

Data Retention - To delete, or not to delete, that is the question?

1 Introduction

Well, it is the question we are posing in this paper, not least to make what might be a complex issue as light hearted as possible. The challenge for all data controllers – at least as far as GDPR is concerned - is what do we keep, why, for how long, who do we share it with, how do we find what we need, and how do we keep it secure. We seek now to break that down into easy to understand “bite size” chunks as part of our support for your implementation.

The absolute need is to delete data that we no longer require, and that is something that we have never really had a system for. The reason that is now changing is that “the data we do not keep is the safest”, so we must change our ways.

2 Your system

We start here, with how you are working at the moment. We are sure it is working, so let’s make life easy for ourselves and say that “if it is not broken, do not fix it”. We have discussed future strategic plans, but to date we have not found the “perfect” system, and there are still two views as to whether to go “cloud” or keep servers on premise – then there is the hybrid option. Many Schools continue to rely on third party providers; some are still very heavily dependent on paper systems. For this purpose there is no requirement to change anything, so relax on that front!

3 Encryption

Where you are using any form of system, however simple or complex, there is one single word that you should have made central to your implementation by now, and that is encryption. Making data unreadable, unless you have authorised access, is the single strongest action you can take to protect yourselves, to the point that even if you are hacked you do not need to report the breach to the ICO. If you have adopted this, pass on (and thank you). If not, please make it a priority to discuss how quickly you can implement encryption with your IT support.

4 What data do we keep?

It is the longer term strategic objective of Satswana to find a system that embraces all the subjects we cover below into one package. There is no reason why it cannot be done. It is a basic premise of relational data base programming that you only use a single iteration of the data, and yet currently you are probably buying multiple packages, and that makes the management more confusing than it needs to be. However, it is not “broken”, so we are going to deal with it as it is – for now!

What we ask please is that you consider which of these headings applies to your School, ignore the rest of course. (Let us know if we have left anything out!)

- 1 Single Central Record
- 2 Management Information System
- 3 Governor Management (or equivalent)

- 4 Curriculum tools
- 5 Payment systems
- 6 Virtual learning environments
- 7 Safeguarding
- 8 Specialist communication tools
- 9 School uniform records
- 10 School photographs (also class use of photography)
- 11 Identity management systems, including bio metric?
- 12 Office documents (plus Microsoft or Google tools)
- 13 Core IT infrastructure and network
- 14 Health and safety records
- 15 Accident books
- 16 Visitors records
- 17 Answering machine records (and notes of phone calls)
- 18 Medical information, including NHS liaison
- 19 Finance, Book keeping and invoices
- 20 Staff information, including recruitment data, payroll
- 21 Property records
- 22 Third party use of premises (tenants, attendees etc.)
- 23 Pupil data on share drives, also pupil email addresses
- 24 Email generally
- 25 Exams data
- 26 Data on phones, tablets, cameras, PC's and perhaps home laptops
- 27 School transport and trips
- 28 Records of meetings

As you will see it is a really long list, and almost certainly there is something we have forgotten, we have not touched on SEN records. Right now we have probably not embraced the idea that the data has to be managed and culled. Perfectly reasonably it has been allowed to build up, and we have kept information “in case we need it”. Since that has to change, let us try to adopt a few initial rules, and time lines that are easy to remember. (A comprehensive list will be provided later.)

5 Summary precis of easy to remember timelines

- 1 Governance Records, six years after the conclusion of the event, but governance instruments would be kept for the life of the School
- 2 School Management, generally current year plus six years, with exceptions.
- 3 Pupil Records (Primary) are passed onto the next School and then deleted. (Secondary) Files are normally passed onto the next stage of education, or retained until the Pupil date of birth plus 25 years. Certain SEN data may be retained until plus 31 years.
- 4 Government and Local Authority returns are retained as required by Statute

6 Simple Principals

We suggest the following simple principals are adopted going forward in order to get the deletion of data under control.

