

SOUTHROP C. OF E. PRIMARY SCHOOL

DATA RETENTION POLICY

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Southrop C of E Primary School

Data Retention Policy

1. The purpose of the Retention Policy

This retention policy lays out the length of time a record needs to be retained and the action to be taken when the specified retention period has expired.

Members of staff are expected to manage their current record keeping systems in accordance with the retention schedule, and to take account of the very different retention periods for different data types when creating new recording systems.

The retention schedule refers to all information, regardless of the media on which it is stored.

2. What to do with records once they have reached the end of their administrative life.

2a Destruction of records

Where records have been identified for destruction they should be disposed of in an appropriate way. All paper records containing personal information, or sensitive policy information should be shredded before disposal.

2b Transfer of records to the Archives

Where records have been identified as being worthy of permanent preservation, arrangements should be made to transfer the records to the County Archives Service.

2c Transfer of information to other media

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other formats such as digital media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

Not appropriate for data that is to be retained permanently.

Note: Where the retention period indicates + a number of years, the disposal is to be completed by the end of that academic year.

1 Child Protection					
These retention periods should be used in conjunction with the document “Safeguarding Children and Safer Recruitment in Education” which can be downloaded from www.everychildmatters.gov.uk .					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
1.1	Child Protection files	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.	SECURE DISPOSAL Child Protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18. Where a child is removed from roll to be educated at home, the file should be copied to the Local Education Authority.
1.2	Child protection information held in separate files	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	SECURE DISPOSAL

Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule.

2 Governing Body					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
2.1	Instruments of Government including Articles of Association	No		Permanent	These should be retained by the school whilst the school is open and then offered to the County Archives Service.
2.2	Action plans created and administered by the Governing Body	No		Life of action plan + 3 years	SECURE DISPOSAL
2.3	Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years	SECURE DISPOSAL
2.4	Complaints files	Yes		Date of resolution of complaint + 6 years then review for further retention in the case of contentious disputes	SECURE DISPOSAL
2.5	Annual Reports required by the Department for Education and Skills	No	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
2.6	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date proposal accepted or declined + 3 years	SECURE DISPOSAL

3 Head Teachers and Senior Management Team

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
3.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate
3.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then review	SECURE DISPOSAL
3.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then review	SECURE DISPOSAL
3.4	Records created by head teachers and other members of staff with administrative responsibilities	There may be data protection issues if the minutes refers to individual pupils or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL

3 Head Teachers and Senior Management Team

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
3.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of correspondence + 3 years then review	SECURE DISPOSAL
3.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
3.7	School Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL

4 Admissions Process					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
4.1	All records relating to the creation and implementation of the School Admissions' Policy	No	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 201	Life of the policy + 3 years	SECURE DISPOSAL
4.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 201	Date of admission + 1 year	SECURE DISPOSAL
4.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 201	Resolution of case + 1 year	SECURE DISPOSAL
4.4	Register of Admissions	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made.	REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school.
4.5	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 201	Life of the policy + 3 years	SECURE DISPOSAL

5 Pupils					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
5.1	Attendance registers including After School Club registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Date of register + 3 years	SECURE DISPOSAL
5.2	Correspondence relating to authorised absence	Yes	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL
5.3	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 143	Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school. This will include: <ul style="list-style-type: none"> • to another primary school • to a secondary school • to a pupil referral unit • If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority
5.4	Pupil's work	Yes		Retain for the current academic year (possibly 2 years if an OFSTED inspection is imminent)	Give to the pupil at the end of the academic year.

