

Policy & Procedure

Huncote Primary School



Data Retention Policy

2021-2023

This Data Retention Policy sets out the minimum amount of time a Leicestershire school needs to keep certain records and the action which should be taken when that information is of no further administrative use.

Under the Freedom of Information Act 2000, schools are required to maintain a retention schedule, which should list the types of documents the school hold, how long they can be kept for and how they should be destroyed. Members of staff are encouraged to manage their current record keeping systems using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems.

The retention schedule refers to all information, regardless of the media in which they are stored. Data will be processed to in line with the requirements and protections set out in the UK General Data Protection Regulation (GDPR).

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

1. 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 (if possible).

The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction. Members of staff should record at least:

- File reference (or other unique identifier)
- File title (or brief description)
- Number of files
- The name of the authorising officer

This could be kept in an Excel spreadsheet or other database format.

2. 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 Archives. A list of the records sent to archives should be created to include the information above.

Please contact the Information Systems Manager, Leicestershire County Council on 0116 305 5783

3. 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 media such as digital media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

4. Useful Contacts

Katie Robey, Information Systems Manager, Leicestershire County Council, 0116 305 5783 krobey@leics.gov.uk

Gill Wood, Assistant Business Partner, Leicestershire County Council, 0116 305 7976 gwood@leics.gov.uk

Agreed & adopted by The Governing Body of Huncote Primary School

Signed.....

Date

Chair of Full Governing Body

This policy will be reviewed every 2 years or as required by legislation

May 2021

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
1. Safeguarding			
Child Protection files	Yes	DOB + 25 years	SHRED Child Protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (i.e. the information does not need to be sent to a university for example). Where a child is removed from roll to be educated at home, the file should be copied to the Local Authority.
Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Until the person's normal retirement age, or 10 years from the date of the allegation if that's longer	SHRED Employment Practices Code: Supplementary Guidance 2.13.1 Records of Disciplinary and Grievance "Records of allegations about workers who have been investigated and found to be without substance should not normally be retained once an investigation has been completed. There are some exceptions to this where for its own protection the employer has to keep a limited record that an allegation was received and investigated, for example, where the allegation relates to abuse and the worker is employed to work with children or other vulnerable individuals". Summary record to be retained on confidential personnel file, and a copy given to the person concerned.
2. Governors			
Minutes • <i>Principal set (signed)</i>	No	Permanent	Retain in school for 6 years from date of meeting. Transfer to Archives
• <i>Inspection copies</i>	No	Date of meeting + 3 years	DESTROY [If these minutes contain any sensitive personal information they should be shredded]
Agendas	No	Date of meeting	DESTROY
Reports	No	Date of report + 6 years	Retain in school for 6 years from date of meeting. Transfer to Archives (The appropriate archivist will then take a sample for permanent preservation)
Annual Parents' meeting papers	No	Date of meeting + 6 years	Retain in school for 6 years from date of meeting. Transfer to Archives (The appropriate archivist will then take a sample for permanent preservation)
Trusts and Endowments	No	Permanent	Retain in school whilst operationally required. Transfer to Archives
Action Plans	No	Date of action plan + 3 years	DESTROY It may be appropriate to offer to the Archives for a sample to be taken if the school has been through a difficult period

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
Policy documents	No	Expiry of policy	Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process) Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)
Complaints files	Yes	Date of resolution of complaint + 6 years	Retain in school for the first six years. Review for further retention in the case of contentious disputes. Destroy routine complaints. Complaints alleging possible harm to a young person by a member of staff are covered in section 1 above.
Annual Reports required by the DCSF	No	Date of report + 10 years	Transfer to Archives (the appropriate archivist will then take a sample for permanent preservation)
Proposals for schools to become, or be established as Specialist Status schools	No	Current year+ 3 years	Transfer to Archives (The appropriate archivist will then take a sample for permanent preservation)
3. Management			
Log Books (Books where the Head Teacher or another member of staff keeps of records of what happens in the school, this may include details of events, photographs and other information]	Yes	Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry. Transfer to the Archives From January 1st 2005 subject access is permitted into unstructured filing systems and log books and other records created within the school containing details about the activities of individual pupils and members of staff will become subject to the Data Protection Act 1998.
Minutes of the SLT and other internal administrative bodies	Yes	Date of meeting + 5 years	Retain in the school for 5 years from meeting. Transfer to Archives (The appropriate archivist will then take a sample for permanent preservation)

