



Ministry  
of Defence

# DCS Directive 7.1.2 Records Management

May 2025 v 1.3

<b>Authorisation</b>	Head DCS
<b>Senior Responsible Owner</b>	AH SIS
<b>Point of Contact</b>	DCS POLRA
<b>Review Date</b>	May 2028
<b>Related Policies</b>	The Data Protection Act 2018 (DPA18)
	The Freedom of Information Act 2000 (FOIA)
	DfE Keeping and Maintaining Records
	LFSO 2019 The Security of Personal and Mission Critical Information
	UK General Data Protection Regulation (GDPR)
	JSP 440 Defence Manual of Security, Resilience and Business Continuity
	JSP 441 Information, Knowledge, Digital and Data in Defence Records Management (then follow the A-Z contents)
	JSP 604 Information and Communications Technology in Defence
	JSP 747 Digital Publishing Policy
	JSP 740 MOD Acceptable Use Policy
	DCS Policy Directive 3.2.8 Complaints Procedure for DCS Schools and Settings Overseas
	DCS Policy Directive 7.1.1 Data Protection

## Introduction

1. This DCS Policy Directive<sup>1</sup> complements MOD policies on records management and includes direction on records specific to children of Tri-Service and Civilian employees. This document should be read in conjunction with DCS Policy Directive 7.1.1 Data Protection.

2. All DCS personnel are to follow MOD policy on the management<sup>2</sup> of records, as below:

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<sup>1</sup> Consideration has been given as to whether this Policy Directive complies with the Public Sector Equality Duty, and it has been concluded that the duty has been complied with.

<sup>2</sup> The term 'management' includes normal processing, retention, security and the disposal of records.

- a. JSP 441, Information, Knowledge, Digital and Data in Defence and the supporting guidance notes
- b. JSP 745, Digital Publishing Policy
- c. JSP 604, Information and Communications Technology in Defence
- d. JSP 740, MOD Acceptable Use Policy

## Aims

3. This document clarifies direction on the management of records within DCS and provides a sample Records Retention Schedule at **Annex A** for DCS to adopt.

## Scope

4. This Policy Directive applies to all records, in all electronic or physical formats or media, created, received, or maintained by all personnel employed within DCS, including those at MOD Schools and Settings overseas.

5. Queen Victoria School must follow MOD policy, with the exemption of any identified historical document or artifact (for example the Royal Warrant), where the Scottish Government's statutory requirements need to be considered.

## General

6. Records are defined in Defence as any information created, received, or maintained in the following formats:

- a. physical, for example, a document, letter, certificate, image, notes
- b. electronic, for example, email, web information, voice/video recording

7. To comply with the Data Protection Principles laid out in the Data Protection Act 2018 (DPA 18), all information must be:

- a. legally held and used
- b. correctly labelled and stored
- c. readily available in a helpful format to those who should have access to it
- d. securely protected from those who should not have access to it
- e. preserved for an appropriate period

8. Effective records management begins by ensuring that the right information is captured, labelled correctly, and stored in an appropriate shared area with the required access permissions. Declaring information as a record provides assurance that it will be appropriately retained and protected against amendment or premature disposal.

9. All DCS personnel are to complete the following mandatory online training, found on the Defence Learning Environment (DLE):

- a. Protecting Personal Data (annually)
- b. Records Management Awareness (every 2 years)
- c. Information and Knowledge Awareness (every 2 years)

10. As a general principle, information must be stored as a record where it has short- or long-term corporate value including:

- a. information which contributes to discussion or decision, such as policy documents, reports, reviews, guides, minutes, meeting papers, data returns, reports, memorandum of understandings, audits, as well as any correspondence sent externally
- b. information which is produced regularly as part of an administrative or operational process, such as minutes, meeting papers, data returns, reports, memorandum of understandings, and audits
- c. any material of significant historical interest
- d. records retained for legal or audit purposes, including legal, finance and accounting records, contracts, and agreements (noting that these may need to be retained in hard copy as well)

## Responsibilities

11. All personnel are responsible for maintaining records and record keeping systems in accordance with MOD policy (JSP 441):<sup>3</sup>

- a. keeping accurate official records
- b. preparing records correctly for storage. Self-modifying fields (such as those that display 'current date' whenever the file is opened) should be replaced by fixed data as at the time the record is being created. Records should not be encrypted, compressed, password protected, or in any condition that will make them difficult to access by authorised people
- c. storing records correctly in the right shared areas, in accordance with unit guidance. Electronic records **must not** be stored offline on media such as CD, DVD, portable drives, USB, etc.

