



Records Management Policy

The King's (The Cathedral) School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution.

Records provide evidence for protecting the legal rights and interests of the school and provide evidence for demonstrating performance and accountability.

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

- Scope
- Responsibilities
- Relationships with existing policies
- Retention

1. Scope of the Policy

- 1.1** This policy applies to all records created, received, or maintained by staff of the school in the course of carrying out its functions.
- 1.2** Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received, or maintained in hard copy or electronically.
- 1.3** A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives and for historical research.

2. Responsibilities

- 2.1** The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher.
- 2.2** The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- 2.3** Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the school's records management guidelines.

3. Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information policy
- GDPR policy

and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

4. Retention and Management of Records

4.1 As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents. The Network Manager operates a 5-week rotation backup cycle, where the first four weeks of each 5-week period use separate sets of tapes for weeks 1, 2, 3 & 4. These tapes are overwritten every 5-weeks. In week 5, the tapes are held for a 12-month period, with the last 2 five-week period tapes being held off site. There is also an annual backup of key data each July/August, which is held for 7-years, this includes SIMS and FMS (finance) databases & email.

4.2 School is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned (unless it has real historical or long term archival interest where it shall be transferred to the Archives).

4.3 The table below sets out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.

4.4 Where we have decided to keep information longer than the statutory requirement, this has been explained in the table below.

4.5 Section 5 of this policy sets out the destruction procedure for documents at the end of their retention period. The Records Managers stated below are responsible for ensuring that this is carried out appropriately, and any questions regarding destruction should be referred to them. They will liaise with the Archivist over any material which may be of historical or long-term archival interest.

If a document or piece of information is reaching the end of its stated retention period, but you are of the view that it should be kept longer, please refer to the Headteacher who will decide as to whether it should be kept, for how long, and note the new time limit and reasons for extension.

4.6 The Headteacher has overall responsibility for this policy.

4.7 DOCUMENT RETENTION PERIOD

DOCUMENT TYPE	LEGISLATION / REASONS FOR RETENTION	REQUIREMENT	RECORDS MANAGER	LOCATION OF RECORD
MANAGEMENT OF GOVERNING BODY				
Trustee/director minutes of meetings and supporting material / written resolutions	Companies Act 2006 Charities Act 2011	12 years	Clerk / Chair of Governors	On the Governors' portal and paper copy in office of the Headteacher's PA
Members' meetings etc. Minutes/resolutions	Companies Act 2006 Charities Act 2011	12 years	Clerk / Chair of Governors	On the Governors' portal and paper copy in office of the Headteacher's PA
Records relating to the election of governors		Date of election plus 6 months	Elections run by the Headteacher's PA	Office of Headteacher's PA for Parent and Staff Governor elections
Register of pecuniary interests		Length of tenure term plus 6 years	Clerk / Chair of Governors	Finance folder in Headteacher's PA office; Copy held by the Company Secretary in Finance Office
Governor personnel information		Length of tenure term plus 6 years	Company Secretary / Chair of Governors	Company Secretary's files in Finance Office Headteacher's PA office
Evidence of appointment of		Length of tenure term plus 6 years	Clerk / Chair of Governors	Headteacher's PA office

Clerk, evidence of appointment of governors, and governor declaration against disqualification criteria				
Records relating to governor training		Length of tenure term plus 6 years	Clerk / Chair of Governors	Single central register There is a list held by the Clerk; it is not currently with the SCR; also recorded in Governor minutes
Records relating to complaints made to and investigated by the governing body or Headteacher		Major complaints: current year plus 6 years. If negligence involved then current year plus 15 years. If child protection or safeguarding issues then: current year plus 40 years	Chair of Governors	
COMPANY RECORDS				
Company Articles of Association, Rules/bylaws	Companies Act 2006 Charities Act 2011	Permanent	Finance Manager	Companies House
Academy funding agreement and any supplemental agreements	Charities Act 2011	Permanent	Finance Manager	DFE Website, GIAS
ARCHIVES				
Documents of clear historical/ archival significance	Data Protection regulation	Permanent	Archivist	Archives Room
CONTRACTS				

