

AIM high, GROW within and REACH beyond the stars



HOLLYFAST PRIMARY SCHOOL

Records Management Policy

2026-2027

DPO framework with Hollyfast operational arrangements



Policy owner	Headteacher
Operational lead	School Business Manager / designated records management lead
Data protection advice	School Data Protection Officer (DPO)
Approved by	Governing Body / relevant committee
Review date	September 2027, or sooner if guidance changes
Supporting schedule	SchoolPro Records Management Schedule V.1 and Appendix 1 of this policy

Document Version Control

Version	Date	Description of change	Responsible
1.0	25 August 2026	Consolidated DPO-based policy with current retention schedule and selected Hollyfast operational arrangements from the previous policy.	Hollyfast Primary School

1. Statement of Intent

Hollyfast Primary School is committed to managing records lawfully, securely and consistently. Good records management supports safeguarding, effective school administration, accountability and the rights of pupils, families, staff and other data subjects.

This policy is based on the school's Data Protection Officer (DPO) framework and has been supplemented with Hollyfast-specific operational arrangements. It sets out how records are created, stored, accessed, transferred, retained and securely disposed of.

2. Scope and Application

This policy applies to all records created, received or maintained in the course of Hollyfast Primary School's work, whether held in paper or electronic form. It applies to employees and, where relevant, governors, volunteers, contractors, visitors and others who are authorised to handle school information.

Records include files, correspondence, forms, plans, photographs, audio/video and CCTV recordings, emails, databases, information held in the school MIS and information held within approved processor or cloud systems.

- Records must be accurate, relevant, appropriately filed and capable of being retrieved when required.
- Duplicate and convenience copies should not be retained longer than necessary.
- Anyone leaving Hollyfast or ceasing an authorised role must return school records and must no longer access school information unless specifically authorised.

3. Legal and Policy Framework

Records management is carried out within the school's wider data protection, safeguarding, information governance and statutory responsibilities. This policy should be read alongside current UK data protection legislation and current Department for Education guidance, together with Hollyfast's Data Protection Policy, Freedom of Information Policy, Safeguarding and Child Protection Policy, CCTV Policy, Acceptable Use / IT policies and information security procedures.

The school uses the current DfE record-keeping guidance for the principal retention periods in Appendix 1 and the SchoolPro Records Management Schedule V.1 for records not specifically listed. Where requirements differ or are unclear, advice will be sought from the DPO before records are destroyed.

4. Responsibilities

The Governing Body and Headteacher have overall responsibility for ensuring that appropriate records management arrangements are in place. The Senior Leadership Team is responsible for implementation within the school.

The School Business Manager, or designated records management lead, coordinates records management practice, supports staff, promotes compliance with the retention schedule and arranges an annual review of records and storage arrangements.

The DPO provides specialist advice and supports the school in reviewing compliance and responding to changes in data protection requirements.

All staff are responsible for records they create or manage. Records must be accurate, stored securely, shared only where appropriate, retained for the required period and disposed of securely.

5. Management and Transfer of Pupil Records

Pupil records may include identification and contact information, admission and attendance information, progress and attainment, SEND information, medical information relevant to school, significant correspondence, reports, exclusions/suspensions and other information required to support the pupil and evidence the school's work.

- The official pupil record should be identifiable and kept up to date.
- Safeguarding records are maintained separately from the main pupil record, with access restricted to those who require it for safeguarding purposes.
- When a pupil leaves Hollyfast for another school, the educational record and required electronic transfer information must be sent securely to the receiving school in accordance with current requirements.
- Hollyfast will not routinely retain copies of transferred pupil records unless there is a lawful or documented reason to do so. Any temporary transfer copy must be securely destroyed once receipt is confirmed.
- Where the destination school is unknown, or a child becomes electively home educated, records will be handled in accordance with current DfE, local authority, safeguarding and retention requirements. The DSL and/or DPO should be consulted where necessary.

6. Safeguarding and Child Protection Records

Safeguarding and child protection records require particularly careful handling. The Designated Safeguarding Lead (DSL) is responsible for ensuring that safeguarding files are maintained securely and transferred appropriately when a child moves to another education setting.

