



Greatstone Primary School and Nursery

Data Retention Policy

1 Introduction

The School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited. Greatstone Primary School adheres to all the principles laid out in the GDPR including Article 25 - Data Protection by design and by default
Article 24 – Responsibility of the controller

2 Scope of the Policy

- 2.1 This policy applies to all records that are created, received or maintained by staff of the school in the course of carrying out its functions.
- 2.2 Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created or received, and then stored, in hard copy or electronically.
- 2.3 A small percentage of the school's records may be selected for permanent preservation as part of the institution's archives and for historical research.

3 Responsibilities

- 3.1 The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher.
- 3.2 The person responsible for records management in the school will give guidance about good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.



3.3 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the schools records management guidelines.

4 Recording Systems

Information created by the school must be managed against the same standards regardless of the media in which it is stored.

4.1 Maintenance of Record Keeping Systems

- i. It is important that filing information is properly resourced and is carried out on a regular basis. It is equally important that the files are weeded of extraneous information where appropriate on a regular basis. Removing information from a file once a freedom of information request has been made will be a criminal offence (unless it is part of normal processing).
- ii. Applying retention periods is straightforward provided files are closed on a regular basis.
- iii. Once a file has been closed, it should be moved out of the current filing system and stored either in a record room in the school or in another appropriate place until it has reached the end of the retention period.
- iv. Information security is very important especially when dealing with personal information or sensitive policy information. There are a number of basic rules:

All personal information should be kept in lockable filing cabinets which are kept locked when the room is unattended;

- Personal information held on computer systems should be adequately password protected. Information should never be left up on a screen if the computer is unattended;
- Files containing personal or sensitive information should not be left out on desks over night;
- Sensitive personal information will only be sent by encrypted e-mail;
- If files need to be taken off the premises they should be secured in the boot of a car or in lockable containers;
- Teachers will only use school supplied cloud storage for offsite data.
- All computer information should be backed up regularly and the back-up should be stored off the site.

v. Information contained in email, fax should be filed into the appropriate electronic or manual filing system once it has been dealt with.

5 The Safe Disposal of Information Using the Retention Schedule

5.1 Files should be disposed of in line with the attached retention schedule (see appendix). This is a process which should be undertaken on an annual basis during the month of August.



5.2 Paper records containing personal information should be shredded using a cross-cutting shredder. Other files can be bundled up and put in a skip or disposed of to the waste paper merchant. Loose papers should not be put in skips unless the skip has a lid. CDs/DVDs should be cut into pieces. Audio/Video tapes and fax rolls should be dismantled and shredded.

5.3 Electronic data should be archived on electronic media and deleted appropriately at the end of the retention period.

6 Monitoring and Review

This policy has been reviewed and approved by the Head teacher and Governors. The Records Management Policy will be reviewed and updated as necessary every 2 years.

Retention Schedule Governors

Basic file description	Retention Period	Business Critical	Protective Marking
Minutes - Principal set (signed)	Permanent	YES	OFFICIAL
Minutes - Inspection copies	Date of meeting + 3 years	NO	NOT PROTECTIVELY MARKED
Agendas – Principal copy	Permanent	YES	NOT PROTECTIVELY MARKED
Agendas – Additional Copies	Date of meeting	NO	NOT PROTECTIVELY MARKED
Reports	Date of report + 6 years	YES	OFFICIAL
Annual Parents’ meeting papers	Date of meeting + 6 years	YES	NOT PROTECTIVELY MARKED
Instruments of Government	Permanent	YES	NOT PROTECTIVELY MARKED
Trusts and Endowments	Permanent	YES	NOT PROTECTIVELY MARKED
Action Plans	Date of action plan + 3 years	YES	NOT PROTECTIVELY MARKED



Basic file description	Retention Period	Business Critical	Protective Marking
Policy documents	Expiry of policy Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)	YES	NOT PROTECTIVELY MARKED
Complaints files	Date of resolution of complaint + 6 years then review for further retention in the case of contentious disputes	YES	OFFICIAL SENSITIVE
Annual Reports required by the Department for Education and Skills	Date of report + 10 years	YES	NOT PROTECTIVELY MARKED
Proposals for schools to become, or be established as Specialist Status schools	Current year + 3 years	YES	NOT PROTECTIVELY MARKED

Management

Basic file description	Retention Period	Business Critical	Protective Marking
Log Books	Date of last entry in the book + 6 years	Yes	NOT PROTECTIVELY MARKED
Minutes of the Senior Management Team and other internal administrative bodies	Date of meeting + 5 years	Yes	OFFICIAL
Reports made by the Head Teacher or the management team	Date of report + 3 years	Yes	OFFICIAL
Records created by Head Teachers, Deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities	Closure of file + 6 years	Yes	OFFICIAL
Correspondence created by Head Teachers, Deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities	Date of correspondence + 3 years	Yes	OFFICIAL
Professional development plans	Closure + 6 years	Yes	NOT PROTECTIVELY MARKED

