



Records Management Policy

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Introduction and Scope

Bridgewater recognises records management as a core corporate function that supports the effective management of the school. A records management programme ensures that authoritative evidence of our work is created, captured, managed and made accessible within the scope of our information governance policy framework. This allows for improved accountability, transparency, continuity, decision-making, and better compliance with relevant legislation and regulations, as well as protecting the rights and interests of ourselves and our pupils.

A record is defined as information created, received and maintained as evidence and as an asset by the school in pursuit of legal obligations or in the transaction of business. Records are retained as evidence for a set period determined by legal, regulatory and functional requirements.

The Records Management policy and retention schedule applies to all records created, received or maintained by the school in the course of carrying out its functions, regardless of whether it is in paper or electronic format.

This policy applies to all employees, governors or Trustees, contractors, agents and representatives, volunteers and temporary staff working for, or on behalf of, the school. It should be read alongside the other policies within our information governance policy framework, including the Data Protection policy, Information Security policy and Acceptable Use policies.

Roles and Responsibilities

Overall responsibility for ensuring that the school meets the statutory requirements of any legislation lies with the Board of Governors or Trustees. The following roles have day to day responsibility for records management compliance and provide the necessary assurance to the Board.

Senior Information Risk Owner (SIRO)

The SIRO is responsible for overseeing the implementation of this policy and ensuring that effective records management practices are in place across the school. They are ultimately responsible for the day-to-day operational management of the school and will ensure that staff are appropriately trained in relation to records management, supported by the SPOC and IAOs. In our organisation this role lies with the Headteacher.

Single Point of Contact (SPOC)

The SPOC will support the SIRO in the day-to-day operational management of the school, providing guidance on good records management practices and promoting compliance with this policy so that information can be retrieved easily, appropriately and in a timely way. They will help develop and carry out regular reviews of the records management programme, at least annually, to ensure compliance and to check that records are stored securely and can be accessed appropriately. In our organisation this role lies with the School Business Manager.

Information Asset Owner (IAO)

The IAO is responsible for the security and maintenance of a particular record during its lifecycle. They need to understand how information is created, amended or added to over time, and know who has access to the records and why. They are

responsible for the appropriate disposal of information when it is no longer required. A record of IAOs is included in our Information Asset Register.

All staff

All staff, including governors or Trustees, contractors, agents and representatives, volunteers and temporary staff working for, or on behalf of, the school are responsible for managing records consistently in accordance with this policy. They must keep complete and accurate records which adequately document their work.

Records Management

We have a robust programme in place for managing our records throughout their lifecycle. This includes using methods such as version control and file plans to ensure that records can be easily searched and accessed in the event of an information request. We also include records and information management as a risk on our corporate risk register.

Information Asset Register (IAR)

In accordance with Article 30 of UK GDPR, we have in place an Information Asset Register (IAR) which maintains a record of our processing activities. The IAR documents exactly what records we hold, where they are stored, who has access to the information and the retention periods in place. This is reviewed, at least annually, to ensure it remains accurate.

Email management

We have a process in place to ensure that emails are also managed in line with this policy and our retention schedule. Emails discussing school business or reflecting significant actions or decisions concerning school business will not be stored in personal email inboxes but will be removed and stored securely in the appropriate filing system.

Personal email inboxes are regularly reviewed to ensure any unnecessary emails are deleted.

School Governors have been provided with school email addresses and are encouraged to use them for all school business.

Exceptionally, it may not be possible for members of the Governing Body to readily access their school email account. In such circumstances a private email address may be used provided that assurance is given that;

- the email account to be used cannot be accessed by any other person;
- emails received will be permanently deleted after they have been read and actioned;
- emails discussing school business sent from non-school email accounts will be permanently deleted from sent folders immediately after the message has been sent successfully;
- any files containing school business will not be saved in personal folders;
- the school must be informed immediately of any changes to a Governor's private email account which is used for school business.

Where a non-school email account is being used, Governors will make every attempt to use school email accounts as soon as practically possible to do so.

Governors remain responsible for the safety of any data received into, or sent from, their non-school email accounts. Any potential data breaches involving non-school email accounts will be reported to the school immediately.

Pupil Records

Schools are under a duty to maintain a record for each pupil which serves as the core record of an individual's progress through the education system and should accompany them throughout their school career. The information within the pupil record must be easy to find, accurately and objectively recorded, and expressed in a professional manner.

