

# Information Management Policy

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## Monitoring and review

Staff responsible	:	Chief Operating Officer; Headteachers
Committee responsible	:	Board of Trustees
Links	:	
Date approved	:	March 2018
Review date*	:	March 2020

\*Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown above and re-circulated.

**The Boleyn Trust Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust.**

## Rationale

The Academies within the Trust hold a great deal of information, much of which is confidential. This may be information about:

- our students;
- our students' parents, or guardians;
- our teachers and other staff;
- our governors.

The Trust 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 Trust 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

## Policy Statement

This policy applies to all records created, received or maintained by staff of each School in the course of carrying out its functions.

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.

A small percentage of the School's records will be selected for permanent preservation as part of the Trust's archives and for historical research.

### Responsibilities

Each 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.

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.

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.

### Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information Policy;
- E-Safety and Data Security Policy;
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the School.

The Retention Schedule (Annex 3) is in operation. This lays down the length of time a record needs to be retained, after which it will be destroyed. Time scales are based on DfE guidelines.

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## Annex 1: Schedule of Records transferred

Schedule of Records transferred by [Name of School] to [Name of Organisation/Record Office]

Date	Description / Volume

**Sent by:**

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Designation: \_\_\_\_\_

Organisation: \_\_\_\_\_

Date: \_\_\_\_\_

**Received by:**

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Designation: \_\_\_\_\_

Organisation: \_\_\_\_\_

Date: \_\_\_\_\_

**Please return a copy to the School Business Manager and Boleyn Trust Chief Operating Officer for retention.**

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### **Annex 3: Information Retention Schedule**

The Retention Schedule is divided into the following sections:

- Management of the School
- Human Resources
- Financial Management of the School
- Property Management
- Pupil Management
- Curriculum Management
- Extra-Curricular Activities
- Central Government and Local Authority

## Management of the School

This section contains retention periods connected to the general management of the School. This covers the work of the Local Governing Body, the senior management team, the admissions process and operational administration.

1.1 Governing Body				
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]
1.1.1	Agendas for Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained as the master set of minutes. All other copies can be disposed of
1.1.2	Minutes of Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		
	Principal Set (signed)			PERMANENT
	Inspection Copies			Date of meeting + 3 years
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if minutes refer directly to individual reports then the reports should be kept permanently

1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years
1.1.5	Instruments of Government including Articles of Association	No		PERMANENT
1.1.6	Trusts and Endowments managed by the Governing Body	No		PERMANENT
1.1.7	Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years
1.1.8	Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years
1.1.9	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years, then review for further retention in case of contentious dispute
1.1.10	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years
1.1.11	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date proposal accepted or denied + 3 years

Please note that all information about the retention of records concerning the recruitment of the Headteacher can be found in the



## 1.2 Head Teacher and Senior Management Team

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operat
1.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book minimum of 6 years then re
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 year review
1.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then review
1.2.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 year review
1.2.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 year review
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years
1.2.7	School Development Plans	No		Life of the plan + 3 years

### 1.3 Admissions Process

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]
1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No	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
1.3.2	Admissions – if the admission is successful	Yes	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
1.3.3	Admissions – if the appeal is unsuccessful	Yes	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
1.3.4	Register of Admissions	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made.
1.3.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year
1.3.6	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014	Current year + 1 year

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1.3.7	Supplementary Information form including additional information such as religion, medical conditions etc.	Yes		
	For successful admissions			This information should be added to the pupilfile
	For unsuccessful admissions			Until appeals process completed

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#### 1.4 Operational Administration

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]
1.4.1	General file series	No		Current year + 5 years then REVIEW
1.4.2	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year
1.4.4	Newsletters and other items with a short operational use	No		Current year + 1 year
1.4.5	Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW

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## Human Resources

This section deals with all matters of Human Resources management within the school.

