

Information Management Policy for Bolton Schools

The school is a public authority and has a number of legal responsibilities for the management of information.

This document is designed to provide a framework for both the school and its members of staff to fulfill their duties around the collection, handling, storage, retention and security of information.

Information Management Unit

Children's and Adult Services,
Bolton Council
3rd Floor, Paderborn House
Bolton, BL1 1UA
Telephone: 01204 332074 / 332872
Email: ec.imu@bolton.gov.uk

Document Control

Amendment History

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V 0.3	05.03.2015	Details of changes made
Page No	Points	Changes
Throughout the document		All LINKS to other sites or documents updated
Throughout the document	Appendix 1 Retention schedules and impact levels	What to do with records after the retention period is over Replaced SHRED with SECURE DISPOSAL
Page 24	5.14	New addition
Page 27	6.11	New addition
Page 32	9.18	New addition

Sign-Off List

Name	Position
Jo Lindon	Headteacher

Distribution List

Name	Position	I / R
All Bolton Schools	The Head, The Business Manager	

Related Documents

Reference No.	Title	Author	Version & Date

The Data Protection Act

The Data Protection Act 1998 came into force on 1 March 2000 to bring the UK in line with a European Community Data Protection Directive and achieve a common standard of protection across Europe. The purpose of the Act is to protect the individual rights and freedoms of individuals, especially their right to privacy with respect to the processing of personal data. The Act applies to personal data (information that identifies a living person) whether it is held on a computer system or on paper. There are particularly stringent rules surrounding 'sensitive' data such as pupil identifiers, pupil characteristics, special educational needs, health, religious beliefs, ethnic background, home address and criminal offences.

Heathfield Primary School is registered under the Data Protection Act 1998 as a Data Controller and aims to fulfil its obligations to the fullest extent and to comply with the eight data protection principles.

Data will be:

1. Fairly and lawfully processed
2. Processed for limited purposes
3. Adequate, relevant and not excessive
4. Accurate and up to date
5. Not kept for longer than is necessary
6. Processed in line with the rights of the data subject
7. Held securely
8. Not transferred to other countries without adequate protection

Privacy Notice - Fair Processing of Data

The school has a duty under principle 4 of the data protection act to check that children, parents and carers information is accurate and up to date. It fulfils this by sending out a data collection form to parents/carers on an annual basis. This form will also include a privacy notice which outlines to the parent/carer:

- What information is held
- Why the information is held
- Who the information is shared with

The current privacy notice for children, parents and carers can be found here:

<https://extranet.bolton.gov.uk/website/pages/view.aspx?f=Privacy Notice Template - Pupils - Sep 14-DFI.doc>

The school also has a duty to check that staff information is accurate and up to date. It fulfils this by asking staff to complete a data collection form. The form will also include a fair processing notice which will outline:

- What information is held
- Why the information is held
- Who the information is shared with

The current privacy notice for staff can be found here:

<https://extranet.bolton.gov.uk/website/pages/view.aspx?f=Privacy Notice Template - Workforce - Sep 14-DFI.doc>

Information Security

The school has a duty under principle 7 of the data protection act to ensure that data is handled securely. To fulfill its obligations under the act and to comply with Cabinet Office guidelines outlined in “Data Handling Procedures in Government” the school will adopt the following to maintain data security:

- Users may not remove or copy sensitive or personal data from the school or authorised premises unless the media is encrypted and is transported securely for storage in a secure location.
- When data is required by an authorised user from outside the school premises (for example, by a teacher or student working from their home or a contractor) they must have secure remote access to the management information system (MIS) or learning platform.
- Users must protect all portable and mobile devices, including media, used to store and transmit personal information using approved encryption software.
- Sensitive or personal data must be securely deleted when it is no longer required.
- Computer passwords should not be disclosed or shared between users
- Files and paperwork that identifies individuals must never be left unattended and must be stored in locked cabinets within a controlled access room that must be locked when not in use
- All staff processing personal information should be appropriately trained

The school will introduce a protective marking scheme to ensure that all data – electronic or on paper – is labelled according to the protection it requires based on Impact Levels:

Impact level	Colour Code	Memory stick?	Example
IL0–Not Protectively Marked	Green	Yes	Newsletters, public information
IL1- Unclassified	Green	Yes	Generic letters to parents containing no personal data
IL2–PROTECT	Yellow	No	Basic student information such as name and address
IL3–Restricted	Red	No	Sensitive Student information such as ethnicity or FSM status
IL4-Confidential	Red	No	Highly sensitive student data relating to child protection

An Information Risk Register will be created and maintained by the school which summarises each information asset the school maintains. Appropriate measures will be taken to mitigate the risk of disclosure of each information asset based on the impact level assigned. The information risk register can be found in Appendix 1.

Incident reporting

Records will be maintained of any suspected breaches of information security using the form attached in appendix 2

The form will be completed in the event of loss of unauthorised disclosure of information. The details of the incident will be used to create a correctional action plan to ensure that a similar incident does not happen again.

