



RECORDS MANAGEMENT POLICY

South Wilts is a progressive grammar school, which aims to maintain high academic standards and cultural achievement within a caring environment. We seek to encourage responsibility and personal fulfilment so that students attain their maximum potential. The school is dynamic and works with the community to prepare its students for life-long learning and adult independence.

South Wilts Grammar School values and respects all students equally and aims to provide equality of opportunity wherever possible.

South Wilts is committed to safeguarding and promoting the welfare of children. The school fulfils its responsibilities as laid out in the following key documents: Working Together to Safeguard Children, Keeping Children Safe in Education and the procedures of the Safeguarding Vulnerable People Partnership.

Safeguarding links/risks associated with this policy: There are no specific additional safeguarding risks associated with this policy.

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1. Introduction

South Wilts Grammar School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and contribute to the effective overall management of the organisation. Records provide evidence for protecting the legal rights and interests of the organisation and provide evidence for demonstrating performance and accountability. The aim of this policy is to provide a framework for managing the organisation's information to enable the organisation to:

- Make informed decisions;
- Be open and transparent;
- Respond appropriately to information requests;
- Protect records;
- Comply with the legislative requirements;
- Effectively work with its partners, and share information as required;
- Demonstrate accountability.

2. Objectives

The objective of this policy is to define a framework for South Wilts Grammar School to manage data, information, and records.

1. Definitions

Data – Raw facts and figures that supply the basis for information.

Information – Data which has been collected, organised, ordered and given both meaning and context.

Record – Information created, received, and maintained as evidence and as an asset by an organisation or person, in pursuit of legal obligations, or in the transaction of business.

Confidential Waste – See [Appendix 1](#).

3. Scope

This policy applies to all employees of South Wilts Grammar School including contract, agency and temporary staff, volunteers and employees of partner organisations working on behalf of South Wilts Grammar School.

All records created, held, and maintained by South Wilts Grammar School in the course of its duties are covered by this policy. This is irrespective of the format of the information, including, but not limited to:

- Paper records
- Electronic records (Word Documents, emails, PowerPoints, database, etc.)
- Photographs, videos, etc.
- Electronic storage media (floppy disc, CDs, DVD and memory sticks)

4. Responsibilities

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

The person responsible for records management in the organisation will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way.

All members of staff and employees are individually responsible for the records they create or hold. Individuals must ensure that records are accurate, maintained securely, and disposed of in accordance with this policy.

5. Creation & Storage

All organisation staff are responsible for creating and maintaining data, information and records in relation to their work, and storing them in a way which ensures that they can be identified and retrieved when required.

Records must be appropriately stored with due regard for efficiency, cost-effectiveness, security, durability, and access. Appropriate procedures and processes are in place to ensure the physical and intellectual security of organisation records.

Storage conditions and handling processes should be designed to protect records from unauthorised access, loss, destruction, theft, and disaster. This in line with the UK General Data Protection Regulation (UKGDPR) principles of data protection by design, and integrity and confidentiality.

The retention of records for longer than necessary is in breach of the UKGDPR, and the duplication of records should be limited to optimise the use of space for storage purposes and to aid data accuracy.

6. Retention and Disposal

Information held for longer than is necessary carries additional risk and cost, therefore records and information shall only be retained when there is a business or legislative need to do so. Under the UKGDPR and the Data Protection Act 2018 (DPA 2018), personal data processed by an organisation must not be retained for longer than is necessary for its lawful purpose.

The retention of specific documents may be necessary to:

- Fulfil statutory or other regulatory requirements.¹
- Evidence events/agreements in the case of disputes.
- Meet operational needs.
- Ensure the preservation of documents of historic or other value.
- Evidence child protection matters.

The untimely destruction of documents could cause the organisation:

- Difficulty in defending litigious claims
- Operational problems
- Embarrassment
- Failure to comply with the Freedom of Information or Data Protection laws.

Conversely, the permanent retention of all documents where there is no business need or other legal basis to retain them, poses regulatory and security risks, as well as being a breach of personal data.

Appropriate secure disposal is accordingly implemented at the organisation in accordance with the organisation's retention schedule for the following reasons:

- To comply with Article 5 of the UKGDPR which states that personal data must not be kept in an identifiable form for longer than is necessary
- To lessen the risk of a data breach through data loss or unauthorised access.
- To increase the efficiency of the exercising of data subject rights.
- To free-up storage space (there is evidence that the de-cluttering of office accommodation can be psychologically beneficial for employees.);
- To reduce the risk of fire (in the case of paper records);

6.1. Retention Schedule

In line with all relevant legislative requirements, including the UKGDPR and DPA 2018, South Wilts Grammar School will keep some forms of information for longer than others. Information will not be kept indefinitely unless there are specific requirements.

