health and Safety	Accident Reporting-Staff	Reporting and investigation of accidents or incidents, accidents, violent or aggressive conduct involving staff	12	Destroy	Date of incident +12years In the case of serious accidents a further retention period will need to be applied. Based on: <ul style="list-style-type: none"> <li>• <a href="#">Social Security (Claims and Payments) Regulations 1979 Regulation 25</a><sup>26</sup>.</li> <li>• <a href="#">Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995, Reg. 7</a><sup>27</sup></li> </ul>	Official Sensitive	Secure Disposal

<sup>26</sup> Social Security Claims - [http://www.legislation.gov.uk/uksi/1979/628/pdfs/uksi\\_19790628\\_en.pdf](http://www.legislation.gov.uk/uksi/1979/628/pdfs/uksi_19790628_en.pdf)

<sup>27</sup> Reporting Injuries - <http://www.legislation.gov.uk/uksi/1995/3163/regulation/7/made>



Archers Brook SEMH Residential School

School	Health and Safety	Accident Reporting-Pupils	Reporting and investigation of accidents or incidents, accidents, violent or aggressive conduct involving children	25	Review	Date of birth of child plus 25 years In the case of serious accidents a further retention period will need to be applied. Based on: <ul style="list-style-type: none"> <li>• <a href="#">Social Security (Claims and Payments) Regulations 1979 Regulation 25</a><sup>28</sup>.</li> <li>• <a href="#">Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995, Reg. 7</a><sup>29</sup></li> </ul>	Official Sensitive	Secure Disposal
School	Health and Safety	Control of Substances Hazardous to Health (COSHH)	Surveying, testing, identification, monitoring, risk assessment, management plans, records of control measures plans of work, licenses, notifications of works and remediation or demolition works including work operations and processes involving hazardous substances Excluding individual health surveillance and exposure monitoring	40	Destroy	Based on a period in which an action can be brought in the case of negligence under Limitation Act 1980 s.14A and <ul style="list-style-type: none"> <li>• <a href="#">Control of Substances Hazardous to Health Regulations 2002 Reg. 10</a> <sup>(5<sup>30</sup>)</sup></li> <li>• <a href="#">Control of Lead at Work Regulations 2002 Reg.10</a><sup>31</sup></li> <li>• <a href="#">Control of Asbestos Regulations 2012 Reg.22</a><sup>32</sup></li> </ul>	Official Sensitive	Secure Disposal
School	Health and Safety	Radiation Monitoring	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	50	Destroy	Last action + 50 years. Based on: <ul style="list-style-type: none"> <li>• <a href="#">Control of Substances Hazardous to Health Regulations 2002 Reg. 10</a> <sup>(5<sup>33</sup>)</sup></li> <li>• <a href="#">Ionising Radiations Regulations 1999 Reg. 24</a><sup>34</sup></li> </ul>	Official Sensitive	Secure Disposal
School	Health and Safety	Fire Precautions log books		6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	Health and Safety	Health Assessment	Manager referred and self-referred employee health assessment records	6	Destroy	Based on a 6 year period in which an action can be brought in the case of negligence under <a href="#">Limitation Act 1980 s.14A</a>	Official Sensitive	Secure Disposal
School	Health and Safety	Pre-Employment Health Screening	Pre-employment health screening assessment	1	Destroy	Based on best practice	Official Sensitive	Secure Disposal
School	Human Resources	Child Protection Investigation following an Allegation	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	10	Review	Retain until the normal retirement age for the member of staff or for 10 years (whichever is the longer). Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned. Based on: <ul style="list-style-type: none"> <li>• <a href="#">Keeping children safe in education Statutory guidance for schools and colleges September 2016</a></li> <li>• <a href="#">Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015</a></li> </ul>	Official Sensitive	See note on the Independent Enquiry into Sexual Abuse. Secure Disposal - These records must be shredded

<sup>28</sup> Social Security Claims - [http://www.legislation.gov.uk/uksi/1979/628/pdfs/uksi\\_19790628\\_en.pdf](http://www.legislation.gov.uk/uksi/1979/628/pdfs/uksi_19790628_en.pdf)

<sup>29</sup> Reporting Injuries - <http://www.legislation.gov.uk/uksi/1995/3163/regulation/7/made>

<sup>30</sup> Control of Substances- <http://www.legislation.gov.uk/uksi/2002/2677/regulation/10/made>

<sup>31</sup> Control of Lead - <http://www.legislation.gov.uk/uksi/2002/2676/regulation/10/made>

<sup>32</sup> Control of Asbestos - <http://www.legislation.gov.uk/uksi/2012/632/regulation/22/made>

<sup>33</sup> Control of Substances- <http://www.legislation.gov.uk/uksi/2002/2677/regulation/10/made>