- 1 Stop using paper! Or at least stop duplicating a record on paper that you retain digitally. Can you get into the habit of scanning paper and attaching the result in a digital form to (for instance) the pupil record? If you can you will be able to retrieve more and more of the information you need from a single source; and that could save you time, as well as complying with GDPR.
- 2 Do not use email as a filing system! We know this will not be easy, but wait until you see 3 below! If information within a mail is important enough to be recorded, then as in 1 above it should be stored where it can be easily retrieved, which means either in the pupil (or teacher, or governor) record. If it does not need to be kept delete it, and then you do not need to tediously copy it if you get a subject access request.
- 3 Stop using email altogether! Of course that will be hard, but the fact is that it has become a dangerous environment (phishing, man in the middle attacks, CEO fraud etc.) and has very little security unless you use encryption. There are safer and more secure messaging options emerging all the time, select the one that suits you best
- 4 Make people come to the data rather than distributing it. Governor's minutes, for instance, can be placed on a shared drive where they have permissioned access. If it is an all staff briefing, ditto – with the added benefit that you can record who has read it!
- 5 Consult your IT support regarding the automated deletion of data, because only that way will anybody ever remember to do it. It is surprising how efficient people can get if they know that their emails are going to be automatically wiped after three months! Deleting finance data at the start of year 8 requires a single script to execute. Similarly removing pupil data at a Primary can follow immediately after the CTF transfer to the Secondary.
- 6 Can case notes for a consultation be contained on a tablet instead of printing them out?

Potentially you are going to save a lot of paper! (Pity the poor intern who was told to photocopy all the documents before they shredded them!)

7 Acknowledgement

Elizabeth Barber is the Public Sector Chair of the IRMS, and also the records manager at Kent County Council. As such she is probably the leading expert on data retention, and it is in her latter role that she has written an Information Management Toolkit for Kent Schools. Her work in producing IRMS 2019 and the aforementioned toolkit are both the source of inspiration and knowledge for much of this document. However, with due respect, we do not always absolutely agree with her. Specifically a considerable expert can get absorbed in their subject and feel that it should have an overwhelming priority. In practice we believe that Schools are busy enough without their lives being totally consumed with process.

An example of what we mean is the pressure that we see online from purveyors of ISO 27001, which we are sure might be a “tick in the box”, but does it really add anything in a practical sense? We have to say that we believe there are better priorities! In her Kent document Elizabeth majors on a “Records Management

Policy”, and if you want to consider that we do cover it here
<https://www.satswana.com/resource/RecordsRetentionSchedule.pdf>

She also includes “Information Asset Register Information” in her retention spreadsheet, which we have excluded in this document since we believe it adds nothing to the GDPR objectives. Neither action diminishes our respect for her and appreciation of her work; it is just that we want to make life easy for our customers, not a matter of tedious routine for its own sake. (She does note both that the Records Management Policy is a “should”, thus not a “must” and that “Schools are not required to have an information asset register”.)

From here onwards we reflect our take on her advice in precis form.

8 Sundry points

- 1 Identifying information assets. We submit that the list in 4 above is what is required to meet this test. An audit is recommended from time to time to confirm the reason for holding the information.
- 2 Principal copies. You should have in mind where the liability lies to ensure the availability of documentation that might be required to protect the school’s liability in any future action or complaint or to support service delivery. (Termed the Principal Record Keeper.)
- 3 Business critical information should be defined and concentrated upon. Satswana advise taking occasional archive copies to guard against ransomware.
- 4 It is identified that data can be damaged by floods, fire, rodents and sunlight etc.
- 5 In some instances records can be transferred to an appropriate archive.
- 6 It is probably worth recording what you disposed of, when and how.
- 7 Consider business continuity, especially in the event of a major computer failure.
- 8 Primary Schools do not need to keep copies of any records in the pupil record except if there is an ongoing legal action when the pupil leaves the school. Custody of, and therefore responsibility for, the records passes to the school the pupil transfers to.
- 9 The school which the pupil attended until statutory school Leaving age (or the school where the pupil completed sixth form studies) is responsible for retaining the pupil record until the pupil reaches the age of 25 years. This retention is set in line with the Limitation Act 1980 which allows that a claim can be made against an organisation by minor for up to 7 years from their 18th birthday.
- 10 Digital continuity. The long term preservation of digital records is more complex than the retention of physical records. A large number of organisations create data in electronic format which needs to be retained for longer than 7 years. If this data is not retained in accessible formats the organisation will be unable to defend any legal challenge which may arise.
- 11 Information security is an integral part of the Data Protection Act 2018/General Data Protection Regulations 2016. You must take all reasonable steps to ensure that any personal or sensitive information which the school is collecting and storing is securely stored.