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
Reports made by the Head Teacher or the SLT	Yes	Date of report + 3 years	Retain in the school for 3 years from meeting. Transfer to Archives (The appropriate archivist will then take a sample for permanent preservation)
Records created by Head Teachers, Deputy Head Teachers and other members of staff with administrative responsibilities (Except child protection records which are dealt with in section 1 above)	Yes	Closure of file + 6 years	DESTROY If these records contain sensitive information they should be shredded
Correspondence created by Head Teacher, Deputy Head Teacher, and other members of staff with administrative responsibilities	No	Date of correspondence + 3 years	DESTROY If these records contain sensitive information they should be shredded
Professional development plans	Yes	Closure+ 6 years	SHRED
School development plans	No	Closure+ 6 years	Review Offer to the Archives
4.Pupils			
Admission Registers	Yes	Date of last entry in the book (or file)+ 6 years	Retain in the school for 6 years from the date of the last entry. Transfer to the Archives
Attendance registers	Yes	Date of register + 3 years	DESTROY (If these records are retained electronically any back-up copies should be destroyed at the same time)

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
Pupil record cards	Yes	Retain for the time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school.
Pupil files	Yes	Retain for the time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school.
Special Educational Needs case files, reviews and Individual Education Plans	Yes	35 years from closure (the Local Authority should have a copy so compare the file to ensure duplicates are not being retained)	SHRED
Letters authorising absence	No	Date of absence + 2 years	SHRED
Absence books	Yes	Current year+ 6 years	SHRED
<ul style="list-style-type: none"> • <i>Public</i> • <i>Internal examination results</i> 	<p>No</p> <p>Yes</p>	<p>Year of examinations+ 6 years</p> <p>Current year + 5 years If these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary.</p>	<p>DESTROY Any certificates left unclaimed should be returned to the appropriate Examination Board</p> <p>DESTROY</p>
Any other records created in the course of contact with pupils	Yes/No	Current year+ 3 years	Review at the end of 3 years and either allocate a further retention period or DESTROY
Statement maintained under The Education Act 1996 - Section 324	Yes	DOB + 30 years	DESTROY unless legal action is pending

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
Proposed statement or amended statement	Yes	DOB+ 30 years	DESTROY unless legal action is pending
Advice and information to parents regarding educational needs	Yes	Closure + 12 years	DESTROY unless legal action is pending
Accessibility Strategy	Yes	Closure + 12 years	DESTROY unless legal action is pending
Children SEN Files	Yes	Closure + 35 years	DESTROY unless legal action is pending
5. Curriculum			
Curriculum development	No	Current year + 6 years	DESTROY
Curriculum returns	No	Current year + 3 years	DESTROY
School syllabus	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 DESTROY
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 DESTROY
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 DESTROY
Class record 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 DESTROY
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 DESTROY
Record of homework set	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 DESTROY
Pupils' 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 DESTROY
Examination results	Yes	Current year + 6 years	DESTROY (These records should be shredded)
Value added records	Yes	Current year + 6 years	DESTROY (These records should be shredded)

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
6. Human Resources			
Timesheets, sick pay	Yes	Current year + 6 years	SHRED
Staff Personal files	Yes	Termination + 7 years	SHRED
Interview notes and recruitment records	Yes	Date of interview + 6 months	SHRED
Pre-employment vetting information (including unsuccessful DBS checks)	No	Date of check + 6 months	SHRED This information should be placed on the personnel file if the applicant is successful and managed according to the guidelines
Disciplinary proceedings for all matters except those relating to child protection issues (see section 1 above): <ul style="list-style-type: none"> • <i>oral warning</i> • <i>written warning - level one</i> • <i>written warning - level two</i> • <i>final warning</i> • <i>case not found (except child protection allegations see section 1 above)</i> 	Yes	Date of warning + 6 months Date of warning + 6 months Date of warning + 12 months Date of warning + 18 months	SHRED If this is placed on a personal file, it must be weeded from the file. SHRED If this is placed on a personal file, it must be weeded from the file. SHRED If this is placed on a personal file, it must be weeded from the file. SHRED If this is placed on a personal file, it must be weeded from the file. DESTROY immediately at the conclusion of the case

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
Records relating to accident/injury at work	Yes	Date of incident +12 years	Review at the end of this period. In the case of serious accidents a further retention period will need to be applied
Annual appraisal/ assessment records	No	Current year + 5 years	SHRED
Salary cards	Yes	Last date of employment + 6 years	The information should be transferred to the superannuation department at the appropriate time who will maintain the master record SHRED
Maternity pay records	Yes	Current year, + 3yrs	SHRED
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Last payment + 6 years	SHRED
7. Health and Safety			
Accessibility Plans		Current year+ 6 years	DESTROY
Accident Reporting			
• Adults – Accident Book	Yes	Last entry in the accident book+ 3 years	SHRED
• Adults – Internal Reports	Yes	Current year+ 3 years	SHRED
• Children	Yes	DOB + 25 years.	SHRED 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.
COSHH		Current year+ 10 years	Review (where appropriate an additional retention period may be allocated)
Incident reports	Yes	Current year+ 20 years	SHRED
Policy Statements		Date of expiry + 1 year	DESTROY
Risk Assessments		Date assessment superseded + 3 years	DESTROY

