

Sunning Hill Primary School

Data Retention Policy

Annual review of school records

COMPLETED: K Atkinson

APPROVED BY GOVERNORS: February 23

TO BE REVIEWED: February 24

Data Retention Policy

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A. Aims

This policy has been produced based on the information management toolkit for schools dated 1st February 2016 and considers the GDPR toolkit for schools – however some of the timeframes differ slightly ensure we simplify the retention periods to avoid confusion and complexity.

This is a checklist developed to enable School Business Managers, Clerks, SENCO, and other School Staff to carry out an efficient annual review and safe destruction of school records and information.

This document should be completed once a year and shared with governors.

B. School Agreed Retention Periods

As a school we have agreed the following retention periods:

Governors related material – 6 Years (or permanent as required)

Senior Leadership material – 6 Years

General Administration material – 3 Years

Human Resources – Until staff member leaves + 25 Years

Health and Safety – 6 years (when it will be checked for longer retention dates)

Finance – 6 years

Property Management – 6 years

Children's information – till the child reaches 18 / or for safeguarding 25

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C. Safe Destruction of Data

As a school we have decided that we will ensure that we securely dispose of all data that comes to the end of its retention period.

We will do this by having the data destroyed whilst on site and witnessed by a member of the team, who will be record this on this policy.

D. School Data Protection Officers

Global Policing support the school with the management of data retention and secure deletion. Should you have any questions or queries, you can contact them directly:

Unit 2
The Pavilions,
Bridge Hall Drive
Bury
BL9 7NX

Email: data@globalpolicing.co.uk
Tel: 0161 212 1682

Data Retention Policy

1. Management of the School

1.1 Governing Body – Agreed retention date 6 Years					
Where possible all Governor minutes will be anonymised and therefore data protection risks will be decreased.					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
1.1.1	Agendas for Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff	One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL	
1.1.2	Minutes of Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)		PERMANENT	County Archives Service	
	Inspection Copies ¹		6 Years	SECURE DISPOSAL	
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the report deals with confidential issues relating to staff	6 Years	SECURE DISPOSAL	
1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	6 Years	SECURE DISPOSAL	
1.1.5	Instruments of Government including Articles of Association	No	PERMANENT	County Archives Service.	
1.1.6	Trusts and Endowments managed by the Governing Body	No	PERMANENT	County Archives Service.	
1.1.7	Action plans created and administered by the Governing Body	No	6 Years	SECURE DISPOSAL	
1.1.8	Policy documents created and administered by the Governing Body	No	Life of the policy	SECURE DISPOSAL	
1.1.9	Records relating to complaints dealt with by the Governing Body	Yes	6 Years	SECURE DISPOSAL	

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1.2 Head Teacher and Senior Management Team - Agreed retention date 6 Years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
1.2.1	Logbooks of activity in the school maintained by the Head Teacher	There may be data protection issues if the logbook refers to individual pupils or members of staff	6 Years	These could be of permanent historical value and should be offered to the County Archives Service if appropriate	
1.2.2	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	6 Years	SECURE DISPOSAL	
1.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff	6 Years	SECURE DISPOSAL	
1.2.4	Records 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 records refer to individual pupils or members of staff	6 Years	SECURE DISPOSAL	
1.2.5	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 correspondence refers to individual pupils or members of staff	6 Years	SECURE DISPOSAL	
1.2.6	Professional Development Plans	Yes	6 Years	SECURE DISPOSAL	
1.2.7	School Development Plans	No	6 Years	SECURE DISPOSAL	

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1.3 Operational Administration - Agreed retention date 3 Years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
1.3.1	General file series	No	3 Years	SECURE DISPOSAL	
1.3.2	Records relating to the creation and publication of the school brochure or prospectus	No	3 Years	SECURE DISPOSAL	
1.3.3	Records relating to the creation and distribution of circulars to staff, parents, or pupils	No	3 Years	SECURE DISPOSAL	
1.3.4	Newsletters and other items with a short operational use	No	3 Years	SECURE DISPOSAL	
1.3.5	Visitors' Books and Signing in Sheets	Yes	3 Years	SECURE DISPOSAL	

7.2 Walking Bus - Agreed retention date 3 Years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
1.4.1	Walking Bus Registers	Yes	Date of register + 3 years This considers the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any backup copies should be destroyed at the same time]	