- 12 Personal data breach. If, despite the security measures you take to protect the personal data the school holds, a breach of security occurs, it is important to deal with the breach effectively. The breach may arise from a theft, a deliberate attack on computer systems (for example, someone has managed to “hack” the system), the unauthorised use of personal data by a member of staff, accidental loss or equipment failure.
- 13 Reporting a breach. If you experience a personal data breach you need to consider whether this poses a risk to people. You need to consider the likelihood and severity of any risk to people’s rights and freedoms, following the breach. When you’ve made this assessment, if it’s likely there will be a risk then you must notify your DPO; if it’s unlikely then please advise your DPO in any event, that way you can never be accused of covering anything up.

9 Summary

The intention of this document is to provide a readable and comprehensible guide to where you keep your data, how long you must keep it for, and alert you to the requirement to start to actively manage the deletion of redundant data. We have sought to avoid over complication, but it is a critical requirement of data security in the future to ensure that you only keep what you have to. That will involve a change in work practices, and we are constantly available to support you in managing that. Below you will find the retention periods recommended by IRMS 2019.

Recommended Retention Periods (Notes at the end are relevant to KCC and may not apply.)

IMTKS1 Governing Body

	Basic file description	Statutory Provisions	Retention Period
IMTKS1A	Management of Governing Body		
IMTKS1A.1	Instruments of Government		Permanent
IMTKS1A.2	Trusts and Endowments		Permanent
IMTKS1A.3	Records relating to the election of parent and staff governors not appointed by the governors		Date of election + 6 months
IMTKS1A.4	Records relating to the appointment of co-opted governors		Provided that the decision has been recorded in the minutes the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office
IMTKS1A.5	Records relating to the election of chair and vice chair		Once the decision has been recorded in the minutes, the records relating to the election can be destroyed
IMTKS1A.6	Scheme of Delegation and Terms of Reference for Committees		PERMANENT
IMTKS1A.7	Meetings Schedule		Current year
IMTKS1A.8	Agendas – Principal copy	The School Governance (Roles, Procedures and Allowances) (England) Regulations 2013	Permanent
IMTKS1A.9	Minutes - Principal set (signed)	As above	Permanent
IMTKS1A.10	Reports made to the Governors' Meeting which are referred to in the minutes	As above	Permanent
IMTKS1A.11	Register of attendance at Full Governing Board meetings	As above	Date of last meeting in the book + 6 years
IMTKS1A.12	Papers relating to the management of the Annual Parents' Meeting	The Education (Annual Parents' Meetings) (England) Regulations 1999[1]	Date of meeting + 6 years
IMTKS1A.13	Agendas – Additional Copies		Date of meeting

IMTKS1A.14	Minutes - Inspection copies		Date of meeting + 3 years
IMTKS1A.15	Records relating to Governor Monitoring Visits		Date of the visit + 3 years
IMTKS1A.16	Annual Reports required by the Department for Education	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI	Date of report + 10 years
IMTKS1A.17	All records relating to the conversion of schools to Academy status		PERMANENT
IMTKS1A.18	Records relating to complaints made to and investigated by the Governing Body		Date of resolution of complaint + 6 years then review for further retention in the case of contentious disputes
IMTKS1A.19	Correspondence sent and received by the Governing Body		Current year + 6 years
IMTKS1B	Management of Governors		
IMTKS1B.1	Records relating to the appointment of a clerk to the Governing Body		Date appointment as clerk ceases + 6 years
IMTKS1B.2	Records relating to the terms of office of serving governors including evidence of appointment		PERMANENT
IMTKS1B.3	Records relating to Governor Declaration against disqualification criteria		Until the Governor steps down
IMTKS1B.4	Register of Business Interests		PERMANENT
IMTKS1B.5	Governors Code of Conduct		This is expected to be a dynamic document, one copy of each version should be kept permanently
IMTKS1B.6	Records relating to the training required and received by Governors		Until the Governor steps down
IMTKS1B.7	Records relating to the induction programme for new governors		Until the Governor steps down
IMTKS1B.8	Records relating to DBS checks carried out on clerk and members of the governing body		Date of DBS check + 6 months