The organisation maintains records in line with its Retention Schedule (Appendix 2).

1.1.1

6.2. Definition of Retention Periods

Defining a retention period will be determined on one of the following three factors:

¹ The Covid-19 Public Inquiry issued a Document Preservation Notice on 11th November 2022. This inquiry will cover all aspects of the country's response to the Covid-19 pandemic and requires organisations to preserve all documents relating to the pandemic and the following recovery period. For more information about the inquiry visit: <https://covid19.public-inquiry.uk/>.

- Statutory requirements.
- Codes of Practice and guidance published by professional bodies.
- In the absence of the above, the retention period will be determined by the needs of the Organisation.

Defining the retention period based on organisation needs must be approved by the Business Manager and where necessary in consultation with the DPO.

6.3. Reviewing Retention Periods

Most retention periods will remain static and will relate to legal requirements to retain data. However, retention periods based on codes of practice and guidance published by professional bodies may vary. Any changes to known retention periods should be raised with the Business Manager and where necessary the DPO.

This Policy and retention schedule should be reviewed annually or where any other cause requires its immediate correction.

6.4. Course of Action at the End of the Retention Period

When a record reaches the end of its retention period in most cases it will be deleted or destroyed. However, these are not the only courses of action that can be taken, and consideration must be made to the relevance of the data for other uses.

In most cases the requirement for further use of data will be identified prior to processing, however there may be occasions where a dataset is identified as having particular relevance to the needs of the organisation .

The following may occur to data after the period of use has expired:

- Anonymisation for statistical needs.
- Transfer to an appropriate archive where it is in the public interest.

Appropriate safeguards must be put in place to ensure that wherever personal data is used beyond its original period of retention it is done so legally and in compliance with DPA 2018 and guidance from the Information Commissioner's Office (ICO).

6.5. Disposal

The organisation will [use an accredited confidential waste disposal provider on site. Information on what should be deemed as confidential waste is detailed in [Appendix 1](#).

Wherever practicable and appropriately secure, disposal methods should encourage recycling.

Electronic files are securely overwritten, in accordance with government guidance, and other media is shredded, incinerated, or otherwise disintegrated for data.

The disposal of the organisation's data, in either paper or electronic form, is conducted in a way that makes reconstruction highly unlikely. Once data has been deleted, it is deemed to be a permanent deletion, irrespective of whether it could technically be reconstructed from a back-up.

Under no circumstances should paper documents containing personal data or confidential information be simply binned or deposited in refuse tips. To do so could result in the unauthorised disclosure of such information to third parties and render the organisation liable to enforcement action by the Information Commissioner's Office.

If records are accidentally destroyed or discovered, this should be reported as a data breach to the Business Manager in line with the Data Breach Policy.

6.6. Archiving

A small percentage of the school's records will be selected for permanent preservation as part of the school's archives. It is maintained as a resource to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging and shared heritage; to prompt memories of school-life among many generations of employees/former students; and to serve as a research resource for all interested in the history of South Wilts Grammar School and the community it serves.

7. Protective Marking

Protective markings may be written upon documentation where it is used in physical forms. In general, the classification of documentation will relate more specifically to the handling and access that is permitted to that data. Confidential data related to employment purposes for example should only be accessible by HR staff or direct line managers for specific reasons.

Information deemed to be financially sensitive, or business sensitive may for the purposes of requests made under the Freedom of Information Act be exempt and, in any case, should be handled with more caution than general data.

8. Monitoring and Compliance

This policy is reviewed annually.

Compliance with this policy shall be monitored through a review process undertaken by the person with overall responsibility for records management within the organisation This will be achieved by an annual survey to check if records are stored securely and can be accessed appropriately.

Should it be found that this policy has not been complied with, or if an intentional breach of the policy has taken place, South Wilts Grammar School, in consultation with senior management and our Data Protection Officer, shall have full authority to take the immediate steps considered necessary, including disciplinary action.

