Data Retention Policy

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Overview

This policy sets out the retention periods for the different types of data handled by the school. It is based on the IRMS Toolkit which can be obtained from http://irms.org.uk/page/SchoolsToolkit

Management of the School

This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Headteacher and the senior management team, the admissions process and operational administration.

Governing Body

Description	Data Protection	Retention Period	Disposal
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
Minutes of Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff.	Permanent for principal set. (3 years for inspection copies)	Secure Disposal
Reports presented to the Governing Body	There may be data protection issues if the meeting is dealing with confidential issues relating to staff.	Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently	Secure Disposal
Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002		6 years	Secure Disposal
Instruments of Government including Articles of Association		Permanent	These should be retained in the school whilst the school is open and then offered to County Archives
Trusts and Endowments managed by the Governing Body		Permanent	These should be retained in the school whilst the school is open and then offered to County Archives
Action plans created and administered by the Governing Body		Life of the action plan + 3 years	Secure Disposal
Policy documents created and administered by the Governing Body		Life of the policy + 3 years	Secure Disposal
Records relating to complaints dealt with by the Governing Body	Yes	Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	Secure Disposal
Annual Reports created		Date of report + 10 years	Secure Disposal

under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002			
Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies		Date proposal accepted or declined + 3 years	Secure Disposal

Head Teacher and Senior Management Team

Description	Data Protection	Retention Period	Disposal
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
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
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	Date of the report + a minimum of 3 years then review	Secure Disposal
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	Current academic year + 6 years then review	Secure Disposal
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	Date of correspondence + 3 years then review	Secure Disposal
Professional Development Plans	Yes	Life of the plan + 6 years	Secure Disposal
School Development Plans	No	Life of the plan + 3 years	Secure Disposal

Admissions Process

Description	Data Protection	Retention Period	Disposal
All records relating to the creation and implementation of the School Admissions' Policy	No	Life of the policy + 3 years then review	Secure Disposal
Admissions – if the admission is successful	Yes	Date of admission + 1 year	Secure Disposal

Admissions – if the appeal is unsuccessful	Yes	Resolution of case + 1 year	Secure Disposal
Register of Admissions	Yes	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.
Proofs of address supplied by parents as part of the admissions process	Yes	Current year + 1 year	Secure Disposal
Supplementary Information form including additional information such as religion, medical conditions etc for successful admissions	Yes	This information should be added to the pupil file	Secure Disposal
Supplementary Information form including additional information such as religion, medical conditions etc for unsuccessful admissions	Yes	Until appeals process completed	Secure Disposal

Operational Administration

Description	Data Protection	Retention Period	Disposal
General file series	No	Current year + 5 years	Secure Disposal
Records relating to the creation and publication of the school brochure or prospectus	No	Current year + 3 years	Standard Disposal
Records relating to the creation and distribution of circulars to staff, parents or pupils	No	Current year + 1 year	Standard Disposal
Newsletters and other items with a short operational use	No	Current year + 1 year	Standard Disposal
Visitors' Books and Signing in Sheets	Yes	Current year + 6 years then review	Secure Disposal
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No	Current year + 6 years then review	Secure Disposal

Human Resources

Recruitment

Description	Data Protection	Retention Period	Disposal

All records leading up to the appointment of a new headteacher	Yes	Date of appointment + 6 years	Secure Disposal
All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes	Date of appointment of successful candidate + 6 months	Secure Disposal
All records leading up to the appointment of a new member of staff – successful candidate	Yes	All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months	Secure Disposal
Pre-employment vetting information – DBS Checks	No	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	
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	
Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	Where possible these documents 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	

Operational Staff Management

Description	Data Protection	Retention Period	Disposal
Staff Personal File	Yes	Termination of Employment + 6 years	Secure Disposal
Timesheets	Yes	Current year + 6 years	Secure Disposal
Annual appraisal/assessment records	Yes	Current year + 5 years	Secure Disposal