Wednesday, 2 May 2018



Basic file description	Retention Period	Business Critical	Protective Marking
School development plans	Closure + 6 years then review	Yes	NOT PROTECTIVELY MARKED
Admissions – if the admission is successful	Admission + 1 year	Yes	OFFICIAL SENSITIVE
Admissions – if the appeal is unsuccessful	Resolution of case + 1 year	Yes	OFFICIAL SENSITIVE
Admissions – Secondary Schools – Casual	Current year + 1 year	Yes	OFFICIAL SENSITIVE
Proofs of address supplied by parents as part of the admissions process	Current year + 1 year	Yes	OFFICIAL SENSITIVE



Pupils

Basic file description	Retention Period	Business Critical	Protective Marking
Admission Registers	Permanent	Yes	OFFICIAL SENSITIVE
Attendance registers	Date of register + 3 years	Yes	OFFICIAL SENSITIVE
Pupil record cards - Primary	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 ¹	Yes	OFFICIAL SENSITIVE
Pupil record cards - Secondary	DOB of the pupil + 25 years ¹	Yes	OFFICIAL SENSITIVE
Pupil Files - Primary	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 ¹	Yes	OFFICIAL SENSITIVE
Pupil Files - Secondary	DOB of the pupil + 25 years ¹	Yes	OFFICIAL SENSITIVE
Special Educational Needs files, reviews and Individual Education Plans	DOB of the pupil + 25 year ¹	Yes	OFFICIAL SENSITIVE
Letters authorising absence	Date of absence + 2 years	Yes	OFFICIAL SENSITIVE
Absence books	Current year + 6 years	Yes	OFFICIAL SENSITIVE

¹ In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service



Basic file description	Retention Period	Business Critical	Protective Marking
Examination results - Public	Year of examinations + 6 years ²	No	NOT PROTECTIVELY MARKED
Examination results - Internal examination results	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	No	NOT PROTECTIVELY MARKED
Any other records created in the course of contact with pupils	Current year + 3 years then review	Yes	OFFICIAL SENSITIVE
Statement maintained under The Education Act 1996 - Section 324	DOB + 30 years Unless legal action is pending	Yes	OFFICIAL SENSITIVE
Proposed statement or amended statement	DOB + 30 years Unless legal action is pending	Yes	OFFICIAL SENSITIVE
Advice and information to parents regarding educational needs	Closure + 12 years Unless legal action is pending	No	OFFICIAL SENSITIVE
Accessibility Strategy	Closure + 12 years Unless legal action is pending	Yes	OFFICIAL SENSITIVE
Pupil SEN Files	DOB of pupil + 25 years then review unless legal action is pending. If so, it may be appropriate to add an additional retention period.	Yes	OFFICIAL SENSITIVE
Parental permission slips for school trips – where there has been no major incident	Conclusion of the trip	Yes	OFFICIAL SENSITIVE

² Any certificates left unclaimed should be returned to the appropriate Examination Board



Basic file description	Retention Period	Business Critical	Protective Marking
Parental permission slips for school trips – where there has been a major incident	DOB of the pupil involved in the incident + 25 years The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils	Yes	OFFICIAL SENSITIVE
All records relating to the organization of school residential trips	Date of the residential visit + a minimum of 6 years then review	Yes	OFFICIAL SENSITIVE
Primary Schools Records created by schools to obtain approval to run an Educational Visit outside the Classroom ³	Date of visit + 14 years ⁴	Yes	OFFICIAL SENSITIVE
Secondary Schools Records created by schools to obtain approval to run an Educational Visit outside the Classroom ³	Date of visit + 10 years ⁴	Yes	OFFICIAL SENSITIVE
Walking Bus registers	Date of register + 3 years ⁵	Yes	OFFICIAL SENSITIVE

³ including GOF1 and GOF2 and data entered on the e-go system

⁴ This retention period has been set in agreement with the Safeguarding Children’s Officer

⁵ 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



Alternative Curriculum

Basic file description	Retention Period	Business Critical	Protective Marking
Curriculum development	Current year + 6 years	No	NOT PROTECTIVELY MARKED
Curriculum returns	Current year + 3 years	No	NOT PROTECTIVELY MARKED
School syllabus	Current year then review	No	NOT PROTECTIVELY MARKED
Schemes of work	Current year then review	No	NOT PROTECTIVELY MARKED
Timetable	Current year then review	No	NOT PROTECTIVELY MARKED
Class record books	Current year then review	No	NOT PROTECTIVELY MARKED
Mark Books	Current year then review	No	NOT PROTECTIVELY MARKED
Record of homework set	Current year then review	No	NOT PROTECTIVELY MARKED
Pupils' work	Current year then review	No	NOT PROTECTIVELY MARKED
SATS records including examination results. Exam papers should only be retained if they are required to evidence the results	Current year + 6 years	Yes	OFFICIAL SENSITIVE