9. Relationship with Existing Policies

This policy has been drawn up within the context of:

- Data Protection Policy
- Data Breach Policy
- ICT and internet acceptable use Policy
- Online safety Policy

Reviewed by	Date of Review / approval	Review cycle	Next Review Date	Statutory / Non statutory	Website
RAP	Summer 2026	2 years	Summer 2028	Statutory	Yes

Appendix 1 - What is Confidential Waste?

(1) Any record* which details personal information

What is personal information?

- Relates to and identifies a living person
- Could help someone identify a person when used with other information
- Is an expression of opinion about an individual
- Indicates our intentions towards an individual

Such as: Name, Address, Date of Birth, Email, Phone numbers, Location data, IP addresses

(2) Any record* which details special categories of personal data

What are special categories of personal data?

- Racial and/or Ethnic Origin
 - Political Opinions
 - Religious Beliefs (or other beliefs of a similar nature)
 - Trade Union membership
 - Biometric Information e.g. Photos
 - Mental or Physical Health condition
 - Sexual life and Orientation
-
- Criminal Records are afforded similar protections to special category data and are similarly sensitive

Such as: Safeguarding, Accident/First Aid, Equalities information, Legal records

(3) Any record* which details business/commercially sensitive information

What is business/commercially sensitive information?

- Information which South Wilts Grammar School would be affected by any loss of, or unauthorised access to.

Such as: Contracts, opinions on service delivery, tender information.

If you have any doubt, then please treat the information as Confidential

** A Record can be in many formats – e.g. Paper, Post-it notes, Disks, CDs, Tapes, Posters, Emails, etc*

Appendix 2 – Retention Schedule

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
Admissions					
11+ application if successful	11+ application form Name / DoB Normal weekday residence – address Parent information / parent address if different to daughter / Telephone / email for parent child resides with / Which parent receives child benefit (relates to main residence) / If looked after / foster / residential or previously looked after / Eligibility for PP and SP Consent to check for above / Sibling in the school If planned change of address in relevant academic year Applicant relationship to applicant / Signed / name of applicant (parent / guardian) Supplementary 11+ plus application (if applicable) Additional information name of school Any additional information parent / guardian provides – EAL / SEND	For processing the admissions Administering the familiarisation test Administering the 11+ Administering the over subscription criteria Allocation of places <i>Schools Admission Code</i> <i>Schools Admission Appeals Code</i>	Schools Admission Code Wiltshire admissions team	Admissions officer SLT member with responsibility for admissions Headteacher	Paper version deleted at the end of the appeal process Electronic copies anonymised date of admission plus 1 year Anonymised held for data analysis purposes <i>IRMS</i>
11+ application if unsuccessful If appealed decision		Supplementary 11+ plus information To determine whether special access arrangements are required	Schools Admission Code Wiltshire admissions team	Admissions officer SLT member with responsibility for admissions Headteacher	Paper copies - Resolution of appeal plus 1 year Electronic - resolution of appeal plus 1 year - then data anonymised Anonymised held for data analysis purposes <i>IRMS</i>
Admission unsuccessful No appeal Student passed 11+	Appeals additional information held Data held for appeals Seating plans / invigilation notes Any written communication received regarding the appeal Schools appeals case	Appeals To present the school case To administer appeals	Schools Admission Code Wiltshire admissions team	SLT member with responsibility for admissions Headteacher School case seen by appeals clerk / viewed by parents and appeals panel Parent case seen by appeals clerk / viewed by school and appeals panel	To be placed on waiting list 11+ valid for one academic year – End of Year 7 – August 31 st Paper version deleted at the end of the appeal process Electronic copies anonymised date of admission plus 1 year Anonymised held for data analysis purposes <i>IRMS</i>
Admission unsuccessful No appeal Student did not pass 11+			Schools Admission Code Wiltshire admissions team	Admissions officer SLT member with responsibility for admissions Headteacher	Deleted at the end of the Appeal process for the application round Anonymised held for data analysis purposes <i>IRMS</i>