Following a reported incident, the school will investigate and after liaising with the Local Authority decide if the incident is of sufficient severity to report to The information Commissioners Office.

Record Retention

The school maintains a records management policy which details compliance with the Lord Chancellor's Code of Practice which can be found here:

<http://www.justice.gov.uk/downloads/information-access-rights/foi/foi-section-46-code-of-practice.pdf>

A detailed retention schedule and protective marking scheme is outlined in [appendix 1](#)

This retention schedule is based on guidance from the records management society:

http://www.irms.org.uk/images/resources/infoguides/records_management_toolkit_for_schools_version_4_may_2012.pdf

It encompasses records managed by all types of school – some of the file descriptions listed may not be relevant to every school.

Regarding documents marked as offer or transfer to Archive, it would be the schools responsibility to contact Bolton Archives service on 01204 333173 or e-mail libraries@bolton.gov.uk

**Please note that retaining documents beyond their retention or transfer dates may breach principle 5 or the Data Protection 1998 (see [principles](#))

Disclosure of personal information

Personal information will be disclosed to 3rd parties under the following conditions:

Information sharing with professionals working with children

Information sharing between professionals is vital to ensure the wellbeing of Children. The school will follow the “7 golden rules of Information Sharing” described by the DfE:

1. Remember that the DPA is not a barrier to sharing information
2. Be open and honest with the person or family
3. Seek advice if you are in any doubt
4. Share with consent where appropriate
5. Consider safety and well-being
6. Necessary, proportionate, relevant, accurate timely, and secure
7. Keep a record of your decision and reasons
8. Unauthorised disclosure of personal data is a criminal offence under Section 55 of the Data Protection Act 1998 and will likely lead to disciplinary action

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/277834/information_sharing_guidance_for_practitioners_and_managers.pdf

Investigation of a crime

The school will treat requests for information from an official bodies related to criminal or taxation purposes under Sections 28, 29 and 35 of the Data Protection Act 1998. The school requires the requestor to complete the Request for personal data form (Appendix 3).

Under section 29 requests from the police will be countersigned by a person no lower than inspector. For requests from other organisations other than the police, the form will be countersigned by a person of a higher position within the organisation than the person making the request.

Generally, the school reserves the right not to release the data but there may be situations such as the receipt of a court order that requires the school to release the information.

Access to Pupils Records

There are two distinct rights to information held by schools about pupils.

- 1 The Subject Access Right (SAR) – under the Data Protection Act 1998 a pupil has the right to a copy of their own information. In certain circumstances requests may be made by a parent on behalf of their child.
- 2 Rights to the educational record – under the Education (Pupil Information) (England) Regulations 2005, a parent has the right to access their child’s educational record.

A child or young person will always be the owner of their personal information as defined within the Data Protection Act 1998, however if a young person is incapable of making their own decisions which is generally accepted as under the age of 12, The primary carer or guardian would act on their behalf. This authority is only extended to functions that are in the ‘best interests’ of the child or young person.

The school will respond to the request within 40 Calendar days. If this request comes from someone other than the individual, the school will consider the capability of the individual and also must ensure the requester is acting in the best interests of the individual.

Requests for information from pupils, or parents, for information that contains, wholly or partly, an educational record must receive a response within 15 school days. Most requests for information are likely to ask for at least some information in the educational record.

Under the Regulations, requests from parents to view their child's **educational** record will be dealt with by the Board of Governors. All other requests for personal information from the **pupil**, or someone acting on their behalf, will be dealt with by the Head Teacher on behalf of the school.

The Protection of Freedoms Act 2012

The Protection of Freedoms Act was introduced in February 2011 and came into force on 9th May 2012 with the commencement orders coming into force in July 2012. It is an Act to impose consent and other requirements in relation to processing of biometric information relating to children, to provide a code of practice about surveillance camera systems amongst other things.

CCTV AND OTHER SURVEILLANCE CAMERA TECHNOLOGY

CCTV surveillance has become a common feature of our daily lives and now there is an increasing use of these in and around educational settings. Information held by the school is covered under the Data Protection Act 1998 (DPA).

Recorded material will be stored in a way that maintains the integrity of the image. Once there is no reason to retain the recorded images, **they will be deleted**.

In area where CCTV surveillance is being carried out there will be clear markings to reflect this.

Subject access requests for CCTV images

Individuals whose images are recorded have a right to view the images of themselves and, unless they agree otherwise, to be provided with a copy of the images. This will be provided within 40 calendar days of receiving a request. The School may charge a fee of up to £10

BIOMETRIC DATA

Biometric technologies are those which automatically measure people's physiological or behavioural characteristics. Examples include automatic fingerprint identification, iris and retina scanning, face recognition and hand geometry, and their use is becoming increasingly popular in educational settings.

Before the first processing of a child's biometric information, the school will notify each parent of the child:

- Of its intention to process the child's biometric information
- That the parent may object at any time to the processing of the information.