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2. Human Resources

2.1 Recruitment - Agreed retention date Employment + 2 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.1.1	All records leading up to the appointment of a new headteacher	Yes	Whilst Staff member is employed + 2 years	SECURE DISPOSAL	
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes	Whilst Staff member is employed + 2 years	SECURE DISPOSAL	
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes	Whilst Staff member is employed + 2 years	SECURE DISPOSAL	
2.1.4	Pre-employment vetting information – DBS Checks	No	Whilst Staff member is employed + 2 years		
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes	Whilst Staff member is employed + 2 years		
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	Whilst Staff member is employed + 2 years		

2.2 Operational Staff Management - Agreed retention date Employment record 25 years & 2 years for timesheets and appraisal information.					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.2.1	Staff Personal File	Yes	Whilst Staff member is employed + 25 years	SECURE DISPOSAL	
2.2.2	Timesheets	Yes	Whilst Staff member is employed + 2 years	SECURE DISPOSAL	
2.2.3	Annual appraisal/ assessment records	Yes	Whilst Staff member is employed + 2 years	SECURE DISPOSAL	

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2.3 Management of Disciplinary and Grievance Processes - Agreed retention date Employment + 6 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	Whilst Staff member is employed + 6 years	SECURE DISPOSAL	
2.3.2	Disciplinary Proceedings	Yes	Whilst Staff member is employed + 6 years		
	oral warning		Whilst Staff member is employed + 6 years	SECURE DISPOSAL	
	written warning – level 1		Whilst Staff member is employed + 6 years		
	written warning – level 2		Whilst Staff member is employed + 6 years		
	final warning		Whilst Staff member is employed + 6 years		
	case not found		Whilst Staff member is employed + 6 years	SECURE DISPOSAL	

2.4 Payroll and Pensions - Agreed retention date 6 years (Finance)					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.4.1	Maternity pay records	Yes	Current year + 3 years	SECURE DISPOSAL	
2.4.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Current year + 6 years	SECURE DISPOSAL	

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2.5 Health and Safety - Agreed retention date 6 years (check for longer periods)					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.5.1	Health and Safety Policy Statements	No	6 Years	SECURE DISPOSAL	
2.5.2	Health and Safety Risk Assessments	No	6 Years	SECURE DISPOSAL	
2.5.3	Records relating to accident/ injury at work	Yes	12 Years	SECURE DISPOSAL	
2.5.4	Accident Reporting	Yes			
	Adults		6 Years	SECURE DISPOSAL	
	Children		Age of child 25	SECURE DISPOSAL	
2.5.5	Control of Substances Hazardous to Health (COSHH)	No	Current year + 40 years	SECURE DISPOSAL	
2.5.6	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	
2.5.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No	Last action + 50 years	SECURE DISPOSAL	
2.5.8	Fire Precautions logbooks	No	6 Years	SECURE DISPOSAL	

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3. Financial Management of the School

3.1 Asset Management - Agreed retention date 6 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.1.1	Inventories of furniture and equipment	No	Current year + 6 years	SECURE DISPOSAL	
3.1.2	Burglary, theft and vandalism report forms	No	Current year + 6 years	SECURE DISPOSAL	

3.2 Accounts and Statements including Budget Management - Agreed retention date 6 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.2.1	Annual Accounts	No	Current year + 6 years	STANDARD DISPOSAL	
3.2.2	Loans and grants managed by the school	No	Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL	
3.2.3	Student Grant applications	Yes	Current year + 3 years	SECURE DISPOSAL	
3.2.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No	Life of the budget + 3 years	SECURE DISPOSAL	
3.2.5	Invoices, receipts, order books and requisitions, delivery notices	No	Current financial year + 6 years	SECURE DISPOSAL	
3.2.6	Records relating to the collection and banking of monies	No	Current financial year + 6 years	SECURE DISPOSAL	
3.2.7	Records relating to the identification and collection of debt	No	Current financial year + 6 years	SECURE DISPOSAL	

3.3 Contract Management - Agreed retention date 6 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.3.1	All records relating to the management of contracts under seal	No	Last payment on the contract + 12 years	SECURE DISPOSAL	
3.3.2	All records relating to the management of contracts under signature	No	Last payment on the contract + 6 years	SECURE DISPOSAL	

