



Records Management and Retention Policy

Policy title:	Records Management and Retention Policy
Function:	The purpose of this policy is to provide a clear framework for the effective management, retention and disposal of records, ensuring compliance with legal, regulatory and operational requirements.
Status:	Approved
Statutory guidance:	Department for Education – Data protection in schools (record keeping and management) Data protection in schools – record keeping and management Department for Education – Retention Schedule (latest guidance) DfE retention schedule Information Commissioner’s Office (ICO) – Retention guidance (UK GDPR) ICO guidance on retention Information Commissioner’s Office (ICO) – Storage limitation principle ICO storage limitation principle Data Protection Act 2018 & UK GDPR (legislation) UK data protection legislation Freedom of Information Act 2000 – Section 46 Code of Practice
Audience:	Staff, Senior Leadership Team, Trustees
Ownership:	Board of Trustees, Headteacher
Last reviewed:	May 2026
Reviewed by:	Board of Trustees
Next review:	May 2028

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Aims and objectives

At The Blue Coat School Liverpool, every student belongs, is valued, and is empowered to thrive. Guided by *Non Sibi Sed Omnibus* — not for oneself but for all — we honour our story with honesty while forging a modern, inclusive future.

We celebrate individuality and champion diversity, inspiring students to flourish in their own way with confidence, curiosity, resilience, and kindness.

Our vision is to ignite ambition and nurture integrity and compassion, preparing young people to shape a fairer, brighter world — in Liverpool and beyond.

1. Purpose of the policy

The purpose of this Records Management and Retention Policy is to establish a clear, consistent and compliant framework for the creation, management, storage, retention and disposal of records across the school. The policy is designed to ensure that all records, whether held in paper or electronic format, are accurate, accessible, securely stored and maintained in line with legal, regulatory and operational requirements.

Effective records management underpins the school's ability to operate efficiently, transparently and accountably. This policy supports the school in demonstrating compliance with the Data Protection Act 2018, UK General Data Protection Regulation (UK GDPR), and other relevant legislation, including the Freedom of Information Act 2000. It ensures that personal data is collected and retained only for lawful purposes and is not kept for longer than necessary, in accordance with the principle of storage limitation.

This policy also aims to safeguard the integrity and confidentiality of information by ensuring appropriate controls are in place to protect records from unauthorised access, loss, misuse or damage. By implementing consistent approaches to records management, the school can reduce risk, support safeguarding responsibilities and ensure that sensitive information relating to pupils, staff and stakeholders is managed appropriately.

In addition, this policy supports the school's operational effectiveness by ensuring that records are organised, reliable, and readily retrievable when required. This enables staff to access accurate information to inform decision-making, respond to enquiries (including subject access requests and Freedom of Information requests) and meet audit and inspection requirements, including those from Ofsted and trustees.

The policy further provides a structured approach to records retention by setting out principles for determining how long different types of records should be kept, based on statutory guidance, business need and best practice. It ensures that once records have reached the end of their retention period, they are securely and appropriately disposed of, with clear audit trails where required.

2. Roles and responsibilities

Effective records management is a shared responsibility across the school. All staff play a role in ensuring that records are created, maintained, retained, and disposed of appropriately in line with this policy.

Trustees

- Ensure that the school has appropriate records management arrangements in place
- Provide strategic oversight and assurance that the school is compliant with legal and regulatory requirements
- Monitor the effectiveness of this policy through regular review and reporting

Headteacher / Senior Leadership Team (SLT)

- Ensure that this policy is implemented consistently across the school
- Promote a culture of good information governance and accountability
- Ensure sufficient resources and training are in place to support effective records management
- Monitor compliance and address any risks or issues identified

Data Protection Officer (DPO)

- Provide advice and guidance on records management, data protection, and retention requirements
- Monitor compliance with data protection legislation, including UK GDPR and the Data Protection Act 2018
- Oversee the development and maintenance of the retention schedule
- Support the school in responding to information requests (e.g. Subject Access Requests and FOI requests)
- Advise on data breaches and appropriate handling of sensitive information

Staff & School Operations Manager/Finance & Estates Manager/Personnel Officer

- Ensure that records, including HR and personnel files, are accurate, complete and maintained in line with this policy
- Implement consistent processes for the storage, retention and disposal of records
- Ensure that contractual, employment and operational records are up to date and compliant
- Support audits of records (e.g. personnel file reviews, contract checks)
- Ensure appropriate access controls are in place for confidential records

Line Managers

- Ensure that records within their areas of responsibility are maintained properly and kept up to date
- Ensure staff understand and adhere to records management procedures
- Promptly update records where there are changes (e.g. staffing, roles, responsibilities)
- Support the secure handling and disposal of records when required

