Data Retention Policy 2024-2025

Please be aware that, under the terms of The Independent Inquiry into Child Sexual Abuse (the Goddard Inquiry), it is an offence to destroy any records that might be of relevance to the inquiry. This overrides all business, statutory, regulatory or legal retention requirements, including data protection requirements and the data subject's right to erasure. It is anticipated that upon conclusion of the inquiry, further guidance regarding retention will be published.

1. Managing Records Retention

The fifth data protection principle states that "Personal data must be kept for no longer than is necessary for the purposes for which it is processed". Therefore, all records, in all formats, should be subject to an applicable retention period, as defined by business, statutory, regulatory, legal or historical requirements.

The Bursar is responsible for records management, with responsibility for ensuring records are retained, reviewed and destroyed in accordance with requirements, and as soon as possible once their lifespan has expired. The local review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained for ongoing business or legal purposes.

All records in all formats must be assigned a retention period and disposal data, either upon creating or when they cease to be in active use, in accordance with this policy. A system is implemented to routinely identify records as soon as they reach their disposal date. This may form part of an electronic record-keeping system or a manual system.

Disposal must be carried out in a timely manner to:

- Ensure compliance with business and legal retention requirements
- Improve the efficiency of the record keeping system
- Free up storage space
- Reduce associated storage and management costs

Destruction must include all backup and duplicate copies, in all formats. This is especially vital for personal information which may be kept in various hybrid record keeping systems.

2. Principles of Disposal

This policy is communicated to all employees and reinforced annually to avoid any possible data breach or the requirements to provide material in a Data Subject Access request or Freedom of Information request.

The disposal methods must be applicable to the content and format of the information. Paper and electronic records should be disposed of separately, i.e. floppy disks, CDs, DVDs, tapes, USBs, etc should not be put into confidential waste containers containing paper as they require different disposal methods and could damage shredding equipment.

Destruction must be undertaken in a way that preserves the confidentiality of the information and which makes it permanent unreadable or unable to be reconstructed or re-instated. Special care should be taken when destroying personal, sensitive or commercial information and confidentiality should be paramount at all stages of the process.

3. Destruction of Records by Type

    3.1. Paper Records

    All hard copies of official records and those containing personal data must be destroyed using confidential methods rather than being placed in general waste bins skips, which could result in a data breach. Specialist companies can provide confidential waste bins and other services to ensure records are disposed of in an appropriate way or office shredders should be used.

    3.2. Electronic and Other Media Records

    Deletion of electronic records should be managed in the same manner as paper records. Records should be routinely identified for deletion and should be authorised by the relevant senior officer. Before deletion, it must be determined that all legal and business requirements have expired, and that there is no related litigation or investigation. Records must be securely deleted in accordance with the School's security policy. Process must be in place to ensure that all backups and copies are included in the deletion process.

4. Transfer of Information to Other Media

Where lengthy retention periods have been allocated to records, the School may wish to consider converting paper records to an alternative format, such as microfilm or digital media.

Consideration should also be given to the legal admissibility of records that have been converted from paper to electronic media. It is essential to have procedures in place so that conversion is done in a standardised fashion to ensure the quality of the electronic version. The School must be able to evidence that the electronic version is a genuine copy of the original, and that the integrity of the data has not been compromised.

5. Retention Periods

The School follows the [IRMS Toolkit for Schools Information Management Toolkit for Schools](#).

Type of Record/Document	Retention Period
Governing Body	
1. Records relating to the Appointment of Governors	1. When the Governor has finished their term of office (except where there have been allegations concerning children where it should be 25 years)
2. Meeting Schedule	2. Current year
3. Agendas	3. 10 years from the date of the meeting
4. Minutes	4. 10 years from the date of the meeting
5. Reports made to Governors	5. 10 years from the date of the meeting
6. Register of attendance	6. Date of last meeting+6 year
7. Complaints made to and investigated by the governing body or the headteacher	7. Major Complaints – current year+6 years. If negligence involved then current year+15 years. If child protection or safeguarding issues are involved then current year+40 years.
8. Correspondence sent and received by the Governing Body or Head	8. General correspondence should be retained for current year + 3 years
9. Policy documents created and administered by the Governing Body	9. Until superseded
Governor Management	
1. Records relating to the appointment of the clerk to the Governing Body	1. Date appointment ceases+6 years
2. Records relating to governor declaration against disqualification criteria	2. Date appointment ceases+6 years
3. Register of business interests	3. Date appointment ceases+6 years
4. Records relating to training required and received by Governors	4. Date appointment ceases+6 years
5. Records relating to the induction programme for new governors	5. Date appointment ceases+6 years
6. Governor personnel files	6. Date appointment ceases+6 years
Management of the School	
1. Log books of activity in the School maintained by a member of SLT	1. Date of last entry in the book+6 years
2. Minutes of SLT meetings	2. Date of the meeting+3 years
3. Reports created by the Head or a member of SLT	3. Date of the report+3 years
4. Correspondence	4. Current year+3 years
5. Professional development plans	5. Held on individual's personnel record. Termination+6 years
6. School Development Plans	6. Life of the plan+3 years
7. Records relating to the creation and publication of the prospectus	7. Current year+3 years
8. Records relating to the creation and distribution of information to staff, parents or pupils	8. Current year+1 year
9. Privacy Notice	9. Until superseded+6 years
10. Consents relating to school activities	10. Consent will last whilst the pupil attends the school and can be destroyed when the pupil leaves
11. Newsletter and other items with a short operational use	11. Current academic year+1 year (with a decision being taken as to whether it should be archived)
12. Visitor Management systems	12. 6 years