IMTKS2 Pupil Management

	Basic file description	Statutory Provisions	Retention Period
IMTKS2A	Admissions and Attendance		
IMTKS2A.1	Admission Registers		Permanent

IMTKS2A.2	Records relating to the admissions process – if the admission is successful		Admission + 1 year
IMTKS2A.3	Admissions – if the appeal is unsuccessful		Resolution of case + 1 year
IMTKS2A.4	Admissions – Secondary Schools – Casual		Current year + 1 year
IMTKS2A.5	Proofs of address supplied by parents as part of the admissions process		Current year + 1 year
IMTKS2A.6	Attendance registers		Date of register + 3 years
IMTKS2A.7	Letters authorising absence		Date of absence + 2 years
IMTKS2B	Pupil Educational Record		
IMTKS2B.1	Pupil Files and/or record cards - Primary	Education (Pupil Information) (England) Regulations 2005 (SI 2005/1437)	Retain for the time which the pupil remains at the Primary School Transfer to the Secondary School (or other Primary School) when the child leaves the school[2]
IMTKS2B.2	Pupil Files and/or record cards - Secondary	Education (Pupil Information) (England) Regulations 2005 (SI 2005/1437)	DOB of the pupil + 25 years ¹
IMTKS2B.3	Examination results - Public		Year of examinations + 6 years[3]
IMTKS2B.4	Examination results - Internal examination results		Current year + 5 years If these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary
IMTKS2B.5	Any other records created in the course of contact with pupils		Current year + 3 years then review
IMTKS2B.6	Images held of pupils together with any consents and permissions to publish		All records relating to the image should be retained for the life of the image. The length of time the image is to be retained should be included on the privacy statement
IMTKS2C	Special Educational Needs		
IMTKS2C.1	Special Educational Needs files, reviews and Individual Education Plans		DOB of the pupil + 25 years
IMTKS2C.2	Statement maintained under The Education Act 1996 - Section 324	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years

			Unless legal action is pending
IMTKS2C.3	Proposed statement or amended statement	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years Unless legal action is pending
IMTKS2C.4	Advice and information to parents regarding educational needs	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12 years Unless legal action is pending
IMTKS2C.5	Accessibility Strategy	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years Unless legal action is pending
IMTKS2C.6	Pupil SEN Files		DOB of pupil + 25 years then review unless legal action is pending. If so, it may be appropriate to add an additional retention period.

IMTKS3 School Trips and Extra Curricular Activities

	Basic file description	Statutory Provisions	Retention Period
IMTKS3A	Educational Visits outside the Classroom		
IMTKS3A.1	Primary Schools Records created by schools to obtain approval to run an Educational Visit outside the Classroom ^[4]	3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) (1998)	Date of visit + 14 years ^[5]
IMTKS3A.2	Secondary Schools Records created by schools to obtain approval to run an Educational Visit outside the Classroom ³	3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) (1998)	Date of visit + 10 years ⁴
IMTKS3B	Day Trips		

IMTKS3B.1	Parental permission slips for school trips – where there has been no major incident		Conclusion of the trip
IMTKS3B.2	Parental permission slips for school trips – where there has been a major incident	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils
IMTKS3C	Residential Trips		
IMTKS3C.1	All records relating to the organization of school residential trips	Limitation Act 1980	Date of the residential visit + a minimum of 6 years then review
IMTKS3D	Walking Bus		
IMTKS3D.1	Walking Bus registers		Date of register + 3 years[6]