All Staff

- Create and maintain accurate records to support their work
- Ensure records are stored securely and handled in line with this policy
- Only access information where authorised and necessary for their role
- Follow the school's retention schedule and disposal procedures
- Report any concerns relating to records management, data protection or information security

IT

- Ensure secure systems are in place for storing and accessing electronic records
- Implement appropriate backup, recovery, and security measures
- Support the secure deletion and disposal of electronic data
- Maintain access controls and permissions in line with school requirements

Monitoring and Compliance

- Compliance with this policy will be monitored through:
 - Internal audits (e.g. personnel files, safeguarding records, data systems)
 - Reviews of retention and disposal practices
 - Reporting to senior leaders and trustees where required
- Any breaches or non-compliance will be addressed promptly and may result in further investigation or action

3. Procedures and Practices

The school will implement clear and consistent procedures to ensure that all records are managed effectively throughout their lifecycle. This includes the creation, storage, review, retention and secure disposal of records, in line with statutory requirements and best practice. These procedures apply to all records, regardless of format and are designed to ensure that information is accurate, accessible when required and securely handled at all times.

Review of Records

- Records will be reviewed regularly to ensure they remain accurate, relevant and up to date
- A formal review process will be undertaken in line with the school's retention schedule
- Records that are no longer required for operational, legal or safeguarding purposes will be identified for disposal
- Departments and line managers are responsible for ensuring records within their areas are reviewed appropriately
- Reviews may be carried out as part of internal audits, data protection checks or routine administrative processes

Retention Periods

- The school will maintain a retention schedule as set out In Appendix A which sets out how long different categories of records must be kept
- Retention periods will be determined based on:
 - Statutory and regulatory requirements
 - Operational and business needs
 - Safeguarding considerations
 - Best practice guidance
- All staff must adhere to the retention schedule when managing records
- Records must not be kept longer than necessary and should be reviewed at the end of their retention period
- Where required, retention periods may be extended (e.g. ongoing investigations, legal hold, or safeguarding matters)

Destruction of Hard Copy Records

- Paper records identified for disposal will be destroyed securely to prevent unauthorised access
 - Confidential or sensitive records must be disposed of using the secure confidential waste bins
- Records must not be disposed of in general waste where they contain personal or sensitive information
- Where appropriate, a record of destruction will be maintained, including details of what was destroyed and when
- Staff must ensure that documents are not left unsecured prior to destruction
- A record of the records deleted should be entered into the destruction log, a copy of which can be found in Appendix B.

Destruction of Electronic Records

- Electronic records will be permanently deleted from systems once they reach the end of their retention period
- Deletion processes will ensure that records cannot be recovered or reconstructed
- Where applicable, records will also be removed from backups in line with system processes

- IT support will ensure that secure deletion methods are in place and that access permissions are managed appropriately
- Staff must ensure that electronic files are not retained unnecessarily in personal drives, emails or shared areas

4. Monitoring, review and evaluation

The implementation and effectiveness of this policy will be monitored on an ongoing basis to ensure compliance with statutory requirements, data protection legislation and best practice in records management. Regular reviews will be undertaken by the Data Protection Officer, in conjunction with senior leaders, to assess the accuracy, completeness and security of records across the school. This will include periodic audits of key record areas (such as personnel files, safeguarding records, and student data), checks against the retention schedule, and verification of appropriate disposal processes, including the maintenance of destruction logs.

The policy will be formally reviewed at least annually, or sooner where there are changes in legislation, guidance or school practices. Feedback from audits, incidents (including data breaches) and stakeholder input will be used to inform improvements and strengthen procedures. Findings from monitoring activities will be reported to senior leadership and, where appropriate, to the trust board to provide assurance that records are managed effectively, risks are mitigated and the school remains compliant and audit-ready.

APPENDIX A

RECORDS RETENTION SCHEDULE

Governance of the School

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Appointment Trustees	Yes		Life of appointment + 6 years	Secure Disposal
Accessibility Plan	There may be if the plan refers to specific students	Limitation Act 1980 (Section 2)	Life of plan + 6 years	Secure Disposal

Trust Board

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Agenda for Trust Board Meetings	May be data protection issues if the meeting is dealing with confidential issues relating to staff	FOI Act 2000	Permanent. One copy should be retained with the master set of minutes. All other copies can be disposed of	Secure disposal
Minutes of, and papers considered at, meetings of the Trust Board and its committees	May be data protection issues if the meeting is dealing with confidential issues relating to staff	FOI Act 2000	Permanent	
Reports presented to the Trust Board	May be data protection issues if the meeting is dealing with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept for the life of the school.	Secure disposal or retain with the set of minutes.

