

ST. JOHN'S CATHOLIC JUNIOR SCHOOL



**DATA RETENTION POLICY
SPRING TERM 2020**

Accepted by Assets & Resources Cttee 2.3.2020

Accepted by Governing Body 26.3.2020

DATA RETENTION POLICY

The School has a responsibility to maintain its records and record keeping systems. When doing this, the School will take account of the following factors: -

- 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 School's 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 School's 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 the School Administration Officers (SAOs).

Electronic records will be regularly monitored by the SAOs.

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; and
- Name of the authorising officer.

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 SAOs. 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 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 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.

RESPONSIBILITY AND MONITORING

The SAOs 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.

By order of the Governing Body of St Scholastica's Catholic Primary School. Spring 2019

(Signed) _____ Date: _____
(Head teacher)

(Signed) _____ Date: _____
(Chair of Governing Body)

Presented to Staff: April 2020

Review date: April 2021

GOVERNORS			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
Minutes			
• <i>Principal set (signed)</i>	No	Permanent	Retain in school for 6 years from date of meeting Destroy
• <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 Destroy
Annual Parents' meeting papers	No	Date of meeting + 6 years	Retain in school for 6 years from date of meeting Destroy
Instruments of Government	No	Permanent	Retain in school whilst school is open Transfer to Archives when the school has closed
Trusts and Endowments	No	Permanent	Retain in school whilst operationally required Transfer to Archives
Action Plans	No	Date of action plan + 3 years	DESTROY
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) Destroy
Complaints files	Yes	Date of resolution of complaint + 6 years	DESTROY BY SHREDDING
Annual Reports required by the Department for Education and Skills	No	Date of report + 10 years	Retain in school for 10 years from date of report. Transfer to Archives
Proposals for schools to become, or be established as Specialist Status schools	No	Current year + 3 years	Destroy

5.2 Management

Basic file description	Data Prot Issues	Retention Period [operational]	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 Management Team and other internal administrative bodies	Yes	Date of meeting + 5 years	Retain in the school for 5 years from meeting Destroy
Reports made by the Headteacher or the management team	Yes	Date of report + 3 years	Retain in the school for 3 years from meeting Destroy
Records created by Headteacher, members of the Senior Leadership Team and other members of staff with administrative responsibilities	Yes	Closure of file + 6 years	DESTROY
Correspondence created by Headteacher, members of the Senior Leadership Team and other members of staff with administrative responsibilities	No	Date of correspondence + 3 years	DESTROY
Professional development plans	Yes	Completion of plan + 6 years	DESTROY
School development plans	No	Completion of plan + 6 years	Retain in the school for 6 years from the date of completion of the plan Destroy

PUPILS			
Basic file description	Data Prot Issues	Retention Period [operational]	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	DESTROY [As these records are retained electronically any backup copies should be destroyed at the same time]
Child Protection Record	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. Complete file sent to receiving school to named person and receipt of file letter kept on record until the child reaches the age of 25
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. In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service
Children SEN Files (to include original Individual Education Plans, Reviews, All Statements (proposed, amended or maintained under The Education Act 1996 – Section 324)	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. Complete file sent to receiving school to named person and receipt of file letter kept on record until the child reaches the age of 25.
Advice and information to parents regarding educational needs	Yes	Until the child turns 25	DESTROY unless legal action is pending
Accessibility Strategy	Yes	Until the child turns 25	DESTROY unless legal action is pending
Letters authorising absence	No	Date of absence + 2 years	DESTROY
Absence books		Current year + 6 years	DESTROY
Examination results	Yes		
• <i>Public</i>	No	Year of examinations + 6 years	DESTROY Any certificates left unclaimed should be returned to the appropriate Examination Board
• <i>Internal examination results</i>	Yes	Current year + 5 years ⁵	DESTROY

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
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5.4 Curriculum			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
Curriculum development	No	Current year + 6 years	DESTROY
Curriculum returns	No	Current year + 3 years	DESTROY
School syllabus	No	Current year + 1 year	DESTROY
Schemes of work	No	Current year + 1 year	DESTROY
Timetable	No	Current year + 1 year	DESTROY
Class record books	No	Current year + 1 year	DESTROY
Mark Books	No	Current year + 1 year	DESTROY
Record of homework set	No	Current year + 1 year	DESTROY
Pupils' work	No	Current year + 1 year	DESTROY
Examination results	Yes	Current year + 6 years	DESTROY
SATS records	Yes	Current year + 6 years	DESTROY

5.6 Health and Safety			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
Accessibility Plans		Current year + 6 years	DESTROY
Accident Reporting			
• <i>Adults</i>	Yes	Current year + 3 years	DESTROY
• <i>Children</i>	Yes	DOB + 25 years ¹	DESTROY
COSHH		Current year + 10 years	Review [where appropriate an additional retention period may be allocated]
Incident reports	Yes	Current year + 20 years	DESTROY

¹ A child may make a claim for negligence for 7 years from their 18 birthday. To ensure that all records are kept until the pupil reaches the age of 25 this retention period has been applied.

