



Data Retention Policy

St Crispin's School recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the school. This document provides the policy framework through which this effective management can be achieved and audited.

Scope of the Policy

This policy applies to all records created, received or maintained by staff at the school in the course of carrying out its functions.

- 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, received or maintained in hard copy or electronically.
- A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives and for historical research. This notice is aimed at prospective, current and former parents, guardians and pupils and explains how the school uses Personal Data that is covered by the General Data Protection Regulations (GDPR). The school may amend this notice at any time.

Responsibilities

The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and timely.

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 school's records management guidelines.

Safe Disposal of Records

Where records have been identified for destruction they should be disposed of in an appropriate way. All records containing personal information, or sensitive policy information, should be destroyed before disposal using a cross cut shredder. Any other records should be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways. Do not put records in the dustbin or a skip.



There are companies who can provide confidential waste bins and other services which can be purchased to ensure that records are disposed of in an appropriate way.

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) and number of files.
- The name of the authorising officer and the date action taken. This should be kept in an Excel spreadsheet or similar suitable format.

Transfer of Information

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

Retention Guidelines

The following retention guidelines have been issued by the Management Society of Great Britain 'Retention Guidelines for Schools'. Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the Data Protection Act 1998, Freedom of Information Act 2000 and the General Data Protection Regulations (GDPR). Managing record series using these retention guidelines will be deemed to be 'normal processing' under the legislation mentioned above. If record series are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented.



Child Protection

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Child Protection files	Yes	Education Act 2002, related guidance "Safeguarding Children in Education", September 2004	Date of leaving records transferred to next school	DELETE	<p>Child Protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (the information does not need to be sent to a university)</p> <p>Where a child is removed from roll to be educated at home, the file should be copied to the Local Authority.</p>
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 whichever is the longer	DELETE	<p>It is important that a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's confidential personnel file, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. It will provide clarification in cases where a future DBS Disclosure reveals information from the police about an allegation that did not result in a criminal conviction. And it will help to prevent unnecessary reinvestigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least 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.</p>



Management

	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Log Books	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
Minutes of the Senior Leadership Team and other internal administrative bodies	Yes		Date of meeting + 5 years	Retain in the school for 5 years from meeting	Transfer to the Archives
Reports made by the head teacher or the management team	Yes		Date of report + 3 years	Retain in the school for 3 years from meeting	Transfer to the Archives
Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Closure of file + 6 years	DELETE	
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Date of correspondence + 3 years	DELETE	
Professional development	Yes		Closure + 6 years	DELETE	
School development plans	No		Closure + 6 years	Review	Offer to the Archives
Admissions	Yes		DOB of the pupil + 25 years	DELETE	



Pupils

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
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	Delete	
Pupil files	Yes	Limitation Act 1980		DOB of the pupil + 25 years	
Special Educational Needs files, reviews and Individual Education Plans	Yes		Date of leaving records transferred to next school	Delete	
Internal and external examination results	Yes		Current year + 5 years	Delete	

Pupils

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
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 DELETE
Statement maintained under The Education Act	Yes	SEN and Disability Act 2001 Section 1	DOB + 30 years	DELETE unless legal action is pending
Proposed statement or amended statement	Yes	SEN and Disability Act 2001 Section 1	DOB + 30 years	DELETE unless legal action is pending
Advice and information to parents regarding educational needs	Yes	SEN and Disability Act 2001 Section 1	Closure + 12 years	DELETE unless legal action is pending



Accessibility Strategy	Yes	SEN and Disability Act 2001 Section	Closure + 12 years	DELETE unless legal action is pending
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Children's SEN Files	Yes		DOB of pupil + 25 years then review – it may be appropriate to add an additional retention period in certain cases	DELETE unless legal action is pending
Parental permission slips for school trips – where there has been no major	Yes		Conclusion of the trip	SHRED
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 pupils on the trip need to be retained to show that the rules had been followed for all	SHRED
Records created by schools to obtain approval to run an Educational Visit outside the	No	3 part supplement to the H&S of Pupils on Educational Visits (HASPEV) (1998).	Date of visit + 10 years	SHRED

Curriculum				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Curriculum development	No		Current year + 6 years	DELETE
Curriculum returns	No		Current year + 3 years	DELETE
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 DELETE
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 DELETE



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 DELETE
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 SHRED
Pupils' work	No		Keep a sample of books and send other books home	It may be appropriate to review these records at the end of each year and allocate a new retention period or DELETE
Examination results	Yes		Current year + 6 years	DELETE
SATS records	Yes		Current year + 6 years	DELETE
PAN reports	Yes		Current year + 6 years	DELETE
Value added records	Yes		Current year + 6 years	DELETE

Staff records				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	DELETE
Staff Personal files	Yes		Termination + 7 years	DELETE
Interview notes and recruitment records	Yes		Date of interview + 6 months	SHRED
Pre-employment vetting information (including DBS checks)	No	DBS guidelines	Date of check + 6 months	SHRED
Disciplinary proceedings:	Yes	Where the warning relates to child protection issues then retain until the person's normal retirement age, or 10 years from the date of the allegation, whichever is the longer If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice.		
Oral warning			Date of warning + 6	DELETE



