

John Bunyan Primary School & Nursery



School Records Management Policy

Reviewed by: SLT

Approved by: SLT

Next Review date: Spring 2027

1. PURPOSE

This policy establishes procedures for lawful processing of personal data, secure creation, storage and management of school records, compliance with UK statutory and safeguarding requirements, and appropriate retention and secure disposal of records. The school recognises that effective records management underpins safeguarding, accountability and educational standards.

2. SCOPE

This policy applies to all school staff, governors, volunteers and contractors; all paper and electronic records; records held on-site or by third-party processors; and all pupil, staff, governance, safeguarding, health & safety and financial records.

3. LEGAL AND REGULATORY FRAMEWORK

This policy complies with UK GDPR, Data Protection Act 2018, Freedom of Information Act 2000, Education Act 2002, Education (Pupil Information) (England) Regulations 2005, Limitation Act 1980, HMRC requirements, safeguarding statutory guidance, DfE guidance, and the IRMS Records Retention Toolkit for Schools.

4. DATA PROTECTION PRINCIPLES

The school processes personal data in accordance with UK GDPR principles: lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality; and accountability.

5. ROLES AND RESPONSIBILITIES

Governing Body – Approves policy and ensures compliance.

Headteacher – Oversees implementation and staff compliance.

Data Protection Officer – Monitors compliance, advises on retention, manages breaches and Subject Access Requests.

All Staff – Maintain accurate records, protect confidentiality, follow retention schedule and report breaches.

6. RECORD STORAGE & SECURITY

Physical records are stored in locked cabinets with restricted access and fire-resistant storage where appropriate. Electronic records use role-based access controls, strong passwords, encryption where appropriate, multi-factor authentication for sensitive systems, and regular secure backups. Child protection files are stored separately.

7. DATA SUBJECT RIGHTS

Individuals have the right of access, rectification, erasure (where applicable), restriction and objection. The school will respond to Subject Access Requests within one calendar month.

8. RECORD RETENTION (SUMMARY- see Appendix A)

Pupil main file – Date of Birth + 25 years
Admission register – Permanent
Attendance register – 3 years
Child protection – DOB + 25 years minimum
Personnel file – Termination + 6 years
Payroll – 6 years
Governing body minutes – Permanent
Financial records – 6 years
Audit reports – Permanent

9. SAFEGUARDING RECORDS

Child protection records must be stored separately, clearly marked confidential, transferred securely within 5 days when a pupil moves school, and retained until DOB + 25 years minimum.

10. RECORD DISPOSAL

Records are reviewed annually and destroyed only after the retention period expires with Headteacher or DPO authorisation. Secure destruction includes cross-cut shredding, approved confidential waste contractor, or secure digital deletion. A destruction log must be maintained.

11. LITIGATION HOLD

If legal proceedings, investigation, audit or insurance claim arises, all relevant records must be preserved regardless of the retention schedule.

12. TRAINING

Annual data protection training, induction for new staff, regular safeguarding updates and compliance audits are provided.

13. POLICY REVIEW

This policy will be reviewed annually, following legislative change, after significant data breach, or updated DfE/IRMS guidance.

Appendix A – Records Retention Schedule

1. Pupil Records

Record Type	Retention Period
Admission Register	Permanent
Attendance Register	3 years from end of academic year
Main Pupil File	Date of Birth + 25 years
Public Examination Results	Permanent
Internal Assessment Records	1 year after end of academic year
SEN Records	Date of Birth + 25 years
Child Protection File	Date of Birth + 25 years (minimum)
Pupil Accident Reports	Date of Birth + 25 years
Exclusion Records	Date of exclusion + 6 years

2. Staff Records

Record Type	Retention Period
Personnel File	Termination + 6 years
Contracts of Employment	Termination + 6 years
Payroll Records	6 years
DBS Record (status only)	6 months after recruitment decision
Disciplinary Records	6 years after employment ends
Staff Accident Reports	3 years from date of incident

3. Governance Records

Record Type	Retention Period
Governing Body Minutes	Permanent
Policy Documents	Current version + 6 years
Complaints Files	6 years after resolution

4. Financial Records

Record Type	Retention Period
Annual Accounts	6 years
Budget Reports	6 years
Purchase Orders	6 years
Audit Reports	Permanent

5. Health & Safety Records

Record Type	Retention Period
Risk Assessments	Superseded + 3 years
Fire Log Book	3 years
RIDDOR Reports	3 years