5 Pupils					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
5.5	Special Educational Needs files, reviews and Individual Education Plans, EHCP	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil + 25 years	REVIEW NOTE: This retention period is the minimum period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves 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.
5.6	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	DOB of the pupil + 25 years Normally retained in pupil file	SECURE DISPOSAL
5.7	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	DOB of the pupil + 25 years Normally retained in pupil file	SECURE DISPOSAL
5.8	SATS results	Yes		The SATS results should be recorded on the pupil’s educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL

5 Pupils					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
5.9	Published Admission Number (PAN) Report	Yes		Current year + 6 years	SECURE DISPOSAL
5.10	Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
5.11	Parental permission slips for school trips – where there has been no major incident	Yes		Conclusion of the trip	SECURE DISPOSAL
5.12	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils	SECURE DISPOSAL
5.13	Mark Books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL

6 Curriculum					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
6.1	Curriculum Long Term Plans	Yes		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or STANDARD DISPOSAL
6.2.	Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or STANDARD DISPOSAL
6.3	SATS records – school's copy	Yes		Current year + 6 years	SECURE DISPOSAL
6.4	Timetable	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL

7 Human Resources Records held in Schools					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
7.1	Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	SECURE DISPOSAL
7.2	Staff Personal files	Yes	Limitation Act 1980 (Section 2)	Termination + 6 years	SECURE DISPOSAL
7.3	Interview notes and recruitment records	Yes		Date of interview + 6 months	SECURE DISPOSAL
7.4	Pre-employment vetting information (including DBS checks)	No	DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months	SECURE DISPOSAL
7.5	Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	Yes		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's personal file	SECURE DISPOSAL
7.6	Pre-employment vetting information – evidence proving the right to work in the United Kingdom	Yes	An employer's guide to right to work checks [Home Office May 2015	Where possible these should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years	SECURE DISPOSAL

7 Human Resources Records held in Schools					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
7.7	Disciplinary proceedings:	Yes	Where the warning relates to child protection issues see 1.2. If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice.		
7.7a	• oral warning			Date of warning + 6 months	SECURE DISPOSAL ¹
7.7b	• written warning – level one			Date of warning + 6 months	SECURE DISPOSAL
7.7c	• written warning – level two			Date of warning + 12 months	SECURE DISPOSAL
7.7d	• final warning			Date of warning + 18 months	SECURE DISPOSAL
7.7e	• case not found			If child protection related please see 1.2 otherwise SECURE DISPOSAL immediately at the conclusion of the case	SECURE DISPOSAL
7.8	Annual appraisal/assessment records	Yes		Current year + 5 years	SECURE DISPOSAL
7.9	Work Experience agreement			DOB of child + 18 years	SECURE DISPOSAL

8 Health and Safety					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
8.1	Accessibility Plans	No	Disability Discrimination Act	Current year + 6 years	SECURE DISPOSAL
8.2	Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
8.2a	• Adults	Yes		Date of incident + 7 years	SECURE DISPOSAL
8.2b	• Children	Yes		DOB of child + 25 years ²	SECURE DISPOSAL
8.3	Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
8.4	COSHH	No		Current year + 10 years [where appropriate an additional retention period may be allocated]	SECURE DISPOSAL
8.5	Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL
8.6	Policy Statements	No		Date of expiry + 1 year	SECURE DISPOSAL
8.7	Risk Assessments	No		Current year + 3 years	SECURE DISPOSAL

² A child may make a claim for negligence for 7 years from their 18th birthday. To ensure that all records are kept until the pupil reaches the age of 25 this retention period has been applied.

8 Health and Safety					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
8.8	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No		Last action + 40 years	SECURE DISPOSAL
8.9	Process of monitoring of areas where employees and persons are likely to have come in contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
8.10	Fire Precautions log books	No		Current year + 6 years	SECURE DISPOSAL

9 Administrative					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
9.1	Employer's Liability certificate	No			SECURE DISPOSAL
9.2	Inventories of equipment and furniture	No		Current year + 6 years	SECURE DISPOSAL
9.4	School brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
9.3	Circulars (staff/parents/pupils)	No		Current year + 1 year	STANDARD DISPOSAL

9 Administrative						
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
9.4	Newsletters, ephemera	No		Current year + 4 year	Review to see whether a further retention period is required	
9.5	Visitors book	Yes		Current year + 2 years	Review to see whether a further retention period is required	
9.6	Service level agreements	No		Until superseded	SECURE DISPOSAL	