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
Process of monitoring of areas where employees and persons are likely to have come in contact with asbestos		Last action + 40 years	DESTROY
Process of monitoring of areas where employees and persons are likely to have come in contact with radiation		Last action + 50 years	DESTROY
Fire Precautions log books		Current year + 6 years	DESTROY
8. Administrative			
Employer's Liability certificate		Permanent whilst the school is open	Retain for 40 years after school has closed
Inventories of equipment and furniture		Disposal of last item + 6 years or date superseded + 6 years	DESTROY
General file series		Current year + 5 years	Review to see whether a further retention period is required Transfer to Archives (The appropriate archivist will then take a sample for permanent preservation)
School brochure/prospectus		Current year + 3 years	Transfer to Archives (The appropriate archivist will then take a sample for permanent preservation)
Circulars		Current year + 1 year	DESTROY
Newsletters, ephemera		Current year + 1 year	Review to see whether a further retention period is required Transfer to Archives (The appropriate archivist will then take a sample for permanent preservation)
Visitors' book		Current year + 2 years	Review to see whether a further retention period is required Transfer to Archives (The appropriate archivist will then take a sample for permanent preservation)
PTA		Current year + 6 years	Review to see whether a further retention period is required Transfer to Archives (The appropriate archivist will then take a sample for permanent preservation)

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
9. Financial			
Annual Accounts		Current year + 6 years	Offer to Archives
Loans and grants		Date of last payment on loan + 12 years	Review to see whether a further retention period is required Transfer to Archives (The appropriate archivist will then take a sample for permanent preservation)
Contracts • <i>under seal</i> • <i>under signature</i> • <i>monitoring records</i>		Contract completion date + 12 years Contract completion date + 6 years Current year+ 2 years	SHRED SHRED SHRED
Copy orders		Current year + 2 years	SHRED
Budget reports, budget monitoring etc		Current year + 3 years	SHRED
Invoice, receipts and other records covered by the Financial Regulations		Current year + 6 years	SHRED
Annual Budget and background papers		Current year + 6 years	SHRED
Order books and requisitions		Current year + 6 years	SHRED
Delivery Documentation		Current year + 6 years	SHRED
Debtors' Records		Current year + 6 years	SHRED
School Fund-Cheque books		Current year + 3 years	SHRED

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
School Fund- Paying in books		Current year + 6 years	SHRED
School Fund- Ledger		Current year + 6 years	SHRED
School Fund – Invoices		Current year + 6 years	SHRED
School Fund- Receipts		Current year + 6 years	SHRED
School Fund - Bank statements		Current year + 6 years	SHRED
School Fund - School Journey books		Current year + 6 years	SHRED
Applications for free school meals, travel, uniformsetc		Whilst child at school	SHRED
Student grant applications		Current year + 3 years	SHRED
Free school meals registers	Yes	Current year + 6 years	SHRED
Petty cash books		Current year + 6 years	SHRED
10. Property			
Title Deeds		Permanent. These should follow the property	Offer to Archives
Plans		Permanent.	Offer to Archives Retain until superseded then offer to archives before destruction
Maintenance and contractors		Current year + 6 years	DESTROY
Leases		Expiry of lease + 6 years	DESTROY
Lettings		Current year + 3 years	DESTROY
Burglary, theft and vandalism report forms		Current year + 6 years	SHRED

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
Maintenance log books		Last entry + 10 years	DESTROY
Contractors' Reports		Current year + 6 years	DESTROY
11. Local Authority			
Secondary transfer sheets (Primary)	Yes	Current year + 2 years	SHRED
Attendance returns	Yes	Current year + 1 year	DESTROY
Circulars from LA		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)
12. DCSF			
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)
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)
Census returns (SIMS does not retain an electronic copy)		Current year + 6 years	DESTROY
Circulars from DCSF		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)
13. Connexions			
Service level agreements		Until superseded	SHRED
Work Experience agreement		DOB of child + 18 years	SHRED
14. School Meals			
Dinner Register		Current year + 3 years	SHRED
School Meals Summary Sheets		Current year + 3 years	SHRED

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
15. Arts in Education			
Pupil Reports		6 years from event	SHRED
Pupil registration forms		6 years from registration	SHRED