



Falkner House Disposal of Records Policy

Nursery - Year 6 including EYFS

Policy Statement

Falkner House recognises the importance of effective records management in supporting the educational, safeguarding, operational and legal functions of the School. The School creates, receives and maintains a wide range of records as part of its day-to-day activities. These records provide evidence of decisions taken, actions undertaken and obligations fulfilled. They also support the School in demonstrating accountability, transparency and compliance with statutory and regulatory requirements. Falkner House is committed to ensuring that records are retained only for as long as they are required and that they are disposed of securely when they are no longer needed. This Policy establishes the framework through which records will be managed throughout their lifecycle, from creation and storage to eventual disposal or permanent preservation.

The purpose of this Policy is to ensure that Falkner House School adopts a consistent and compliant approach to the retention and disposal of records. The Policy aims to ensure that records are available when required, that personal information is protected appropriately, and that records are not retained for longer than necessary.

Falkner House acknowledges that retaining records unnecessarily can increase the risk of data breaches, compromise compliance with data protection legislation and create inefficiencies in records management. Equally, the premature destruction of records may expose the School to legal, regulatory or safeguarding risks. The retention periods contained within the accompanying Retention Schedule (Appendix A), are designed to achieve an appropriate balance between these competing considerations.

The Policy also seeks to provide staff with clear guidance regarding their responsibilities for maintaining records, reviewing retention periods and arranging secure disposal.

Scope of the Policy

This Policy applies to all records created, received or maintained by Falkner House in the course of carrying out its functions and activities. It applies irrespective of the format in which the information is held. Records may exist in paper form, electronic format, email systems, databases, cloud-based platforms, photographs, audio and video recordings or any other medium used by the School.

The Policy applies to the proprietors, all employees, volunteers, contractors, agency workers and any other individuals who process information on behalf of the School. For the purposes of this Policy, a record is defined as any information created, received or maintained as evidence of the School's business activities, decisions, transactions or legal obligations. Records may have operational, historical, financial, safeguarding or legal value and must therefore be managed appropriately throughout their lifecycle.

Legislative and Regulatory Framework

The Policy has been developed with reference to the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018, the Independent School Standards Regulations, Keeping Children Safe in Education, Working Together to Safeguard Children, employment legislation, health and safety legislation and relevant guidance issued by the Information Commissioner's Office.



Falkner House will ensure that its records management practices remain aligned with current legislation and recognised good practice. The Retention Schedule shall be reviewed at least annually by the Data Protection Lead and approved as part of the School's policy review process.

Data Protection Principles

Falkner House recognises that many records contain personal data and must therefore be managed in accordance with data protection principles. Personal information will be processed lawfully, fairly and transparently. Information will be collected only for specified and legitimate purposes and will be limited to what is necessary for those purposes.

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed, except where retention is required for legal, regulatory, safeguarding, historical or archival purposes. Records will be maintained accurately and, where appropriate, kept up to date. Appropriate technical and organisational measures will be implemented to protect information from unauthorised access, loss, destruction or misuse. Personal data will not be retained indefinitely and will be disposed of when there is no longer a lawful reason for its retention.

The School will ensure that retention periods are applied consistently and that records containing personal data are reviewed regularly to determine whether continued retention remains necessary and proportionate. The Data Retention Schedule is located at Appendix A.

Roles and Responsibilities

The Proprietors have overall responsibility for ensuring that the School maintains appropriate arrangements for the management, retention and disposal of records. They are responsible for approving this Policy and ensuring that adequate governance arrangements are in place.

The Principal has day-to-day responsibility for the implementation of this Policy and for ensuring that staff understand and comply with their obligations. The Principal may delegate operational responsibilities to senior leaders or designated staff members but retains overall accountability for compliance.

The School's Data Protection Lead will provide advice regarding retention requirements, data protection compliance and secure disposal arrangements. They will also support periodic reviews of the Retention Schedule and monitor compliance with this Policy.