All records relating to the management of contracts under signature	Limitation Act 1980	Length of contract term plus 6 years	Finance Manager	Filing cabinet in Finance Manager's office (Not all contracts are in Finance Office, many are retained by Premises/Procurement Manager, IT Manager and HT Office)
All records relating to the management of contracts under seal	Limitation Act 1980	Length of contract term plus 12 years	Finance Manager	Filing cabinet in Finance Manager's office, some might be in other areas as well
TAX AND FINANCE				
Annual accounts and review (including transferred records on amalgamation)	Companies Act 2006 Charities Act 2011	Permanent	Finance Manager	Companies House and Archivist Filing cabinet in cellar
Corporation tax records		6 years from end of relevant tax year	Finance Manager	Filing cabinet in Finance Manager's office
Accounting records	Finance Act 1998 Taxes Management Act 1970	6 years from end of relevant tax year	Finance Manager	Finance Management systems. File for monthly management in Finance Manager's office.
Information relevant for VAT purposes	Finance Act 1998 and HMRC Notice 700/21	6 years from end of relevant tax year		Current year in Finance Office cabinet, 6 previous years in cellar archive
School fund accounts – cheque books, paying in	Companies Act 2006 Charities Act 2011	6 years from relevant tax year	Finance Manager	Current year in Finance Office cabinet near Trips

books, ledger, invoices, receipts, bank statements, journey books				desk, 6 previous years in cellar archive
Payroll and pensions				
Payroll/Employee/Income Tax and NI records: P45; P6; P11D; P60, etc. Tax forms P6/P11/P11D/P35/P45/P46/P48	The minimum requirement - as stated in Inland Revenue Booklet 490 - is for at least 3 years after the end of the tax year to which they apply. Originals must be retained in paper/ electronic format. It is a corporate decision to retain for current year + 6 years. Employees should retain records for 22 months after current tax year	6 years from relevant tax year	Finance Manager	Sage payroll system Filing cabinet in Finance Manager's office and cupboard in Finance Office Leaver's staff file
Payroll file to include Maternity pay, Sick pay, National Minimum wage records	Statutory Maternity Pay Regulations, Statutory Sick Pay (General) Regulations, National Minimum Wage Act	3 years after the end of the tax year	Finance Manager	Sage payroll system Filing cabinet in Finance Manager's office
National Insurance – schedule of payments	Taxes Management Act 1970 Income and Corporation Taxes 1988	6 years from relevant tax year		Sage payroll system Payroll storage cupboard in Finance Office
Overtime	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	Finance Manager	Payroll storage cupboard in Finance Office and cellar archive

Payroll reports	Taxes Management Act 1970 Income and Corporation Taxes 1988	6 years from relevant tax year	Finance Manager	Sage payroll system Filing cabinet in Finance Manager's office and filing cabinet in cellar archive
PENSION RECORDS				
Records about employees and workers	Detailed Guidance for Employers: (April 2017) pensions regulator.gov.uk	40 years	Finance Manager	Filing cabinet in Finance Manager's office
Records re active members and opt in / opt out		40 years	Finance Manager	Filing cabinet in Finance Manager's office
INSURANCE				
Employer's Liability Insurance	Employers' Liability (Compulsory Insurance Regulation) 1998	40 years	Finance Manager	Filing cabinet in Finance Manager's office Electronic copy on file
Policies	Commercial	6 years after lapse	Finance Manager	Filing cabinet in Finance Manager's office Electronic copy on file
Claims correspondence	Commercial	6 years after settlement	Finance Manager	Filing cabinet in Finance Manager's office Electronic copy on file

