



## St Peter's Church of England (Aided) Primary School Data Retention Policy

The Governing Body of St Peter's Church of England (Aided) Primary School adopted this policy on 17<sup>th</sup> March 2021

Signed: \_\_\_\_\_ (*Chair of Governors*)

Signed: \_\_\_\_\_ (*Head Teacher*)

Review every 2 years

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](mailto:krobey@leics.gov.uk)

Gill Wood, Assistant Business Partner, Leicestershire County Council, 0116 305 7976 [gwood@leics.gov.uk](mailto:gwood@leics.gov.uk)

## Data Retention Policy

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
<b>1. Safeguarding</b>			
Child Protection files	Yes	DOB + 25 years	<b>SHRED</b> 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	<b>SHRED</b> 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.
<b>2. Governors</b>			
Minutes • <i>Principal set (signed)</i>	No	Permanent	Retain in school for 6 years from date of meeting. <b>Transfer to Archives</b>
• <i>Inspection copies</i>	No	Date of meeting + 3 years	<b>DESTROY</b> [If these minutes contain any sensitive personal information they should be shredded]
Agendas	No	Date of meeting	<b>DESTROY</b>
Reports	No	Date of report+ 6 years	Retain in school for 6 years from date of meeting. <b>Transfer to Archives</b> (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. <b>Transfer to Archives</b> (The appropriate archivist will then take a sample for permanent preservation)
Trusts and Endowments	No	Permanent	Retain in school whilst operationally required. <b>Transfer to Archives</b>
Action Plans	No	Date of action plan + 3	<b>DESTROY</b> It may be appropriate to offer to the Archives for a sample to be taken if

## Data Retention Policy

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
		years	the school has been through a difficult period
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) <b>Transfer to Archives</b> (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. <b>Complaints alleging possible harm to a young person by a member of staff are covered in section 1 above.</b>
Annual Reports required by the DCSF	No	Date of report + 10 years	<b>Transfer to Archives</b> (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	<b>Transfer to Archives</b> (The appropriate archivist will then take a sample for permanent preservation)
<b>3. Management</b>			
Log Books (Books where the Head Teacher or another member of staff keeps 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. <b>Transfer to the Archives</b> 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	Yes	Date of meeting + 5 years	Retain in the school for 5 years from meeting. <b>Transfer to Archives</b> (The appropriate archivist will then take a sample for permanent preservation)

## Data Retention Policy

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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. <b>Transfer to Archives</b> (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	<b>DESTROY</b> 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	<b>DESTROY</b> If these records contain sensitive information they should be shredded
Professional development plans	Yes	Closure+ 6 years	<b>SHRED</b>
School development plans	No	Closure+ 6 years	Review Offer to the Archives
<b>4.Pupils</b>			
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. <b>Transfer to the Archives</b>

## Data Retention Policy

Attendance registers	Yes	Date of register + 3 years	<b>DESTROY</b> (If these records are retained electronically any back-up copies should be destroyed at the same time)
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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)	<b>SHRED</b>
Letters authorising absence	No	Date of absence + 2 years	<b>SHRED</b>
Absence books	Yes	Current year+ 6 years	<b>SHRED</b>
<ul style="list-style-type: none"> <li>• <i>Public</i></li> <li>• <i>Internal examination results</i></li> </ul>	<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><b>DESTROY</b> Any certificates left unclaimed should be returned to the appropriate Examination Board</p> <p><b>DESTROY</b></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 <b>DESTROY</b>

## Data Retention Policy

Statement maintained under The Education Act 1996 - Section 324	Yes	DOB + 30 years	<b>DESTROY</b> 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	<b>DESTROY</b> unless legal action is pending
Advice and information to parents regarding educational needs	Yes	Closure + 12 years	<b>DESTROY</b> unless legal action is pending
Accessibility Strategy	Yes	Closure + 12 years	<b>DESTROY</b> unless legal action is pending
Children SEN Files	Yes	Closure + 35 years	<b>DESTROY</b> unless legal action is pending
<b>5. Curriculum</b>			
Curriculum development	No	Current year + 6 years	<b>DESTROY</b>
Curriculum returns	No	Current year + 3 years	<b>DESTROY</b>
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 <b>DESTROY</b>
Schemes of work	No	Current year + 1year	It may be appropriate to review these records at the end of each year and allocate a new retention period or <b>DESTROY</b>
Timetable	No	Current year + 1year	It may be appropriate to review these records at the end of each year and allocate a new retention period or <b>DESTROY</b>
Class record books	No	Current year + 1year	It may be appropriate to review these records at the end of each year and allocate a new retention period or <b>DESTROY</b>
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 <b>DESTROY</b>
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 <b>DESTROY</b>
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 <b>DESTROY</b>