IMTKS4 School Management – Teaching and Curriculum

	Basic file description	Statutory Provisions	Retention Period
IMTKS4A	Senior Management Team		
IMTKS4A.1	Log Books		Date of last entry in the book + 6 years
IMTKS4A.2	Minutes of the Senior Management Team and other internal administrative bodies		Date of meeting + 5 years
IMTKS4A.3	Reports made by the Head Teacher or the management team		Date of report + 3 years
IMTKS4A.4	Records created by Head Teachers, Deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities		Closure of file + 6 years
IMTKS4A.5	Correspondence created by Head Teachers, Deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities		Date of correspondence + 3 years
IMTKS4A.6	School development plans		Closure + 6 years then review
IMTKS4A.7	Professional development plans		Closure + 6 years
IMTKS4A.8	Action Plans		Date of action plan + 3 years
IMTKS4A.9	Policy documents		Expiry of policy

			Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)
IMTKS4B	Curriculum Management		
IMTKS4B.1	Timetable		Current year then review
IMTKS4B.2	Curriculum development		Current year + 6 years
IMTKS4B.3	Curriculum returns		Current year + 3 years
IMTKS4B.4	School syllabus		Current year then review
IMTKS4B.5	Schemes of work		Current year then review
IMTKS4B.6	Class record books		Current year then review
IMTKS4B.7	Mark Books		Current year then review
IMTKS4B.8	Record of homework set		Current year then review
IMTKS4B.9	Pupils' work		Current year then review
IMTKS4B.10	SATS records including examination results. Exam papers should only be retained if they are required to evidence the results		Current year + 6 years

IMTKS5 Management of Schools - Administration

	Basic file description	Statutory Provisions	Retention Period
IMTKS5A	Personnel Management		
IMTKS5A.1	Employer's Liability certificate		Closure of the school + 40 years
IMTKS5A.2	Staff Personal files		Termination + 6 years[7]
IMTKS5A.3	Interview notes and recruitment records		Date of interview + 6 months
IMTKS5A.4	Pre-employment vetting information (including DBS checks)[8]	DBS guidelines	Date of check + 6 months
IMTKS5A.5	Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure		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 placed on the member of staff's personal file.
IMTKS5A.6	Right to Work in the UK checks	https://www.gov.uk/check-job-applicant-right-to-work	Termination of employment + 2 years
IMTKS5A.7	Disciplinary proceedings: case not found		Take advice from Personnel if the proceedings were child protection related otherwise destroy immediately at the conclusion of the case

IMTKS5A.8	Disciplinary proceedings: written warnings		The duration of the warning [9]
IMTKS5A.9	Annual appraisal or assessment records		Current year + 5 years
IMTKS5A.10	Images held of members of staff together with any consents and permissions to publish		All records relating to the image should be retained for the life of the image. The length of time the image is to be retained should be included on the privacy statement
IMTKS5B	Health and Safety		
IMTKS5B.1	Policy Statements		Date of expiry + 1 year [it may be necessary to keep one copy of each policy so that a history of what policies were in place at any time]
IMTKS5B.2	Accessibility Plans	Disability Discrimination Act 1995	Current year + 6 years
IMTKS5B.3	Records relating to accident/injury at work	The Management of Health & Safety at Work Regulations 1999 Health and Safety at Work Act 1974	Date of incident + 12 years [10]
IMTKS5B.4	Accident Reporting – Children	Limitation Act 1980	Date of birth + 22 years where the injured person is a minor at the time of the accident
IMTKS5B.5	Accident Reporting – Adults	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of the accident + 4 years where the injured person is an adult at the time of the accident;
IMTKS5B.6	Risk Assessments	The Management of Health & Safety at Work Regulations 1999 Health and Safety at Work Act 1974	Current year + 3 years
IMTKS5B.7	COSHH Risk Assessments	Control of Substances Hazardous to Health (COSHH) Regulations 2002	Date of creation + 40 years
IMTKS5B.8	Incident reports		Current year + 20 years
IMTKS5B.9	Process of monitoring areas where employees and persons are likely to have become in contact with	Control of Asbestos Regulations 2012	Last action + 40 years