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Records relating to complaints dealt with by the Trust Board	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	Secure disposal
Declarations of Interest Statements Trustees			Life of School	

Funding and Finance

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Maternity Pay Records	Yes	Statutory Maternity Pay (General) Regulations 1986	Current year + 3 years	Secure Disposal
Records held under Retirement Benefits Schemes Regulations 1995	Yes	Regulation 15 Retirement Benefits Schemes Regulations 1995	From the end of the year in which the accounts were signed for a minimum of 6 years	Secure Disposal
Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	Secure Disposal
Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	Secure Disposal
Payroll records	Yes		Date of payroll run + 6 years	Secure Disposal
School Fund - Invoices	No		Current year + 6 years	Secure Disposal
School Fund - Receipts	No		Current year + 6 years	Secure Disposal
School Fund – Bank Statements	No		Current year + 6 years	Secure Disposal
School Meals				
Free school meals registers	Yes		Current year + 6 years	Secure Disposal
School meals registers	Yes		Current year + 3 years	Secure Disposal

Human Resources

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Recruitment				
All records leading up to the appointment of a new Headteacher	Yes		Date of appointment + 6 Years	
All records leading up to the appointment of a new member of staff, unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	Secure Disposal
All records leading up to the appointment of a new member of staff, successful candidate	Yes		All relevant information should be added to the Staff Personnel file and all other information retained for 6 months	Secure Disposal
Proofs of identity collected as part of the process of checking	Yes		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 added to the Staff Personnel File	Secure Disposal
Pre-employment vetting information, evidence proving the right to work in the UK	Yes	An employer's guide to right to work checks (Home Office May 2015)	Where possible these documents should be added to the Staff Personnel File but if they are kept separately then the Home Office requires that the documents are kept for the termination of employment plus not less than 2 years.	Secure Disposal
Records relating to the employment of overseas teachers	Yes		Where possible these documents should be added to the Staff Personnel File	Secure Disposal

			but if they are kept separately then the Home Office requires that the documents are kept for the termination of employment plus not less than 2 years	
Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	Secure Disposal

Operational Staff Management

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Staff Personnel File including employment contract and staff training records	Yes	Limitation Act 1980 (section 2)	Termination of employment + 6 years	Secure Disposal
Timesheets	Yes		Current year + 6 years	Secure Disposal
Annual appraisal/assessment records	Yes		Current year + 5 years	Secure Disposal

Management of Disciplinary and Grievance Processes

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded.	Yes	Keeping children safe in education Statutory guidance for schools and colleges 2023, Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children July 2018.	Until the persons normal retirement age or 10 years from the date of the allegation, whichever is longer, then review.	Secure Disposal
Disciplinary Proceedings				
Oral warning			Date of warning + 6 months	Secure Disposal

Written warning – Level 1			Date of warning + 6 months	Secure Disposal
Written warning – Level 2			Date of warning + 12 months	Secure Disposal
Final warning			Date of warning + 18 months	Secure Disposal
Case not found			If the incident is child protection related then see above; otherwise, dispose of at the conclusion of the case	Secure Disposal

Health and Safety

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Records relating to accident/injury at work	Yes		Date of incident + 12 years. In the case of serious accidents, a further retention period will need to be applied.	Secure Disposal
Accident reporting (i.e. accident resulting in injury or property damage)	Yes	Social Security (Claims and payments) Regulations 1979 (regulation 25). Social Security Administration Act 1992 (section 8). Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format. The incident reporting form may be retained as below.	
• Adults			Date of incident + 6 years	Secure Disposal
• Children			Date of birth of the child + 25 years	Secure Disposal
Incident reports (i.e. incident that does not result in injury or property damage, might be referred to as a 'near miss')	Yes		Current year + 20 years	Secure Disposal

Management of the School

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Admissions – if the admission is successful	Yes	School Admissions Code Mandatory requirements and statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admissions appeals panels 2021	Date of admission + 1 year	Secure Disposal
Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Mandatory requirements and statutory guidance for admission authorities, governing bodies		
Register of admissions	Yes		Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made.	Review 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.
Admissions – Secondary Schools - Casual	Yes		Current year + 1 year	Secure Disposal
Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Mandatory requirements and statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels 2021	Current year + 1 year	Secure Disposal
Supplementary information form,	Yes			

including additional information such as religion and medical conditions				
Successful admissions			This information should be added to the student file	Secure Disposal
Unsuccessful admissions			Until appeals process completed	Secure Disposal