HUMAN RESOURCES				
Pre-employment vetting information – Evidence proving the right to work in the United Kingdom – successful candidates	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 [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of employment + not less than 2 years	PA to the Headteacher	Personnel file in PA to the Headteacher’s office. Archived files in the basement
Pre-employment vetting information – DBS Checks – successful candidates	DBS Update Service Employer Guide June 2014; Keeping Children Safe in Education.2018 (Statutory Guidance from DoE) Sections 73, 74 Single Central Record Requirements under Part 4 of the Schedule to the Education (Independent School Standards) Regulations 2014	Application forms, references and other documents – for the duration of the employee’s employment + 6 years Record only satisfactory / unsatisfactory result and delete other information. If copy is kept, not to be retained beyond 6 months See further DfE statutory Guidance ‘ Working Together to safeguard children’ https://www.gov.uk/government/publications/working-together-to-safeguard-children--2	PA to the Headteacher	Single Central Register Archived files in the basement
Unsuccessful applicants - Job	ICO Employment Practices Code	6-12 months from your notification of	PA to the Headteacher	Locked cabinet in PA to the

applications (CVs and related materials)	(Recruitment & Selection) Equality Act 2010	outcome of application		Headteacher's office. Electronic files kept by PA to the Headteacher's
Staff personnel file	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years, unless the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete	PA to the Headteacher	Personnel file in PA to the Headteacher's office for 2 years (for references). Sims Archived files in the basement Archives room for historical / archival interest
Staff training – where the training relates to children (e.g. safeguarding or other child related training)		Date of the training + 40 years [This retention period reflects that the IICSA may wish to see training records as part of an investigation	Deputy Headteacher (Pastoral)	PA to the Deputy Headteacher office
Records re working time	Working Time Regulations 1998 as amended	2 years		
Annual appraisal/assessment records		Current year + 6 years	PA to the Headteacher	Personnel file in PA to the Headteacher's office. Archived files in the basement
Volunteer records		Treated in same manner as employment records	PA to the Headteacher	Personnel file in PA to the Headteacher's office. Archived files in the basement

<p>Records relating to any allegation of a child protection nature against a member of staff</p>	<p>“Keeping children safe in education Statutory guidance for schools and colleges September 2018”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018”</p>	<p>Until the person’s normal retirement age or 10 years from the date of the allegation (whichever is the longer) then REVIEW. Note: allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned UNLESS the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete</p>	<p>PA to the Headteacher</p>	<p>Personnel file in PA to the Headteacher’s office. Archived files in the basement</p>
<p>Disciplinary proceedings</p>		<p>Oral warning: Date of warning + 6 months Written warning – level 1: Date of warning + 6 months Written warning – level 2: Date of warning + 12 months Final warning: Date of warning + 18 months</p>	<p>Headteacher</p>	<p>File in Headteacher’s office.</p>

		Case not found: If the incident is related to child protection then see above, otherwise dispose of at the conclusion of the case		
HEALTH & SAFETY / MEDICAL				
General records	Limitation Act 1970	3 years	Premises Manager	Prime (Local Authority)
Records re work with hazardous substances	Control of Hazardous Substances to Health Regulations 2002	Date of incident + 40 years	Premises Manager Norse Cleaning company	Files in Premises office. Asbestos recorded on Amosite Ltd (re-issued yearly and old records not retained) Norse are responsible for maintaining own COSHH records.
Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628 Social Security (Claims and Payments) Regulations SI 1987	The Accident Book – BI 510 - 3 years after last entry in the book This includes the new format to be used from 1/1/04 This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry Completed pages must be kept secure with restricted access. Data Protection	Pupil Receptionist	Pupil Reception Prime (Local Authority)

	No 1968 Revokes all but Part I of SI 1979 No 628 Social Security Administration Act 1992 Section 8. Social Security (Claims and Payments) Amendment (No 30 Regulations 1993 SI 1993 No 2113 Allows the information to be kept electronically	Act 2018 and GDPR		
Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628 Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part I of SI 1979 No 628 Social Security Administration Act 1992 Section 8. Social Security (Claims and Payments) Amendment (No 30 Regulations 1993 SI 1993 No 2113 Allows the	The Accident Book – BI 510 - 3 years after last entry in the book This includes the new format to be used from 1/1/04 This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR	Pupil Receptionist	Pupil Reception Prime (Local Authority)

	information to be kept electronically			
Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see http://www.hse.gov.uk/RIDDOR/	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2)	Date of incident + 3 years provided that all records relating to the incident are held on personnel file [see 2.4.2 above]	Premises Manager	Prime (Local Authority)
Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	Premises Manager	Risk assessment stored in Staff Shares
Process of monitoring of areas where employees and persons are likely to have come into contact with radiation. Maintenance records or controls, safety features and PPE ----- -- Dose assessment and recording	The Ionising Radiation Regulations 2017. SI 2017 No 1075 Regulation 11 As amended by SI 2018 No 390 Personal Protective Equipment (Enforcement) Regulations 2018	2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. ----- ----- To keep the records made and maintained (or a copy of these records) until the person to whom the record relates has or would have attained the age of 75 years, but in any event for at least 30 years from when the record was made	Marie White	Locked cupboard in room 31