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
Test papers and student papers	Completion of 11+ Contains name / DoB / test registration number	Completion of 11+	Schools Admission Code Wiltshire admissions team	Admissions officer	Up to two years – collected and destroyed by GL Assessment
Late entry tests Years 8-10	Name / normal residence / DoB / right to reside in Britain (if overseas applicant) / if looked after / if sibling in school / if PP and SP / if taken previous test and when / month and year preferred admission / year group of admission / any special access requirements / have they completed CAF / parent information names / address / recipient of child benefit Current school contact and address / study of language – duration	For processing the admissions Administering the late entry test Administering the over subscription criteria Allocation of places Schools Admission Code Schools Admission Appeals Code Confirming eligibility for test – age related and confirming not already sat a test within the academic year School for reference / working in year Language of study – if successful to help in determining tutor group CAF – Wiltshire administers midyear applicants	Schools Admission Code Wiltshire admissions team	Admissions officer SLT member with responsibility for admissions Headteacher	Paper version deleted at the end of the appeal process Electronic copies anonymised date of admission plus 1 year Anonymised held for data analysis purposes
6 th form admissions – if admitted	Name / address / dob/ email / phone number / mobile Priority contact details / relationship to student / phone home mobile work GCSEs / predicted / results if known Subjects applied for	For administering admissions and allocation of places For invitations to induction and taster day	Schools Admission Code Wiltshire admissions team	Sixth form administrator Sixth form team School staff	Date of admission plus 1 year
6 th form admissions – if place not taken up			Schools Admission Code Wiltshire admissions team	Sixth form administrator Sixth form team	Up to end of 31 st October each year – to allow for student to change decision

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
BWS Students					
Data field	Data held	Reasons / need for data	Criteria under GDPR / legislation	Who has access	Length data should be held
Examination results electronic Staff resources / admin assessment / Sims	Name / Candidate number / Class / average GCSE score / module – paper results / final result / total result	For school data analysis purposes and monitoring	Pupil information Regulations 2005 (maintained schools only) Same approach applied in academy context. Data Protection regulation	Staff	Kept for 6 years and then the data is anonymised for data analysis purposes
Personal data Sims Recorded as Guest pupil	– Legal and preferred names / DOB/ gender Registration group / year group/ enrolment status guest / admission date/ former UPN / UPN/ year taught in / Admission number /attendance mode Addresses – home address / telephone / email / family home contacts / parental salutations <i>(Ethnic / cultural ethnicity / first language / regional identity / country of birth / religion / proficiency in English)/ network ID</i> In italic previously held to be removed and not entered in future	For administrative purposes For contacting parents For dealing with any medical issues For monitoring attendance Examination processing Network id – administering security monitoring use Access to library resources	Pupil information Regulations 2005 (maintained schools only) Same approach applied in academy context. Data Protection regulation	Staff	Kept for 6 years after end of enrolment

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
Examinations					
Examination certificates	Data held on exam certification - name – date – award	To be given to candidates who were not able to collect at time of distribution	JCQ	Exams and Admissions Officer	The centre should retain all unclaimed certificates under secure conditions for a minimum of 12 months from the date of issue The centre should destroy any unclaimed certificates after retaining them for a minimum of 12 months. They must be destroyed in a confidential manner A record of certificates that have been destroyed should be retained for four years from their date of destruction. <i>JCQ regulations</i>
Examination results – paper	Spreadsheet data – Name / school candidate number / UCI / ULN/ DoB / Entries / results	For internal data analysis and monitoring	Pupil Information Regulations 2005	Staff	Kept for sixth years
Examination results electronic (SWGS)	Name / candidate number / class / average GCSE/ module – paper results / actual grade / target grade	For internal data analysis and monitoring	Pupil Information Regulations 2005	Staff	Kept for sixth years Anonymised after 6 years
Examination results electronic (BWS)	Name / Candidate number / Class / average GCSE score / module – paper results / final result / total result	For internal data analysis and monitoring If subject taught at SWGS / jointly information shared with SWGS	Pupil Information Regulations 2005	Staff	Kept for sixth years Anonymised after 6 years
Student (internal) information held on SIMS CAPITA	Name / school candidate number / UCI / ULN/ DoB / admission number / if any special access arrangements / year group / registration group / name of tutor Entries / results	To be transferred to relevant awarding bodies For administering exams Seating plans Examination timetable Downloading results from awarding bodies and subsequent publication If subject taught at BWS / jointly information shared with BWS	Pupil Information Regulations 2005	Staff	Kept for sixth years Anonymised after 6 years

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
University admission tests	Name, DOB, Gender, UCAS ID, college choice, course choice. We receive from exam board: Name, DOB, Gender, UCAS ID, BMAT, ELAT, TSA, TMUA results	To enable the exams to be administered by Cambridge Assessment		Exams and Admissions Officer	For the year of admission
CATS and 11+ GL Assessment	Name, DOB and Gender	To enable the exams to be administered by GL assessment	Pupil Information Regulations 2005	Staff	School years plus 6 years