Pupil records are held electronically within our management information system (MIS). Some information, not forming part of the core record, will be held outside the MIS in either electronic or paper format. This includes information which has shorter retention periods such as attendance registers, consent forms, medical forms, accident forms, absence notes and pupil work.

Safeguarding files

Records relating to pupils involved with child protection or safeguarding are held securely in a designated system accessible to the Designated Safeguarding Leads (DSLs). This is stored separately to the core pupil record to ensure confidentiality and restricted accessibility.

Staff Records

Records relating to the school workforce will be held securely, either electronically or in paper format, with appropriate measures in place to ensure accessibility is restricted.

Storage and Security

All records, especially where containing personal data, will be stored securely to maintain confidentiality, whilst also keeping information accessible to those authorised to see it. Electronic records will have appropriate security and access controls in place, and systems will have robust audit functions in place wherever possible.

Paper records will be stored in secure, lockable storage areas with restricted access.

When sharing or transferring records containing personal information, we will ensure appropriate transmission security controls are in place, in line with our Information Security Policy.

Retention and Disposal

Retention is the period a record is kept for after it stops being actively used, but before it is destroyed. Retention is a vital part of records management as it allows organisations to retain records only for as long as needed, and discourages records being kept for long periods 'just in case'.

The retention period for particular types of records is determined by legal, regulatory or functional requirements. We have implemented a Retention Schedule which sets out our specified retention periods (Appendix One).

We will ensure that any records containing personal or confidential information are disposed of appropriately and securely when they have reached the end of their retention period, in line with our retention schedule.

Records held in databases or electronic management systems with the functionality for automatic destruction of records after a specified period of time will be used wherever possible. A review of the records will be carried out prior to destruction, where practical.

Where automatic disposal is not in place, for example for paper records, we will carry out a manual review, at least annually, to ensure they are deleted in line with retention guidelines.

The disposal of all information is documented to ensure that we maintain a record of when it has been deleted and by whom. This allows us to evidence that a record no longer exists, or has been transferred to another institution, in the event of a subject access or Freedom of Information request being received.

Archiving

A small percentage of our records will be selected for permanent preservation as part of the Local Authority Archives Service. This is maintained as a resource to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging and shared heritage; to prompt memories of school-life among many generations; and to serve as a research resource for all interested in the history of the school and the community it serves.


Records containing personal information will only be selected for archive with appropriate safeguards in place to protect the rights and freedoms of individuals. This will include anonymisation or pseudonymisation wherever possible.

Training

Since all employees are involved in creating, maintaining and using records, it is vital that everyone understands their record management responsibilities as set out in this policy. We will ensure that staff are appropriately trained or experienced and that they understand the need for effective record keeping.

When we introduce new technology or ICT systems we ensure that users are appropriately trained to use these systems and can manage records within them effectively.

Appendix One - Retention Schedule

Where an entry is marked with this symbol , consideration should be given to the potential for legal challenges. Where a legal challenge is possible or pending at the end of the initial retention period, records may be retained for an additional six years, in line with the Limitations Act 1980.

Pupil Records

Records in this section contain those that the Department for Education (DfE) considers as part of a pupil's file. Please refer to the 'Safeguarding and Child Protection Records' section for retention periods relating to safeguarding.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Primary school pupil file	Yes	Until the pupil leaves the school.	Statutory	The Education (Pupil Information) (England) Regulations 2005	Securely transfer to the onward setting.
Secondary school pupil file	Yes	Until the pupil's 25th birthday. (18 + 6 years as an adult)	Statutory	The Education (Pupil Information) (England) Regulations 2005 Limitations Act 1980	Secure disposal If a pupil leaves, transfer the records to the onward setting
Formal academic attainment (e.g. coursework/ exam results)	Yes	Subject to the pupil file retention.	Statutory	The Education (Pupil Information) (England) Regulations 2005	Secure disposal May wish to anonymise and retain results for comparison purposes

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Pupil work (e.g. exercise books, homework, learning app data, etc.)	Yes	Given to pupils at the end of each year. Where not possible, retain for the current year + 1.	Business Need		Secure disposal
Special educational needs and disabilities (SEND) ▲ (Inc. reviews and education, health, and care (EHC) plans)	Yes	End of EHCP + 6 years or until the pupil's 25th birthday.	Statutory	The Special Educational Needs and Disability Regulations 2014	Secure disposal If a pupil leaves, transfer the records to the onward setting
Personal Education Plans (PEPS) (For looked after children)	Yes	Date of birth of the pupil + 25 years.	Statutory	Children and Young Persons Act 2008 Children and Social Work Act 2017	Secure disposal
Medical administration records ▲	Yes	Retained in pupil file or until the pupil's 25 th birthday.	Best Practice	NHS Records Management Code of Practice	Secure disposal