Fire Precautions log books		Current year + 3 years	Premises Manager	Electronically and filing cabinet in Premises Manager office.
PREMISES / PROPERTY				
Title deeds of properties belonging to the school		Permanent / to disposal of property	PA to the Headteacher	PA to the Headteacher's office Archives room post disposal
Building records, plans, consents and certification and warranties etc	Limitations Act 1980	6 years after disposal or permanent if of historical / archival interest.	Premises Manager	PA to the Headteacher's office Archives room
All records relating to the maintenance of the school carried out by contractors or school employees		These should be retained whilst the building belongs to the Governing Board and should be passed on to any new owners if the building is leased or sold. See 2.4.10	Premises Manager	Files in Premises office Archives room for historical / archival interest
STUDENTS				
All records relating to the creation and implementation of the School Admissions Criteria	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then review	Headteacher	Staff shares Website One copy of Admissions booklet to Archives

Published Admission Number (PAN) Reports		Current year + 6 years	School Registrar	School Registrar's office
Admissions – if the admission is successful	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Date of admission + 1 year	KS3 / 4 Administrator	Part of student file in PA to the Headteacher's office
Admissions – if the appeal is unsuccessful	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Resolution of case + 1 year (except those on waiting list)	School Registrar	School Registrar's office
Educational Record including examination results (public and internal), parental permission for trips	Pupil information Regulations 2005 (maintained schools only) Same approach applied in academy context. Data Protection regulation	25 years from date of birth if this is the final school of the child but the pupil file should follow the student so it is likely to be difficult to justify the need for retention once the file has been passed to the student's new school. As it is not feasible to delete files automatically on each ex-student's 25 th birthday, they will	Examinations Officer Assessment and Reporting Officer / SIMS Administrator KS3 / 4 Administrator	Sims Exams Office Electronic copies kept on file Cellar Student file in PA to the Headteacher's office

		be disposed of at the end of the academic year a pupil turns 25.		
Examination data including seating plans, access arrangement, results		9 years from year the students leaves (as Y11 and 13 are examined together it is hard to extract)	Examinations Officer	Sims Exams Office Electronic copies kept on file Cellar Archives room for historical / archival interest (generic results)
Attendance registers	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made.	Assessment and Reporting Officer / SIMS Administrator	SiMs
Correspondence relating to any absence (authorised or unauthorised)	Education Act 1996 Section 7	Current academic year + 2 years	Assessment and Reporting Officer / SIMS Administrator	
Care plans		Destroyed when student's leave the school	Pupil Receptionist	Pupil Reception
CHILD PROTECTION INFORMATION				
Child Protection information (on child's file) including information on Looked After Children	"Keeping children safe in education Statutory guidance for schools and colleges 2018"; "Working together to safeguard children. A guide to	RETAIN UNTIL FURTHER RECOMMENDATIONS Subject to moratorium on destruction due to	Deputy Head: Pastoral	Locked cabinets in Deputy Head's office. Archived files in basement.

	inter-agency working to safeguard and promote the welfare of children 2018”	historic child abuse enquiry. See https://www.iicsa.org.uk/document/guidance-note-retention-instructions-and-data-protection-requirements “Keeping children safe in education Statutory guidance for schools and colleges 2018”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018”		Electronic copies held on MyConcern Archived in MyConcern
Child Protection Information in other files	“Keeping children safe in education Statutory guidance for schools and colleges September 2016”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children February 2017”	RETAIN UNTIL FURTHER NOTICE Subject to moratorium on destruction due to historic child abuse enquiry. See https://www.iicsa.org.uk/document/guidance-note-retention-instructions-and-data-protection-requirements	Deputy Head: Pastoral SENDCo	SIMS Early Help-password protected files with limited access LAC folders – password protected
SPECIAL EDUCATIONAL NEEDS				