Schools must comply with data protection principles and additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012 in order to use Biometric Technologies. The school needs to ensure that

- a) each parent of a child is notified of the school's intention to use the child's biometric data
- b) written consent of at least one parent must be obtained before the data are taken from the child
- c) **In no circumstances can a child's biometric data be processed without written consent.**

The school is not required to notify a parent, or obtain the consent of a parent, if the school is

satisfied:

- a) The parent cannot be found
- b) The parent lacks capacity (within the meaning of the Mental Capacity Act 2005) to object or consent (as the case may be) to the processing of the child's biometric information
- c) The welfare of the child requires that the parents is not contacted
- d) It is otherwise not reasonable practicable to notify the parent or (as the case may be) obtain the consent of the parent.

Disclosure of non - personal information / FOI Requests

The school as a public authority is subject to The Freedom of Information Act 2000 and all requests for information that is not personal information must be treated as a Freedom of Information request. FOI requests must be fully responded within 20 (school) working days by law. The information will be provided unless the school can provide an exemption under the FOI act

A more detailed guide to FOI exemptions is here:

https://ico.org.uk/media/for-organisations/documents/1642/guide_to_freedom_of_information.pdf

Roles and Responsibilities

The senior information risk owner (SIRO) for the school is the Headteacher

They are responsible for:

- Owning and updating this policy
- Owning the information risk register
- Appointing Information Asset Owners (IAOs) for each Information Asset
- Advocating information risk management and raising awareness of information security issues
- After liaising with the Local Authority decide if a security incident is of sufficient severity to report to the information Commissioners Office.

Information Asset Owners are responsible for:

- Ensuring the information is used for the purpose it was collected
- How information has been amended or added to over time
- Who has access to protected data and why

All staff are responsible for ensuring that information is managed according to this policy.

Chairperson of the Governing body – Zulfi Jiva

Appendix 1

Retention schedules and impact levels

NOTE TO SCHOOLS:

This retention schedule is based on guidance from the records management society:

http://www.irms.org.uk/images/resources/infoguides/records_management_toolkit_for_schools_version_4_may_2012.pdf

It encompasses records managed by all types of school – some of the file descriptions listed may not be relevant to every school.

1 Child Protection

These retention periods should be used in conjunction with the document "Safeguarding Children and Safer Recruitment in Education which can be downloaded from this link:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289214/safeguarding_children_and_safer_recruitment_in_education.pdf

	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
1.1	Child Protection files	Yes	Education Act 2002, s175, related guidance "Safeguarding Children in Education", September 2004	DOB + 25 years [1]	SECURE DISPOSAL	Child Protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (i.e. the information does not need to be sent to a university for example)	IL4-Confidential
1.2	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance)	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer	SECURE DISPOSAL	The following is an extract from "Safeguarding Children and Safer Recruitment in Education" p60	IL4-Confidential

			Education Act 2002 guidance "Dealing with Allegations of Abuse against Teachers and Other Staff" November 2005			"Record Keeping	
						5.10 It is important that a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's confidential personnel file, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. It will provide clarification in cases where a future CRB Disclosure reveals information from the police about an allegation that did not result in a criminal conviction. And it will help to prevent unnecessary reinvestigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer."	

[\[1\] This amendment has been made in consultation with the Safeguarding Children Group.](#)

2 Governors							
	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
2.1	Minutes						
	<i>Principal set (signed)</i>	No		Permanent	Retain in school for 6 years from date of meeting	Transfer to Archives	IL3 - RESTRICTED
	<i>Inspection copies</i>	No		Date of meeting + 3 years	SECURE DISPOSAL [If these minutes contain any sensitive personal information they should be SECURELY DISPOSED]		IL3 - RESTRICTED
2.2	Agendas	No		Date of meeting	SECURE DISPOSAL		IL1–Unclassified
2.3	Reports	No		Date of report + 6 years	Retain in school for 6 years from date of meeting	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	IL1–Unclassified
2.4	Annual Parents' meeting papers	No		Date of meeting + 6 years	Retain in school for 6 years from date of meeting	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	IL1–Unclassified

2.5	Instruments of Government	No		Permanent	Retain in school whilst school is open	Transfer to Archives when the school has closed	IL1–Unclassified
2.6	Trusts and Endowments	No		Permanent	Retain in school whilst operationally required	Transfer to Archives	IL1–Unclassified
2.7	Action Plans	No		Date of action plan + 3 years	SECURE DISPOSAL	It may be appropriate to offer to the Archives for a sample to be taken if the school has been through a difficult period	IL1–Unclassified
2.8	Statutory Policy documents (does not include school specific policies such as writing policies etc.)	No		Expiry of policy	Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	IL1–Unclassified
2.9	Complaints files	Yes		Date of resolution of complaint + 6 years	Retain in school for the first six years Review for further retention in the case of contentious disputes SECURE DISPOSAL		IL3 - RESTRICTED

2.10	Proposals for schools to become, or be established as Specialist Status schools	No			Current year + 3 years	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	IL2-PROTECT
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3 Management