### 2.1 Recruitment

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]
2.1.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All the relevant information should be added to the personal file (see below) and all other information retained for 6 months
2.1.4	Pre-employment vetting information – DBS Checks	No	DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible these should be checked, and a note made of what was seen and what has been checked. If it is found necessary to keep copy documentation, then this should be placed on the member of staff’s personal file

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2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom <sup>4</sup>	Yes	An employer's guide to right to work checks [Home Office May 2015]	Where possible these documents should be added to Personal File [see below], but if they are kept separate the Home Office requires that the documents are kept for 2 years after termination of Employment plus not less than two years
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## 2.2 Operational Staff Management

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]
2.2.1	Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years
2.2.2	Timesheets	Yes		Current year + 6 years
2.2.3	Annual appraisal/ assessment records	Yes		Current year + 5 years

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### 2.3 Management of Disciplinary and Grievance Processes

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	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
2.3.2	Disciplinary Proceedings	Yes		
	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
	case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case



## 2.4 Health and Safety

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Opera
2.4.1	Health and Safety Policy Statements	No		Life of policy + 3 years
2.4.2	Health and Safety Risk Assessments	No		Life of risk assessment -
2.4.3	Records relating to accident/ injury at work	Yes		Date of incident + 12 years In the case of serious accident further retention period will be applied
2.4.4	Accident Reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	
	Adults			Date of the incident + 6 years
	Children			DOB of the child + 25 years
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	Current year + 40 years
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years

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2.4.8

Fire Precautions log books

No

Current year + 6 years

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## 2.5 Payroll and Pensions

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]
2.5.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years

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## Financial Management of the School

This section deals with all aspects of the financial management of the school including the administration of school meals.

### 3.1 Risk Management and Insurance

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]
3.1.1	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years

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### 3.2 Asset Management

	Basicfile description	Data Prot Issues	Statutory Provisions	RetentionPeriod[Operational]
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years

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### 3.3 Accounts and Statements including Budget Management

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]
3.3.1	Annual Accounts	No		Current year + 6 years
3.3.2	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then R
3.3.3	Student Grant applications	Yes		Current year + 3 years
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 3 years
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years
3.3.6	Records relating to the collection and banking of monies	No		Current financial year + 6 years
3.3.7	Records relating to the identification and collection of debt	No		Current financial year + 6 years

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### 3.4 Contract Management

	Basicfile description	Data Prot Issues	Statutory Provisions	Retention Period[Operational]
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years
3.4.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years
3.4.3	Records relating to the monitoring of contracts	No		Current year + 2 years

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### 3.5 School Fund

	Basicfile description	Data Prot Issues	Statutory Provisions	Retention Period[Operational]
3.5.1	School Fund - Cheque books	No		Current year + 6 years
3.5.2	School Fund - Paying in books	No		Current year + 6 years
3.5.3	School Fund – Ledger	No		Current year + 6 years
3.5.4	School Fund – Invoices	No		Current year + 6 years
3.5.5	School Fund – Receipts	No		Current year + 6 years
3.5.6	School Fund - Bank statements	No		Current year + 6 years
3.5.7	School Fund – Journey Books	No		Current year + 6 years

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### 3.6 School Meals Management

	Basicfile description	Data Prot Issues	Statutory Provisions	Retention Period[Operational]
3.6.1	Free School Meals Registers	Yes		Current year + 6 years
3.6.2	School Meals Registers	Yes		Current year + 3 years
3.6.3	School Meals Summary Sheets	No		Current year + 3 years

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## Property Management

These sections cover the management of buildings and property.