Policy Statements		Date of expiry + 1 year	DESTROY
Risk Assessments		Current year + 3 years	DESTROY
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

5.7 Administrative			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
Employer's Liability certificate		Permanent whilst the school is open	DESTROY once the school has closed
Inventories of equipment and furniture		Current year + 6 years	DESTROY
General file series		Current year + 5 years	Retain in school for 5 years
School brochure/prospectus		Current year + 3 years	DESTROY
Circulars (staff/parents/pupils)		Current year + 1 year	DESTROY
Newsletters, ephemera		Current year + 1 year	Retain in school for 1 year DESTROY
Visitors' book		Current year + 2 years	DESTROY
PTA/Old Pupils' Associations		Current year + 6 years	Retain in school for 6 years DESTROY

5.10 Employment Records			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
Job applications and interview records of unsuccessful candidates	Yes	Six months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference. In this case, application forms will give applicants the opportunity to object to their details being retained	DESTROY
Job applications and interview records of successful candidates	Yes	6 years after employment ceases	DESTROY
Written particulars of employment, contracts of employment and changes to terms and conditions	Yes	6 years after employment ceases	DESTROY

Right to work documentation including identification documents	Yes	2 years after employment ceases	DESTROY
Immigration checks	Yes	Two years after the termination of employment	DESTROY
DBS checks and disclosures of criminal records forms	Yes	As soon as practicable after the check has been completed and the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months.	DESTROY
Change of personal details notifications	Yes	No longer than 6 months after receiving this notification	DESTROY
Emergency contact details	Yes	Destroyed on termination	DESTROY
Personnel and training records	Yes	While employment continues and up to six years after employment ceases	DESTROY
Annual leave records	Yes	Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year	DESTROY
Consents for the processing of personal and sensitive data	Yes	For as long as the data is being processed and up to 6 years afterwards	DESTROY
Working Time Regulations: • Opt out forms • Records of compliance with WTR	Yes	Two years from the date on which they were entered into Two years after the relevant period	DESTROY
Disciplinary and training records	Yes	6 years after employment ceases	DESTROY
Allegations of a child protection nature against a member of staff including where the allegation is founded	Yes	10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed.	

5.10 Finance & Payroll Records			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
Pension records	Yes	12 years	DESTROY
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	Yes	6 years from the end of the scheme year in which the event took place	DESTROY
Payroll and wage records	Yes	6 years after end of tax year they relate to	DESTROY
Maternity/Adoption/Paternity Leave records	Yes	3 years after end of tax year they relate to	DESTROY
Statutory Sick Pay	Yes	3 years after the end of the tax year they relate to	DESTROY

Current bank details	Yes	No longer than necessary	DESTROY
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5.8 Finance			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
Annual Accounts		Current year + 6 years	DESTROY
Loans and grants		Date of last payment on loan + 12 years	DESTROY
Contracts			
• under seal		Contract completion date + 12 years	DESTROY
• under signature		Contract completion date + 6 years	DESTROY
• monitoring records		Current year + 2 years	DESTROY
Copy orders		Current year + 2 years	DESTROY
Budget reports, budget monitoring etc.		Current year + 3 years	DESTROY
Invoice, receipts and other records covered by the Financial Regulations		Current year + 6 years	DESTROY
Annual Budget and background papers		Current year + 6 years	DESTROY
Order books and requisitions		Current year + 6 years	DESTROY
Delivery Documentation		Current year + 6 years	DESTROY
Debtors' Records		Current year + 6 years	DESTROY
School Fund – Cheque books		Current year + 3 years	DESTROY
School Fund – Paying in books		Current year + 6 years	DESTROY
School Fund – Ledger		Current year + 6 years	DESTROY
School Fund – Invoices		Current year + 6 years	DESTROY
School Fund – Receipts		Current year + 6 years	DESTROY
School Fund – Bank statements		Current year + 6 years	DESTROY
School Fund – School Journey books		Current year + 6 years	DESTROY
Applications for free school meals, travel, uniforms etc.		Whilst child at school	DESTROY
Student grant applications		Current year + 3 years	DESTROY
Free school meals registers	Yes	Current year + 6 years	DESTROY
Petty cash books		Current year + 6 years	DESTROY

5.9 Property			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
Title Deeds		Permanent Non-voluntary aided schools – held at Archives Voluntary aided schools – held by trustees	These should follow the property
As-built plans		Permanent	Retain in school whilst operational then Transfer to Archives
Draft plans		3 years	DESTROY
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	DESTROY
Maintenance log books		Last entry + 10 years	DESTROY
Contractors' Reports		Current year + 6 years	DESTROY

5.10 LEA			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
Secondary transfer sheets (Primary)	Yes	Current year + 2 years	DESTROY
Attendance returns	Yes	Current year + 1 year	DESTROY
Circulars from LEA		Whilst operationally required	1) pre-2001 - DESTROY 2) post 2001 - DESTROY

511 DfES			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
HMI reports		These do not need to be kept any longer	Destroy
OFSTED reports and papers		Replace former report with any new inspection report	Retain in school while operationally required Destroy
Returns		Current year + 6 years	DESTROY
Circulars from DfES		Whilst operationally required	Retain in school while operationally required Destroy

5.12 School Meals			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
School Meals Register		Current year + 3 years	DESTROY
Free School Meals Dinner Register		Current year + 6 years	DESTROY
School Meals Summary Sheets		Current year + 3 years	DESTROY

5.13 All Records			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
All pre-1920 records			Transfer to Archives

Monitoring and Review

This policy has been reviewed and approved by the Governors onand will be reviewed and updated as necessary every 2 years.

File Destruction Log

Date	File Reference	File Title	No of files	Signature of authorising officer