	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record	Protective Marking Classification
3.1	Log Books	Yes[1]		Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry.	Transfer to the Archives IL3 - RESTRICTED
3.2	Minutes of the Senior Management Team and other internal administrative bodies	Yes ¹		Date of meeting + 5 years	Retain in the school for 5 years from meeting	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] IL3 - RESTRICTED
3.3	Reports made by the head teacher or the management team	Yes ¹		Date of report + 3 years	Retain in the school for 3 years from meeting	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation] IL3 - RESTRICTED

3.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes ¹		Closure of file + 6 years	SECURE DISPOSAL		IL3 - RESTRICTED
3.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	No		Date of correspondence + 3 years	SECURE DISPOSAL		IL2-PROTECT
3.6	Professional development plans (Management plans for professional development plans of staff)	Yes		Closure + 6 years	SECURE DISPOSAL		IL3 - RESTRICTED
3.7	School development plans	No		Closure + 6 years	Review	Offer to the Archives	IL2-PROTECT
3.8	Admissions – if the admission is successful	Yes		Admission + 1 year	SECURE DISPOSAL		IL3 - RESTRICTED
3.9	Admissions – if the appeal is unsuccessful	Yes		Resolution of case + 1 year	SECURE DISPOSAL		IL3 - RESTRICTED

3.10	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL		IL3 - RESTRICTED
3.11	Proofs of address supplied by parents as part of the admissions process	Yes		Current year + 1 year	SECURE DISPOSAL		IL3 - RESTRICTED

[1] From January 1st 2005 subject access is permitted into unstructured filing systems and log books and other records created within the school containing details about the activities of individual pupils and members of staff will become subject to the Data Protection Act 1998.

3 Management

	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record	Protective Marking Classification
4.1	Admission Registers	Yes		Date of last entry in the book (or file) + 6 years	Retain in the school for 6 years from the date of the last entry. Transfer to the Archives	IL3 - RESTRICTED
4.2	Attendance registers	Yes	The Education (Pupil Registration) (England) Regulations 2006 (No. 1751)	Date of register + 3 years	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]	IL3 - RESTRICTED

4.3	Pupil record cards						
4.3a	<i>Primary</i>	Yes		Retain for the time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school. In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service		IL3 - RESTRICTED
4.3b	<i>Secondary</i>	Yes	Limitation Act 1980	DOB of the pupil + 25 years[1]	SECURE DISPOSAL		
4.4	Pupil files						
4.4a	<i>Primary</i>	Yes		Retain for the time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school. In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service		IL3 - RESTRICTED
4.4b	<i>Secondary</i>	Yes	Limitation Act 1980	DOB of the pupil + 25 years[2]	SECURE DISPOSAL		

4.5	Special Educational Needs files, reviews and Individual Education Plans	Yes		DOB of the pupil + 25 years the review NOTE: This retention period is the minimum period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time 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.	SECURE DISPOSAL		IL4-Confidential
4.6	Correspondence Relating to Authorised Absence and Issues	No		Date of absence + 2 years	SECURE DISPOSAL		IL2-PROTECT
4.7	Absence books	Yes		Current year + 6 years	SECURE DISPOSAL		IL3 - RESTRICTED
4.8	Examination results	Yes					
4.8a	<i>Public</i>	No		Year of examinations + 6 years	SECURE DISPOSAL	Any certificates left unclaimed should be returned to the appropriate Examination Board	IL2-PROTECT
4.8b	<i>Internal examination results</i>	Yes		Current year + 5 years [3]	SECURE DISPOSAL		IL2-PROTECT

4.9	Any other records created in the course of contact with pupils	Yes/No		Current year + 3 years	Review at the end of 3 years and either allocate a further retention period or SECURE DISPOSAL		IL3 - RESTRICTED
4.10	Statement maintained under The Education Act 1996 - Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SECURE DISPOSAL unless legal action is pending		IL4-Confidential
4.11	Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SECURE DISPOSAL unless legal action is pending		IL4-Confidential
4.12	Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12 years	SECURE DISPOSAL unless legal action is pending		IL4-Confidential
4.13	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years	SECURE DISPOSAL unless legal action is pending		IL3 - RESTRICTED

4.14	Children's SEN Files	Yes		DOB of pupil + 25 years then review – it may be appropriate to add an additional retention period in certain cases	SECURE DISPOSAL unless legal action is pending		IL4-Confidential
4.15	Parental permission slips for school trips – where there has been no major incident	Yes		Conclusion of the trip	SECURE DISPOSAL		IL3 - RESTRICTED
4.16	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils	SECURE DISPOSAL		IL3 - RESTRICTED
4.17	Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Primary Schools	N	3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) (1998).	Date of visit + 14 years [4]	N	SECURE DISPOSAL or delete securely	IL2-PROTECT

4.18	Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Secondary Schools	N	3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) (1998).	Date of visit + 10 years ⁷	N	SECURE DISPOSAL or delete securely	IL2-PROTECT
4.19	Walking Bus registers	Yes		Date of register + 3 years	SECURE DISPOSAL		IL3 - RESTRICTED
					[If these records are retained electronically any back up copies should be destroyed at the same time]		
				This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting			

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

[2] [As above](#)

[3] [If these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary.](#)