All members of staff are responsible for creating, maintaining and storing records appropriately. Staff must ensure that records are accurate, complete and retained in accordance with the approved retention periods. Disposal of records containing personal or confidential information must be authorised by the Principal, Headteacher, Data Protection Lead or another designated senior member of staff.

Retention of Records

The School will maintain a comprehensive Retention Schedule that identifies the categories of records held, the applicable retention periods and the required disposal arrangements. The Retention Schedule forms an integral part of this Policy and should be read alongside it.



Records will be retained for the minimum period necessary to fulfil the purpose for which they were created, to comply with statutory obligations and to protect the legitimate interests of the School. Retention periods may be extended where legal proceedings, safeguarding concerns, insurance claims, complaints, regulatory investigations or other exceptional circumstances make continued retention necessary.

The School recognises that certain records possess enduring historical, evidential or governance value. Such records may be retained permanently as part of the School's archive.

Records Relating to Child Protection

The School recognises that safeguarding records require particularly careful management due to their highly sensitive nature and the potential long-term implications for children and adults. Safeguarding information may include child protection files, referrals to external agencies, safeguarding concerns, allegations against staff, low-level concerns, Prevent-related matters, peer-on-peer abuse records and records relating to online safety incidents. Safeguarding records will be maintained separately from routine pupil records where appropriate and access will be restricted to authorised personnel with a legitimate safeguarding need. Such records will be retained in accordance with safeguarding guidance and the School's Retention Schedule.

Where safeguarding information is transferred to another educational setting, the School will ensure that the transfer is undertaken securely and that an appropriate record of the transfer is retained.

Secure Disposal of Records

When records reach the end of their retention period, they will be reviewed and disposed of securely unless there is a lawful reason for their continued retention. The School recognises that secure disposal is an essential component of data protection compliance and effective information governance.

Paper records containing confidential or personal information will be destroyed using cross-cut shredding or through an approved confidential waste disposal contractor. Electronic records will be deleted using methods designed to prevent reconstruction or recovery wherever reasonably practicable.

No record will be destroyed where legal proceedings, safeguarding investigations, complaints, insurance claims, regulatory investigations or subject access requests are ongoing or reasonably anticipated. In such circumstances, disposal will be suspended until the matter has been concluded and authorisation to proceed has been granted.

Additionally, where the School becomes aware of actual or potential litigation, regulatory investigation, safeguarding investigation or other circumstances requiring preservation of records, a formal records hold shall be implemented and normal destruction schedules suspended.



Appendix A

Data Retention Schedule

This Retention Schedule forms part of the Falkner House School Data Retention and Secure Disposal Policy. It sets out the normal retention periods that apply to records maintained by the School. The periods shown represent minimum retention periods and may be extended where there is a safeguarding concern, ongoing complaint, litigation, insurance claim, regulatory investigation, subject access request or other lawful reason requiring continued retention.

All records reaching the end of their retention period must be securely disposed of in accordance with the School's Secure Disposal Procedures.

Records Relating to Child Protection

Record Type	Retention Period	Disposal
Child Protection Files	Date of birth plus 25 years	Secure destruction
Safeguarding Concern Records	Date of birth plus 25 years	Secure destruction
Early Help Records	Date of birth plus 25 years	Secure destruction
Prevent Referrals	Date of birth plus 25 years	Secure destruction
Peer-on-Peer Abuse Records	Date of birth plus 25 years	Secure destruction
Online Safety Investigations	Date of birth plus 25 years	Secure destruction
Low-Level Concern Records Relating to Staff	Employment ends plus 10 years	Secure destruction
Allegations Against Staff (including unfounded allegations)	Until normal retirement age or 10 years from conclusion, whichever is longer	Secure destruction
Safeguarding Training Records	Employment ends plus 6 years	Secure destruction
DSL Training Records	Employment ends plus 6 years	Secure destruction



