



St Mary's C of E Primary School Data Retention Policy Spring 2021

The school has a responsibility to maintain its records and record keeping systems. When doing this, the school will take account of the following factors:

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure;
- Accessibility of records

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does however reflect the School's current practice, the requirements of current legislation and best practice and guidance.

It may be amended by the school from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect.

The school may also vary any parts of this procedure, including any time limits, as appropriate in any case.

Data Protection

This policy sets out how long employment-related and pupil data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the General Data Protection Regulation (GDPR) and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of the school. The school's Data Protection Policy outlines its duties and obligations under the GDPR.

Retention Schedule

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the school will adhere to the standard retention times listed within that schedule.

Paper records will be regularly monitored by the School Business Manager.

Electronic records will be regularly monitored by the School Business Manager.

The schedule is a relatively lengthy document listing the many types of records used by the school and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

Destruction of Records

Where records have been identified for destruction they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information, or sensitive policy information should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate waste paper merchant. All electronic information will be deleted.



St Mary's C of E Primary School Data Retention Policy Spring 2021

The school maintains a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in this list at least:-

- File reference (or other unique identifier);
- File title / description;
- Number of files;
- Name of the authorising officer.

Archiving

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. A database of the records sent to the archives is maintained by the School Business Manager.

The appropriate staff member, when archiving documents should record in this list the following information:-

- File reference (or other unique identifier);
- File title / description;
- Number of files;
- Name of the authorising officer.

Transferring 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 media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

Responsibility and Monitoring

The Headteacher has primary and day-to-day responsibility for implementing this Policy. The Data Protection Officer, in conjunction with the school is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The data protection officer will consider the suitability and adequacy of this policy and report improvements directly to management.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.



St Mary's C of E Primary School
Data Retention Policy Spring 2021

Retention Schedule

| FILE DESCRIPTION | RETENTION PERIOD |
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| Governance Records | |
| Agendas for Governing Body meetings | One copy should be retained permanently with the master set of minutes. All other copies should be securely disposed of. |
| Minutes of Governing Body meetings | The principal signed copy should be retained permanently. Any other inspection copies retained by the clerk to allow requestors to view all the appropriate information without the clerk needing to print off and collate redacted copies each time should be securely disposed of 3 years after the date of the meeting. |
| Reports presented to the Governing Body | Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then these reports should be kept permanently. |
| Action plans created and administered by the Governing Body | Life of the action plan, plus 3 years. |
| Policy documents created and administered by the Governing Body | Life of the policy, plus 3 years. |
| Records relating to complaints dealt with by the Governing Body | Date of the resolution of the complaint, plus a minimum of 6 years then review for further retention in cases of contentious disputes. |
| Headteacher and Senior Management Team | |
| Minutes of Senior Management Team meetings and the meeting of other internal administrative bodies | Date of the meeting, plus 3 years then review. |
| Reports created by the Headteacher of the Management Team | Date of the report, plus a minimum of 3 years then review. |
| Records created by Headteachers, Deputy Headteachers and other members of staff with administrative responsibilities | Current academic year, plus 6 years then review |
| Correspondence created by Headteachers, Deputy Headteachers and other members of staff with administrative responsibilities | Date of correspondence, plus 3 years then review |
| School Development Plans | Life of the plan, plus 3 years |



St Mary's C of E Primary School Data Retention Policy Spring 2021

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| Professional Development Plans | Life of the plan, plus 6 years |
| Admissions Process | |
| All records relating to the creation and implementation of the School Admissions Policy | Life of the policy, plus 3 years then review |
| Admissions records | 1 year from the date of admission |
| Unsuccessful admissions appeals | 1 year from resolution of case |
| Admissions register | Entries to be preserved for three years from date of entry |
| Proof of address supplied by parents as part of the admissions process | Current year, plus 1 year |
| Supplementary information form, including additional information such as religion, medical conditions, etc. | For successful admissions, this information should be added to the pupil file. For unsuccessful admissions, this information should be retained until the appeals process is completed and then securely disposed of. |
| Operational Administration | |
| Newsletters, circulars to staff, parents and pupils and other items with a short operational use | Current year, plus 1 year |
| Visitors Book and Signing In Sheets | Current year, plus 6 years the review |
| Human Resources | |
| All records leading to the appointment of a new Headteacher | Date of appointment, plus 6 years |
| Job applications and interview records of unsuccessful candidates | Six months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference. |
| Job applications and interview records of successful candidates | 6 years after employment ceases |
| Pre-employment vetting information – DBS Checks | As soon as practicable after the check has been completed and the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months. |