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

5 Curriculum						
	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record	Protective Marking Classification
5.1	Curriculum development	No		Current year + 6 years	SECURE DISPOSAL	IL1–Unclassified
5.2	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL	IL1–Unclassified
5.3	School syllabus	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL	IL1–Unclassified
5.4	Schemes of work	No		Current year + 1 year This retention period starts once the document has been superceded	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL	IL1–Unclassified
5.5	Timetable	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL	IL1–Unclassified

5.6	Class record books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL		IL2-PROTECT
5.7	Mark Books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL		IL2-PROTECT
5.8	Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL		IL2-PROTECT

5.9	Pupils' work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL		IL2-PROTECT
5.1	Examination results	Yes		Current year + 6 years	SECURE DISPOSAL		IL3 - RESTRICTED
5.11	SATS records	Yes		Current year + 6 years	SECURE DISPOSAL		IL3 - RESTRICTED
5.12	PAN reports	Yes		Current year + 6 years	SECURE DISPOSAL		IL3 - RESTRICTED
5.13	Value added records	Yes		Current year + 6 years	SECURE DISPOSAL		IL3 - RESTRICTED
5.14	Self Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL		IL3 - RESTRICTED
6 Personnel Records held in Schools							
	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
6.1	Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	SECURE DISPOSAL		IL2-PROTECT
6.2	Staff Personal files	Yes		Termination + 7 years	SECURE DISPOSAL		IL2-PROTECT
6.3	Interview notes and recruitment records	Yes		Date of interview + 6 months	SECURE DISPOSAL		IL2-PROTECT

6.4	Pre-employment vetting information (including CRB Checks)	No	CRB Guidelines	Date of check + 6 months	SECURE DISPOSAL [by the designated member of staff]		IL2-PROTECT
6.41	Single Central Record	Yes	ISA guidelines	Keep until school closure	Offer to local authority designated officer		IL2-PROTECT
6.5	Disciplinary proceedings:		Where the warning relates to child protection issues see 1.2. If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice.				
6.5a	<i>oral warning</i>	Yes		Date of warning + 6 months	SECURE DISPOSAL		IL2-PROTECT
6.5b	<i>written warning – level one</i>	Yes		Date of warning + 6 months	SECURE DISPOSAL		IL2-PROTECT
6.5c	<i>written warning – level two</i>	Yes		Date of warning + 12 months	SECURE DISPOSAL		IL2-PROTECT
6.5d	<i>final warning</i>	Yes		Date of warning + 18 months	SECURE DISPOSAL		IL2-PROTECT
6.5e	<i>case not found</i>	Yes		If child protection related please see 1.2 otherwise SECURE DISPOSAL immediately at the conclusion of the case	SECURE DISPOSAL		IL2-PROTECT

6.6	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		IL2-PROTECT
6.7	Annual appraisal/assessment records	No		Current year + 5 years	SECURE DISPOSAL		IL2-PROTECT
6.8	Salary cards	Yes		Last date of employment + 85 years	SECURE DISPOSAL		IL2-PROTECT
6.9	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year, +3yrs	SECURE DISPOSAL		IL2-PROTECT
6.1	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SECURE DISPOSAL		IL2-PROTECT

6.11	Proof of identity collected as part of the process of checking “portable” enhanced CRB disclosure	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 placed on the member of staff’s personal file.		IL2–PROTECT
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[1] If this is placed on a personal file it must be weeded from the file.

7 Health and Safety

	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
7.1	Accessibility Plans	No	Disability Discrimination Act	Current year + 6 years	SECURE DISPOSAL		IL1–Unclassified
7.2	Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980				
7.2a	<i>Adults</i> (All Accidents)	Yes		Date of incident + 7 years	SECURE DISPOSAL		IL3 - RESTRICTED
7.2b	<i>Children</i> (All Accidents)	Yes		DOB of child + 25 years [1]	SECURE DISPOSAL		IL3 - RESTRICTED

7.3	COSHH	No		Current year + 10 years [where appropriate an additional retention period may be allocated]	SECURE DISPOSAL		IL1–Unclassified
7.4	Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL		IL3 - RESTRICTED
7.5	Policy Statements	No		Date of expiry + 1 year	SECURE DISPOSAL		IL1–Unclassified
7.6	Risk Assessments	No		Current year + 3 years	SECURE DISPOSAL		IL1–Unclassified
7.7	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No		Last action + 40 years	SECURE DISPOSAL		IL1–Unclassified
7.8	Process of monitoring of areas where employees and persons are likely to have come in contact with radiation	No		SECURE DISPOSAL			IL1–Unclassified
7.9	Fire Precautions log books	No		Current year + 6 years	SECURE DISPOSAL		IL1–Unclassified

[\[1\] A child may make a claim for negligence for 7 years from their 18th birthday. To ensure that all records are kept until the pupil reaches the age of 25 this retention period has been applied.](#)