Safeguarding and Child Protection Records

Records in this section relate to safeguarding and child protection matters.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Primary school safeguarding & child protection files ▲	Yes	Until the pupil leaves the school.	Statutory	The Education (Pupil Information) (England) Regulations 2005. DfE Keeping Children Safe in Education	Securely transfer to the onward setting as a separate file or in a sealed envelope within the pupil's file
Secondary school safeguarding & child protection files ▲	Yes	Until the pupil's 25th birthday. (18 + 6 years as an adult)	Statutory	The Education (Pupil Information) (England) Regulations 2005 DfE Keeping Children Safe in Education	Secure disposal
Child sexual abuse files ▲	Yes	Until the child's 75th birthday.	Statutory	The Report of the Independent Inquiry into Child Sexual Abuse (IICSA) recommendation on access to records	We expect this information to be held by the Local Authority as the lead. If this is not the case, records should be held by the final school setting
Allegations concerning child protection against a member of staff ▲ (including unfounded)	Yes	Until the staff member's normal retirement age, or 10 years from the date of the allegation, whichever is later.	Statutory	DfE Keeping Children Safe in Education	Secure disposal
Complaints: negligence or safeguarding ▲ (dealt with by Governing Body)	Yes	Date the complaint resolved + 15 years.	Best Practice		Secure disposal

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Complaints: child sexual abuse ▲ (dealt with by Governing Body)	Yes	Date the complaint resolved + 75 years.	Best Practice		Secure disposal

Staff and HR Information

This section relates to data held about staff members. Where records are retained for a business need, please ensure you review the suggested retention period and amend it as required to meet your school or Trust's requirements.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Personnel files	Yes	Termination date + 6 years	Statutory	Limitations Act 1980	Secure disposal
Appraisal records	Yes	Current year + 6 years	Business Need		Secure disposal
Professional development plans	Yes	Life of the plan + 6 years	Business Need		Secure disposal
Timesheets & pay records	Yes	End of the tax year + 3 years.	Statutory	PAYE and payroll for employers: Keeping records	Secure disposal
Maternity pay records	Yes	End of the tax year + 3 years.	Statutory	The Statutory Maternity Pay (General) Regulations 1986	Secure disposal
Sickness and leave of absence records	Yes	Current year + 3 years.	Best Practice		Secure disposal

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Retirement benefits	Yes	End of the year in which the accounts were signed + 6 years.	Statutory	Retirement Benefits Schemes (Information Powers) Regulations 1995	Secure disposal
Appointment of Headteacher records	Yes	Date of appointment + 6 years.	Best Practice		Secure disposal
Successful candidates	Yes	Relevant information added to HR file, all other information held for date of appointment + 6 months.	Business Need		Secure disposal
Unsuccessful candidates	Yes	Date of appointment + 6 months.	Best Practice		Secure disposal
Copies of DBS certificates	Yes	Date of appointment + 6 months.	Statutory	DfE Keeping Children Safe in Education	Secure disposal
Pre-employment vetting information (Evidence proving the right to work in the United Kingdom)	Yes	Termination date + 2 years.	Statutory	An employer's guide to right to work checks [Home Office May 2015] Last updated 27 April 2022	Secure disposal
Access to work documentation	Yes	As per funding requirements, or in line with the Limitations Act.	Statutory	Limitations Act 1980	Secure disposal
Supply and agency staff	Yes	Date last worked in school + 6 years.	Best Practice		Secure disposal
Volunteers	Yes	Date last worked in school + 3 years.	Best Practice		Secure disposal

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Governor/ trustee personnel file (including parent governors)	Yes	End of appointment + 6 years.	Statutory	Companies Act 2006	Secure disposal

School Operations and Governance

This section relates to the operational running and governance of schools and Trusts.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Attendance records	Yes	Register – Date of entry + 6 years. Back-up – End of school year + 6 years.	Statutory	School Attendance (Pupil Registration) (England) Regulations 2024	Secure disposal
Admissions data	Yes	Date of admission + 6 years.	Statutory	School Attendance (Pupil Registration) (England) Regulations 2024	Consider for permanent preservation
Unsuccessful admission applications	Yes	Resolution of case + 1 year.	Statutory	School Admissions Code.	Secure disposal
School trips	Yes	Date of visit + 6 years. If an incident occurred, retain permission slips & incident report in the pupil file.	Best Practice	Health and safety on educational visits	Secure disposal
Consent forms (e.g school trip or photo consent)	Yes	Current year + 1 year.	Business Need		Secure disposal

