Retention Policy

The school has a responsibility to maintain its records and record keeping systems. When doing this, the following factors will be taken into account:

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Their accessibility.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the schools' current practice, the requirements of current legislation and best practice and guidance. It may be amended by the school from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect. The school may also vary any parts of this procedure, including any time limits, as appropriate in any case.

Data Protection

This policy sets out how long employment-related and pupil data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the General Data Protection Regulation (GDPR) and the Freedom of Information Act 2000. Data will be stored and processed to allow for the efficient operation of the school. The Data Protection Policy outlines its duties and obligations under the GDPR.

Retention Schedule

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the school will adhere to the standard retention times listed within that schedule.

Paper records will be regularly monitored by annual reviews at the end of each academic year.

Electronic records will be regularly monitored by annual reviews at the end of each academic year.

The schedule is a relatively lengthy document listing the many types of records used by the school and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

Destruction of Records

Where records have been identified for destruction, they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information, or sensitive policy information should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate waste paper merchant. All electronic information will be deleted.

The school maintains a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in this list at least:

- File reference (or other unique identifier);
- File title/description;
- Number of files;
- Name of the authorising Officer;
- Date destroyed or deleted from system; and
- Person(s) who undertook destruction.

Record of Safeguarding

Any allegations made that are found to be malicious must not be part of the personnel records.

For any other allegations made, the school must keep a comprehensive summary of the allegation made, details of how the investigation was looked into and resolved and any decisions reached. This should be kept on the personnel files of the accused.

Any allegations made of sexual abuse should be preserved by the school for the term of an inquiry by the Independent Inquiry into Child Sexual Abuse. All other records (for example, the personnel file of the accused) should be retained until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Guidance from the Independent Inquiry Child Sexual Abuse states that prolonged retention of personal data at the request of an Inquiry would not contravene data protection regulation provided the information is restricted to that necessary to fulfil potential legal duties that a school may have in relation to an Inquiry.

Whilst the Independent Inquiry into Child Sexual Abuse is ongoing, it is an offence to destroy any records relating to it. At the conclusion of the Inquiry, it is likely that an indication regarding the appropriate retention periods of the records will be made.

Archiving

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. A database of the records sent to the archives is maintained by the school.
The appropriate staff member, when archiving documents should record in this list the following information:

- File reference (or other unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising officer.

Transferring Information to another 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 or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

Transferring Information to another School

We retain the Pupil's educational record whilst the child remains at the school. Once a pupil leaves the school, the file should be sent to their next school. The responsibility for retention then shifts onto the next school. We retain the file for a year following transfer in case any issues arise as a result of the transfer. We may delay destruction for a further period where there are special factors such as potential litigation.

Responsibility and Monitoring

The Head Teacher has primary and day-to-day responsibility for implementing this Policy. The Data Protection Officer, in conjunction with the school is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The Data Protection Officer will consider the suitability and adequacy of this policy and report improvements directly to management.
Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.
Management at all levels are responsible for ensuring those reporting to them, are made aware of and understand this Policy and are given adequate and regular training on it.

Emails

Email accounts are not a case management tool in itself. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost.

Pupil Records

All schools, with the exception of independent schools, are under a duty to maintain a pupil record for each pupil. Early Years will have their own separate record keeping requirements. If a child changes schools, the responsibility for maintaining the pupil record moves to the next school. We retain the file for a year following transfer in case any issues arise as a result of the transfer.

Management Information System (MIS) Arbor

All schools will use a management information system to store their staff, pupil and parent information. Arbor is one of the fastest growing MIS systems in the UK. Their website specifies that it offers solutions for primary, high schools and MATs. However, the system is set up to comply with retention standards applicable to High schools. Due to this primary schools will be storing a lot of pupil data longer than is necessary for them.
This has been discussed with the DfE and Information Commissioners Office. Neither feel this is a concern.

Please note that no pupil records can be deleted from Arbor until that child reaches the age of 23 years. This change to the publicised schedule below, is for these digital records only. For paper documents please follow the schedule below.