8 Administrative							
	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
8.1	Employer's Liability certificate	No		Closure of the school + 40 years	SECURE DISPOSAL		IL1–Unclassified
8.2	Inventories of equipment and furniture	No		Current year + 6 years	SECURE DISPOSAL		IL1–Unclassified
8.3	General administrative records (records not specifically listed elsewhere)	No		Current year + 5 years	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	IL1–Unclassified
8.4	School brochure or prospectus	No		Current year + 3 years		Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	IL1–Unclassified
8.5	Circulars (staff/parents/pupils)	No		Current year + 1 year	SECURE DISPOSAL		IL1–Unclassified
8.6	Newsletters, ephemera	No		Current year + 1 year	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	IL1–Unclassified

8.7	Visitors book	No		Current year + 2 years	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	IL1–Unclassified
8.8	PTA/Old Pupils Associations	No		Current year + 6 years	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	
9 Finance							
	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
9.1	Annual Accounts	No	Financial Regulations	Current year + 6 years		Offer to the Archives	IL2–PROTECT
9.2	Loans and grants	No	Financial Regulations	Date of last payment on loan + 12 years	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	IL2–PROTECT
9.3	Contracts						
9.3a	under seal	No		Contract completion date + 12 years	SECURE DISPOSAL		IL2–PROTECT
9.3b	under signature	No		Contract completion date + 6 years	SECURE DISPOSAL		IL2–PROTECT

9.3c	monitoring records (Bolton Council Corporate Property Unit may hold these records on the schools behalf)	No		Current year + 2 years	SECURE DISPOSAL		IL2-PROTECT
9.4	Copy orders	No		Current year + 2 years	SECURE DISPOSAL		IL2-PROTECT
9.5	Budget reports, budget monitoring etc	No		Current year + 3 years	SECURE DISPOSAL		IL2-PROTECT
9.6	Invoice, receipts and other records covered by the Financial Regulations	No	Financial Regulations	Current year + 6 years	SECURE DISPOSAL		IL2-PROTECT
9.7	Annual Budget and background papers	No		Current year + 6 years	SECURE DISPOSAL		IL2-PROTECT
9.8	Order books and requisitions	No		Current year + 6 years	SECURE DISPOSAL		IL2-PROTECT
9.9	Delivery Documentation	No		Current year + 6 years	SECURE DISPOSAL		IL2-PROTECT
9.1	Debtors' Records	No	Limitation Act 1980	Current year + 6 years	SECURE DISPOSAL		IL2-PROTECT
9.11	School Fund – Cheque books	No		Current year + 3 years	SECURE DISPOSAL		IL2-PROTECT
9.12	School Fund – Paying in books	No		Current year + 6 years then review	SECURE DISPOSAL		IL2-PROTECT
9.13	School Fund – Ledger	No		Current year + 6 years then review	SECURE DISPOSAL		IL2-PROTECT

9.14	School Fund – Invoices	No		Current year + 6 years then review	SECURE DISPOSAL		IL2–PROTECT
9.15	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL		IL2–PROTECT
9.16	School Fund – Bank statements	No		Current year + 6 years then review	SECURE DISPOSAL		IL2–PROTECT
9.17	School Fund – School Journey books	No		Current year + 6 years then review	SECURE DISPOSAL		IL2–PROTECT
9.18	Student Grant Applications	Yes		Current year + 6 years then review	SECURE DISPOSAL		IL2–PROTECT
9.19	Free school meals registers	Yes	Financial Regulations	Current year + 6 years	SECURE DISPOSAL		IL3 - RESTRICTED
9.20	Petty cash books	No	Financial Regulations	Current year + 6 years	SECURE DISPOSAL		IL2–PROTECT
10 Property							
	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
10.1	Title Deeds	No		Permanent	Permanent these should follow the property unless the property has been registered at the Land Registry	Offer to Archives if the deeds are no longer needed	IL2–PROTECT

10.2	Plans	No		Permanent	Retain in school whilst operational	Offer to Archives[1]	IL3 - RESTRICTED
10.3	Maintenance and contractors	No	Financial Regulations	Current year + 6 years	SECURE DISPOSAL		IL2-PROTECT
10.4	Leases	No		Expiry of lease + 6 years	SECURE DISPOSAL		IL2-PROTECT
10.5	Lettings	No		Current year + 3 years	SECURE DISPOSAL		IL2-PROTECT
10.6	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL		IL2-PROTECT
10.7	Maintenance log books	No		Last entry + 10 years	SECURE DISPOSAL		IL1-Unclassified
10.8	Contractors' Reports	No		Current year + 6 years	SECURE DISPOSAL		IL2-PROTECT

[\[1\] If the property has been sold for private housing then the archives service will embargo these records for an appropriate period of time to prevent them being used to plan or carry out a crime.](#)

11 Local Education Authority

	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record	Protective Marking Classification
11.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL	IL3 - RESTRICTED
11.2	Attendance returns	Yes		Current year + 1 year	SECURE DISPOSAL	IL3 - RESTRICTED