SEN files	Limitation Act 1980	7 years from date leaving. Longer in agreement with the Deputy Headteacher (Pastoral). Should student mover to another School, their record moves with them.	SENDCO	SIMS Filing cabinet in SENDCO office Cellar for archived files
Education Health and Care Plans	Special Educational Needs and Disability Regulations 2014 Children and families Act 2014, part 3	7 years from date of leaving.	SENDCO	SIMS Filing cabinet in SENDCO office Cellar for archived files
Statements of Special Educational Needs (now historic)	Originally under Special Educational Needs and Disability Regulations 2001	7 years from date of leaving unless passed to new school (usually on the student's file)	SENDCO	SIMS Filing cabinet in SENDCO office Cellar for archived files
TEACHER RECORDS				
Timetable, class record books, mark books, record of homework set, pupil's work		Current year + 1 year	Class teachers	Paper and electronic copies Whole school timetable copy saved to Archives.
Other items e.g. curriculum related, photographs, video recordings, school photos	Case by case basis	The Deputy Headteacher (Pastoral) will determine and document appropriate timescale and refer to the Archivist if necessary.		Any photographs and videos other than of individual portraits to the Archives room.

PARENTS AND CARERS (Legal Guardians)	Pupil Registration Regulations 2006 For basic name and contact details. Otherwise usually operational in accordance with the statutory functions of the school	For the duration that the parent has a student at the school.	Assessment and Reporting Officer / SIMS Administrator KS3 / 4 Administrator	Student files and Sims
LOCAL AUTHORITY / CENTRAL GOVERNMENT				
School census returns		Current year + 5 years	Assessment and Reporting Officer / SIMS Administrator	Copy saved to Archive folder in Staff Shares
Secondary Transfer Sheets (primary)		Current year + 2 years	KS3 / 4 Administrator	Student files
Returns made to central government		Current year + 6 years	Assessment and Reporting Officer / SIMS Administrator	
Archives including staff and student information such as: Staff: surname, forenames, DOB, start date end date, previous school. Students: Admission year and date, age on admission, surname, forenames, SIMS		Indefinitely	Archivist	Archives room Staff shared – archives files – password protected, limited access

chosen name, gender, date of birth, parents' name, address with postcode, previous school, leaving date, age on leaving, destination.				
OTHER SCHOOL RELATED INFORMATION		Please consult the IRMS toolkit for schools which is here: http://irms.org.uk/page/SchoolsToolkit		

5. Deletion of Documents

When a document is at the end of its retention period, it should be dealt with in accordance with this policy.

Confidential waste

- 5.1 This should be made available for collection in the confidential waste bins or sacks located around the office. Should you have a shredder in your office this should be used.
- 5.2 Anything that contains personal information should be treated as confidential.
- 5.3 Where deleting electronically, please refer to the Network Manager to ensure that this is carried out effectively.

Other documentation

- 5.4 Other documentation can be deleted or placed in recycling bins where appropriate.

Automatic deletion

- 5.5 Certain information will be automatically archived by the computer systems, details of which are set out in the table above. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact the Network Manager.

Logging deletion of important records

- 5.6** A log is kept when disposing of important records. This includes personnel and educational records. Deputy Heads are responsible for the authorisation of routine deletion. The Headteacher will be responsible for the authorisation of retrospective bulk deletion.

6. Individual Responsibility

Much of the retention and deletion of documents will be automatic, but when faced with a decision about an individual document, you should ask yourself the following:

- Has the information come to the end of its useful life?
- Is there a legal requirement to keep this information or document for a set period?
- Would the information be likely to be needed in the case of any legal proceedings? In particular, is it potentially relevant to an historic child abuse enquiry? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)
- Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
- Is the document of historic or statistical significance? Please refer to the Archivist for clarification.
- If the decision is made to keep the document, this should be referred to the Headteacher and reasons given.

7. Review

This policy will be reviewed every two years.