

HOLY TRINITY CE SCHOOL

Data Retention Policy

**Policy Review**

This policy will be reviewed in full by the Governing Body every 2 years unless needed sooner.

The policy was agreed by the Governing Body in July 2019.

It is due for review – *July 2021.*

Signature …………………………………. Date ……………………

Head Teacher

Signature ………………….………………. Date ….…………………

Chair of Governors

1. **The purpose of the Retention Policy**

The retention policy stipulates the length of time a record needs to be retained and the action which should be taken when it is of no further administrative use.

Members of staff are expected to manage their current record keeping systems using the retention schedule, and to take account of the different kinds of retention periods when creating new recording systems.

The retention schedule refers to all information, regardless of the media in which they are stored.

1. **What to do with records once they have reached the end of their administrative life.**

**2a Destruction 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 shredded before disposal.

**2b 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.

**2c 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.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **6.1 Child Protection**  **The retention and use of records relating to child protection matters concerning pupils, and child protection allegations against staff requires specific guidance in this schedule. This will be subject to update following implementation of the recommendations by Sir Michael Bichard.** | | | | | |
| **Basic file description** | **Data**  **Prot Issues** | **Statutory Provisions** | **Retention Period [operational]** | **Action at the end of the administrative life of the record** | |
| Child Protection files | Yes | Education Act 2002, s175,  related guidance “Safeguarding Children in Education”, September 2004. | DOB + 25 years | SHRED | 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 Education Authority. |
| Allegation of a child protection nature against a member of staff, including where the allegation is unfounded. | Yes | Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance) Education Act 2002 guidance “Dealing with Allegations of Abuse against  Teachers and Other Staff” November 2005. | Until the person’s normal retirement age, or 10 years from the date of the allegation if that’s longer. | SHRED | 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 limite4d 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. |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **6.2 Governors** | | | | | |
| **Basic file description** | **Data**  **Prot Issues** | **Statutory Provisions** | **Retention Period [operational]** | **Action at the end of the administrative life of the record** | |
| Minutes |  |  |  |  |  |
| * Head set (signed) | No |  | Permanent | Retain in school for 6 years from date of meeting. | Transfer to Archives. |
| * Inspection copies | 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. | Transfer to Archives. [The appropriate archivist will then take a sample for permanent preservation.] |
| 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 | It may be appropriate to offer to the Archives for a sample to be taken if 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). | Transfer to Archives. [The appropriate archivist will then take a sample for permanent preservation.] |
| Complaints files | Yes |  | Date of resolution | Retain in school for the first |  |
|  |  | of complaint + 6 | six years. |
|  |  | years | Review for further retention |
|  |  |  | in the case of contentious |
|  |  |  | disputes. |
|  |  |  | Destroy routing complaints. |
|  |  |  | **Complaints alleging** |
|  |  |  | **possible harm to a young** |
|  |  |  | **person by a member of** |
|  |  |  | **staff are covered in 6.1** |
|  |  |  | **above.** |
| Annual Reports | No | Education (Governors’ Annual | Date of report + |  | Transfer to Archives. [The |
| required by the |  | Reports) (England) | 10 years | appropriate archivist will then take |
| Department for |  | (Amendment) Regulations 2002. |  | a sample for permanent |
| Education and Skills |  | SI 2002 No 1171 |  | preservation.] |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **6.3 Management** | | | | | |
| **Basic file description** | **Data**  **Prot Issues** | **Statutory Provisions** | **Retention Period [operational]** | **Action at the end of the administrative life of the record** | |
| Log Books | Yes2 |  | Date of last entry in the | Retain in the school for 6 | Transfer to the Archives. |
| [Books where the |  | book + 6 years | years from the date of the |  |
| Headteacher or |  |  | last entry. |  |
| another member of |  |  |  |  |
| staff keeps of record |  |  |  |  |
| of what happens in |  |  |  |  |
| the school, this may |  |  |  |  |
| include details of |  |  |  |  |
| events, photographs |  |  |  |  |
| and other |  |  |  |  |
| information.] |  |  |  |  |
| Minutes of the Senior | Yes1 |  | Date of meeting + 5 | Retain in the school for 5 | Transfer to Archives. [The |
| Management Team |  | years | years from meeting. | appropriate archivist will then take |
| and other internal |  |  |  | a sample for permanent |
| administrative bodies |  |  |  | preservation.] |
| Reports made by the | Yes1 |  | Date of the report + 3 | Retain in the school for 3 | Transfer to Archives. [The |
| Headteacher or the |  | years | years from meeting. | appropriate archivist will then take |
| management team |  |  |  | a sample for permanent |
|  |  |  |  | preservation.] |
| Records created by | Yes1 |  | Closure of file + 6 years | DESTROY |  |
| headteachers, deputy |  |  | If these records contain |
| headteacher, |  |  | sensitive information, they |
| and other |  |  | should be shredded. |
| members of staff with |  |  |  |
| administrative |  |  |  |
| responsibilities |  |  |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| (except child protection records, which are dealt with in section 6.1 above). |  |  |  |  |  |