## Data Retention Policy

Examination results	Yes	Current year + 6 years	<b>DESTROY</b> (These records should be shredded)
Value added records	Yes	Current year + 6 years	<b>DESTROY</b> (These records should be shredded)

Function Description	Data Protection issues	Retention period operational	Action at end of administrative life of the record
<b>6. Human Resources</b>			
Timesheets, sick pay	Yes	Current year + 6 years	<b>SHRED</b>
Staff Personal files	Yes	Termination + 7 years	<b>SHRED</b>
Interview notes and recruitment records	Yes	Date of interview + 6 months	<b>SHRED</b>
Pre-employment vetting information (including unsuccessful DBS checks)	No	Date of check + 6 months	<b>SHRED</b> 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 <b>except</b> those relating to child protection issues (see section 1 above):  <ul style="list-style-type: none"> <li>• <i>oral warning</i></li> <li>• <i>written warning - level one</i></li> <li>• <i>written warning - level two</i></li> <li>• <i>final warning</i></li> </ul>	Yes	<p>Date of warning + 6 months</p> <p>Date of warning + 6 months</p> <p>Date of warning + 12 months</p> <p>Date of warning + 18 months</p>	<p><b>SHRED</b> If this is placed on a personal file, it must be weeded from the file.</p> <p><b>SHRED</b> If this is placed on a personal file, it must be weeded from the file.</p> <p><b>SHRED</b> If this is placed on a personal file, it must be weeded from the file.</p> <p><b>SHRED</b> If this is placed on a personal file, it must be weeded from the file.</p>



## Data Retention Policy

• <i>case not found (except child protection allegations see section 1 above)</i>			<b>DESTROY</b> 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	<b>SHRED</b>
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 <b>SHRED</b>
Maternity pay records	Yes	Current year, + 3yrs	<b>SHRED</b>
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Last payment + 6 years	<b>SHRED</b>
<b>7. Health and Safety</b>			
Accessibility Plans		Current year+ 6 years	<b>DESTROY</b>
Accident Reporting			
• <i>Adults – Accident Book</i>	Yes	Last entry in the accident book+ 3 years	<b>SHRED</b>
• <i>Adults – Internal Reports</i>	Yes	Current year+ 3 years	<b>SHRED</b>
• <i>Children</i>	Yes	DOB + 25 years.	<b>SHRED</b> 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.

## Data Retention Policy

COSHH		Current year+ 10 years	Review (where appropriate an additional retention period may be allocated)
Incident reports	Yes	Current year+ 20 years	<b>SHRED</b>
Policy Statements		Date of expiry + 1 year	<b>DESTROY</b>
Risk Assessments		Date assessment superseded + 3 years	<b>DESTROY</b>
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 <b>asbestos</b>		Last action + 40 years	<b>DESTROY</b>
Process of monitoring of areas where employees and persons are likely to have come in contact with <b>radiation</b>		Last action + 50 years	<b>DESTROY</b>
Fire Precautions log books		Current year + 6 years	<b>DESTROY</b>
<b>8. Administrative</b>			
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	<b>DESTROY</b>
General file series		Current year + 5 years	Review to see whether a further retention period is required <b>Transfer to Archives</b> (The appropriate archivist will then take a sample for permanent preservation)
School brochure/prospectus		Current year + 3 years	<b>Transfer to Archives</b> (The appropriate archivist will then take a sample for permanent preservation)
Circulars		Current year + 1year	<b>DESTROY</b>