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
List of pupils on free school meals	Yes	Current financial year + 3 years.	Business Need		Secure disposal
Photographs and videos – internal use (displays, ID, pupil work, etc.)	Yes	Current year + 1 year.	Business Need		Given to the pupil or secure disposal
Photographs and videos – external use (publications, marketing, social media etc.)	Yes	Current year + 3 years.	Business Need		Consider for permanent preservation
Annual governors’ report	Possibly	Date of report + 10 years.	Statutory	The Education (Governors’ Annual Reports) (England) (Amendment) Regulations 2002	Secure disposal
Governing board meeting minutes (maintained schools)	Yes	Principal set (signed) – retain for historical interest. Other copies - date of meeting + 3 years.	Business Need		Principal set - offer to archives Other copies - secure disposal
Trustee meeting minutes (Academy Trust)	Yes	Principal set (signed) – retain for historical interest. Other copies - date of meeting + 10 years.	Statutory	Companies Act 2006	Principal set - offer to archives Other copies - secure disposal
Memoranda of understanding	No	Life of the academy + 6 years.	Statutory	Companies Act 2006	Routine disposal
Complaint files	Yes	Date complaint resolved + 3 years.	Business Need		Secure disposal

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Curriculum records	No	Current year + 1 year.	Statutory	Education (Pupil Information) (England) Regulations 2005	Routine disposal
Directors – disqualification (Academy Trust)	Yes	Date of disqualification + 15 years.	Statutory	The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England) Regulations 2004	Secure disposal
School vehicles	No	Vehicle disposal + 6 years.	Statutory	Limitations Act 1980	Routine disposal
Ofsted reports	No	Life of the report then review.	Business Need		Routine disposal
Policy documents	No	Until superseded + 3 years.	Business Need		Routine disposal
E-monitoring data	Yes	Non-actionable notifications + 1 month. Actionable notifications – retained in pupil or personnel file or with safeguarding records.	Business Need		Secure disposal
Visitor management	Yes	Academic year + 1 year.	Business Need		Secure disposal
Surveillance system footage (CCTV)	Yes	Date of recording + 30 days unless required for an investigation or access request.	Business Need		Secure disposal

Health and Safety

These records relate to the statutory health and safety obligations of the school or Trust.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Accessibility plans	Yes	Life of plan + 6 years.	Statutory	Limitations Act 1980	Secure disposal
Accident records	Yes	Date of accident + 3 years. (Serious accidents involving pupils should be retained in the pupil file).	Statutory	Social Security (Claims and Payments) Regulations 1979	Secure disposal
Risk assessments (for substances hazardous to health)	No	Date of assessment + 5 years.	Statutory	The Control of Substances Hazardous to Health Regulations 2002	Routine disposal
Health surveillance records (inc. exposure to hazardous substances)	Yes	Date of record + 40 years.	Statutory	The Control of Substances Hazardous to Health Regulations 2002	Secure disposal
Other staff health records	Yes	Held in line with the staff personnel file.	Statutory	HSE guidance on health surveillance - record keeping	Secure disposal
Fire assessments	No	Life of the risk assessment + 6 years.	Statutory	Fire Service Order 2005	Secure disposal

Property and Finance

Records in this section refer to the property, contracts, or financial transactions. Please ensure adherence to the correct retention period, as specified in the contract or funding agreement, where a longer retention period is required.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Maintenance records	No	End of year + 6 years.	Statutory	Record keeping (VAT Notice 700/21)	Routine disposal
Title deeds	No	End of deed + 12 years.	Statutory	Limitations Act 1980	Routine disposal
Contracts	No	Contract end + 6 years.	Statutory	Limitations Act 1980	Routine disposal
Debtor's records	Yes	End of financial year + 6 years.	Statutory	Limitations Act 1980	Secure disposal
Petty cash	No	End of financial year + 6 years.	Statutory	Limitations Act 1980	Routine disposal
VAT records	No	End of financial year + 6 years.	Statutory	Record keeping (VAT Notice 700/21)	Routine disposal