<sup>34</sup> Radiation - <http://www.legislation.gov.uk/uksi/1999/3232/regulation/24/made>

Archers Brook SEMH Residential School

School	Human Resources	Leave and Time Recording	<ul style="list-style-type: none"> <li>• Paternity Leave, Maternity Leave,</li> <li>• Annual Leave, unpaid leave, special leave</li> <li>• Toil, Flexisheet, Timesheets,</li> </ul>	3	Review	<ul style="list-style-type: none"> <li>• <a href="#">Working Time Regulations 1998</a></li> <li>• <a href="#">Statutory Sick Pay (General) Regulations 1982 reg. 13</a></li> <li>• <a href="#">Statutory Paternity and Statutory Adoption Pay (Administration) Regulations 2002 reg.9</a></li> <li>• <a href="#">Statutory Maternity Pay (General) Regulations 1986 reg.26</a></li> </ul>	Official Sensitive	Secure Disposal
School	Human Resources	Employee Files	<ul style="list-style-type: none"> <li>• Individual employees' terms and condition of employment,</li> <li>• job description, personal specification, pay grade,</li> <li>• change of role and record of changes to individuals' employment contracts,</li> <li>• Sickness Records, Occupational Health referrals and reports, return to work documentation, formal absence process records</li> <li>• Training and development records relating to attendance and achievement of individual employees Excluding records of training for work with hazardous substances</li> <li>• Successful Recruitment Application and Process</li> <li>• Termination of Employment</li> <li>• Record of routine Disclosure and Barring Service (DBS) checks having been made during employment where required by nature of job role</li> <li>• Staff supervision files</li> <li>• Documentation relating to the performance appraisal of an employee, including performance related pay if applicable</li> <li>• Probationary reports, Performance plans, Staff Capability Assessments</li> <li>• One 2 Ones</li> </ul>	25	Review	<ul style="list-style-type: none"> <li>• High risk employees or occupations identified as requiring increased retention limits. Claims relating to such conditions do not have the usual limitations</li> <li>• <a href="#">Home Office Code of Practice For Registered Persons and other recipients of Disclosure Information</a></li> <li>• <a href="#">The Information Commissioner's Office, Employment Practices Code (data protection)</a></li> </ul>	Official Sensitive	Secure Disposal
School	Human Resources	Disciplinary and Grievance	Administration of formal disciplinary and grievance processes including tribunal cases when working with children ( <i>keep on employees personnel file permanently</i> )	25	Review	<ul style="list-style-type: none"> <li>• High risk employees or occupations identified as requiring increased retention limits. Claims relating to such conditions do not have the usual limitations</li> </ul>	Official Sensitive	Secure Disposal
School	Human Resources	Recruitment - Unsuccessful Applicants	Recruitment planning, application processing and assessment, interview administration and candidate assessment ( <i>See Employee Files for Successful Applicants Retention Period</i> )	1	Destroy	<ul style="list-style-type: none"> <li>• <a href="#">National Archives Guidance-</a></li> </ul>	Official Sensitive	Secure Disposal
School	Payroll and Pensions	Maternity, Adoption and Paternity Pay Record	Records relating to maternity, adoption and shared parental pay	3	Destroy	Current year + 3 years. Based on: <ul style="list-style-type: none"> <li>• <a href="#">Statutory Maternity Pay and Leave: employer guide</a></li> </ul>	Official Sensitive	Secure Disposal
School	Payroll and Pensions	Pension Fund Management	School's pension fund management records including fund management strategy, policy and guidance influencing decisions Excluding accounting and reporting	6	Destroy	Current year + 6 years. <a href="#">The Retirement Benefits Schemes (Information Powers) Regulations 1995</a>	Official Sensitive	Secure Disposal
School	Payroll and Pensions	Pension Scheme Administration	Records of member and employer pension contributions, member notifications administration of pension benefit payments to scheme members, repayment of contributions to members withdrawing from scheme including copies of legislation, regulation, guidance notices, policies affecting contributions and payments (Note: documents may that may not be readily available from other sources in the long-term)	6	Destroy	Retain records 6 years after death of last known beneficiary of member. Based on: <ul style="list-style-type: none"> <li>• <a href="#">The Retirement Benefits Schemes (Information Powers) Regulations 1995</a></li> </ul>	Official Sensitive	Secure Disposal
School	Payroll and Pensions	Payroll Administration	Transactional HR records including expenses and allowances claims, changes to pay, increments, loss of earnings, statutory and non-statutory payments and deductions, additional hours claims redundancy payments, income tax and national insurance records	6		Retain records 6 years after the end of the financial year in which records created. Based on <ul style="list-style-type: none"> <li>• <a href="#">Taxes Management Act 1970 s.34</a></li> </ul>	Official Sensitive	Secure Disposal
School	Procurement	Ordinary contracts		6	Destroy	Best Practice	Official Sensitive	Secure Disposal
School	Procurement	Contracts under seal		12	Destroy	Destroy - 12 years after the term of the contract has expired. Contracts with over a 10 year lifespan should be reviewed at the 5 year period to evaluate ongoing business need to retain	Official Sensitive	Secure Disposal
School	Property Management	Title Deeds	Title deeds of properties belonging to the school	9999	Archive	PERMANENT - These should follow the property unless the property has been registered with the Land Registry	Official Sensitive	Secure Disposal