## Data Retention Policy

Newsletters, ephemera		Current year + 1 year	Review to see whether a further retention period is required <b>Transfer to Archives</b> (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 <b>Transfer to Archives</b> (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 <b>Transfer to Archives</b> (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
<b>9. Financial</b>			
Annual Accounts		Current year + 6 years	<b>Offer to Archives</b>
Loans and grants		Date of last payment on loan + 12 years	Review to see whether a further retention period is required <b>Transfer to Archives</b> (The appropriate archivist will then take a sample for permanent preservation)
Contracts		Contract completion date + 12 years	<b>SHRED</b>
• <i>under seal</i>			
• <i>under signature</i>		Contract completion date + 6 years	<b>SHRED</b>
• <i>monitoring records</i>		Current year+ 2 years	<b>SHRED</b>
Copy orders		Current year + 2 years	<b>SHRED</b>
Budget reports, budget monitoring etc		Current year + 3 years	<b>SHRED</b>
Invoice, receipts and other records covered by the Financial Regulations		Current year + 6 years	<b>SHRED</b>
Annual Budget and background papers		Current year + 6 years	<b>SHRED</b>

## Data Retention Policy

Order books and requisitions		Current year + 6 years	<b>SHRED</b>
Delivery Documentation		Current year + 6 years	<b>SHRED</b>
Debtors' Records		Current year + 6 years	<b>SHRED</b>
School Fund-Cheque books		Current year + 3 years	<b>SHRED</b>
<b>Function Description</b>	<b>Data Protection issues</b>	<b>Retention period operational</b>	<b>Action at end of administrative life of the record</b>
School Fund-Paying in books		Current year + 6 years	<b>SHRED</b>
School Fund-Ledger		Current year + 6 years	<b>SHRED</b>
School Fund – Invoices		Current year + 6 years	<b>SHRED</b>
School Fund-Receipts		Current year + 6 years	<b>SHRED</b>
School Fund - Bank statements		Current year + 6 years	<b>SHRED</b>
School Fund - School Journey books		Current year + 6 years	<b>SHRED</b>
Applications for free school meals, travel, uniformsetc		Whilst child at school	<b>SHRED</b>
Student grant applications		Current year + 3 years	<b>SHRED</b>
Free school meals registers	Yes	Current year + 6 years	<b>SHRED</b>
Petty cash books		Current year + 6 years	<b>SHRED</b>
<b>10. Property</b>			
Title Deeds		Permanent. These should follow the property	<b>Offer to Archives</b>

## Data Retention Policy

Plans		Permanent.	<b>Offer to Archives</b> Retain until superseded then offer to archives before destruction
Maintenance and contractors		Current year + 6 years	<b>DESTROY</b>
Leases		Expiry of lease + 6 years	<b>DESTROY</b>
Lettings		Current year + 3 years	<b>DESTROY</b>
Burglary, theft and vandalism report forms		Current year + 6 years	<b>SHRED</b>
<b>Function Description</b>	<b>Data Protection issues</b>	<b>Retention period operational</b>	<b>Action at end of administrative life of the record</b>
Maintenance log books		Last entry + 10 years	<b>DESTROY</b>
Contractors' Reports		Current year + 6 years	<b>DESTROY</b>
<b>11. Local Authority</b>			
Secondary transfer sheets (Primary)	Yes	Current year + 2 years	<b>SHRED</b>
Attendance returns	Yes	Current year + 1 year	<b>DESTROY</b>
Circulars from LA		Whilst operationally required	Review to see whether a further retention period is required <b>Transfer to Archives</b> (The appropriate archivist will then take a sample for permanent preservation)
<b>12. DCSF</b>			
HMI reports			These do not need to be kept any longer <b>Transfer to Archives</b> (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 <b>Transfer to Archives</b> (The appropriate archivist will then take a sample for permanent preservation)
Census returns (SIMS does not retain an electronic copy)		Current year + 6 years	<b>DESTROY</b>
Circulars from DCSF		Whilst operationally required. Review to see whether a further retention period is required	<b>Transfer to Archives</b> (The appropriate archivist will then take a sample for permanent preservation)

<b>13. Connexions</b>			
Service level agreements		Until superseded	<b>SHRED</b>
Work Experience agreement		DOB of child + 18 years	<b>SHRED</b>
<b>14. School Meals</b>			
Dinner Register		Current year + 3 years	<b>SHRED</b>
School Meals Summary Sheets		Current year + 3 years	<b>SHRED</b>
<b>Function Description</b>	<b>Data Protection issues</b>	<b>Retention period operational</b>	<b>Action at end of administrative life of the record</b>
<b>15. Arts in Education</b>			
Pupil Reports		6 years from event	<b>SHRED</b>
Pupil registration forms		6 years from registration	<b>SHRED</b>