12. Personnel specifically responsible for records management are to:

- a. provide guidance for good records management practice
- b. promote compliance with policy by routinely checking that records are securely stored and appropriately accessible

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<sup>3</sup> JSP 441 Information, Knowledge, Digital and Data in Defence

- c. ensure that records are transferred, stored, and disposed of appropriately and in accordance with mod and government (UK wide) guidelines

13. DCS Schools and Settings are responsible for the creation and maintenance of School and Setting level records management procedures and must also be able to demonstrate their compliance with it. Where an external contract or software application subscription is used to process records, this will need to be included in the School or Setting retention schedule for example, One Team Logic's 'My Concern' software used for child protection and safeguarding records. Or the various educational progress journal applications such as 'Family' App.

14. The MOD Departmental Record Officer (DRO) is to fulfil the role as published by The National Archives (TNA), and in particular is responsible for:

- a. ensuring MOD information is managed from the point of creation until it is destroyed or transferred
- b. selecting information for permanent preservation, in accordance with TNA policy and guidance
- c. transferring selected records to TNA

15. Defence Business Services (DBS) is responsible to the DRO for:

- a. managing the MOD's archives, either directly or through a specialist supplier
- b. reviewing records, selecting important records for transfer to TNA and disposing of all material appropriately, when no longer required

## **Personnel Records**

16. Personnel files and training records (including misconduct and working time records) should normally be retained for 6 years after employment ceases. However, records should be retained until the adult reaches retirement, or for 10 years (if this is the longer period), where any of the following concerns are identified:

- a. behaviour of an adult working with children, where they behaved in a harmful way towards a child (actual harm or potential to harm)
- b. adult committed a criminal offence against or related to a child
- c. adult behaved towards a child in a manner that indicated they were unsuitable to work with children

17. On closing a DCS School or Setting, personnel records are to be managed in accordance with MOD guidelines. Physical records are to be transferred to DBS and a schedule of records held at HQ DCS. Electronic records are to be retained, in accordance with MOD guidelines.

18. All records on LEC files are the property of Local Support Units.

## Records relating to under 18-year-olds

19. **Pupil Records.** The pupil record is the primary means of charting an individual pupil's progress through the Education System and should accompany the pupil through every stage and every School and Setting attended:

- a. Pupil records are to be accurate, objective, and accessible. Detailed statutory guidance is accessible on the Department for Education (DfE) website<sup>4</sup>
- b. Where a child completes statutory education in a DCS School or Setting, the pupil record is to be transferred to the parent on leaving the School or Setting. Records relating to pupils who have left a DCS School or Setting education are to be transferred to RESTORE where they should be held from DOB + 25 years. All units must adhere to the new DBS records request process, prior to sending any hardcopy records to RESTORE in accordance with the new DIN<sup>5</sup> 2025DIN05-002-Closure of the MOD Main Archive
- c. DCS Schools and Settings are to send a copy of their DBS Approval Reference and RESTORE transfer record to the DCS IHUB Multiuser mailbox: RC-DCS-HQ-IHUB@mod.gov.uk

20. Where a child has not completed statutory education in a DCS School or Setting, the pupil record must be transferred to their new School or Setting, including the completion of the Common Transfer File (CTF) within 15 school days of the pupil ceasing to be registered at their previous School or Setting. If the new School or Setting is unknown, DfE recommends that the School or Setting should still complete the CTF and load it onto a school-to-school secure file transfer system (S2S), as local authorities can search for files on S2S, on behalf of Schools and Settings, who haven't received CTFs. DCS shouldn't retain any record.

21. Records generated by social care, welfare, and educational professionals, are to be processed as below and disposed of securely unless subject to a legal hold. All case work that relates to child welfare (including referrals and non-referrals) should be kept for 6 years after the last contact with the service, unless the records include Safeguarding or Child Protection concerns in which case they will be retained in line with Child Protection record retention i.e. at least 6 years from the child's 18<sup>th</sup> birthday with a maximum retention of 25 years.

22. Records held on Service families retained by the Education Advisory Team (EAT), or the Overseas Educational Supportability Team (OEST) are processed as below and digitalised where possible. Legacy physical files may be sent to RESTORE with the authorisation of HQ DCS, but only in extremis:

- a. SEND records are processed and retained in RESTORE from the Date of Birth (DOB) of the child plus 25 years. For SEND students with an Education, Health and Care plan (EHCP) until they turn 31, in line with the Code of Practice 2015<sup>6</sup>
- b. Non-SEND case work records are processed and retained separately and are to be kept for 6 years after the last contact with the service user

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<sup>4</sup> [Department for Education Website](#)

<sup>5</sup> New DBS archiving permission process ([2025DIN05-002-Closure of the MOD Main Archive.docx](#))

<sup>6</sup> [Special Educational Needs and Disability Code of Practice 0 to 25 Years 2015](#)

23. Special Educational Needs and Disability (SEND) Records are retained from DOB of the pupil plus 25 years and disposed of securely unless subject to a legal hold. DCS may choose to keep SEND files for longer to defend itself in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.