- The safeguarding file must be transferred separately from the main pupil file and directly to the receiving school or college's DSL or equivalent safeguarding lead.
- Transfer must be secure and traceable. Confirmation of receipt must be obtained and Hollyfast should retain an appropriate transfer record/audit trail.
- Where there is an active Child Protection Plan, Child in Need arrangement or other significant current concern, the DSL should consider appropriate advance liaison with the receiving setting and relevant professionals so support can continue without delay.
- Where the receiving establishment is not yet known, safeguarding records must remain securely held by Hollyfast until they can lawfully be transferred or the applicable retention period expires.

The retention periods for safeguarding records, including the extended period for records relating to child sexual abuse, are set out in Appendix 1.

7. Storage, Access and Information Security

- Confidential paper records must be kept in secure storage with access restricted to authorised staff.
- Electronic records must be held on school-approved systems with appropriate permissions, authentication and backup arrangements.
- Staff should follow a clear-desk approach for confidential information and must not leave sensitive records unattended or visible in areas accessible to others.
- School personal data must not be stored on unapproved personal devices or unencrypted removable media.
- Before sharing information, staff must check that there is an appropriate lawful basis or safeguarding reason, that the recipient is correct and that a suitably secure transfer method is used.

- Visitors, volunteers and contractors must not be given access to confidential records unless access is authorised and necessary for their role.
- Any loss, theft, unauthorised access or disclosure must be reported immediately and managed under the school's data breach procedures.

8. Access to Records and Individual Rights

Access to school records is limited to authorised individuals who require access for a legitimate purpose. Requests by individuals for access to their personal data, or requests relating to other data protection rights, must be handled under Hollyfast's Data Protection Policy and Subject Access Request procedures. Staff should not disclose records informally where a formal process is required.

9. Information Asset Review and Data Mapping

Hollyfast will maintain appropriate oversight of the information it holds. This may include a data map, information asset register and/or record of processing activities. Reviews should consider what information is held, why it is needed, where and how it is stored, who is responsible for it, who can access it, how it is shared and how long it should be retained.

Material changes to systems, processors, storage arrangements or information flows should be reflected in the school's information governance records and referred to the DPO where appropriate.

10. Retention and Secure Disposal

Records must be retained for no longer than necessary, subject to statutory, safeguarding, contractual, audit and legal requirements. Appendix 1 provides Hollyfast's practical retention schedule for the principal records held by the school.

Disposal must be suspended where records are relevant to an ongoing safeguarding matter, complaint, investigation, audit, information request, litigation or other legal process. If there is uncertainty, records must not be destroyed until advice has been obtained.

- Confidential paper records must be shredded or disposed of through an approved confidential waste process.
- Electronic records must be securely deleted in accordance with the school's systems and procedures.
- Disposal of significant or confidential records should be authorised and documented so the school can evidence what was destroyed, when and under whose authority.

11. Permanent and Historical Records

A small proportion of records may have permanent historical or archival value. Where appropriate, Hollyfast will liaise with the relevant local archives service before permanent preservation or transfer.

12. Monitoring and Review

The policy and retention schedule will be reviewed at least annually and sooner where legislation, DfE guidance, DPO advice, school systems or the SchoolPro Records Management Schedule change. Any significant changes will be communicated to relevant staff and governors.

Approval

Headteacher	
Chair of Governors / Committee Chair	
Date approved	
Next review date	September 2027

Appendix 1 - Hollyfast Primary School Retention Schedule

This practical schedule forms part of the policy. It reflects the retention periods checked for the 2026-2027 policy and should be used alongside current DfE guidance and the SchoolPro Records Management Schedule V.1. If a record is not listed, or there is doubt about the correct period, seek advice before disposal.

Do not destroy records required for an ongoing safeguarding matter, complaint, investigation, audit, legal claim, Freedom of Information request, Subject Access Request or other formal process.