Written warning – level one			Date of warning + 6 months	DELETE
Written warning – level two			Date of warning + 12 months	DELETE
Final warning			Date of warning + 18 months	DELETE
			If child protection related then retain until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer. Otherwise DELETE immediately at the	
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	DELETE
Annual appraisal/assessment records	No		Current year + 5 years	SHRED
Salary cards	Yes		Last date of employment + 85 years	DELETE
Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI	Current year, + 3yrs	DELETE
Records held under Retirement Benefits Schemes (Information Powers) Regulations	Yes		Current year + 6 years	SHRED
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	



Health and Safety

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Accessibility Plans		Disability Discrimination Act	Current year + 6 years	DELETE
Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration		DELETE
Adults	Yes		Date of incident + 7 years	DELETE
Children	Yes		DOB of child + 25 years	DELETE
COSHH	No		Current year + 10 years [where appropriate an additional retention period may be allocated]	DELETE
Incident reports	Yes		Current year + 20 years	DELETE
Policy Statements	No		Date of expiry + 1 year	DELETE
Risk Assessments	No		Current year + 3 years	DELETE
Process of monitoring of areas where employees and persons are likely to have become in contact with			Last action + 40 years	DELETE
Fire Precautions log books			Current year + 6 years	DELETE



Administrative

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Employer's Liability certificate			Closure of the school + 40 years	SHRED	
Inventories of equipment and furniture			Current year + 6 years	DELETE	
School brochure or prospectus			Current year + 3 years		Transfer to Archives
Circulars (staff/parents/pupils)			Current year + 1 year	DELETE	
Newsletters, ephemera			Current year + 1 year	Review to see whether a further retention period is	Transfer to Archives
Visitors' book			Current year + 2 years	Review to see whether a further retention period is	Transfer to Archives
PTA/Old Pupils Associations			Current year + 6 years	Review to see whether a further retention period is	Transfer to Archives

Finance

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Annual Accounts		Financial Regulations	Current year + 6 years	Offer to the Archives	Annual Accounts
Loans and grants		Financial Regulations	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 under seal			Contract completion date + 12 years	DELETE	
Contracts under signature			Contract completion date + 6 years	DELETE	



Contracts monitoring records			Current year + 2 years	DELETE	
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Finance				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
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		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		Limitation Act 1980	Current year + 6 years	SHRED
School Fund – Cheque books			Current year + 3 years	SHRED
School Fund – Paying in books			Current year + 6 years then review	SHRED
School Fund – Ledger			Current year + 6 years then review	SHRED
School Fund – Invoices			Current year + 6 years then review	SHRED
School Fund – Receipts			Current year + 6 years	SHRED
School Fund – Bank statements			Current year + 6 years then review	SHRED
School Fund – School Journey books			Current year + 6 years then review	SHRED



Applications for free school meals, travel, uniforms etc			Whilst child at school	SHRED
Student grant applications			Current year + 3 years	SHRED
Free school meals registers	Yes	Financial Regulations	Current year + 6 years	SHRED
Petty cash books		Financial Regulations	Current year + 6 years	SHRED

Property					
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Title Deeds			Permanent	Permanent these should follow the property unless the property has been registered at the Land Registry	Offer to Archives if the deeds are no longer needed
Plans			Permanent	Retain in school whilst operational	Offer to Archives
Maintenance and contractors		Financial Regulations	Current year + 6 years	SHRED	
Leases			Expiry of lease + 6 years	SHRED	
Lettings			Current year + 3 years	SHRED	
Burglary, theft and vandalism report forms			Current year + 6 years	SHRED	
Maintenance log books			Last entry + 10 years	SHRED	
Contractors' Reports			Current year + 6 years	SHRED	



Other Records - Administration

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period
Financial Records			
Financial records – accounts, statements, invoices, petty cash	No		Current year + 6 years
Insurance			
Insurance policies – Employers Liability	No	Employers Liability Financial Regulations	The policies are kept for a minimum of 6 years and a maximum of 40 years depending on the type of policy
Claims made against insurance policies – damage to property	Yes		Case concluded + 3 years
Claims made against insurance policies – personal injury	Yes		Case concluded + 6 years
Human Resources			
Personal Files - records relating to an individual's employment history	Yes		Termination + 6 years then review
Pre-employment vetting information (including DBS checks)	No	DBS guidelines	Date of check + 6 months
Staff training records – general	Yes		Current year + 2 years
Training (proof of completion such as certificates, awards, exam	Yes		Last action + 7 years
Premises files (relating to maintenance)	No		Cessation of use of building + 7 years then review
Risk Assessments	No		Current year + 3 years
Staff training records – general	Yes		Current year + 2 years
Training (proof of completion such as certificates, awards, exam	Yes		Last action + 7 years
Premises and Health and Safety			



Premises files (relating to maintenance)	New		Cessation of use of building + 7 years then review
Risk Assessments	New		Current year + 3 years