10 Finance						
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
10.1	Annual Accounts	No	Financial Regulations	Current year + 6 years	SECURE DISPOSAL	Offer to the Archives
10.2	Loans and grants	No	Financial Regulations	Date of last payment on loan + 12 years	Review to see whether a further retention period is required	
10.3	Contracts	No				

10 Finance					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
10.3a	• under seal			Contract completion date + 12 years	SECURE DISPOSAL
10.3b	• under signature			Contract completion date + 6 years	SECURE DISPOSAL
10.3c	• monitoring records			Current year + 2 years	SECURE DISPOSAL
10.4	Copy orders	No		Current year + 2 years	SECURE DISPOSAL
10.5	Budget reports, budget monitoring etc	No		Current year + 3 years	SECURE DISPOSAL
10.6	Invoice, receipts and other records covered by the Financial Regulations	No	Financial Regulations	Current year + 6 years	SECURE DISPOSAL
10.7	Annual Budget and background papers	No		Current year + 6 years	SECURE DISPOSAL
10.8	Order books and requisitions	No		Current year + 6 years	SECURE DISPOSAL
10.9	Delivery Documentation	No		Current year + 6 years	SECURE DISPOSAL
10.10	Debtors' Records	No	Limitation Act 1980	Current year + 6 years	SECURE DISPOSAL
10.11	School Fund – Cheque books	No		Current year + 3 years	SECURE DISPOSAL
10.12	School Fund – Paying in books	No		Current year + 6 years then review	SECURE DISPOSAL
10.13	School Fund – Ledger	No		Current year + 6 years then review	SECURE DISPOSAL

10 Finance						
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
10.14	School Fund – Invoices	No		Current year + 6 years then review	SECURE DISPOSAL	
10.15	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL	
10.16	School Fund – Bank statements	No		Current year + 6 years then review	SECURE DISPOSAL	
10.17	School Fund – School Journey books	No		Current year + 6 years then review	SECURE DISPOSAL	
10.18	Applications for free school meals, travel, uniforms etc	Yes		Whilst child at school	SECURE DISPOSAL	
10.20	Free school meals registers	Yes	Financial Regulations	Current year + 6 years	SECURE DISPOSAL	
10.21	Petty cash books	Yes	Financial Regulations	Current year + 6 years	SECURE DISPOSAL	

11 Property						
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
11.1	Title Deeds	No		Permanent	Permanent these should follow the property unless the property has been registered at the Land Registry	Offer to Archives if the deeds are no longer needed
11.2	Plans	No		Permanent	Retain in school whilst operational	Offer to Archives ³
11.3	Maintenance and contractors	No	Financial Regulations	Current year + 6 years	SECURE DISPOSAL	
11.4	Leases	No		Expiry of lease + 6 years	SECURE DISPOSAL	
11.5	Lettings	No		Current year + 3 years	SECURE DISPOSAL	
11.6	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL	
11.7	Contractors' Reports	No		Current year + 6 years	SECURE DISPOSAL	

12 Local Education Authority						
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
12.1	Secondary transfer sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL	
12.2	Attendance returns	Yes		Current year + 1 year	SECURE DISPOSAL	

³ If the property has been sold for private housing then the archives service will embargo these records for an appropriate period of time to prevent them being used to plan or carry out a crime.

12.3	Circulars from LEA			Whilst required operationally	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
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13 Department for Children, Schools and Families

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
13.1	HMI reports			These do not need to be kept any longer		Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
13.2	OFSTED reports and papers			Replace former report with any new inspection report	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
13.3	Returns			Current year + 6 years	SECURE DISPOSAL	
13.4	Circulars from Department for Children, Schools and Families			Whilst operationally required	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]

14 Schools Meals

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
14.1	Dinner Register			Current year + 3 years	SECURE DISPOSAL
14.2	School Meals Summary Sheets			Current year + 3 years	SECURE DISPOSAL