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
Finance					
Tax and accounting records	Tax and accounting records	Accounting purposes HMRC	Finance Act 1998 Taxes management Act 1970	Business Manager	6 years from end of relevant tax year
Information relevant for tax purposes	Information relevant for tax purposes	Accounting purposes HMRC	Finance Act 1998 HMRC Notice 700/21	Business Manager	Minimum 6 years from end of relevant tax year
Banking records / receipts / ledgers	Accounting purposes	Accounting purposes	Companies Act 2006 Charities Act 2011	Business Manager	6 years from transaction

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
Health and Safety / trips / careers					
General records			Limitation Act 1970	Business Manager	Minimum 3 years
Records re work with hazardous substances			Control of Hazardous Substances to Health Regulations 2002	Business Manager	Permanent
Accident book / records		To monitor any trends if intervention needed To provide overview for trustees as part of school monitoring	Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995	Business Manager	3 years after last entry or end of investigation
Legal /Accident/Incident Forms	Incident form Name of student / age / date / type of incident	In case of any future legal claim To monitor any trends if intervention needed To provide over view for governors as part of school monitoring	Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995	Business Manager Overseen health and safety governor	DoB child plus 25 Adult – date of incident plus 6 years
Trip information	Will be dependent on trip – location / nature Residential / medical Name / DoB/ next of kin / contact details – phone – home / work /mobile Dr / Dr telephone / NHS number Passport number / EHIC number / Dietary requirements Medical checklist known conditions Permission pain relief mild to administer / blood transfusion permission field / tetanus	To administer trip To run trip Emergency contact details Medical information		Trips coordinator	Shredded on trip return
Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Secondary Schools	Internal forms / approval Risk assessments	Might contain risk assessments	Health and Safety and Safety at Work 1974	Trip Coordinator	14 years form date of visit

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
Records created by schools to obtain approval to run an Educational Visit outside the classroom where there has been a major incident	Internal forms / approval Risk assessments	Might contain risk assessment	Health and Safety and Safety at Work 1974	Business Manager	Retain for 21 years from the student D.O.B
Records relating to accident / injury work	Incident form Name / age / date / type of incident	Potential insurance claim		Business Manager	Date of incident plus 12 years If severe can be kept for longer
Work experience Risk Assessments – work experience locations/pupils	Location of work placement Type of risk assessment undertaken			Work experience coordinator plus administrator	D.O.B child plus 18 Years
Accessibility Plan	Accessibility Plan		Special Educational Needs and Disability Act 2001	SLT	Retain for 12 Years on expiry
Insurance policies		Commercial			3 years after lapse
Insurance claims correspondence		Commercial			3 years after settlement
Employer's liability insurance		Employers' liability (Compulsory Insurance Regulation) 1998			40 years

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
HR / pay roll					
Application for teaching position - unsuccessful	Name / previous name / telephone no home, mobile, work / email National insurance – date of QTS and DfE reference number Post held / reason for leaving / pay scale / FT-PT / employer information / subjects taught / age range Qualifications – degree / teaching qualification / A Levels / GCSEs / equivalent – date – awarding body – grade Courses attended Previous employment non-teaching If convicted of criminal offence / list 99 / confirm relating to convictions / bind overs/ caution Qualified teacher / probationary period 2 references / signature / relationship with someone in the school	Verification of identity Verification of right to work in UK Safeguarding of students – prohibition checks – continuity of employment Ability to undertake role – experience / qualifications Pay portability Pay roll	ICO Employment Practices Code (Recruitment & Selection) Disability Discrimination Act 1995 & Race Relations Act 1976 Limitation Act 1970	HR manager Shortlisting panel Interview panel	Date of successful appointment + 6 months Appointment of headteacher – date of appointment plus 6 years <i>IRMS</i>
Application for support staff position - unsuccessful	Name / previous name / telephone no home, mobile, work / email National insurance Employer / salary / full – part time / job titles – duties / reasons for leaving / dates of employment Education history – awarding body – qualification – dates Additional information / ICT skills If convicted of criminal offence / list 99 / confirm relating to convictions / bind overs/ caution 2 references / signature / relationship with someone in school	Verification of identity Verification of right to work in UK Safeguarding of students – prohibition checks – continuity of employment Ability to undertake role – experience / qualifications Pay roll	ICO Employment Practices Code (Recruitment & Selection) Disability Discrimination Act 1995 & Race Relations Act 1976 Limitation Act 1970	HR manager Shortlisting panel Interview panel	Date of successful appointment + 6 months <i>IRMS</i>
Disclosure & Barring Service checks			Part 4 of the Schedule to the Education (Independent School Standards)		Record only satisfactory / unsatisfactory result and delete other information. If copy is kept, not to be retained beyond 6 months (DfE statutory Guidance 'Working Together to safeguard children - https://www.gov.uk/government/publications/working-together-to-safeguard-children--2)