Area	Record	Minimum / recommended retention	Action / Hollyfast note
Pupil records	Primary school pupil record	Until the pupil leaves Hollyfast	Transfer to the receiving primary or secondary school when the pupil leaves. Keep pupil data on the MIS for 2 terms after leaving where needed for census/reporting.
Safeguarding	Child protection file	Until the child's 25th birthday; if the file relates to child sexual abuse, until the child's 75th birthday	Pass securely to any new school the child attends, separately from the main pupil file. The receiving school continues the safeguarding record and applicable retention period.
Safeguarding	Allegations against a member of staff, including unfounded allegations	Until the staff member's normal retirement age, or 10 years from the date of the allegation, whichever is later	Dispose of securely after the retention period, unless a continuing legal or safeguarding hold applies.
Admissions & attendance	Admission register entries	6 years from the date the data was entered	Preserve the legal record for the full period, then dispose of securely.
Admissions & attendance	Attendance register entries	6 years from the date the data was entered	Preserve the legal record for the full period, including the audit trail for amendments, then dispose of securely.
Finance	Contracts	6 years from the last payment on the contract	Dispose of securely, subject to any longer contractual/legal requirement.
Finance	Debtor records	6 years from the end of the financial year	Dispose of securely.
Finance	VAT records	6 years from the financial year end	May include relevant invoices, budgets, bank statements and annual accounts. Dispose of securely.
Governance & curriculum	Annual governors' report	10 years	Dispose of securely after the retention period.
Governance & curriculum	Curricular record	At least 1 year	Dispose of securely when no longer required.
Governance & curriculum	Board/governing body meeting records and annual reports	10 years from the meeting/report date where applicable	Retain approved/final records for the applicable period; review any records selected for permanent historical preservation before disposal.
Educational visits	Records of educational visits	10 years from the date of the visit	Dispose of securely. If an incident occurred, retain permission slips for all pupils and the incident report in the pupil record as appropriate.
Staff	Personnel files	6 years from termination of employment	Dispose of securely.
Staff	Copies of DBS certificates	No longer than 6 months where the school has a valid reason to retain a copy	Dispose of securely. The school does not need to retain the certificate itself to maintain the Single Central Record; it may retain a record that vetting was carried out, the result and the recruitment decision.
Staff	Pay records	3 years from the end of the tax year to which they relate	Dispose of securely.
Staff	Maternity pay records	3 years after the end of the tax year in which the maternity pay period ends	Dispose of securely.
Staff	Retirement benefit records	Minimum 6 years from the end of the year in which the accounts were signed	Dispose of securely, or retain longer where scheme requirements apply.
Health & safety	Accessibility plans	Life of the plan plus 6 years	Dispose of securely.
Health & safety	Accident records	3 years from the date of the accident	Dispose of securely. Accidents involving pupils should also be retained in the pupil record as appropriate.
Health & safety	Monitoring exposure to substances hazardous to health, including asbestos	5 years	Dispose of securely. Where the record is a health-surveillance record, use the 40-year period below.
Health & safety	Health surveillance records	40 years	Dispose of securely after the retention period.
Health & safety	Other health records of staff	While the worker is employed at Hollyfast	Dispose of securely when no longer required, subject to any other applicable retention requirement.
Health & safety	Fire risk assessments	Life of the risk assessment plus 6 years	Dispose of securely.
Property	Maintenance records	6 years from the financial year end	Dispose of securely.
Property	Title deeds	12 years from the end of the deed	Review before disposal and consider whether the original deed or related property evidence remains operationally or historically necessary.
Information governance	Destruction log	Maintain as an audit trail in line with the school's information-governance arrangements	Record a brief description of the data/records destroyed, the number of files where appropriate, and the senior leader who authorised destruction.

Annual Retention Review

The School Business Manager / designated records management lead should coordinate an annual review of records held across the school. Record owners should identify material that has reached the end of its retention period and arrange authorised, secure disposal. The review should also identify records that must remain on hold because of safeguarding, legal, complaint, audit or information-rights activity.

Appendix 2 - Pupil and Safeguarding Record Transfer Checklist

- Confirm the pupil has been formally accepted by the receiving school/setting before transferring confidential records.
- Prepare the required pupil educational record / electronic transfer in accordance with current requirements.
- Keep safeguarding/child protection information separate from the main pupil record.
- Send safeguarding information directly to the receiving DSL or equivalent safeguarding lead using a secure method.
- Record the date, method of transfer, receiving setting and person responsible for sending the records.
- Obtain confirmation of receipt and retain the transfer audit trail in accordance with the applicable retention period.
- Securely destroy any temporary transfer copy once receipt has been confirmed, unless there is a documented reason to retain it.
- Where the destination is unknown, or there is an active safeguarding concern, refer the matter to the DSL and follow current local authority/DfE procedures.