

Data Retention Policy

Annual review of school records

**Plymouth Grove Primary School**

**Ratified March 21**

**Review March 22**

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# 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.

# 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 – Still staff member leaves + 2 Years (6 Years if HR matters pending)

 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

# 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.

# 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:

 Global Policing Limited

 601 Piccadilly House

 49 Piccadilly

 Manchester

 M1 2AP

 Email: datarequestions@globalpolicing.co.uk

 Tel: 0161 212 1682

# Management of the School

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| * 1. **Governing Body – Agreed retention date 6 Years**

**Where possible all Governor minutes will be anonimised 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 (√)** |
|  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]](#footnote-2) |  | 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 (√)** |
| 1.2.1 | 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 | 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 (√)** |
| 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 |  |

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| **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 (√)** |
|  1.4.1 | Walking Bus Registers | Yes | Date of register + 3 yearsThis takes into account 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 of time required for accident reporting | SECURE DISPOSAL[If these records are retained electronically any back up copies should be destroyed at the same time] |  |

# Human Resources

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| **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 (√)** |
|  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 |  |
| 2.13 | 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 Kingdom4 | Yes | Whilst Staff member is employed + 2 years  |  |  |

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| **2.2 Operational Staff Management - 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 (√)** |
|  2.2.1 | Staff Personal File | Yes | Whilst Staff member is employed + 2 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 (√)** |
|  2.3.1 | Allegation of a child protection nature against a member of staff including where the allegation is unfounded5 | 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 |  |

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| **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 (√)** |
|  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 (√)** |
| 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 log books | No | 6 Years | SECURE DISPOSAL |  |

# Financial Management of the School

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| **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 (√)** |
|  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 |  |

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| **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 (√)** |
| 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 |  |

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| **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 (√)** |
| 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 |  |
| 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 (√)** |
| 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 |  |

# Property Management

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| **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 (√)** |
|  4.1.1 | Title deeds of properties belonging to the school | No | PERMANENTThese 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 |  |

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| **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 (√)** |
|  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 |  |

# Pupil Management

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| *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.* |

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| **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 (√)** |
|  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  |  |

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| **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 (√)** |
| 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 (√)** |
| 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  |  |

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| **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 (√)** |
| 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 theClassroom – 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 (√)** |
|  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 |  |  |

# 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** | **Confirm****(i) Safely destroyed** **(ii) In accordance with Data Retention Guidelines****Tick (√)** |
| --- | --- | --- | --- | --- | --- | --- |
| *e.g.*  | *School Invoices* | *Copies of purchase invoices dated 2011/12* | *Folders marked* ***“****Purchase Invoices 2011/12****”*** *1 to 3* | *3 Folders* | *Shredding* | √ |
| 1 |  |  |  |  |  |  |
| 2 |  |  |  |  |  |  |
| 3 |  |  |  |  |  |  |
| 4 |  |  |  |  |  |  |
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| 11 |  |  |  |  |  |  |
| 12 |  |  |  |  |  |  |
| 13 |  |  |  |  |  |  |
| 14 |  |  |  |  |  |  |

1. [↑](#footnote-ref-2)