Personnel Records Held in Schools

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Timesheets, sick pay	Financial Regulations	Current year + 6 years	Yes	OFFICIAL SENSITIVE
Staff Personal files		Termination + 7 years ⁶	Yes	OFFICIAL SENSITIVE
Interview notes and recruitment records		Date of interview + 6 months	Yes	OFFICIAL SENSITIVE
Pre-employment vetting information (including DBS checks)	DBS guidelines	Date of check + 6 months	Yes	OFFICIAL SENSITIVE
Please note that schools must not keep copies of the documents which are checked for DBS purposes.				
Right to Work in the UK checks	https://www.gov.uk/check-job-applicant-right-to-work	Termination of employment + 2 years	Yes	OFFICIAL SENSITIVE
Disciplinary proceedings: case not found		Take advice from Personnel if the proceedings were child protection related otherwise destroy immediately at the conclusion of the case	Yes	OFFICIAL SENSITIVE
Disciplinary proceedings: written warning – level two		Date of warning + 12 months ⁷	Yes	OFFICIAL SENSITIVE

⁶ These files should be subject to KCC's open file policy where the employees are employed by Kent County Council as the Local Authority

⁷ If this information has been added to an individual's personnel file, it must be weeded from the file once the retention period has elapsed



Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Disciplinary proceedings: written warning – level one		Date of warning + 6 months ⁷	Yes	OFFICIAL SENSITIVE
Disciplinary proceedings: oral warning		Date of warning + 6 months ⁷	Yes	OFFICIAL SENSITIVE
Disciplinary proceedings: final warning		Date of warning + 18 months ⁷	Yes	OFFICIAL SENSITIVE
Records relating to accident/injury at work		Date of incident + 12 years ⁸	Yes	OFFICIAL SENSITIVE
Annual appraisal or assessment records		Current year + 5 years	Yes	OFFICIAL SENSITIVE
Salary cards		Last date of employment + 85 years	Yes	OFFICIAL SENSITIVE
Maternity pay records	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year + 3yrs	Yes	OFFICIAL SENSITIVE
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995		Current year + 6 years	Yes	OFFICIAL SENSITIVE
Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure		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.	Yes	OFFICIAL SENSITIVE

⁸ In the case of serious accidents a further retention period will need to be applied



Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Records of allegations about workers who have been investigated and found to be without substance	Information Commissioner Code of Practice: Employment Records 2002 - “Child Protection Procedures for Managing Allegations Against Staff within Schools and Education Services” (September 2008) p17	These records should not normally be retained once an investigation has been completed ⁹ .	Yes	OFFICIAL SENSITIVE
Outcome of an allegation made against a staff member	Safeguarding Children in Education Guidelines: Dealing with Allegations of Abuse against Teachers and Other Staff Safeguarding Children in Education and Safer Recruitment 2007 Para 5.1	Until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer	Yes	OFFICIAL SENSITIVE

Health and Safety

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Accessibility Plans	Disability Discrimination Act 1995	Current year + 6 years	Yes	OFFICIAL SENSITIVE
Accident Reporting – Children	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of birth + 22 years where the injured person is a minor at the time of the accident	Yes	OFFICIAL SENSITIVE

⁹ 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 adults



Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Accident Reporting – Adults	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of the accident + 4 years where the injured person is an adult at the time of the accident;	Yes	OFFICIAL SENSITIVE
COSHH Risk Assessments		Date of creation + 40 years	Yes	NOT PROTECTIVELY MARKED
Incident reports		Current year + 20 years	Yes	OFFICIAL SENSITIVE
Policy Statements		Date of expiry + 1 year	Yes	NOT PROTECTIVELY MARKED
Risk Assessments		Current year + 3 years	Yes	NOT PROTECTIVELY MARKED
Process of monitoring areas where employees and persons are likely to have become in contact with asbestos		Last action + 40 years	Yes	NOT PROTECTIVELY MARKED
Process of monitoring of areas where employees and persons are likely to have come in contact with radiation		Last action + 50 years	Yes	NOT PROTECTIVELY MARKED
Fire Precautions log books		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED



Administrative

Basic file description	Retention Period	Business Critical	Protective Marking
Employer's Liability certificate	Closure of the school + 40 years	Yes	NOT PROTECTIVELY MARKED
Inventories of equipment and furniture	Current year + 6 years	No	NOT PROTECTIVELY MARKED
School brochure/prospectus	Current year + 3 years	No	NOT PROTECTIVELY MARKED
General file series	Current year + 5 years	No	NOT PROTECTIVELY MARKED
Circulars (staff/parents/pupils)	Current year + 1 year	No	NOT PROTECTIVELY MARKED
Newsletters, ephemera	Current year + 1 year	No	NOT PROTECTIVELY MARKED
Visitors book	Current year + 2 years	No	NOT PROTECTIVELY MARKED
PTA/Old Pupils Associations	Current year + 6 years	No	NOT PROTECTIVELY MARKED



Financial Records Held in Schools

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Annual Accounts	Financial Regulations	Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Loans and grants	Financial Regulations	Date of last payment on loan + 12 years then review to see whether a further retention period is required	Yes	NOT PROTECTIVELY MARKED
Contracts - under seal		Contract completion date + 12 years	Yes	NOT PROTECTIVELY MARKED
Contracts - under signature		Contract completion date + 6 years	Yes	NOT PROTECTIVELY MARKED
Contracts - monitoring records		Current year + 2 years	Yes	NOT PROTECTIVELY MARKED
Copy orders		Current year + 2 years	No	NOT PROTECTIVELY MARKED
Budget reports, budget monitoring etc		Current year + 3 years	Yes	NOT PROTECTIVELY MARKED
Invoice, receipts and other records covered by the Financial Regulations	Financial Regulations	Current year + 6 years	Yes	NOT PROTECTIVELY MARKED



Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Annual Budget and background papers		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Order books and requisitions		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Delivery Documentation		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Debtors' Records	Limitation Act 1980	Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
School Fund Records ¹⁰		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Applications for free school meals, travel, uniforms etc		Whilst child is at school	No	NOT PROTECTIVELY MARKED
Student grant applications		Current year + 3 years	Yes	NOT PROTECTIVELY MARKED
Free school meals registers	Financial Regulations	Current year + 6 years	Yes	NOT PROTECTIVELY MARKED

¹⁰ including cheque books, paying in books, ledgers, invoices, receipts, bank statements, school journey books



Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Petty cash books	Financial Regulations	Indefinitely	Yes	NOT PROTECTIVELY MARKED



Property Records Held in Schools

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Title Deeds		Permanent ¹¹	Yes	NOT PROTECTIVELY MARKED
Plans		Permanent Retain in school whilst operational	Yes	OFFICIAL ¹²
Maintenance and contractors	Financial Regulations	Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Leases		Expiry of lease + 6 years	Yes	NOT PROTECTIVELY MARKED
Lettings		Current year + 3 years	Yes	NOT PROTECTIVELY MARKED
Burglary, theft and vandalism report forms		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED
Maintenance log books		Last entry + 10 years	Yes	NOT PROTECTIVELY MARKED
Contractors' Reports		Current year + 6 years	Yes	NOT PROTECTIVELY MARKED

¹¹ these should follow the property unless the property has been registered at the Land Registry

¹² These records carry an OFFICIAL marking as there can be security issues about allowing access to the plans of buildings to people who may be looking to burgle the premises



Local Authority

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Secondary transfer sheets (Primary)		Current year + 2 years	No	OFFICIAL SENSITIVE
Attendance returns		Current year + 1 year	No	NOT PROTECTIVELY MARKED
Circulars from LA		Whilst required operationally then review to see whether a further retention period is required	No	NOT PROTECTIVELY MARKED

DfE

	Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
IMTKS11.1	OFSTED reports and papers		Replace former report with any new inspection report then review to see whether a further retention period is required	No	NOT PROTECTIVELY MARKED
IMTKS11.2	Returns		Current year + 6 years	No	NOT PROTECTIVELY MARKED
IMTKS11.3	Circulars from DfE		Whilst operationally required then review to see whether a further retention period is required	No	NOT PROTECTIVELY MARKED



School Meals

Basic file description	Statutory Provisions	Retention Period	Business Critical	Protective Marking
Dinner Register		Current year + 3 years	Yes	OFFICIAL SENSITIVE
School Meals Summary Sheets		Current year + 3 years	No	NOT PROTECTIVELY MARKED

Family Liaison Officers and Parent Support Assistants

Basic file description	Retention Period	Business Critical	Protective Marking
Day Books	Current year + 2 years then review	No	OFFICIAL SENSITIVE
Reports for outside agencies – where the report has been included on the case file created by the outside agency	Whilst the child is attending the school then destroy	No	OFFICIAL SENSITIVE
Referral forms	While the referral is current then add to child's file	No	OFFICIAL SENSITIVE
Contact data sheets	Current year then review, if contact is no longer active then destroy	No	OFFICIAL SENSITIVE
Contact database entries	Current year then review, if contact is no longer active then destroy	No	OFFICIAL SENSITIVE
Group Registers	Current year + 2 years	No	OFFICIAL SENSITIVE