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
			Regulations 2014		
Application - Equal opportunities	– ethnic origin / gender / age / dob/ disability / where did you see the job advertised	To ensure complaint with Equalities Act Monitoring		Headteacher – after employment	Date of successful appointment + 6 months Appointment of headteacher – date of appointment plus 6 years <i>IRMS</i>
Volunteer records	Name, address, DOB, documents used for ID proof and DBS, List 99, dates for checking list 99/s.128 etc as appropriate, DBS number and details of reading school handbook. Sports Coaches: Same details as for staff except not qualifications and often a risk assessment not references.	For sharing relevant information with student and parents For checks relating for working with children Emergency contact details	Part 4 of the Schedule to the Education (Independent School Standards) Regulations 2014	DSL and Deputy DSL HR Manager	Same as teaching staff
Peripatetic teachers	Name, address, telephone and email contact details, emergency contact details, car registration details and relevant medical information	For sharing relevant information with student and parents For checks relating for working with children Emergency contact details	Part 4 of the Schedule to the Education (Independent School Standards) Regulations 2014	DSL and Deputy DSL Music support	Same as teaching staff
Appraisal documentation	Teachers Appraisal objectives and outcomes for previous year Appraisals objective for forthcoming year 2 lesson observations Staff reflection against teacher standards Any CPD requirements Support staff	To monitor staff performance Any disciplinary procedures		Staff member / reviewer Headteacher	Current year plus 6 years
Lesson observations	Outcome of lesson observations Admin / staff resources / headsec	School monitoring / SEF CPD requirements		Headteacher / Deputy Headteacher	Termination plus 6 years
Staff current Paper HR files	Application form / references Contract / pay information Appraisal letters relating to pay progression Proof of ID / qualifications / DBS number – safeguarding training Absences / requests	Employment records For reporting purposes – workforce census Pay roll	Limitation Act 1970 and Data Protection regulation	HR Manager / business Manager – pay roll/ Headteacher	Ongoing for duration of employment, maximum 6 years after employment

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
Records regarding working time			Working Time Regulations 1998	HR Manager	2 years
Pay roll data (SAGE)	Name / TLR if applicable / FTE / pay scale NI / pension details / bank details Payroll / Employee / Income Tax and NI records: P45; P6; PIID; P60	To administer payroll	Taxes Management Act 1970 / IT (PAYE) Regulations	Finance officer responsible for pay roll Business Manager	6 years from end of current year
Pension records	Scheme membership Records re active members opt in and out Records about employees	Administration of pensions Wiltshire LGPS and Teachers Pensions	Detailed guidance for employers – Pension Regulator 2017 Detailed Guidance N0.9 record keeping	Business Manager	For the time period needed - until known a person takes their retirement
Maternity pay records	MAT B1, SMP	School absence reasons – monitoring and insurance SSP – legislation	Statutory Maternity Pay Regulations	Finance officer responsible for pay roll Business Manager	Current year plus 3
Sick pay	Self-certification / Drs certificate, dates of absent and reason – SSP records	School absence reasons – monitoring and insurance SSP – legislation	Statutory Sick Pay (General) Regulations	Finance officer responsible for pay roll Business Manager	3 years after the end of the tax year
SCR	Name / address / dob / ID seen date / job title / qualification if appropriate to role / checks barring lists / prohibition lists / EEA check / S128 check if appropriate / DBS / oversees police check if appropriate / entitlement to work in UK Check / visa if appropriate/ relevant safeguarding training including recruitment if appropriate / proof read safeguarding hand book	Safeguarding requirements		DSL HR Manager Headteacher	Ongoing but leavers taken off immediately
HSCC software	Name / TLR if applicable / FTE / pay scale	To help the school plan the school budget		HR Manager Headteacher	6 years from end of financial period

