



Records Retention and Disposal Policy

Version 1 – January 2021

**Owner: Brent Council Data Protection Officer on behalf of
Barham Primary School**

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Version control table

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1. Introduction

The aims of this policy are to:

- Assist in identifying records that may be worth preserving permanently as part of our archives;
- Prevent the premature destruction of records that need to be retained for a specified period to satisfy legal, financial and other requirements of the school.
- Provide consistency for the destruction of those records not required permanently after specified periods;
- Promote improved Records Management practices within the school.

2. Policy Statement

Barham Primary School shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference, or to comply with contractual or legal requirements, or for other purposes detailed below.

3. Scope of this policy

This Records Retention and Disposal Policy refer to records held in any media.

4. General principles

The records of the school shall be classified for purposes of retention and disposal as set out below.

5. Retention Schedules

Barham Primary School will have identified classes of information held in the school's Information Asset Register. This specifies the retention period for each type of record held within this class. The retention period for each type of record is found within the School's Retention Guidelines.

6. Permanent Retention

Records that are permanent or essential shall be retained and preserved indefinitely. The Data Protection Act provides an exemption for information about identifiable living individuals that is held for research, statistical or historical purposes to be held indefinitely, provided specific requirements are met. It is the responsibility of the

Archivist to ensure that this is so. The Archivist should be informed of sensitivity at the time of transfer of the material to the archives, and an appropriate closure period agreed.

7. Current Records

Current records are records which for convenience, ready reference or other reasons are retained in the office space and equipment of the school.

Where retention is specified by law – where legal requirements prescribe a definite period of time for retaining certain records, the school will retain the records for the period specified by law. Examples of records required to be maintained are pupil records.

Where no retention is specified by law – where no specific retention period is specified by law, the retention period for records that the school is required to retain shall be specified in the School's Retention Guidelines. Examples of current records include school memoranda, budget documents, and personnel files.

8. Off-site Storage of Paper Records

Paper records stored off-site are subject to the same retention requirements as current records and should be regularly reviewed and destroyed in line with the retention period.

9. No Retention Required

Documents and other materials that are not 'records' need not be retained unless retention is otherwise required by law or by the retention requirements in the School's Retention Guidelines. Documents and other materials (including originals and duplicates) that are not otherwise required to be retained, are not necessary to the functioning or continuity of business administration and which have no legal significance may be destroyed when no longer needed. Examples include materials and documents generated for the convenience of the person generating them, draft documents (other than some contracts) which have been superseded by subsequent versions, and or rendered moot by school action, notepads, e-mails that do not contain information required to be retained under this policy, and chronological files.

With limited exceptions, no specific retention requirements are assigned to documents in this category. Instead, it is up to the originator or recipient to determine when the document's business utility has ended.

10. Destruction of Records

Whenever there is the possibility of litigation, the records of information that are likely to be affected should not be amended or disposed of until the threat of litigation has been removed.

Please note: On the 23 June 2015 the Independent Inquiry into Child Sexual Abuse (Goddard Inquiry) requested all agencies to “retain any and all documents; correspondence; notes; emails and all other information – however held – which contain or may contain content pertaining directly or indirectly to the sexual abuse of children or to child protection and care.” For more [information Independent Inquiry into Child Sexual Abuse website](#)

When records identified for disposal are destroyed, a register of such records needs to be kept. Enough details should be retained to identify which records have been destroyed.

11. Records not addressed in the Information Asset Register

Records and other documents or materials that are not expressly addressed by the Information Asset Register may be destroyed at any time provided that they have been retained for the periods prescribed for substantially similar records.

This usually applies to information that is duplicated, unimportant or only of short-term facilitative value. Unimportant records or information include:

- With Compliments slips
- catalogues and trade journals
- telephone message slips
- non acceptance of invitations
- trivial electronic mail messages or notes that are not related to school business
- out-of-date distribution lists
- working papers which lead to a final report

Duplicated and superseded material such as stationery, manuals, drafts, forms, address books and reference copies of annual reports may be destroyed. Paper copies of electronic documents are also covered.

Any records or information that can be used as evidence – to prove that something happened must be retained. If you are in doubt about what information is required consult with Legal Services & the School's Data Protection Service.

12. Guidance

Storage of unnecessary records is wasteful of space and sometimes of time and money, and records not required for permanent preservation should be destroyed as soon as they are no longer required, i.e. as soon as they no longer have any administrative value and as soon as legal and financial requirements have been satisfied.

For records stored on the school's shared drive, it is good practice to create an archive folder with the destruction date in the folder name. As for records that are to be preserved for historical or other research purposes, these should be transferred to archive as soon as it is administratively convenient – in effect, as soon as you no longer need them on a day-to-day basis.

Old electronic files should never be stored on CD, or other removable media.

Confidential and sensitive information must be destroyed appropriately, for example paper records should be cross shredded.

13. Roles and Responsibilities

All staff should have read this Retention policy and be mindful of it in their day to day work. Staff are responsible for preserving and destroying records in line with the schedule.

Barham Primary School will have an officer who is responsible for providing guidance and assistance. They will also ensure that the Information Asset Register is regularly reviewed and adhered to by staff within the unit.

The Headteacher has overall responsibility for co-ordinating the school's Retention and Disposal Policy and ensuring that the school regularly reviews the School's Retention Guidelines.