St Mary's C of E Primary School Data Retention Policy Spring 2021

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| Pre-employment vetting information – Evidence proving the right to work in the UK | 2 years after employment ceases |
| Immigration checks | 2 years after employment ceases |
| Written particulars of employment, contracts of employment and changes to terms and conditions | 6 years after employment ceases |
| Change of personal details notifications | No longer than 6 months after receiving this notification |
| Emergency contact details | Destroyed on termination of employment |
| Personnel and training records | While employment continues and up to 6 years after employment ceases |
| Annual appraisal / assessment records | Current year, plus 5 years |
| Annual leave records and timesheets | Current year, plus 6 years |
| Working Time Regulations: | Opt Out Forms - 2 years from the date on which they were entered into Records of Compliance with WTR - 2 years after the relevant period |
| Consents for the processing of personal and sensitive data | For as long as the data is being processed and up to 6 years afterwards |
| Collective workforce agreements and past agreements that could affect present employees | Permanently |
| Trade Union Agreements | 10 years after ceasing to be effective |
| Management of Disciplinary and Grievance Processes | |
| Allegations of a child protection nature against a member of staff including where the allegation is founded | 10 years from the date of the allegation or the person's normal retirement age (whichever is longer), then review. Allegations that are found to be malicious should be removed from personnel files. Founded allegations should be retained in the personnel files and a copy provided to the person concerned. |
| Disciplinary records | 6 years after employment ceases |



St Mary's C of E Primary School
Data Retention Policy Spring 2021

| Health & Safety | |
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| Health and Safety Consultations | Permanently |
| Health and Safety Risk Assessments | Life of the risk assessment, plus 3 years |
| Records relating to accidents / injuries at work | Date of the incident, plus 12 years. In the case of serious accidents a further retention period may need to be applied. |
| Accident Reporting | Adults – 6 years from the date of the incident Children – when the child attains 25 years of age. |
| Fire Precaution Log Books | Current year, plus 6 years |
| Medical records and details of:- <ul style="list-style-type: none"> • Control of Lead at work • Employees exposed to asbestos dust • Records specified by the Control of Substances Hazardous to Health Regulations (COSHH) | 40 years from the date of the last entry made in the record |
| Records of tests and examinations of control systems and protection equipment under COSHH | 5 years from the date on which the record was made |
| Payroll and Pensions | |
| Pension Records | 12 years |
| Retirement Benefits Schemes – Notifiable Events (for example, relating to incapacity) | 6 years from the end of the scheme year in which the event took place |
| Payroll and Wage Records | 6 years after end of tax year they relate to |
| Maternity / Adoption / Paternity Leave Records | Current year, plus 3 years |
| Statutory Sick Pay Records | Current year, plus 3 years |
| Current Bank Details | No longer than necessary |
| Records relating to hours worked and payments made to temporary and casual workers | 3 years |
| School Meals Management | |
| School Meals Registers | 3 years |
| Free School Meals Registers | 6 years |



St Mary's C of E Primary School

Data Retention Policy Spring 2021

| Property Management | |
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| Records relating to the letting of the school premises | Current financial year, plus 6 years |
| Pupil's Educational Records | |
| Pupil's Education Record required by The Education (Pupil Information) (England) Regulations 2005 | <p>The file should follow the pupil when he / she leaves the primary school. This will include:-</p> <ul style="list-style-type: none">• To another primary school.• To a secondary school.• To a pupil referral unit. <p>If the pupil dies whilst at primary school the file should be retained by the school for 25 years from the pupil's date of birth.</p> <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the county, the file should be retained by the school for 25 years from the pupil's date of birth.</p> |
| Attendance Registers | Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made |
| Correspondence relating to authorized absence | Current academic year, plus 2 years |
| Special Educational Needs & Child Protection | |
| Special Educational Needs files, reviews and Individual Education Plans (this includes any statements and all advice and information shared regarding educational needs) | If the child does not move to another educational setting (eg Home Schooled) then the records will be retained until the child turns 25. |
| Child Protection Records | <p>The Child Protection records will be passed to the new school (separately from the main pupil record) when the child leaves the school. The school will ensure safe transit and obtain confirmation of receipt. The school will retain a copy of the Child Protection records until such a time that the new school acknowledges receipt of the original file. The copy will then be shredded.</p> <p>If the child does not move to another educational setting then the records will be</p> |



St Mary's C of E Primary School Data Retention Policy Spring 2021

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| | retained by the school for 25 years from the pupil's date of birth. |
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For any files or documents not included in the above retention schedule, the school will refer to the Information Management Toolkit for Schools, produced by The Information and Records Management Society (IRMS) www.irms.org.uk.

Policy written by: Katie Creedon (School Business Manager)
Next review due: Spring 2022