Management of Disciplinary and Grievance Processes

Description	Data Protection	Retention Period	Disposal
Allegation of a child protection nature against a member of staff including	Yes	Until the person’s normal retirement age or 10 years from the date of the	Secure Disposal

where the allegation is unfounded		allegation whichever is the longer then review. *Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned*	
Disciplinary Proceedings			
oral warning		Date of warning + 6 months	Secure Disposal If warnings are placed on personal files then they must be weeded from the file
written warning – level 1		Date of warning + 6 months	
written warning – level 2		Date of warning + 1 year	
final warning		Date of warning + 18 months	
case not found		If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	Secure Disposal

Health and Safety

Description	Data Protection	Retention Period	Disposal
Health and Safety Policy Statements	No	Life of policy + 3 years	Secure Disposal
Health and Safety Risk Assessments	No	Life of risk assessment + 3 years	Secure Disposal
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
Accident Reporting - Adults	Yes	Date of the incident + 6 years	Secure Disposal
Accident Reporting - Children	Yes	DOB of the child + 25 years	Secure Disposal
Control of Substances Hazardous to Health (COSHH)	No	Current year + 40 years	Secure Disposal
Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Last action + 50 years	Secure Disposal
Fire Precautions log books	No	Current year + 6 years	Secure Disposal

Payroll and Pensions

Description	Data Protection	Retention Period	Disposal
Maternity pay records	Yes	Current year + 3 years	Secure Disposal
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Current year + 6 years	Secure Disposal

Financial Management of the School

Risk Management and Insurance

Description	Data Protection	Retention Period	Disposal
Employer's Liability Insurance Certificate	No	Closure of the school + 40 years	Secure Disposal

Asset Management

Description	Data Protection	Retention Period	Disposal
Inventories of furniture and equipment	No	Current year + 6 years	Secure Disposal
Burglary, theft and vandalism report forms	No	Current year + 6 years	Secure Disposal

Accounts and Statements including Budget Management

Description	Data Protection	Retention Period	Disposal
Annual Accounts	No	Current year + 6 years	Standard Disposal
Loans and grants managed by the school	No	Date of last payment on the loan + 12 years	Secure Disposal
Student Grant applications	Yes	Current year + 3 years	Secure Disposal
All records relating to the creation and management of budgets including the Annual Budget statement and background papers		Life of the budget + 3 years	Secure Disposal
Invoices, receipts, order books and requisitions, delivery notices	No	Current financial year + 6 years	Secure Disposal
Records relating to the collection and banking of monies	No	Current financial year + 6 years	Secure Disposal
Records relating to the identification and collection of debt	No	Current financial year + 6 years	Secure Disposal

Contract Management

Description	Data Protection	Retention Period	Disposal
All records relating to the management of contracts under seal	No	Last payment on the contract + 12 years	Secure Disposal
All records relating to the management of contracts under signature	No	Last payment on the contract + 6 years	Secure Disposal
Records relating to the monitoring of contracts	No	Current year + 2 years	Secure Disposal

School Fund

Description	Data Protection	Retention Period	Disposal
School Fund - Cheque books	No	Current year + 6 years	Secure Disposal
School Fund - Paying in books	No	Current year + 6 years	Secure Disposal
School Fund - Ledger	No	Current year + 6 years	Secure Disposal
School Fund - Invoices	No	Current year + 6 years	Secure Disposal
School Fund - Receipts	No	Current year + 6 years	Secure Disposal
School Fund - Bank statements	No	Current year + 6 years	Secure Disposal
School Fund - Journey Books	No	Current year + 6 years	Secure Disposal

School Meals Management

Description	Data Protection	Retention Period	Disposal
Free School Meals Registers	Yes	Current year + 6 years	Secure Disposal
School Meals Registers	Yes	Current year + 3 years	Secure Disposal
School Meals Summary Sheets	No	Current year + 3 years	Secure Disposal

Property Management

Property Management

Description	Data Protection	Retention Period	Disposal
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	

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.	
Leases of property leased by or to the school	No	Expiry of lease + 6 years	Secure Disposal
Records relating to the letting of school premises	No	Expiry of lease + 6 years	Secure Disposal

Maintenance

Description	Data Protection	Retention Period	Disposal
All records relating to the maintenance of the school carried out by contractors	No	Current year + 6 years	Secure Disposal
All records relating to the maintenance of the school carried out by school employees including maintenance log books	No	Current year + 6 years	Secure Disposal

Pupil Management

This section includes all records which are created during the time a pupil spends at the school. For information about accident reporting see under Health and Safety above.