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
Allegation of a safeguarding nature included if unfounded	Meeting notes / any referrals / outcome of school investigations and procedures			HR manager Headteacher	Until normal retirement age or ten years from date of allegation whichever is the longest <i>Keeping children Safe in Education</i>
Disciplinary	Verbal warning Written warning – 1 Written warning – 2 Final warning Case unfounded				Date of warning plus 6 months Date of warning plus 6 months Date of warning plus 12 months Date of warning plus 18 months Dispose securely end of case
Car registration	Car registration – held staff resources	Administrative purposes Site safety / safeguarding			Until staff employment terminated
Foreign national ID documents				Immigration (Restrictions on Employment) Order 2007 Independent School Standards Regulations	Minimum 2 years from end of employment

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
Reception					
Visitor signing in / out book	Name, time and date attended, car registration, who they were visiting	Safeguarding and health and safety considerations	Common practice		3 months after conclusion of academic year
Trustee signing in / out book	Name, time and date attended, car registration	Safeguarding and health and safety considerations	Common practice		3 months after conclusion of academic year
Staff signing in / out book	Name, time and date attended, car registration	Safeguarding and health and safety considerations	Common practice		3 months after conclusion of academic year
Student signing in / out book	Name, form, time and date	Safeguarding and health and safety considerations	Common practice		3 months after conclusion of academic year
Locker key information	Name, year group, form and key number	To administer process	Common practice		3 months after conclusion of academic year
Student medical need files	For the use by the 'matron' and medical room	To administer to medical need	Common practice		Ongoing – updated annually – old version disposed of securely
Student lunch information	Lunch tokens Early lunch tokens	To administer	Common practice		Ongoing – updated annually – old version disposed of securely
Bus passes	Information relating to lost bus passes	To resolve	Common practice		1 Year after conclusion of academic year

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
Governance / school information					
Governor / trustee personal data	Contact details, Name including any former name, Date and place of birth, nationality, occupation, mother's maiden name and eye colour, Information provided on governor nomination form, CPD attended including safeguarding training, Attendance at meetings, Evidence of checks required for working in schools (Single Central Register), Photographs, References, Terms of office	Administration / registration with Companies House			Duration of office plus 6 years (same as HR)
Governor / trustee application	Name, address, DOB, nationality, town of birth, mother's maiden name and eye colour	For process of administration and relevant safeguarding checks to be undertaken Companies House regulations for registration Registration also with Wiltshire's Governor Services, NGA website and Edubase	Companies House regulations for registration		Date of successful appointment + 6 months
Minutes of meeting – principal signed copy	Named attendees and apologies				Permanent Retain in school for 6 years from date of meeting Transfer to archive
Agendas		Administration / management of meeting			Date of meeting then destroy
Instrument of Governance	Instrument of Governance	Legal requirement			Retain in school whilst school is open Transfer to Archives when the school has closed
Complaints file					Retain in school for the first six years Review for further retention in the case of contentious disputes Destroy routine complaints
Company Articles of	Company Articles of Association	Legal requirement	Companies Act 2006 Charities Act 2011		Permanent

Association, Rules / by laws					
Academy funding agreement and any supplemental agreements	Academy funding agreement	Legal requirement	Charities Act 2011		Permanent
Members' meetings etc. Minutes / resolutions	Named attendees and apologies Resolutions	Legal requirement	Companies Act 2006 Charities Act 2011		10 years (after 10 years stored securely off site)
Governor / trustee attendance at meetings	Named attendees and apologies	Required data published on Academies House	Companies Act 2006 Charities Act 2011		10 years (after 10 years stored securely off site)
Audit reports	Name and attendance at meetings (numerical)	Financial accountability			Close at end of financial year Current curriculum year + 6 years
Annual Accounts and review			Companies Act 2006 Charities Act 2011		Permanent
Title deeds	Title Deeds	Legal requirement / proof of land ownership			Permanent to disposal of property
Building records, plans, consents, certification and warranties			Limitation Act 1980		6 years after disposal or permanent if of historical interest

