Huntington School
Learn and succeed

# Records Management Policy

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| **Policy Number:** | **73** |
| **Member of Staff Responsible for the Policy:** | **Matt Smith** |
| **Date on which this Policy was last reviewed:** | **February 2026** |
| **Date by which this Policy is to be reviewed:** | **February 2027** |
| **Dissemination of the Policy:** | **All Staff, Governors, Parents, School Website** |

## Introduction and Scope

Huntington School recognises records management as a core corporate function that supports the effective management of the organisation. A records management programme improves accountability, transparency, continuity, decision-making, and compliance with relevant legislation and regulations.

This policy provides a framework for ensuring that we comply with the requirements of the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, and information access legislation, including the Freedom of Information Act and other associated guidance and codes of practice.

This policy applies to our entire workforce. This includes employees, governors or trustees, contractors, agents and representatives, volunteers and temporary staff working for or on our behalf. Individuals found to knowingly or recklessly infringe this policy may face disciplinary action.

The Records Management Policy applies to all records created, received or maintained by us while carrying out our functions, whether in paper or electronic format. It should be read alongside the other policies within our information governance policy framework.

## Roles and Responsibilities

Overall responsibility for ensuring that we meet the statutory requirements of any legislation lies with the Board of Governors or Trustees. The following roles will have day-to-day responsibility for records management compliance and providing the necessary assurance to the Board.

**Senior Information Risk Owner (SIRO)**
The SIRO is responsible for overseeing the implementation of this policy and ensuring that effective records management practices are in place across the organisation. The SIRO is also responsible for operational management and will ensure that staff are appropriately trained in records management, supported by the SPOC and IAOs. In our organisation, this role lies with the Headteacher.

**Single Point of Contact (SPOC)**
The SPOC will support the SIRO in day-to-day operational management. This includes providing guidance on effective records management practices and promoting compliance with this policy so that information can be retrieved easily, appropriately, and in a timely way. In our organisation, this role lies with the School Business Manager.

**Information Asset Owner (IAO)**
The IAO is responsible for the security and maintenance of a particular record during its lifecycle. IAOs need to understand how information is created, amended, or added over time, who has access to the records, and why. They are also responsible for the appropriate disposal of information when it is no longer required. A record of IAOs is included in our Information Asset Register.

**All staff**
All staff, including governors or trustees, contractors, agents and representatives, volunteers, and temporary staff working for or on our behalf, will be responsible for managing records consistently in accordance with this policy. Complete and accurate records must be held that adequately document their work.

## Records Management

A record is 'information created, received, and maintained as evidence and an asset by an organisation in pursuit of legal obligations or in the transaction of business.' Records are retained for a period determined by legal, regulatory, and functional requirements.

A programme will be developed to manage our records throughout their lifecycle. This will include using methods such as version control, naming conventions, and file plans to ensure that records can be easily searched and accessed in the event of an information request.

We will ensure that our records are authentic, reliable, useable and have integrity to fulfil and retain their evidentiary value. Regular reviews of the records management programme will be conducted to ensure compliance and check that records are stored securely and can be accessed appropriately.

## Pupil Records

We are required to maintain records for each pupil. This record is the core evidence of an individual's progress through the education system and will accompany them throughout their school career.

Pupil records are held electronically within our management information system (MIS) whenever possible. Information not forming part of the core record may be held outside the MIS in either electronic or paper format. This includes information with shorter retention periods, such as attendance registers, consent forms, medical forms, accident forms, absence notes, and pupil work.

Records relating to pupils involved with child protection or safeguarding are held securely in a designated system accessible to the Designated Safeguarding Lead and designated staff members. These records are stored separately from the core pupil record to ensure confidentiality and restricted accessibility. They may be retained for longer than the core pupil file.

We will ensure that the information in the pupil file is accurate, objectively recorded, expressed in a professional manner, and kept up to date.

Pupil records will be transferred electronically to any new setting the pupil attends. Once securely transferred, we will not keep copies of the pupil record unless there is ongoing legal action. The setting the pupil attends until the statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25.

## Staff Records

Records relating to our workforce will be held securely electronically, wherever possible, or in paper format. Appropriate security measures are in place to ensure confidentiality and restricted access.

Information related to child protection allegations against staff will be held separately from the core employee record to ensure confidentiality and restricted accessibility. This information may be held for longer than the core employee file.

## Information Asset Register (IAR)

In accordance with Article 30 of UK GDPR, we will have an Information Asset Register (IAR) that maintains a record of our processing activities. The IAR will document what records we hold, where they are stored, who has access to the information, and the retention periods in place. It will be reviewed, at least annually, to ensure it remains accurate.

## Email Management

We will have a process in place to ensure that emails are managed in accordance with this policy and our retention schedule. Emails discussing business or reflecting significant actions or decisions concerning our pupils or staff will not be stored in personal email inboxes. These emails must be filed into an appropriate electronic filing system, and the original email deleted.

