



This advice is based on the IRMS Toolkit 2019 for Local Authority Schools; it is a work of immense scholarship containing practical advice and valuable cross references to other legislation. Academies and Independent Schools may have varied requirements.

Our intent is to provide a precis to consolidate advice wherever possible and make it more accessible. It is a guide only and circumstances may exist where individual Schools have good reasons to vary the policy. Please refer to the full document for absolute detail.

It is particularly issued by Satswana to emphasise the need to consider the management and timing of the deletion of data, both in paper and digital form.

1 Pupil Record

This is the principle core record that will follow the pupil through the School. It can be a paper record, but more likely today takes a form set by an MIS supplier. SEN and complaints data would normally be stored separately within the file. Files would be either physically transferred to a new School, or via electronic Common Transfer File (CTF).

2 Additional School Data

Attendance data, consents, accident records, medicine consents (and administration details), document copies, correspondence, and pupil work are headings that you may contain within the Pupil Record, but will not be transferred to the next school.

3 Governor Management

Most records must be kept for six years after the conclusion of the event, but governance instruments would be kept for the life of the School.

4 Management of the School

Matters that may be of archive interest should be considered separately.

We note that the IRMS has come up with a huge number of variations that will not be remembered and will be hard to apply.

Generally “current year plus six years” (as for financial data) will cover most contingencies. Some are less, but exceptions will be almost impossible to manage.

Keeping staff training data for 40 years in case of an IICSA investigation (which overrides all other retention criteria) will be seen as an onerous overhead, ditto asbestos and substances “hazardous to health”. (To be passed to LA in the event of school closure.)



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The disciplinary and grievance process (page 78) will be found useful.

It is bizarre that an accident book can be destroyed three years after the last entry in the book, whereas a visitor's book is recommended to be kept for six years. Further common sense must be applied in time.

5 Pupil Management

Generally files are retained whilst the Child is at the School, and then passed on to the next school.

The final school should retain the files until age 25

Or in the case of SEN data where there may be subsequent litigation, age 31.

Child protection information and details of a major incident are DOB plus 25

Pupil's work or related matters is current year, + 1 year and/or given to the Pupil

6 School Support

Current year for most agency reports

Management of PTA, current + 6 years

7 Government and Local Authority

Secondary transfer sheets, Current + 2 years

Attendance returns, Current + 1 year

School census returns, Current + 5 years

Returns to Government, Current + 6 Years



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Appendix A

Having a records management policy will support the school in meeting its responsibilities under the Data Protection Act 2018 and the General Data Protection Regulation.

Policy Template

The following extract forms part of a policy statement template which could be adopted by individual schools. It has been extracted from a model action plan for developing records management compliant with the Lord Chancellor's Code of Practice under Section 46 of the Freedom of Information Act 2000 Model Action Plan for Schools.

<https://www.nationalarchives.gov.uk/documents/schools.rtf>

The policy statement template can be adopted in its entirety or can be amended to reflect the needs of individual schools. Once it has been amended, it should be approved by the governing body or other appropriate authority. Once the records management policy has been approved at the appropriate level it should be published, perhaps as part of the publication scheme.

[Name of School] Records Management Policy

The School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability.

This document provides the policy framework through which this effective management can be achieved and audited. It covers:

- Scope
- Responsibilities
- Relationships with existing policies.

1. Scope of the policy

- 1.1 This policy applies to all records created, received or maintained by permanent and temporary staff of the school in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school.
- 1.2 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) to provide evidence of its transactions or activities. These records may be created, received or maintained in hardcopy or electronic format e.g. paper documents, scanned documents, e-mails which document business activities and decisions, audio and video recordings, text messages, notes of telephone and Skype conversations, spreadsheets, Word documents, presentations etc.

2. Responsibilities

- 2.1 The governing body of a school has a statutory responsibility to maintain the school records and record keeping systems in accordance with the regulatory environment specific to the school. The responsibility is usually delegated to the head teacher of the school.



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2.2 The person responsible for day-to-day operational management in the school will give guidance on 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.

2.3 The school will manage and document its records disposal process in line with the records Retention Schedule. This will help to ensure that it can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (subject access requests "SARS").

2.4 Individual staff and employees must ensure, with respect to records for which they are responsible, that they:

2.4.1 Manage the school's records consistently in accordance with the school's policies and procedures;

2.4.2 Properly document their actions and decisions;

2.4.3 Hold personal information securely;

2.4.4 Only share personal information appropriately and do not disclose it to any unauthorised third party;

2.4.5 Dispose of records securely in accordance with the school's Records Retention Schedule.

3. Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- Information Governance Policy and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

Signed: [Head of School]



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Appendix B

Records Retention Schedule for xyz School

The School deletes or disposes of information according to a retention schedule as recommended by the IRMS 2019 Toolkit for Schools.

In summary form these are:-

- 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