Pupil's Educational Record

Description	Data Protection	Retention Period	Disposal
Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	Retain whilst the child remains at the school	The file should follow the pupil when he/she leaves the school. This will include: • to another primary school • to a secondary school • to a pupil referral unit • If the pupil dies whilst at 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
Public Examination Results - Pupil Copies	Yes	This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.
Internal Examination Results - Pupil Copies	Yes	This information should be added to the pupil file	
Child Protection information held on pupil file	Yes	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 held on pupil file	Yes	DOB of the child + 25 years then review	Secure Disposal

Attendance

Description	Data Protection	Retention Period	Disposal
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
Correspondence relating to authorized absence	Yes	Current academic year + 2 years	Secure Disposal

Special Educational Needs

Description	Data Protection	Retention Period	Disposal
Special Educational Needs files, reviews and Individual Education Plans	Yes	Date of Birth of the pupil + 25 years then review	Secure disposal unless the document is subject to a legal hold
Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	Secure disposal unless the document is subject to a legal hold
Advice and information provided to parents regarding educational needs		Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	Secure disposal unless the document is subject to a legal hold
Accessibility Strategy		Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	Secure disposal unless the document is subject to a legal hold

Curriculum Management

Statistics and Management Information

Description	Data Protection	Retention Period	Disposal
Curriculum returns	No	Current year + 3 years	Secure Disposal
Examination Results (Schools Copy)	Yes	Current year + 6 years	Secure Disposal
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
SATS Examination Papers	Yes	The examination papers should be kept until any appeals/validation process is complete	Secure Disposal
Published Admission Number (PAN) Reports	Yes	Current year + 6 years	Secure Disposal
Value Added and Contextual Data	Yes	Current year + 6 years	Secure Disposal
Self Evaluation Forms	Yes	Current year + 6 years	Secure Disposal

Implementation of Curriculum

Description	Data Protection	Retention Period	Disposal
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 further retention period	Secure Disposal
Timetable	No	Current year + 1 year	Standard Disposal
Class Record Books	No	Current year + 1 year	Standard Disposal
Mark Books	No	Current year + 1 year	Standard Disposal
Record of homework set	No	Current year + 1 year	Standard Disposal
Pupils' Work	No	Current year + 1 year	Standard Disposal

Extra Curricular Activities

Educational Visits outside the Classroom

Description	Data Protection	Retention Period	Disposal
Records created to obtain approval to run an Educational Visit outside the Classroom	No	Date of visit + 14 years	Secure Disposal
Parental consent forms for school trips where there has been no major incident	Yes	Conclusion of the trip	Secure Disposal
Parental permission slips for school trips where there has been a major incident	Yes	DOB of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	Secure Disposal

Walking Bus

Description	Data Protection	Retention Period	Disposal
Walking Bus Registers	Yes	Date of register + 3 years This 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

Family Liaison Officers and Home School Liaison Assistants

Description	Data Protection	Retention Period	Disposal
Day Books	Yes	Current year + 2 years then review	Secure Disposal
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	Secure Disposal
Referral forms	Yes	hile the referral is current	Secure Disposal
Contact data sheets	Yes	Current year then review, if contact is no longer active then destroy	Secure Disposal
Contact database entries	Yes	Current year then review, if contact is no longer active then destroy	Secure Disposal

Group Registers	Yes	Current year + 2 years	Secure Disposal

Central Government and Local Authority

Local Authority

Description	Data Protection	Retention Period	Disposal
Secondary Transfer Sheets	Yes	Current year + 2 years	
Attendance Returns	Yes	Current year + 1 year	
School Census Returns	No	Current year + 5 years	
Circulars and other information sent from the Local Authority	No	Operational use	

Central Government

Description	Data Protection	Retention Period	Disposal
OFSTED reports and papers		Life of the report then review	
Returns made to central government		Current year + 6 years	
Circulars and other information sent from central government		Operational use	