Admission Records

Record Type	Retention Period	Disposal
Admission Registers	Permanent	Archive
Successful Admissions Records	Duration of attendance plus 7 years	Secure destruction
Unsuccessful Applications	1 year after admission process concludes	Secure destruction
Admission Appeals	1 year after conclusion of appeal	Secure destruction
Proof of Address Documents	Duration of attendance plus 1 year	Secure destruction
Supplementary Information Forms	Duration of attendance plus 1 year	Secure destruction

Pupil Records

Record Type	Retention Period	Disposal
Main Pupil Educational File	Date pupil leaves plus 7 years	Secure destruction
Academic Reports	Date pupil leaves plus 7 years	Secure destruction
Examination Results	Date pupil leaves plus 7 years	Secure destruction
Attendance Registers	3 years	Secure destruction
School Trip Consent Forms (routine)	End of trip plus 1 year	Secure destruction
School Trip Records involving Serious Incident	Date of birth plus 25 years	Secure destruction
Accident Records involving Pupils	Date of birth plus 25 years	Secure destruction
Medical Records Held by School	Date of birth plus 25 years	Secure destruction
Behaviour Records	Date pupil leaves plus 7 years	Secure destruction
Exclusion Records	Date pupil leaves plus 25 years	Secure destruction where appropriate

SEND Records

Record Type	Retention Period	Disposal
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SEND Files	Date of birth plus 25 years	Secure destruction
EHCP Documentation	Date of birth plus 25 years	Secure destruction
Educational Psychologist Reports	Date of birth plus 25 years	Secure destruction
Individual Education Plans	Date of birth plus 25 years	Secure destruction
SEND Reviews	Date of birth plus 25 years	Secure destruction

Recruitment Records

Record Type	Retention Period	Disposal
Recruitment Records (successful applicant)	Personnel file retention period	Secure destruction
Recruitment Records (unsuccessful applicant)	6 months after appointment	Secure destruction
Interview Notes	6 months after appointment process	Secure destruction
Application Forms	Personnel file retention period	Secure destruction
References	Personnel file retention period	Secure destruction
Identity Verification Records	Employment ends plus 2 years	Secure destruction
Right to Work Documentation	Employment ends plus 2 years	Secure destruction
DBS Certificate Information	6 months after recruitment decision	Secure destruction
Overseas Criminal Record Checks	Employment ends plus 6 years	Secure destruction
Prohibition Checks	Employment ends plus 6 years	Secure destruction
Section 128 Checks	Employment ends plus 6 years	Secure destruction
Online Search Records	Employment ends plus 6 years	Secure destruction
Medical Fitness Evidence	Employment ends plus 6 years	Secure destruction
Disqualification by Association/Childcare Disqualification Declaration	Employment ends plus 6 years	Secure destruction
Single Central Register	Current record plus 6 years	Secure destruction
Evidence Supporting SCR Entries	Employment ends plus 6 years	Secure destruction

Personnel Records



Record Type	Retention Period	Disposal
Personnel Files	Employment ends plus 10 years	Secure destruction
Contracts of Employment	Employment ends plus 10 years	Secure destruction
Performance Management Records	Employment ends plus 6 years	Secure destruction
Training Records	Employment ends plus 6 years	Secure destruction
Payroll Records	Current year plus 6 years	Secure destruction
Sick Leave Records	Employment ends plus 6 years	Secure destruction
Maternity Records	Current year plus 3 years	Secure destruction
Pension Records	Current year plus 6 years	Secure destruction
Grievance Records	Employment ends plus 10 years	Secure destruction
Disciplinary Records	Employment ends plus 10 years	Secure destruction
Occupational Health Records	Employment ends plus 40 years where required	Secure destruction
Flexible Working Requests	Employment ends plus 2 years	Secure destruction
Whistleblowing Records	Closure plus 6 years	Secure destruction