	asbestos		
IMTKS5B.10	Process of monitoring of areas where employees and persons are likely to have come in contact with radiation	Ionising Radiations Regulations 2017	Last action + 50 years
IMTKS5B.11	Fire Safety Records including Fire Safety Audits	Regulatory Reform (Fire Safety) Order 2005	Current year + 6 years
IMTKS5B.12	Fire Risk Assessments	Regulatory Reform (Fire Safety) Order 2005	Date the fire risk assessment expires + 6 years
IMTKS5B.13	Fire Drill records	Regulatory Reform (Fire Safety) Order 2005	Date of fire drill + 6 years
IMTKS5C	Payroll and Pensions		
IMTKS5C.1	Records relating to the management of the payroll	HMRC - Compliance Handbook Manual CH15400	Financial year to which the payroll is run + 6 years
IMTKS5C.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Retirement Benefits Schemes (Information Powers) Regulations 1995	Current year + 6 years
IMTKS5C.3	Salary cards		Last date of employment + 85 years
IMTKS5C.4	Maternity pay records	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year + 3yrs
IMTKS5C.5	Timesheets, sick pay	HMRC - Compliance Handbook Manual CH15400	Current year + 6 years
IMTKS5D	Financial Records		
IMTKS5D.1	Annual Accounts	HMRC - Compliance Handbook Manual CH15400	Current year + 6 years
IMTKS5D.2	Loans and grants	HMRC - Compliance Handbook Manual CH15400	Date of last payment on loan + 12 years then review to see whether a further retention period is required
IMTKS5D.3	Inventories of equipment and furniture		Current year + 6 years
IMTKS5D.4	Annual Budget and background papers		Current year + 6 years
IMTKS5D.5	Budget reports, budget monitoring etc		Current year + 3 years
IMTKS5D.6	Contracts - under seal	Limitation Act 1980 (Section 12)	Contract completion date + 12 years

IMTKS5D.7	Contracts - under signature	Limitation Act 1980 (Section 2)	Contract completion date + 6 years
IMTKS5D.8	Contracts - monitoring records		Current year + 2 years
IMTKS5D.9	Order books and requisitions		Current year + 6 years
IMTKS5D.10	Copy orders		Current year + 2 years
IMTKS5D.11	Delivery Documentation		Current year + 6 years
IMTKS5D.12	Invoice, receipts and other records covered by the HMRC - Compliance Handbook Manual CH15400	HMRC - Compliance Handbook Manual CH15400	Current year + 6 years
IMTKS5D.13	Petty cash books	HMRC - Compliance Handbook Manual CH15400	Current financial year + 6 years
IMTKS5D.14	Debtors' Records	HMRC - Compliance Handbook Manual CH15400	Current year + 6 years
IMTKS5D.15	Applications for free school meals, travel, uniforms etc		Whilst child is at school
IMTKS5D.16	Student grant applications		Current year + 3 years
IMTKS5D.17	School Fund Records[11]	HMRC - Compliance Handbook Manual CH15400	Current year + 6 years
IMTKS5E	Building Management		
IMTKS5E.1	Title Deeds		Permanent [12]
IMTKS5E.2	Plans		Permanent Retain in school whilst operational
IMTKS5E.3	Records relating to maintenance and contractors	HMRC - Compliance Handbook Manual CH15400	Current year + 6 years
IMTKS5E.4	Maintenance log books		Last entry + 10 years
IMTKS5E.5	Contractors' Reports		Current year + 6 years
IMTKS5E.6	Leases		Expiry of lease + 6 years
IMTKS5E.7	Lettings		Current year + 3 years
IMTKS5E.8	Burglary, theft and vandalism report forms		Current year + 6 years
IMTKS5E.9	Records relating to legionella and water checks	The Management of Health & Safety at Work Regulations 1999 Health and Safety at Work Act 1974	Date of check + 3 years
IMTKS5F	School Meals		
IMTKS5F.1	Dinner Register		Current year + 3 years
IMTKS5F.2	School Meals Summary Sheets		Current year + 3 years