| Correspondence created by headteachers, deputy headteachers, and other members of staff with administrative responsibilities. | No |  | Date of correspondence  + 3 years | DESTROY  If these records contain sensitive information, they should be shredded. |  |
| Professional development plans | Yes |  | Closure + 6 years | SHRED |  |
| School development plans | No |  | Closure + 6 years | Review | Offer to the Archives. |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **6.4** | **Pupils** |  |  |  |  |  |
| **Basic file description** | | **Data Prot**  **Issues** | **Statutory Provisions** | **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  [If these records are retained electronically any back-up copies should be destroyed at the same  time]. |  |
| Pupil files | | Yes |  | Retain for the time which the pupil remains at the 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. |  |
| Special Educational Needs files, reviews and Individual Education Plans | | Yes |  | DOB of the pupil + 25 year5 | SHRED |  |
| Letters authorising absence | | No |  | Date of absence + 2 years | SHRED |  |
| Absence books | |  |  | Current year + 6 years | SHRED |  |
| Examination Results | | Yes |  |  |  |  |
| Public - SATs | | No |  | Year of examinations + 6 years | DESTROY |  |
| Internal examination results | | Yes |  | Current year + 5 years6 | 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. |  |
| Statement maintained under The education Act 1996 – Section 324 | | Yes | Special Educational Needs and Disability Act 2001 Section 1 | DOB + 30 years | DESTROY unless legal action is pending. |  |
| Proposed statement or amended statement | | Yes | Special Educational Needs and Disability Act 2001 Section 1 | DOB + 30 years | DESTROY unless legal action is pending. |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Advice and information to parents regarding educational needs. | Yes | Special Educational Needs and Disability Act 2001 Section 2 | Closure + 12 years | DESTROY unless legal action is pending. |  |
| Accessibility Strategy | Yes | Special Educational Needs and Disability Act 2001 Section 14 | Closure + 12 years | DESTROY unless legal action is pending. |  |
| Children SEN files | Yes |  | Closure + 35 years | DESTROY unless legal action is pending. |  |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **6.5** | **Curriculum** |  |  |  |  |  |
| **Basic file description** | | **Data**  **Prot Issues** | **Statutory Provisions** | **Retention Period [operational]** | **Action at the end of the administrative life of the record** | |
| Curriculum development | | No |  | Current year + 6 years | DESTROY |  |
| 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 DESTROY. |  |
| 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 DESTROY. |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| 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 DESTROY. |  |
| 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  DESTROY. |  |
| 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 DESTROY. |  |
| SATS records | Yes |  | Current year + 6 years | DESTROY  [These records should be shredded]. |  |
| Value added records | Yes |  | Current year + 6 years | DESTROY  [These records should be shredded]. |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **6.6 Personnel** | | | | | |
| **Basic file description** | **Data Prot**  **Issues** | **Statutory Provisions** | **Retention Period [operational]** | **Action at the end of the administrative life of the record** | |
| Timesheets, sick pay | Yes | Financial Regulations | Current year + 6 years | SHRED |  |
| Staff Personnel files | Yes |  | Termination + 7 years | SHRED |  |
| Interview notes and recruitment records | Yes |  | Date of interview + 6 months | SHRED |  |
| Pre-employment vetting information (including unsuccessful CRB checks) | No | CRB guidelines | Date of check + 6 months | SHRED  [By the designated member of staff]. | This information should be placed on the personnel file if the application is successful and managed according to the guidelines. |
| Disciplinary proceedings for all matters **except** those relating to child protection issues (see  6.1 above): | Yes |  |  |  |  |
| * Oral warning |  |  | Date of warning + 6 months | SHRED  If this is placed on a personnel file, it must be weeded from the file. |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| * Written warning – level one |  |  | Date of warning + 6 months | SHRED  If this is placed on a personnel file, it must be weeded from the file. |  |
| * Written warning – level two |  |  | Date of warning + 12 months | SHRED  If this is placed on a personnel file, it must be weeded from the file. |  |
| * Final warning |  |  | Date of warning + 18 months | SHRED  If this is placed on a personnel file, it must be weeded from the file. |  |
| * Case not found (except child protection allegations, see section 6.1 above). |  |  | DESTROY immediately at the conclusion of the case. |  |  |
| 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 | SHRED |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  |  |  |  | the appropriate time, who will maintain the master record. |  |
| Maternity pay records | Yes | Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960),  revised 1999 (SI 1999/567). | Current year + 3 years | SHRED |  |
| Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Yes |  | Last payment + 6 years | SHRED |  |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **6.7** | **Health & Safety** | |  |  |  |  |
| **Basic file description** | | **Data Prot**  **Issues** | **Statutory Provisions** | **Retention Period [operational]** | **Action at the end of the administrative life of the record** | |
| Accessibility Plans | |  | Disability Discrimination Act | Current year + 6 years | DESTROY |  |
| Accident Reporting | |  | Social Security (Claims and Payments) Regulations 1979  Regulation 25. Social Security Administration Act 1992 Section 8.  Limitation Act 1980 |  |  |  |