Archers Brook SEMH Residential School

School	Property Management	Property Plans	Plans of property belong to the school	3	Destroy	These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.	Official Sensitive	Secure Disposal
School	Property Management	Leases	Leases of property leased by or to the school	6	Destroy	Expiry of lease + 6 years	Official Sensitive	Secure Disposal
School	Property Management	Letting of Properties	Records relating to the letting of school premises	6	Destroy	Current financial year + 6 years	Official Sensitive	Secure Disposal
School	Property Management	School Maintenance	All records relating to the maintenance of the school	6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	Pupil Records	SEN Assessment and Support	<ul style="list-style-type: none"> <li>• Educational arrangements for those with learning difficulties, and support for other special cases, eg talented or gifted children, or those disadvantaged by language or gender.</li> </ul>	31	Review	<ul style="list-style-type: none"> <li>• Based on a 6 year timescale in which an action can be brought in the case of a simple contract under <a href="#">Limitation Act 1980 s.5</a></li> <li>• <a href="#">Children and Families Act 2014 s.46</a></li> </ul>	Official Sensitive	Secure Disposal
School	Pupil Records	Absence Letters	Letters authorising absence from parents or guardians	2	Destroy	Retain for 2 years then destroy	Official Sensitive	Secure Disposal
School	Pupil Records	Pupil Primary School Case Files	<p>Pupil Case File Information, including but not limited to:-</p> <ul style="list-style-type: none"> <li>• Exclusions</li> <li>• Educational Welfare</li> <li>• Special Educational Needs files, reviews and Individual Education Plans</li> <li>• Attendance and Truancy</li> <li>• Student Health</li> <li>• Pupil Careers Advice</li> <li>• Data on attendance at out of school projects, outings etc</li> </ul> <p>The file should follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> <li>• to another primary school</li> <li>• to a secondary school</li> <li>• to a pupil referral unit</li> <li>• If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period.</li> </ul>	25	Destroy	<p>Retain for duration of the pupil's attendance at primary school (until Year 11 if still on roll)</p> <p>To be reviewed (due to the nature of our pupils) after the child / young persons 30th birthday (due to recent experiences).</p>	Official Sensitive	Transfer to Secondary School
School	Pupil Records	Pupil Secondary School Case Files	<p>Pupil Case File Information, including but not limited to:-</p> <ul style="list-style-type: none"> <li>• Exclusions</li> <li>• Educational Welfare</li> <li>• Special Educational Needs files, reviews and Individual Education Plans</li> <li>• Attendance and Truancy</li> <li>• Pupil Careers Advice</li> <li>• Student health</li> <li>• Data on attendance at out of school projects, outings etc</li> </ul>	30	Destroy	To be reviewed (due to the nature of our pupils) after the child / young persons 30th birthday (due to recent experiences).	Official Sensitive	Secure Disposal
School	Pupil's Educational Record	Pupil's Primary School Educational Record	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	25	Destroy	Retain whilst the child remains at the primary school. The file should follow the pupil when he/she leaves the primary school. This will include: to another primary school, to a secondary school or to a pupil referral unit. <a href="#">The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437</a>	Official Sensitive	Secure Disposal
School	Pupil's Educational Record	Pupil's Secondary School Educational Record	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	25	Destroy	Retain until the child's 25th birthday. <a href="#">The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437</a>	Official Sensitive	Secure Disposal
School	Pupil's Educational Record	Examination Results	This information should be added to the pupil file. All uncollected certificates should be returned to the examination board.	25	Destroy	Retain until the child's 25th birthday. <a href="#">The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437</a>	Official Sensitive	Secure Disposal

Archers Brook SEMH Residential School

School	Risk Management and Insurance	Employer's Liability Insurance Certificate		40	Destroy	Closure of the school + 40 years	Official Sensitive	Secure Disposal
School	School Meals Management	Free School Meals Registers		6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	School Meals Management	School Meals Registers		6	Destroy	Current year + 6 years	Official Sensitive	Secure Disposal
School	Walking Bus	Walking Bus Register		3	Destroy	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	Official Sensitive	Secure Disposal
School		Loans and Leasing Administration	Processing of staff loan and leasing applications, administration of loans, repayments and leasing	6		Retain records 6 years after the end of the financial year in which records created.	Official Sensitive	Secure Disposal