IMTKS5F.3	Free school meals registers	HMRC - Compliance Handbook Manual CH15400	Current year + 6 years
IMTKS5G	General Administration		
IMTKS5G.1	School brochure/prospectus		Current year + 3 years
IMTKS5G.2	General file series or correspondence files		Current year + 5 years
IMTKS5G.3	Circulars (staff/parents/pupils)		Current year + 1 year
IMTKS5G.4	Newsletters, ephemera		Current year + 1 year
IMTKS5G.5	Visitors book		Current year + 2 years
IMTKS5G.6	Images held of pupils together with any consents and permissions to publish		All records relating to the image should be retained for the life of the image. The length of time the image is to be retained should be included on the privacy statement
IMTKS5G.7	Records relating to the management of PTA/Old Pupils Associations		Current year + 6 years
IMTKS5G.8	Records relating to the management of data subject access requests		Current year + 3 years
IMTKS5G.9	Records relating to the management of freedom of information requests		Current year + 3 years

IMTKS6 Management of Schools – Safeguarding

	Basic file description	Statutory Provisions	Retention Period
IMTKS6A	Adults		

IMTKS6A.1	Records of allegations about workers who have been investigated and found to be without substance	Information Commissioner Code of Practice: Employment Records 2002 - "Child Protection Procedures for Managing Allegations Against Staff within Schools and Education Services" (September 2008) p17	These records should not normally be retained once an investigation has been completed[14].
IMTKS6A.2	Outcome of an allegation made against a staff member	Safeguarding Children in Education Guidelines: Dealing with Allegations of Abuse against Teachers and Other Staff Safeguarding Children in Education and Safer Recruitment 2007 Para 5.1	Until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer

IMTKS7 Central Government and Local Authority

	Basic file description	Statutory Provisions	Retention Period
IMTKS7A	Local Authority		
IMTKS7A.1	Secondary transfer sheets (Primary)		Current year + 2 years
IMTKS7A.2	Attendance returns		Current year + 1 year
IMTKS7A.3	Circulars from LA		Whilst required operationally then review to see whether a further retention period is required
IMTKS7B	Central Government		

IMTKS7B.1	OFSTED reports and papers		Replace former report with any new inspection report then review to see whether a further retention period is required
IMTKS7B.2	Returns		Current year + 6 years
IMTKS7B.3	Circulars from DfE		Whilst operationally required then review to see whether a further retention period is required

IMTKS8 Family Liaison Officers and Parent Support Assistants

	Basic file description	Statutory Provisions	Retention Period
IMTKS8.1	Day Books		Current year + 2 years then review
IMTKS8.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency		Whilst the child is attending the school then destroy
IMTKS8.3	Referral forms		While the referral is current then add to child's file
IMTKS8.4	Contact data sheets		Current year then review, if contact is no longer active then destroy
IMTKS8.5	Contact database entries		Current year then review, if contact is no longer active then destroy
IMTKS8.6	Group Registers		Current year + 2 years

[1] [Statutory Instruments 1999 No 2014](#)

[2] [In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service.](#)

[3] [Any certificates left unclaimed should be returned to the appropriate Examination Board](#)

[4] [including GOF1 and GOF2 and data entered on the e-go system](#)

[5] [This retention period has been set in agreement with the Safeguarding Children's Officer](#)

[6] [If there is an incident requiring an accident report the register will be submitted with the report and kept for the period of time required](#)

[7] [These files should be subject to KCC's open file policy where the employees are employed by Kent County Council as the Local Authority](#)

[8] [Please note that schools must not keep copies of the documents which are checked for DBS purposes.](#)

[9] [If this information has been added to an individual's personnel file, it must be weeded from the file once the retention period has elapsed](#)

[10] [In the case of serious accidents a further retention period will need to be applied](#)

[11] [including cheque books, paying in books, ledgers, invoices, receipts, bank statements, school](#)

journey books

[12] these should follow the property unless the property has been registered at the Land Registry

[13] Records carry an OFFICIAL marking, there can be security issues about allowing access to the plans to people who may be looking to burgle premises

[14] There are some exceptions to this where for its own protection the employer has to keep a limited record that an allegation was received.