24. The normal processing of SEND records, including those created in support of the DCS assessment of support needs is undertaken by the Educational Psychology, Speech & Language (EPSL) team, the SEND team and the OEST.

25. SEND files (including advice and information provided to parents), reviews and Individual Support Plans (ISP) are normally transferred by the DCS School or Setting to the receiving School or Setting. The receiving School or Setting is then responsible for normal processing of these records.

26. Where a child completes compulsory mainstream schooling in a DCS School, the records must be transferred to RESTORE.<sup>7</sup>

## Retention Schedule

27. The principle underpinning retention of records as directed by DPA 18 is that: ‘Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.’

28. The MOD’s Data Protection policy provides guidance on retention periods for personal information. When deciding on how long to retain information, personnel should consider whether information is affected by:

- a. legislation which directs a statutory retention period
- b. a limitation period, for example keeping a contract for at least the length of time that a claim could be brought against it

29. All DCS functional areas, including DCS Schools and Settings are required to maintain a retention schedule, which sets out the normal processing of records; the length of time a record series needs to be kept and the action required, when it is of no further administrative use. Detailed guidance on the types of records held within Defence establishments and their recommended retention periods is accessed in JSP 441.

30. The retention schedule (**Annex A**) should be used by personnel to manage current record keeping systems and to inform the creation of new record keeping systems. The schedule references a record series regardless of the media in which they are stored (paper or electronic).

31. Managing records against the retention schedule is deemed to be “normal processing” under DPA 18, the FOIA and JSP 441. Once a Freedom of Information (FOI)

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<sup>7</sup> With effect from April 2024, prior approval to send records to Restore must be obtained from DCS KI team. Detailed direction can be found in [2025DIN05-002-Closure of the MOD Main Archive](#)

request is received or a legal hold imposed, records disposal relating to the request or legal hold must be stopped.

32. Retention schedules are to be periodically reviewed and amended to include any new record series and remove obsolete ones by Knowledge and Information Management (KIM) trained staff.

33. Not all records are of long-term value and worthy of permanent preservation. When a file is closed, the records within should be reviewed by the Information Asset Owner (IAO)<sup>8</sup> and a decision on their long-term value must be made. All records are to be securely disposed of and child protection records must be shredded. Detailed direction is accessed at 2025DIN05-002.<sup>9</sup>

## Transfer to Archives

34. Registered documents that need to be retained should be sent to MOD Main Archives (for records classified up to SECRET) or to MOD Sensitive Archives (for material classified above SECRET). Detailed guidance is accessed in JSP 441 Processing a Subject Access Request.

35. Records of historical interest from DCS Schools and Settings may be archived. Schools and Settings are to contact the Archivist at either BFES SCEA or the National Army Museum (NAM) for consideration of permanent preservation. Schools and Settings should contact DCS HQ by e-mailing [RC-DCS-HQ-MAILBOX \(MULTIUSER\)](mailto:RC-DCS-HQ-MAILBOX (MULTIUSER)) for further guidance.

## Subject Access Requests (SAR)

36. Effective information and records management is crucial to being able to process FOIA 2000 and DPA 18 information. Both Acts require organisations to search all their information and data holdings for anything within the scope of the request, then review the content in line with the respective Act and consider any justifiable exemptions ahead of releasing any documents. It is therefore crucial to have identifiable locations where DCS documents are being held, to label them appropriately and to have an electronically searchable index to enable swift and effective searches as required.

37. This is especially important for large holdings of hardcopy (physical) files, as both FOI requests and SARs have mandated timescales to complete the process. The FOIA 2000 states that a response is to be provided within 20 working days after the receipt of the request. When responding to an FOI request, attention must be paid to any particular requirements, such as information to be supplied in a specific format. For a SAR, information must be supplied within one month of receiving the request. You can extend the time to respond by a further two months, if the request is complex or you have received a number of requests from the individual e.g. other types of requests relating to the individuals' rights. Both Acts recognise where information has been appropriately destroyed after their retention period and utilise an 'information not held' template reply.

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<sup>8</sup> The IAO in DCS Schools and Settings is the Head Teacher or Settings Manager, or for business support teams, the Team Leader.

<sup>9</sup> With effect from April 2024, prior approval to send records to Restore must be obtained from DCS KI team. Detailed direction can be found in <2024DIN05-004>

## **Model Retention Schedule Template**

This model Retention Schedule provides examples of retention periods and is not exhaustive. The template should be adapted for use by each DCS functional area, and DCS Schools and Settings and should detail the normal processing of records.