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
SWGS students					
Examination results external electronic Staff resources / admin assessment / Sims	Name / Candidate number / Class / average GCSE score / module – paper results / final result / total result	For school data analysis purposes and monitoring	Pupil information Regulations 2005 (maintained schools only) Same approach applied in academy context. Data Protection regulation	All staff	Kept for 6 years and then the data is anonymised for data analysis purposes
Examination results internal	Name / year / tutor group / teaching class /	Assessing student progress and planning any intervention strategies if needed	Pupil information Regulations 2005 (maintained schools only) Same approach applied in academy context. Data Protection regulation	All staff Admin /assessment data	Current year + 5
Personal data Educational record Sims Recorded as Guest pupil (For SEND and safeguarding see below)	Assessment data - Interim and full report Examination data –entries / predictions /results / coursework grades Timetable Behaviour - conduct points / detentions / report cards, exclusions Absence reports Linked documents – letters Basic details – name legal and preferred / dob / gender / registration group / year group / former UPN / UPN / curriculum year/ admission number / attendance mode Addresses – telephone / email – if provided Family – home – contact details Dietary including FSM Medical NHS number / medical practice / medical conditions Ethnicity Religion National identity / country of birth / proficiency in English	For administrative purposes For contacting parents For dealing with any medical issues For monitoring attendance Examination processing Network id – administering security monitoring use Access to library resources To compile medical needs list for staff To monitor attendance For reporting purposes – Census Trips /visits information Photograph permission list	Pupil information Regulations 2005 (maintained schools only) Same approach applied in academy context. Data Protection regulation	All staff	25 years from date of birth if this is the final school of the child but the pupil file should follow the pupil so it is likely to be difficult to justify the need for retention once the file has been passed to the pupil's new school

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
	Mode of travel / If in care – details / School history / If forces / School network Photograph permissions				
Student paper files	As above	As above	As above	As above	25 years from date of birth if this is the final school of the child but the pupil file should follow the pupil so it is likely to be difficult to justify the need for retention once the file has been passed to the pupil's new school
Child Protection information (on child's file)	Information to the case – will be dependent on the individual case	Safeguarding	Keeping children safe in education Statutory guidance for schools and colleges September 2016"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children February 2017"	DSL and Deputy DSL	RETAIN UNTIL FURTHER RECOMMENDATIONS Subject to moratorium on destruction due to historic child abuse enquiry. See https://www.iicsa.org.uk/document/guidance-note-retention-instructions-and-data-protection-requirements
Child Protection Information in other files	Information to the case – will be dependent on the individual case	Safeguarding	Keeping children safe in education Statutory guidance for schools and colleges September 2016"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children February 2017"	DSL / Deputy DSL	RETAIN UNTIL FURTHER RECOMMENDATIONS Subject to moratorium on destruction due to historic child abuse enquiry. See https://www.iicsa.org.uk/document/guidance-note-retention-instructions-and-data-protection-requirements
SEN files	Information will vary due to named individuals	Relates to specific learning needs	Limitations Act 1980	SENCO and information shared with relevant staff	Usually 25 years from date of birth of the pupil. If kept longer there is the need to show good justification.
EHCP	Information will vary due to named individuals	Relates to specific learning needs	Special Educational Needs and Disability Regulations 2014	SENCO and information shared with relevant staff	Usually 25 years from date of birth of the pupil. If kept longer there is the need to show good justification.

DATA FIELD	DATA HELD	REASONS/NEED FOR DATA	Criteria under GDPR / legislation	WHO HAD ACCESS	LENGTH DATA SHOULD BE HELD
			Children and families Act 2014, part 3		
Statements of Special Educational Needs (now historic)	Information will vary due to named individuals	Relates to specific learning needs	Originally under Special Educational Needs and Disability Regulations 2001	SENCO	25 years from date of birth of pupil unless passed to new school (usually on the pupil's file)
Attendance registers	Attendance Authorised / unauthorised and other relevant attendance codes	Tracking attendance	Pupil Registration Regulations 2006 Regulation 14	Relevant school staff	3 years from when the register entry was made if made in paper registers For computerised registers retain until 3 years after the end of the school year during which the entry was made. This applies to every back up copy.
Held on network – electronically Admin / staff resources	Departmental minutes	Ongoing monitoring		Staff	Redaction of student names after 6 years following end of enrolment if minutes retained
Letters authorising absence	Letters authorising absence – student information	Tracking, monitoring and recording attendance	Pupil Registration Regulations 2006 Regulation 14	Relevant school staff	Date of absence plus 2 years
UCAS information	Copy of application form	To assist administration of process To assist if a student choses to apply in a different year		Sixth form team	2 years after student
Photographs	Photographs from events	Kept for historical records (no names linked to photographs) Internal use only unless consent sought		Staff	Could be permanent