Headteacher and Senior Management Team

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Log books of activity in the school maintained by the Headteacher	There may be data protection issues if the log book refers to individual students or members of staff		Date of last entry in the book + a minimum of 6 years then Review	These could be of permanent historical value and should be offered to the County
Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual students or members of staff		Date of the meeting + 3 years then review	Secure Disposal
Reports created by the Headteacher or the Management Team	There may be data protection issues if the report refers to individual students or members of staff			
Records created by the Headteacher, Deputy Headteacher, Heads of Year and other members of staff with administrative responsibilities	There may be data protection issues if the report refers to individual students or members of staff		Current academic year + 6 years then review	Secure Disposal
Correspondence created by Headteacher, Deputy Headteacher, Head of Year and other members of staff with	There may be data protection issues if the report refers to individual students or		Date of correspondence + 3 years then review	Secure Disposal

administrative responsibilities	members of staff			
Professional Development Plans	Yes		Life of the plan + 6 years	Secure Disposal

Operational Administration

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Management of complaints	Yes		Date of complaint + 3 years	Secure Disposal
Visitors' books and signing in sheets	Yes			

Student Management

This section includes all records which are created during the time a pupil spends at the school. For information about accident reporting, see under Health and Safety above.

Students Educational Record

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Students Education Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 (SI 2005 No. 1437)		
Secondary		Limitation Act 1980 (section 2)	Date of birth of the student +25 years	Secure Disposal
Records relating to the management of exclusions	Yes		Date of birth of the student involved + 25 years	Secure Disposal
Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be maintained.	
Examination results – student copies	Yes			
Public			This information should be added to the student file	All uncollected certificates should be returned to the examination board

• Internal			This information should be added to the student file	
Child protection information held on student file	Yes	Keeping children safe in education Statutory guidance for schools and colleges 2023, Working together to safeguard children. A guide to inter agency working to safeguard and promote the welfare of children July 2018	If any records relating to child protection issues are placed on the student file, it should be in a sealed envelope and then retained for the same period of time as the student file.	
Child protection information held in separate files	Yes	Keeping children safe in education Statutory guidance for schools and colleges 2023, Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children July 2018.	Date of birth of the child + 25 years then review.	Secure Disposal

Attendance

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Attendance registers	Yes		Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	Secure Disposal
Correspondence relating to authorised absence		Education Act 1996 (section 7)	Current academic year + 2 years	Secure Disposal

Special Educational Needs

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of the student +25 years	Review Note: This retention period is the minimum retention period that any student file should be kept. Some authorities choose to keep SEN files for a longer period of time in order to defend themselves in a 'failure to provide a sufficient education' case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period, this should be documented
Statement maintained under Section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 (Section 1)	Date of birth of the student + 25 years (This would normally be retained on the student file)	Secure Disposal, unless the document is subject to a legal hold
Statement maintained under Section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Special Educational Needs and Disability Act 2001 (Section 2)	Date of birth of the student + 25 years (this would normally be retained on the student file)	Secure Disposal, unless the document is subject to a legal hold
Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 (Section 14)	Date of birth of the student + 25 years (This would normally be retained on the student file)	Secure Disposal, unless the document is subject to a legal hold.

Curriculum Management

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Examination results (schools' copy)	Yes		Current year + 6 years	Secure Disposal
Published Admission Number (PAN) reports	Yes		Current year + 6 years	Secure Disposal
Value added and contextual data	Yes		Current year + 6 years	Secure Disposal
Self-evaluation forms	Yes		Current year + 6 years	Secure Disposal

Extracurricular Activities

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for the date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.
Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	Date of birth of the student involved in the incident + 25 years. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all students. Place in the student file.	
Records relating to residential trips	Yes		Date of birth of youngest student involved + 25 years	Secure Disposal

Student Work

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Student work (non-examination assessment), including homework and classwork	Yes	UK GDPR and Data Protection Act 2018	Duration of the student's enrolment at the school	Secure deletion from server/storage system.

Network Home Folders

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Student/Staff network home folders	Yes	UK GDPR and Data Protection Act 2018	Deactivated immediately on leaving school, deleted 30 days after leaving.	Account deactivation followed by secure deletion.

Email Accounts

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at end of administrative life of the record
Student/Staff email accounts (including mailbox content)	Yes	UK GDPR and Data Protection Act 2018	Deactivated on leaving the school; mailbox retained 30 days to allow recovery of essential information, then permanently deleted	Account deactivation and secure deletion of mailbox and associated data.

APPENDIX B

RECORD OF DESTRUCTION

Description of Item	No. of files/records destroyed	Person authorising destruction	Method	Date