| Adults – Accident Book | | Yes |  | Last entry in the accident book + 3 years | SHRED |  |
| Adults – Internal Reports | | Yes |  | Current year + 3 years | SHRED |  |
| Children | | Yes |  | DOB + 25 years7 | SHRED |  |
| COSHH | |  |  | Current year + 10 years | Review [where appropriate an additional retention period may be allocated]. |  |
| Incident reports | | Yes |  | Current year + 20 years | SHRED |  |
| Policy Statements | |  |  | Date of expiry + 1 year | DESTROY |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Risk Assessments |  |  | Date assessment  superseded + 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 |  |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **6.8** | **Administrative** | |  |  |  |  |
| **Basic file description** | | **Data**  **Prot Issues** | **Statutory Provisions** | **Retention Period [operational]** | **Action at the end of the administrative life of the record** | |
| 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 | DESTROY |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| General file series |  |  | Current year + 5 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]. |
| School brochure / prospectus |  |  | Current year + 3 years |  | Transfer to Archives  [The appropriate archivist will then take a sample for permanent preservation]. |
| Circulars (staff/parents/pupils) |  |  | Current year + 1 year | DESTROY |  |
| Newsletters, ephemera |  |  | Current year + 1 year | Review to see whether a further retention period is required. | Transfer to Archives  [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. | Transfer to Archives  [The appropriate archivist will then take a sample for permanent preservation]. |
| PTA/Old Pupils’ Associations |  |  | Current year + 6 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]. |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **6.9 Finance** | | | | |
| **Basic file description** | **Data Prot**  **Issues** | **Statutory Provisions** | **Retention Period [operational]** | **Action at the end of the administrative life of the record** |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Annual Accounts |  | Financial Regulations | Current year + 6 years |  | Offer to the Archives. |
| 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 | SHRED |  |
| * Under signature |  |  | Contract completion date + 6 years | SHRED |  |
| * Monitoring records |  |  | Current year + 2 years | SHRED |  |
| 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 | SHRED |  |
| School Fund – Ledger |  |  | Current year + 6 years | SHRED |  |
| School Fund – Invoices |  |  | Current year + 6 years | SHRED |  |
| School Fund – Receipts |  |  | Current year + 6 years | SHRED |  |
| School Fund – Bank statements |  |  | Current Year + 6 years | SHRED |  |
| School fund – School Journey books |  |  | Current year + 6 years | 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 |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **6.10 Property** | | | | | |
| **Basic file description** | **Data**  **Prot Issues** | **Statutory Provisions** | **Retention Period [operational]** | **Action at the end of the administrative life of the record** | |
| Title Deeds |  |  | Permanent | These should follow the property. | Offer to Archives. |
| Plans |  |  | Permanent | Retain until superseded then offer to archives before destruction. | Offer to Archives. |
| Maintenance and contractors |  | Financial Regulations | 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 | SHRED |  |
| Maintenance log books |  |  | Last entry + 10 years | DESTROY |  |
| Contractors’ Reports |  |  | Current year + 6 years | DESTROY |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **6.11** | **LEA** |  |  |  |  |  |
| **Basic file description** | | **Data Prot**  **Issues** | **Statutory Provisions** | **Retention Period [operational]** | **Action at the end of the administrative life of the record** | |
| Secondary transfer sheets (Primary) | | Yes |  | Current year + 2 years | SHRED |  |
| Attendance returns | | Yes |  | Current year + 1 year | DESTROY |  |
| Circulars from LEA | |  |  | Whilst operationally required | Review to see whether a further retention period is required. | Transfer to Archives.  [The appropriate archivist will then take a sample for permanent preservation]. |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **6.12 DfES** | | | | | |
| **Basic file description** | **Data Prot**  **Issues** | **Statutory Provisions** | **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. |  | Transfer to Archives.  [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. | Transfer to Archives.  [The appropriate archivist will then take a sample for permanent preservation]. |
| Returns |  |  | Current year + 6 years | DESTROY |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |
| Circulars from DfES |  |  | Whilst operationally required. | Review to see whether a further retention period is required. | Transfer to Archives.  [The appropriate archivist will then take a sample for permanent preservation]. |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **6.13** | **Connexions** |  |  |  |  |  |
| **Basic file description** | | **Data Prot**  **Issues** | **Statutory Provisions** | **Retention Period [operational]** | **Action at the end of the administrative life of the record** | |
| Service Level agreements | |  |  | Until superseded. | SHRED |  |
| Work Experience agreement | |  |  | DOB of child + 18 years. | SHRED |  |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **6.14** | **School Meals** |  |  |  |  |  |
| **Basic file description** | | **Data**  **Prot Issues** | **Statutory Provisions** | **Retention Period [operational]** | **Action at the end of the administrative life of the record** | |
| Dinner Register | |  |  | Current year + 3 years | SHRED |  |
| School Meals Summary Sheets | |  |  | Current year + 3 years | SHRED |  |