11.3	Circulars from LEA	No		Whilst required operationally	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	IL1–Unclassified
12 Department for Children, Schools and Families							
	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
12.1	OFSTED reports and papers	No		Replace former report with any new inspection report	Schools may wish to retain copies of former reports for longer	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	IL2–PROTECT
12.2	Returns	No		Current year + 6 years	SECURE DISPOSAL		IL3 - RESTRICTED
12.3	Circulars from Department for Children, Schools and Families	No		Whilst operationally required	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]	IL1–Unclassified
13 Connexions							
	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
13.1	Service level agreements	No		Until superseded	SECURE DISPOSAL		IL1–Unclassified
13.2	Work Experience agreement	Yes		DOB of child + 18 years	SECURE DISPOSAL		IL3 - RESTRICTED

14 Schools Meals							
	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
14.1	Dinner Register	Yes		C + 3 years	SECURE DISPOSAL		IL2-PROTECT
14.2	School Meals Summary Sheets	Yes		C + 3 years	SECURE DISPOSAL		IL2-PROTECT
15 Family Liaison Officers and Parent Support Assistants							
	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
15.1	Day Books	Yes		Current year + 2 years then review	SECURE DISPOSAL		IL3 - RESTRICTED
15.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency	Yes		Whilst the child is attending the school then destroy	SECURE DISPOSAL		IL3 - RESTRICTED
15.3	Referral forms	Yes		While the referral is current then	SECURE DISPOSAL		IL4-Confidential
15.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL		IL2-PROTECT

15.5	Contact database entries (FLO contact records with agencies and family member)	Yes		Current year then review, if contact is no longer active then destroy	DELETE		IL2-PROTECT
15.6	Group Registers (FLO work)	Yes		Current year + 2 years	SECURE DISPOSAL		IL2-PROTECT
15.7	CAFs	Yes		Current year + 6	SECURE DISPOSAL		IL4-Confidential

16 Early Years Provision (Childcare / Nursery provision etc.)

16.1 Records to be kept by Registered Persons - All Cases

	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
16.1.1	The name, home address and date of birth of each child who is looked after on the premises	Yes		Closure of setting + 50 years			IL3 - RESTRICTED
				[These could be required to show whether or not an individual child attended the setting in a child protection investigation]			

16.1.2	The name, home address and telephone number of a parent of each child who is looked after on the premises	Yes		If this information is kept in the same book or on the same form as in 16.1.1 then the same retention period should be used as in 16.1.1			IL3 - RESTRICTED
				If the information is stored separately, then destroy once the child has left the setting (unless the information is collected for anything other than emergency contact)			
16.1.3	The name, address and telephone number of any person who will be looking after children on the premises	Yes		See 16.4.5 below			IL3 - RESTRICTED

16.1.4	A daily record of the names of children looked after on the premises, their hours of attendance and the names of the persons who looked after them	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003	The regulations say that these records should be kept for 2 years (SI20031996 7(1b)). If these records are likely to be needed in a child protection setting (see 16.1.1 above) then the records should be retained for closure of setting + 50 years			IL3 - RESTRICTED
16.1.5	A record of accidents occurring on the premises and incident books relating to other incidents	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003 [1]	DOB of the child involved in the accident or the incident + 25 years			IL2-PROTECT
				If an adult is injured then the accident book must be kept for 7 years from the date of the incident			

16.1.6	A record of any medicinal product administered to any child on the premises, including the date and circumstances of its administration, by whom it was administered, including medicinal products which the child is permitted to administer to himself, together with a record of parent's consent	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003 [2]	DOB of the child being given/taking the medicine + 25 years			IL3 - RESTRICTED
16.1.7	Records of transfer	Yes		One copy is to be given to the parents, one copy transferred to the Primary School where the child is going			IL2-PROTECT
16.1.8	Portfolio of work, observations and so on	Yes		To be sent home with the child			IL2-PROTECT

16.1.9	Birth certificates	Yes		Once the setting has had sight of the birth certificate and recorded the necessary information the original can be returned to the parents. There is no requirement to keep a copy of the birth certificate.			IL3 - RESTRICTED
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[1] The regulations say that these records should be kept for 2 years (SI20031996 7(1b)). The Statute of Limitations states that a minor may make a claim for 7 years from their eighteenth birthday, therefore the retention should be for the longer period.

[2] The regulations say that these records should be kept for 2 years (SI20031996 7(1b)). The NHS records retention schedule states that any records relating to a child under the age of 18 should be retained until that child reaches the age of 25 years. Therefore, the retention should be DOB of the child being given/taking the medicine + 25 years

16.2 Records to be kept by Registered Persons - Day Care
(Relates to nursery and child minding provision)

	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record	Protective Marking Classification
16.2.1	The name and address and telephone number of the registered person and every other person living or employed on the premises	Yes		See 16.4 below		IL3 - RESTRICTED