4.1 Property Management		Data Prot Issues	Statutory Provisions	Retention Period [Operational]
4.1.1	Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry.
4.1.2	Plans of property belong to the school	No		These should be retained whilst the building is used for the school and should be passed onto any new owners if the building is leased or sold.
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years

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## 4.2 Maintenance

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [Operational]
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No		Current year + 6 years

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# Pupil Management

This section includes all records which are created during the time a pupil spends at the school. For information about accidents

5.1 Pupil's Educational Record					
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI2005No. 1437		
	Primary			Retain whilst the child remains at the primary school	<p>The file should follow the pupil to another primary school. This will include:</p> <ul style="list-style-type: none"> <li>to another primary school</li> <li>to a secondary school</li> <li>to a pupil referral unit</li> <li>If the pupil dies, the records should be returned to the Local Authority for retention period.</li> </ul> <p>If the pupil transfers to another school or leaves school, the records should be returned to the Local Authority to be stored for 25 years. It makes more sense for the Local Authority to store records for 25 years as it is more secure than from the Local Authority.</p>
	Secondary		Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2	Examination Results – Pupil Copies	Yes			
	Public			This information should be added to the pupil file	All uncollected copies should be returned to the examination board.

	Internal			This information should be added to the pupil file	
5.1.3	Child Protection information held on pupil file	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.	SECURE DISPO
5.1.4	Child protection information held in separate files	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	DOB of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	SECURE DISPO

Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule

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## 5.2 Attendance

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Oper
5.2.1	Attendance Registers	Yes	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 three years after the end of the academic year on which the entry was made
5.2.2	Correspondence relating to authorized absence		Education Act 1996 Section 7	Current academic year

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### 5.3 Special Educational Needs

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	REVIEW NOTE: This retention period for pupil file should be kept. Should a longer period of time to determine "sufficient education" case. Involved in any decision to review retention period and this
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL un
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL un
5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL un

# Curriculum Management

6.1 Statistics and Management Information				
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]
6.1.1	Curriculum returns	No		Current year + 3 years
6.1.2	Examination Results (Schools Copy)	Yes		Current year + 6 years
	SATS records –	Yes		
	Results			The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATS. These could be kept for current year + 6 years to allow suitable comparison.
	Examination Papers			The examination papers should be kept until any appeals/validation process is complete.
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years
6.1.4	Value Added and Contextual Data	Yes		Current year + 6 years
6.1.5	Self-Evaluation Forms	Yes		Current year + 6 years



## 6.2 Implementation of Curriculum

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]	Action at record
6.2.1	Schemes of Work	No		Current year + 1 year	It may be a each year SECURE
6.2.2	Timetable	No		Current year + 1 year	
6.2.3	Class Record Books	No		Current year + 1 year	
6.2.4	Mark Books	No		Current year + 1 year	
6.2.5	Record of homework set	No		Current year + 1 year	
6.2.6	Pupils' Work	No		Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year	SECURE D

## Extra-Curricular Activities

7.1 Educational Visits outside the Classroom				
Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [O
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Outdoor Education Advisers' Panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 14 ye
7.1.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Outdoor Education Advisers' Panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 10 ye
7.1.3	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the tri
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil invol incident + 25 years The permission slips f pupils on the trip ne retained to show that had been followed for

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## 7.2 Walking Bus

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]
7.2.1	Walking Bus Registers	Yes		Date of register + 3 years 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

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### 7.3 Family Liaison Officers and Home School Liaison Assistants

Basic file description		Data Prot Issues	Statutory Provisions	Retention Period [Operational]
7.3.1	Day Books	Yes		Current year + 2 years then review
7.3.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then dest
7.3.3	Referral forms	Yes		While the referral is current
7.3.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy
7.3.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy
7.3.6	Group Registers	Yes		Current year + 2 years

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## Central Government and local Authority

This section covers records created in the course of interaction between the school and central and local government.

<b>8.1 Local Authority</b>				
	Basicfile description	DataProtIssues	Statutory Provisions	RetentionPeriod[Operat
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years
8.1.2	Attendance Returns	Yes		Current year + 1 year
8.1.3	School Census Returns	No		Current year + 5 years
8.1.4	Circulars and other information sent from the Local Authority	No		Operational use

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## 8.2 Central Government

	Basicfile description	DataProtIssues	Statutory Provisions	RetentionPeriod[Opera
8.2.1	OFSTED reports and papers	No		Life of the report then R
8.2.2	Returns made to central government	No		Current year + 6 years
8.2.3	Circulars and other information sent from central government	No		Operational use

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