Retention Schedule

File Description	Retention Period
Employment Records	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates
Job applications and interview records of successful candidates	6 years after employment ceases
Written particulars of employment, contracts of employment and changes to terms and conditions	6 years after employment ceases
Right to work documentation including ID documents	6 years after employment ceases
Immigration checks	2 years after employment ceases
DBS checks and disclosures of criminal records	As soon as practical after the check has been completed and outcome recorded. Unless in exceptional circumstances e.g. to allow for consideration and resolution of any disputes or complaints. In these cases, no longer than 6 months.
Change of personal details notifications	No longer than 6 months after receiving the notification
Emergency contact details	Destroyed on termination
Personnel records	6 years after employment ceases
Annual leave records	6 years after the end of the year they relate to or possibly longer if leave can be carried over from year to year

Consents for the processing of personal, sensitive and special category data	For as long as the data is processed and for up to 6 years afterwards
Working Time Regulations: • Opt out forms • Records of compliance with WTR	• 2 years from the date into which they were entered into • 2 years after the relevant period
Disciplinary records	6 years after employment ceases – Sanction letters only to be kept on the personnel file until sanction lapse date
Training	6 years after employment ceases or length of time by the professional body
Annual appraisal/assessment records	Current year + 6 years
Professional development plans	6 years from life of plan
Allegations of a child protection nature against a member of staff including where the allegation is founded	10 years from the date of the allegation or the normal persons retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed
Financial and Payroll Records	
Pension records	12 years
Retirement benefit schemes	6 years from the end of the scheme year in which the event took place
Payroll and wage records	6 year after the end of the tax year they relate to
Maternity/Adoption/Paternity leave records	3 years after the end of the tax year they relate to
Statutory sick pay	3 years after the end of the tax year they relate to
Current bank details	Until updated plus 3 years
Bonus sheets	Current year plus 3 years
Time sheets/clock cards/flexitime	Current year plus 3 years

PP Fund records	Date pupil leaves the school plus 6 years
National Insurance (schedule of payments)	Current year plus 6 years
Insurance	Current year plus 6 years
Overtime	Current year plus 3 years

Annual Accounts	Current year plus 6 years
Loans and grants managed by the school	Date of last payment on the loan plus 12 years
All records relating to the creation and management of budgets	Life of the budget plus 3 years
Invoices, receipts, order books and requisitions, delivery notices	Current financial year plus 6 years
Student grant applications	Current year plus 3 years
School fund documentation (including but not limited to invoices, cheque books, receipts, bank statements)	Current year plus 6 years
Free school meal registers (where the register is used for the basis of funding)	Current year plus 6 years
School meals registers and summary sheets	Current year plus 3 years
Agreements and Administrative Paperwork	
Collective workforce agreements and past agreements that could affect present employees	Permanently
Trade Union agreements	10 years after ceasing to be effective
School development plans	3 years from the life of the plan
Visitor book and signing in sheets	6 Years
Newsletters and circulars to staff, parents and pupils	1 year

Minutes of SLT team meetings	Date of the meetings plus a minimum of 3 years
Reports created by the Head Teacher or the SLT	Date of the reports plus a minimum of 3 years
Records relating to the creation and publication of the school prospectus	Current academic year plus 3 years

Health & Safety Records	
Health & Safety consultations	Permanently
Health & Safety risk assessments	Life of risk assessment plus 3 years
Health & Safety policy statements	Life of policy plus 3 years
Any records relating to any reportable death, injury, disease or dangerous occurrence	Date of incident plus 3 years provided that all records relating to the incident are held on the personnel file
Accident reporting records relating to individuals who are **under** the age of 21 at the time of the incident	Accident book should be retained for 3 years after the date of the last entry, all records relating to the incident are held until the child reaches 21
Accident reporting records relating to individuals over the age of 21 at the time of the incident	Accident book should be retained for 3 years after the date of the last entry, all additional records relating to the instances are kept on the personnel file
Fire precaution logs	Current year plus 3 years
Medical records and details of: • Control of lead at work; • Employees exposed to asbestos dust • Records specified by the Control of Substances Hazardous to health Regulations (COSHH)	40 years from the date of the last entry made in the record
Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made
Temporary and Casual Workers	