Where possible, emails are automatically deleted in accordance with our retention schedule. Where this is not possible, staff review personal email inboxes manually to ensure any unnecessary emails are deleted.

## Security and Access

All records, especially those containing personal data, will be stored securely to maintain confidentiality while keeping the information accessible to those authorised to see it. Electronic records will have appropriate security and access controls, and systems will have robust audit functionality wherever possible.

Paper records will be stored in secure, lockable storage areas with restricted access to key roles.

When sharing or transferring records containing personal information, we will ensure appropriate transmission security controls are in place and align with our Information Security Policy.

## Information Requests and Data Subject Rights

Requests for information under Data Protection, Freedom of Information, Environmental Information, or other legislation will be handled in line with our Data Protection Policy.

## Retention and Disposal

Retention is the period a record is kept after it stops being actively used but before it is destroyed. It is a vital part of records management as it allows organisations to retain records only for as long as needed and discourages records being held for long periods 'just in case'.

Legal, regulatory, or functional requirements determine the retention period for particular types of records. We have implemented a Retention Schedule (Appendix One) that outlines our specified retention periods. This schedule will be reviewed at least annually to ensure accuracy.

We will ensure that any records containing personal or confidential information are disposed of appropriately and securely in line with our retention schedule.

Records held in databases or electronic management systems, with the functionality to automatically destroy records after a specified period, will be used wherever possible. A review of the records will be carried out before destruction, where practical.

Where automatic disposal is not in place, for example, for paper records, we will conduct a manual review annually to ensure they are destroyed in line with retention guidelines.

The disposal of all information is documented to ensure that we maintain a record of when it has been deleted and by whom. This allows us to evidence that a record no longer exists or has been transferred to another setting in the event of an information request being received.

## Archiving

A small percentage of our records may be selected for permanent preservation. This 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; and to serve as a research resource for all interested in the history of the school and the community it serves.

Records containing personal information will only be selected for archive with appropriate safeguards in place to protect the rights and freedoms of individuals. This will include anonymisation or pseudonymisation wherever possible.

Where we retain records for archiving purposes on-site, we will ensure that we have an archiving policy in place setting out how this operates.

## Appendix One – Retention Schedule

Where an entry is marked with this symbol ▲, consideration should be given to the potential for legal challenges. Where a legal challenge is possible or pending at the end of the initial retention period, records may be retained for an additional six years, in line with the Limitations Act 1980.

### Pupil Records

Records in this section contain those that the Department for Education (DfE) considers as part of a pupil's file. Please refer to the 'Safeguarding and Child Protection Records' section for retention periods relating to safeguarding.

| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| **Primary school pupil file** | Yes | Pupil data should be retained on the MIS system for a maximum of one year after the pupil leaves the school for census reporting purposes. | Statutory | The Education (Pupil Information) (England) Regulations 2005<br>DfE Guidance | Securely transfer to the onward setting. |
| **Secondary school pupil file** | Yes | Until the pupil's 25th birthday.<br>(18 + 6 years as an adult) | Statutory | The Education (Pupil Information) (England) Regulations 2005<br><br>Limitations Act 1980 | Secure disposal<br><br>If a pupil leaves, transfer the records to the onward setting |
| **Formal academic attainment**<br>(e.g. coursework/ exam results) | Yes | Subject to the pupil file retention. | Statutory | The Education (Pupil Information) (England) Regulations 2005 | Secure disposal<br><br>May wish to anonymise and retain results for comparison purposes |

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| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| **Pupil work** (e.g. exercise books, homework, learning app data, etc.) | Yes | Given to pupils at the end of each year.<br><br>Where not possible, retain for the current year + 1. | Business Need | | Secure disposal |
| **Special educational needs and disabilities (SEND)** ⚠ (Inc. reviews and education, health, and care (EHC) plans) | Yes | End of EHCP + 6 years or until the pupil's 25th birthday. | Statutory | The Special Educational Needs and Disability Regulations 2014 | Secure disposal<br><br>If a pupil leaves, transfer the records to the onward setting |
| **Personal Education Plans (PEPS)** (For looked after children) | Yes | Date of birth of the pupil + 25 years. | Statutory | Children and Young Persons Act 2008<br><br>Children and Social Work Act 2017 | Secure disposal |
| **Medical administration records** ⚠ | Yes | Retained in pupil file or until the pupil's 25th birthday. | Best Practice | NHS Records Management Code of Practice | Secure disposal |

## Safeguarding and Child Protection Records

Records in this section relate to safeguarding and child protection matters.

| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| **Primary school safeguarding & child protection files** ⚠ | Yes | Until the pupil leaves the school. | Statutory | The Education (Pupil Information) (England) Regulations 2005.<br>DfE Keeping Children Safe in Education | Securely transfer to the onward setting as a separate file or in a sealed envelope within the pupil's file |

| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| **Secondary school safeguarding & child protection files** ▲ | Yes | Until the pupil's 25th birthday.<br>(18 + 6 years as an adult) | Statutory | The Education (Pupil Information) (England) Regulations 2005<br><br>DfE Keeping Children Safe in Education | Secure disposal |
| **Child sexual abuse files** ▲ | Yes | Until the child's 75th birthday. | Statutory | The Report of the Independent Inquiry into Child Sexual Abuse (IICSA) recommendation on access to records | We expect this information to be held by the Local Authority as the lead. If this is not the case, records should be held by the final school setting |
| **Allegations concerning child protection against a member of staff** ▲ (including unfounded) | Yes | Until the staff member's normal retirement age, or 10 years from the date of the allegation, whichever is later. | Statutory | DfE Keeping Children Safe in Education | Secure disposal |
| **Complaints: negligence or safeguarding** ▲ (dealt with by Governing Body) | Yes | Date the complaint resolved + 15 years. | Best Practice | | Secure disposal |
| **Complaints: child sexual abuse** ▲ (dealt with by Governing Body) | Yes | Date the complaint resolved + 75 years. | Best Practice | | Secure disposal |

## Staff and HR Information

This section relates to data held about staff members. Where records are retained for a business need, please ensure you review the suggested retention period and amend it as required to meet your school or Trust's requirements.

| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| **Personnel files** | Yes | Termination date + 6 years | Statutory | Limitations Act 1980 | Secure disposal |
| **Appraisal records** | Yes | Current year + 6 years | Business Need | | Secure disposal |
| **Professional development plans** | Yes | Life of the plan + 6 years | Business Need | | Secure disposal |
| **Timesheets & pay records** | Yes | End of the tax year + 3 years. | Statutory | PAYE and payroll for employers: Keeping records | Secure disposal |
| **Maternity pay records** | Yes | End of the tax year + 3 years. | Statutory | The Statutory Maternity Pay (General) Regulations 1986 | Secure disposal |
| **Sickness and leave of absence records** | Yes | Current year + 3 years. | Best Practice | | Secure disposal |
| **Retirement benefits** | Yes | End of the year in which the accounts were signed + 6 years. | Statutory | Retirement Benefits Schemes (Information Powers) Regulations 1995 | Secure disposal |
| **Appointment of Headteacher records** | Yes | Date of appointment + 6 years. | Best Practice | | Secure disposal |
| **Successful candidates** | Yes | Relevant information added to HR file, all other information held for date of appointment + 6 months. | Business Need | | Secure disposal |

| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| **Unsuccessful candidates** | Yes | Date of appointment + 6 months. | Best Practice | | Secure disposal |
| **Copies of DBS certificates** | Yes | Date of appointment + 6 months. | Statutory | DfE Keeping Children Safe in Education | Secure disposal |
| **Pre-employment vetting information** (Evidence proving the right to work in the United Kingdom) | Yes | Termination date + 2 years. | Statutory | An employer's guide to right to work checks [Home Office May 2015] Last updated 27 April 2022 | Secure disposal |
| **Access to work documentation** | Yes | As per funding requirements, or in line with the Limitations Act. | Statutory | Limitations Act 1980 | Secure disposal |
| **Supply and agency staff** | Yes | Date last worked in school + 6 years. | Best Practice | | Secure disposal |
| **Volunteers** | Yes | Date last worked in school + 3 years. | Best Practice | | Secure disposal |
| **Governor/ trustee personnel file** (including parent governors) | Yes | End of appointment + 6 years. | Statutory | Companies Act 2006 | Secure disposal |

## School Operations and Governance

This section relates to the operational running and governance of schools and Trusts.

| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| **Attendance records** | Yes | Register – Date of entry + 6 years.<br>Back-up – End of school year + 6 years. | Statutory | School Attendance (Pupil Registration) (England) Regulations 2024 | Secure disposal |

| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| **Admissions data** | Yes | Date of admission + 6 years. | Statutory | School Attendance (Pupil Registration) (England) Regulations 2024 | Consider for permanent preservation |
| **Unsuccessful admission applications** | Yes | Resolution of case + 1 year. | Statutory | School Admissions Code. | Secure disposal |
| **School trips** | Yes | Date of visit + 6 years.<br><br>If an incident occurred, retain permission slips & incident report in the pupil file. | Best Practice | Health and safety on educational visits | Secure disposal |
| **Consent forms** (e.g school trip or photo consent) | Yes | Current year + 1 year. | Business Need | | Secure disposal |
| **List of pupils on free school meals** | Yes | Current financial year + 3 years. | Business Need | | Secure disposal |
| **Biometric data - pupils** (e.g. fingerprint technology) | Yes | Information retained for the duration pupil is at school and valid consent is held. | Best Practice | Protection of biometric data of children in schools and colleges | Secure disposal |
| **Biometric data - staff** (e.g. device or system access fingerprint technology, voice data for transcription etc.) | Yes | Retain for the duration of the staff member's employment. | Business Need | | Secure disposal |
| **Photographs and videos – internal use** (displays, ID, pupil work, etc.) | Yes | Current year + 1 year. | Business Need | | Given to the pupil or secure disposal |

| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| **Photographs and videos – external use** (publications, marketing, social media etc.) | Yes | Current year + 3 years. | Business Need | | Consider for permanent preservation |
| **Annual governors' report** | Possibly | Date of report + 10 years. | Statutory | The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002 | Secure disposal |
| **Governing board meeting minutes** (maintained schools) | Yes | Principal set (signed) – retain for historical interest. Other copies - date of meeting + 3 years. | Business Need | | Principal set - offer to archives<br><br>Other copies - secure disposal |
| **Trustee meeting minutes** (Academy Trust) | Yes | Principal set (signed) – retain for historical interest. Other copies - date of meeting + 10 years. | Statutory | Companies Act 2006 | Principal set - offer to archives<br><br>Other copies - secure disposal |
| **Memoranda of understanding** | No | Life of the academy + 6 years. | Statutory | Companies Act 2006 | Routine disposal |
| **Complaint files** | Yes | Date complaint resolved + 3 years. | Business Need | | Secure disposal |
| **Curriculum records** | No | Current year + 1 year. | Statutory | Education (Pupil Information) (England) Regulations 2005 | Routine disposal |
| **Directors – disqualification** (Academy Trust) | Yes | Date of disqualification + 15 years. | Statutory | The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification | Secure disposal |

| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| | | | | Provisions) (England) Regulations 2004 | |
| **School vehicles** | No | Vehicle disposal + 6 years. | Statutory | Limitations Act 1980 | Routine disposal |
| **Ofsted reports** | No | Life of the report then review. | Business Need | | Routine disposal |
| **Policy documents** | No | Until superseded + 3 years. | Business Need | | Routine disposal |
| **E-monitoring data** | Yes | Non-actionable notifications + 1 month.<br><br>Actionable notifications – retained in pupil or personnel file or with safeguarding records. | Business Need | | Secure disposal |
| **Visitor management** | Yes | Academic year + 1 year. | Business Need | | Secure disposal |
| **Surveillance system footage (CCTV)** | Yes | Date of recording + 30 days unless required for an investigation or access request. | Business Need | | Secure disposal |
| **Telephone call recordings** | Yes | Date of recording + 30 days unless required for an investigation or access request. | Business Need | | Secure disposal |

## Health and Safety

These records relate to the statutory health and safety obligations of the school or Trust.

| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| **Accessibility plans** | Yes | Life of plan + 6 years. | Statutory | Limitations Act 1980 | Secure disposal |
| **Accident records** | Yes | Date of accident + 3 years. (Serious accidents involving pupils should be retained in the pupil file). | Statutory | Social Security (Claims and Payments) Regulations 1979 | Secure disposal |
| **Risk assessments** (for substances hazardous to health) | No | Date of assessment + 5 years. | Statutory | The Control of Substances Hazardous to Health Regulations 2002 | Routine disposal |
| **Health surveillance records** (inc. exposure to hazardous substances) | Yes | Date of record + 40 years. | Statutory | The Control of Substances Hazardous to Health Regulations 2002 | Secure disposal |
| **Other staff health records** | Yes | Held in line with the staff personnel file. | Statutory | HSE guidance on health surveillance - record keeping | Secure disposal |
| **Fire assessments** | No | Life of the risk assessment + 6 years. | Statutory | Fire Service Order 2005 | Secure disposal |

## Property and Finance

Records in this section refer to the property, contracts, or financial transactions. Please ensure adherence to the correct retention period, as specified in the contract or funding agreement, where a longer retention period is required.

| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| **Maintenance records** | No | End of year + 6 years. | Statutory | Record keeping (VAT Notice 700/21) | Routine disposal |
| **Title deeds** | No | End of deed + 12 years. | Statutory | Limitations Act 1980 | Routine disposal |
| **Contracts** | No | Contract end + 6 years. | Statutory | Limitations Act 1980 | Routine disposal |

| Information Asset Name | Personal data | Retention Period | Basis | Reference | Action or disposal method |
|---|---|---|---|---|---|
| **Debtor's records** | Yes | End of financial year + 6 years. | Statutory | Limitations Act 1980 | Secure disposal |
| **Petty cash** | No | End of financial year + 6 years. | Statutory | Limitations Act 1980 | Routine disposal |
| **VAT records** | No | End of financial year + 6 years. | Statutory | Record keeping (VAT Notice 700/21) | Routine disposal |