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3.3.3	Records relating to the monitoring of contracts	No	Current year + 2 years	SECURE DISPOSAL	
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3.4 School Meals - Agreed retention date **6 years**

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.4.1	Free School Meals Registers	Yes	Current year + 6 years	SECURE DISPOSAL	
3.4.2	School Meals Registers	Yes	Current year + 3 years	SECURE DISPOSAL	
3.4.3	School Meals Summary Sheets	No	Current year + 3 years	SECURE DISPOSAL	

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4. Property Management

4.1 Property Management - Agreed retention date 6 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
4.1.1	Title deeds of properties belonging to the school	No	PERMANENT These should follow the property unless the property has been registered with the Land Registry		
4.1.2	Plans of property belong to the school	No	These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.		
4.1.3	Leases of property leased by or to the school	No	6 years	SECURE DISPOSAL	
4.1.4	Records relating to the letting of school premises	No	6 years	SECURE DISPOSAL	

4.2 Maintenance - Agreed retention date 6 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
4.2.1	All records relating to the maintenance of the school carried out by contractors	No	6 years	SECURE DISPOSAL	
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No	6 years	SECURE DISPOSAL	

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5. Pupil Management

At this school we have decided to retain pupil information until the end of the set age of education, so until the child reaches the age of 18.

5.1 Pupil's Educational Record - Agreed retention date when the child reaches 18 / Safeguarding 25					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes			
	Primary		Until the child reaches 18	There is an option for the file to follow the child to high school.	
5.1.2	Examination Results – Pupil Copies	Yes			
	Public		Until the child reaches 18	All uncollected certificates should be returned to the examination board.	
	Internal		Until the child reaches 18		
5.1.3	Child Protection information held on pupil file		Until the child reaches 25	SECURE DISPOSAL	
5.1.4	Child protection information held in separate files		Until the child reaches 25	SECURE DISPOSAL	

5.2 Attendance - Agreed retention date when the child reaches 18					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.2.1	Attendance Registers	Yes	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL	
5.2.2	Correspondence relating to authorized absence		Current academic year + 2 years	SECURE DISPOSAL	

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5.3 Special Educational Needs - Agreed retention date when the child reaches 25					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Until the child reaches 25	Secure DISPOSAL	
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Until the child reaches 25	SECURE DISPOSAL	
			Until the child reaches 25	SECURE DISPOSAL	
			Until the child reaches 25	SECURE DISPOSAL	

5.4 Educational Visits outside the Classroom - Agreed retention date when the child reaches 25					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.4.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Until the child reaches 25	SECURE DISPOSAL	
5.4.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Until the child reaches 25	SECURE DISPOSAL	
5.4.3	Parental consent forms for school trips where there has been no major incident	Yes	Until the child reaches 25	SECURE DISPOSAL	
5.4.4	Parental permission slips for school trips – where there has been a major incident	Yes	Until the child reaches 25		

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5.5 Those working in safeguarding roles - Agreed retention date when the child reaches 25					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.5.1	Day Books	Yes	Current year + 2 years then review		
5.5.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes	Whilst child is attending school and then destroy		
5.5.3	Referral forms	Yes	While the referral is current		
5.5.4	Contact data sheets	Yes	Current year then review if contact is no longer active then destroy		
5.5.5	Contact database entries	Yes	Current year then review if contact is no longer active then destroy		
5.5.6	Group Registers	Yes	Current year + 2 years		

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Appendix A – List of School Records and Data safely destroyed

School name: _____

Review completed by: _____

Date: _____

Approved by Headteacher: _____

Date: _____

The following sheet can be completed or alternatively documented in a spreadsheet.

Ref Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of destruction	<u>Confirm</u> (i) Safely destroyed (ii) In accordance with Data Retention Guidelines Tick (✓)
<i>e.g.</i>	<i>School Invoices</i>	<i>Copies of purchase invoices dated 2011/12</i>	<i>Folders marked "Purchase Invoices 2011/12" 1 to 3</i>	<i>3 Folders</i>	<i>Shredding</i>	✓
1						
2						
3						
4						
5						
6						
7						
8						
9						

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Ref Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of destruction	<u>Confirm</u> (i) Safely destroyed (ii) In accordance with Data Retention Guidelines Tick (✓)
10						
11						
12						
13						
14						