Records relating to hours worked and payments made to workers	3 years
Governing Body Documents	
Instruments of government	For the life of the school
Meeting schedules	Current year
Minutes – principle set (signed)	Generally kept for the life of the school

Agendas – principal copy	Where possible the agenda should be stored with the principal set of minutes
Agendas – additional copies	Date of meeting
Policy documents created and administered by the governing body	Until replaced
Register of attendance at full governing body meetings	Date of last meeting I the book plus 6 years
Annual reports required by the Department of Education	Date of the report plus 10 years
Records relating to complaints made to an investigated by the governing body of head teacher	Major complaints: current year plus 6 years. If negligence involved: current year plus 15 year. If child protection or safeguarding issues are involved then: current year plus 40 years.
Correspondence sent or received by the governing body or head teacher.	General correspondence should be retained for current year plus 3 years.
Records relating to the terms of office of serving governors, including evidence of appointment	Date of appointment ceases plus 6 years
Register of business interests	Date of appointment ceases plus 6 years
Records relating to the training required and received by governors.	Date appointment ceases plus 6 years

Records relating to the appointment of a clerk to the governing body	Date on which clerk appointment ceases plus 6 years
Governor personnel files	Date of appointment plus 6 years
Pupil Records	
Details of whether admission is successful/unsuccessful	1 year from date of admission/non admission
Proof of address supplied by parents as part of admission process	Current year plus 1 year
Admissions register	Entries to be preserved for 3 years from date of entry
Pupil record	Primary – whilst the child attends the school Secondary – until the child reaches the age of 25
Attendance registers	3 years from the date of entry
Correspondence relating to absence (authorised or unauthorised)	Current academic year plus 2 years
Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Date of birth f the pupil plus 31 years (Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan)
Child protection information	DOB of the child plus 25 years
Exam results (pupil copy)	1-3 years from the date the results are released
Examination results (school copy)	Current year plus 6 years
Allegations of sexual abuse	For the time period of an inquiry by the Independent Inquiry into Child Sexual Abuse
Records relating to any allegation of a child protection nature against a member of staff	

	Until the accused normal retirement age or 10 years from the date of the allegation (whichever is longer)
Consents relating to school activities as part of GDPR compliance	Consent will last whilst the pupil attends school
Pupil's work	Where possible, returned to pupil at the end of the academic year, otherwise the work should be retained for the current year plus 1 year
Mark books	Current year plus 1 year
Schemes of work	Current year plus 1 year
Timetable	Current year plus 1 year
Class record book	Current year plus 1 year
Record of homework set	Current year plus 1 year
Photographs of children	For the time the child is in the school, unless consent is given to extend
Parental consent forms for school trips where there has not been an accident	End of trip or end of the academic year
Parental consent forms for a school trip where there has been a major incident	DOB of the pupil involved in the incident plus 25 years. Permission slips for all pupils on the trip should be retained to demonstrate the rules had been followed by all.
Other Records	
Emails	Regular (at least termly) deletion of inbox and routine transfer to relevant electronic filing system. Delete deleted items at least annually.
CCTV	No more than 1 calendar month
Privacy notices	Until replaced plus 6 years
Inventories of furniture and equipment	Current year plus 6 years

All records relating to the maintenance of the school carried out by contractors or employees	Whilst the building belongs to the school
Records relating to the letting of school premises	Current year plus 6 years
Records relating to the creation and management of Parent Teachers Associations	Current year plus 6 years
Referral forms	Whilst the referral is current
Contact data sheets	Current year then review, if contact is no longer active then destroy
Parent and Public Complaints	
Complaint data	1 year after finalisation of an outcome, unless statutory regulations apply
Anonymised data	5 years after finalisation of an outcome