16.2.2	A statement of the procedure to be followed in the event of a fire or accident	No		Procedure superseded + 7 years			IL1–Unclassified
16.2.3	A statement of the procedure to be followed in the event of a child being lost or not collected	No		Procedure superseded + 7 years			IL1–Unclassified
16.2.4	A statement of the procedure to be followed where a parent has a complaint about the service being provided by the registered person	No		Until superseded			IL1–Unclassified
16.2.4	A statement of the arrangements in place for the protection of children, including arrangements to safeguard the children from abuse or	Yes		Closure of setting + 50 years			IL4-Confidential

	neglect and procedures to be followed in the event of allegations of abuse or neglect			[These could be required to show whether or not an individual child attended the setting in a child protection investigation]			
16.3 Records to be kept by Registered Persons - Overnight provision – under 2's							
	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record		Protective Marking Classification
16.3.1	Emergency contact details for appropriate adult to collect the child if necessary	Yes		Destroy once the child has left the setting (unless the information is collected for anything other than emergency contact)			IL3 - RESTRICTED
16.3.2	Contract, signed by the parent, stating all the relevant details regarding the child and their care, including the name of the emergency contact and confirmation of their agreement to collect the child during the night	Yes		Date of birth of the child who is the subject of the contract + 25 years			IL3 - RESTRICTED

16.4 Other Records – Administration						
	Basic file description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record	Protective Marking Classification
Financial Records						
16.4.1	Financial records – accounts, statements, invoices, petty cash etc	No		Current year + 6 years		IL2–PROTECT
Insurance						
16.4.2	Insurance policies – Employers Liability	No	Employers Liability Financial Regulations	The policies are kept for a minimum of 6 years and a maximum of 40 years depending on the type of policy		IL1–Unclassified
16.4.3	Claims made against insurance policies – damage to property	Yes		Case concluded + 3 years		IL2–PROTECT
16.4.4	Claims made against insurance policies – personal injury	Yes		Case concluded + 6 years		IL2–PROTECT
Human Resources						
16.4.5	Personal Files - records relating to an individual's employment history	Yes		Termination + 6 years then review		IL3 - RESTRICTED

16.4.6	Pre-employment vetting information (including CRB checks)	No	CRB guidelines	Date of check + 6 months			IL4-Confidential
16.4.7	Staff training records – general	Yes		Current year + 2 years			IL2-PROTECT
16.4.8	Training (proof of completion such as certificates, awards, exam results)	Yes		Last action + 7 years			IL2-PROTECT
Premises and Health and Safety							
16.4.9	Premises files (relating to maintenance)	No		Cessation of use of building + 7 years then review			IL1-Unclassified
16.4.10	Risk Assessments	No		Current year + 3 years			IL1-Unclassified
<u>[1] For Data Protection purposes the following information should be kept on the file for the following periods :</u>							
• all documentation on the personal file				Duration of employment			
• pre-employment and vetting information				Start date + 6 months			
• records relating to accident or injury at work				Minimum of 12 years			
• annual appraisal/assessment records				Minimum of 5 years			
• records relating to disciplinary matters (kept on personal files)							
o oral warning				6 months			
o first level warning				6 months			
o second level warning				12 months			
o final warning				18 months			

Appendix 2

Information Security Incident Report Form

ISIR Reference	ISIR (year)(no) e.g ISIR 2015 001	Date Opened:		Information Security Incident Report Form
Short Title				
Associated Reference number:		ISIR owner (provide name and job title):		
Police Crime No:		Device ID:		
Lost <input type="checkbox"/>	Stolen <input type="checkbox"/>	Other		
Impact Risk	Low <input type="checkbox"/>	Medium <input type="checkbox"/>	High <input type="checkbox"/>	
Has Insurance been informed? Yes/No		Date:		
Description of Data lost (Format, Volume, Personal Data, from which system):				
Has the data/system owner been informed? Yes/No		Date:		
Name:				
Definition of the Problem and how it was reported, including history of events:				
Impact Summary:				
Detail of Resolution or Workaround:				
Root Cause Analysis:				
Corrective Actions:				
Ref:	Action	Target date	Owner	Complete?
Lessons Learned:				
Ref	Lesson Learned			
Date agreed for Evaluation		Evaluation Date		
Date Closed		Head teacher Signoff		

Appendix 3

Request for personal data Form

Request for personal data

School Logo

All boxes must be completed

To

Details of applicant

Name of applicant	
Job title	
Department and Section	
Full Address	
Telephone number	
e-mail address or fax number	
Investigation reference / Operation Name	
Date	

Details of application

1. This request is made pursuant to the Data Protection Act 1998. I can confirm that this request complies with the following non-disclosure provisions

Section 29

The data is necessary for the prevention or detection of crime

The data is necessary for the apprehension or prosecution of offenders

Section 35

The data is necessary for the purpose of or in connection with present legal Proceedings

The data is necessary for the purpose of or in connection with prospective legal proceedings

2. I require the following information

3. Why I require the information

4. What statutory powers does the requester have to demand the information

5. I can confirm that the information you provide will be held in the strictest confidence and will not be further processed beyond the purpose for which it was requested.

I have grounds believing that failure to disclose the required information will be likely to prejudice my enquiries and can confirm that the details supplied on this form are, to the best of my knowledge, correct.

I am aware of the provisions of Section 55 of the Data protection Act 1998, regarding the unlawful obtaining of personal details.

Signature

Print Name