Record of Complaints

Record Type	Retention Period	Disposal
Formal Complaints	Closure plus 7 years	Secure destruction
Informal Complaints	Closure plus 3 years	Secure destruction
Complaint Investigation Records	Closure plus 7 years	Secure destruction
Tribunal or Legal Complaints	Conclusion plus 7 years or as advised by legal advisers	Secure destruction

Data Protection Records

Record Type	Retention Period	Disposal
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Subject Access Requests	Closure plus 3 years	Secure destruction
Data Breach Records	Closure plus 6 years	Secure destruction
Data Protection Impact Assessments	Superseded version plus 6 years	Secure destruction
Privacy Notices	Superseded version plus 6 years	Secure destruction
Consent Records	Duration of consent plus 6 years	Secure destruction

Health and Safety Records

Record Type	Retention Period	Disposal
Accident Records (Staff)	Date of incident plus 7 years	Secure destruction
RIDDOR Reports	Date of incident plus 7 years	Secure destruction
Fire Risk Assessments	Current assessment plus 6 years	Secure destruction
Fire Drill Records	Current year plus 6 years	Secure destruction
Fire Alarm Maintenance Records	Current year plus 6 years	Secure destruction
Risk Assessments	Current assessment plus 6 years	Secure destruction
COSHH Records	Current year plus 10 years	Secure destruction
Asbestos Records	Last action plus 40 years	Secure destruction
Legionella Records	Current year plus 5 years	Secure destruction
Employer Liability Insurance Certificates	40 years	Secure destruction

Premises and Property Records

Record Type	Retention Period	Disposal
Title Deeds	Permanent	Archive
Building Plans	Permanent	Archive
Maintenance Records	Current year plus 6 years	Secure destruction
Insurance Claims	Settlement plus 7 years	Secure destruction



Contractor Reports	Current year plus 6 years	Secure destruction
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Finance Records

Record Type	Retention Period	Disposal
Annual Accounts	Current year plus 6 years	Secure destruction
VAT Records	Current year plus 6 years	Secure destruction
Purchase Invoices	Current year plus 6 years	Secure destruction
Sales Invoices	Current year plus 6 years	Secure destruction
Bank Statements	Current year plus 6 years	Secure destruction
Petty Cash Records	Current year plus 6 years	Secure destruction
Payroll Accounting Records	Current year plus 6 years	Secure destruction
Loans and Grant Records	Final payment plus 12 years	Secure destruction

Security Records

Record Type	Retention Period	Disposal
Visitor Records	Current year plus 1 year	Secure destruction
Security Incident Reports	Closure plus 7 years	Secure destruction

Information Technology Records

Record Type	Retention Period	Disposal
System Access Logs	12 months	Secure destruction
Cyber Security Incident Records	Closure plus 6 years	Secure destruction
Backup Records	In accordance with backup schedule	Secure destruction
User Account Records	Employment or enrolment ends plus 12 months	Secure destruction

Curriculum and Educational Records



Record Type	Retention Period	Disposal
School Development Plans	Current version plus 6 years	Secure destruction
Curriculum Planning Documents	Current version plus 3 years	Secure destruction
Schemes of Work	Current version plus 3 years	Secure destruction
Pupils' Work	End of academic year unless educational need requires longer retention	Secure destruction

Proprietors Records

Record Type	Retention Period	Disposal
Proprietor Meeting Minutes	Permanent	Archive
Committee Minutes	Permanent	Archive
Governance Policies	Superseded version plus 6 years	Secure destruction
Declarations of Interest	End of service plus 6 years	Secure destruction

Inspection and Regulatory Records

Record Type	Retention Period	Disposal
ISI Inspection Reports	Permanent	Archive
Inspection Evidence Files	Next inspection plus 6 years	Secure destruction
Regulatory Correspondence	Closure plus 6 years	Secure destruction
DfE Correspondence	Closure plus 6 years	Secure destruction