<b>File Description</b>	<b>Statutory Provisions</b>	<b>Minimum Retention Period</b>	<b>End of record life</b>
Correspondence (email, physical record)	Limitation Act 1980	Termination of Employment + 6 years  (Longer where subject to investigation)	Secure Disposal
Personnel Administration	Limitation Act 1980	1 year after closure of file	Secure Disposal
Recruitment	<a href="#">Recruitment policy</a> , as per Paragraph 1, 'Keeping Records'	All panel members must keep all notes that have been made during the recruitment process for two years for audit purposes or if a complaint is investigated  Handwritten notes from interviews must uploaded onto the Recruiting Line Managers (RLM's) One Drive <b>only</b> for the retention period above and the hard copy shredded. The RLM remains the contact and is accountable for the information including a data breach	Files destroyed after retention period
Pupil Educational or Case Work Records (not safeguarding)	The Education Regulations (Pupil Information) (England)  Limitation Act 1980	<b>Primary:</b> retain whilst child remains in the primary school  <b>Secondary:</b> DOB + 25 years <sup>10</sup>	File should follow pupil.  Secure disposal

<sup>10</sup> 18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)

Personnel Records	Limitation Act 1980	<p>All personnel and human resource management activities in support of the unit, including all manpower issues, discipline, pay, casualty, awards, selection, duties and industrial relations + 15 years</p> <p>However, personnel records (personal activity) relating to:</p> <p>Travel and subsistence - Claim and authorisation + 3 years</p> <p>Appraisal records + 6 years</p> <p>Bank details – current + 6 years after employment has ended</p> <p>Address details – current + 6 years after employment has ended</p> <p>Personal security records + 7 years from date of retirement or 10 years after resignation or termination if before normal retirement age</p> <p>Annual leave records + 7 years from date of resignation, termination or retirement</p> <p>Advances for: Season tickets, Car parking, Bicycles Christmas/holidays Housing + 7 years after repayment</p> <p>Authorisation for deputising, substitution allowance and/or overtime/travel time claim + 7 years</p> <p>For pension requirements, DOB + 100 or DOB + 5 from last action</p> <p>Personal security records are kept only for as long as required</p> <p>Local Support Units/ locally employed civilians (LEC) Pay and Personnel Offices, at local overseas Commands are responsible for managing personnel records of LECs</p>	Secure Disposal
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Safeguarding Records	DfE 'Keeping children safe in education' (KCSIE) statutory guidance	<p>General records - DOB + 25 years</p> <p>For children who are looked after or if the file relates to child sexual abuse - DOB + 75 years<sup>11</sup></p> <p>Allegations of child protection against a member of staff, including unfounded allegations:</p> <ul style="list-style-type: none"> <li>a. until the staff member's normal retirement age, or</li> <li>b. 10 years from the date of the allegation, whichever is later</li> </ul>	Secure disposal, must be shredded
Special Educational Needs	<p>Limitation Act 1980</p> <p>Education Act 1996</p> <p>SEND Act 2014</p> <p>DfE Code of Practice 2015</p>	<p>DOB + 25 years</p> <p>Records may be retained for longer as a defence against a failure to provide sufficient education case which must be documented</p>	Secure disposal
Education Social Work Case Records	<p>DfE KCSIE</p> <p>Limitation Act 1980</p>	<p>Education Social Work Records should be retained for 6 years unless subject to legal hold</p> <p>One-off consultation records may be destroyed a year after the child concerned ceases to use DCS services</p>	Secure Disposal
Allegation of a protection nature against personnel	DfE KCSIE	<ul style="list-style-type: none"> <li>a. Until the person's retirement or</li> <li>b. 10 years from the date of the allegation, whichever is the longer period and then reviewed</li> </ul> <p>Allegations found to be malicious should be removed</p>	Secure Disposal
Health and Safety	Limitation Act 1980	Records relating to personal injury actions must be kept for 40-60 years	Secure Disposal

<sup>11</sup> recommended retention period by the Independent Inquiry into Child Sexual Abuse, (IICSA)

Complaints (in all media)	Limitation Act 1980  DfE KCSIE	6 years after employment ceases or longer (see allegations) where:  a. there are concerns about people who work with children b. employee has breached the code of conduct  DCS Schools and Settings must log and record formal stage 1 – 3 complaint outcomes. More information can be found in DCS Policy Directive 3.2.8 Complaints Procedure for DCS Schools and Settings Overseas	Secure Disposal
EAT / OEST case work	DfE KCSIE  Limitation Act 1980	Minimum period of 1 year after the child, young person or adult ceases to use DCS services  (A longer period may be required where the subject of case work is evidenced in safeguarding referrals, complaints, allegations, and investigations)	Secure Disposal
DCS School and Setting management records	Limitation Act 1980  Education Regulations 2014  Education Act 2011	General operational management: current year + 6 years  Date of report + 10 years  Date of meeting + 6 years	Secure Disposal