Human Resources - Recruitment

1. All records leading up to the appointment of a headteacher	1. Unsuccessful applicants – Date of appointment of successful candidate+6 months. Successful applicants – add to personnel file and retain until termination+6 years except in the cases of negligence or claims of child abuse they at least 15 years
2. All records leading up to the appointment of a member of staff/Governor – Unsuccessful candidates	2. Date of appointment of successful candidate+6 months
3. Pre-employment vetting information – successful candidates	3. Retained on personnel file – Termination+6 years
4. Proof of identity	4. Retained on personnel file – Termination+6 years

Human Resources – Operational Staff Management

1. Staff personnel file	1. Termination+6 years
2. Annual appraisal/assessment records	2. Current Year+6 years
3. Sickness absence monitoring	3. Current Year+6 years
4. Staff training	4. Retained on personnel file – Termination+6 years

Human Resources – Disciplinary and Grievance Processes

1. Records relating to any allegation of a child protection nature against a member of staff	1. Normal retirement age or 10 years from the date of allegation (whichever is longer)
2. Disciplinary proceedings	2.
2.1. Oral warning	2.1. Termination+6 years
2.2. Written warning	2.2. Termination+6 years
2.3. Final warning	2.3. Termination+6 years
2.4. Case not found	2.4. If not related to child protection, dispose of at the conclusion of the case

Human Resources – Payroll and Pensions

1. Absence Record	1. Current year+3 years
2. Batches	2. Current year+6 years
3. Additional Hours	3. Current year
4. Expenses	4. Current year+6 years
5. Income tax form P60	5. Current year+6 years
6. Insurance	6. Current year+6 years
7. Maternity payment	7. Current year+3 years
8. Members allowance register	8. Current year+6 years
9. Payroll	9. Current year+6 years
10. Sickness records	10. Current year+3 years
11. Tax forms	11. Current year+6 years

Health and Safety

1. Health and Safety Policy	1. Life of policy+3 years
2. Risk assessments	2. Life of risk assessment+3 years
3. Accident reporting – over 18s	3. Date of entry+3 years
4. Accident reporting – under 18s	4. Date of entry+3 years
5. RIDDOR reporting	5. Retained on personnel file – Termination+6 years
6. COSHH incident	6. Date of incident+40 years
7. Asbestos register	7. Last action+40 years
8. Fire precautions log	8. Current year+3 years

Finance Management – Risk management and Insurance

1. Employer's Liability Insurance Certificate	1. Closure of the School+40 years

Finance Management – Asset Management	
1. Inventories of furniture and equipment	1. Current year+6 years
2. Burglary, theft and vandalism report forms	2. Current year+6 years

Finance Management – Accounts and Statements (including budget management)	
1. Annual accounts	1. Current year+6 years
2. Loans and grants managed by the School	2. Date of last payment on the loan+12 years
3. All records relating to the creation and management of budgets	3. Life of the budget+3 years
4. Invoices, receipts, order books and requisitions, delivery notices	4. Current year+6 years
5. Records relating to the banking of monies	5. Current year+6 years
6. Records relating to the Identification and collection of debt	6. Final payment of debt +6 years

Finance Management – Pupil finance	
1. Fee invoices and collection	1. Current Date pupil leaves+6 years

Finance Management – Contract Management	
1. All records relating to the management of contracts	1. Last payment on the contract+6 years

Property Management	
1. Title deeds of properties belonging to the School	1. Registered at Land Registry
2. Plans of property belonging to the School	2. Retained whilst the building belongs to the School
3. Leases of property leased by or to the School	3. Expiry of lease+6 years
4. Records relating to the letting of School premises	4. Current year+6 years

Property Management - Maintenance	
1. Records relating to the maintenance of the School carried out by contractors	1. Retained whilst the building belongs to the School
2. Records relating to the maintenance of the School carried out by School employees	2. Retained whilst the building belongs to the School

Pupil Management – Admissions	
1. Records relating to the creation and implementation of the School Admissions Policy	1. Life of the Policy+3 years
2. Admission – Successful	2. Date of admission+1 year
3. Admission – appeal is unsuccessful	3. Resolution of the case+1 year
4. Register of Admissions	4. Date of entry+3 years
5. Proofs of address supplied of parents as part of the Admissions process	5. Current year+1 year
6. Information form – successful admissions	6. Added to the pupil file
7. Information form – unsuccessful admissions	7. Until appeals process completed

Pupil Management – Pupil's Educational Record	
1. Primary education record	1. Whilst the child remains at the School
2. Examination results	2. Added to the pupil file
3. Child protection information held on pupil file	3. Kept in sealed envelope and held retained for same period as Pupil file
4. Child protection information held in separate files	4. DOB of the child+25 years

Pupil Management - Attendance	
1. Attendance registers	1. Date of entry+6 years
2. Correspondence relating to any absence	2. Current year+2 years
3. SEN information	3. DOB of the child+31 years

Curriculum and Extra Curricular activities – statists and management information	
1. Pupil progress data	1. Current year+3 years
Curriculum and Extra Curricular activities – Implementation of Curriculum	
1. Schemes of work	1. Current year+1 year
2. Timetable	2. Current year+1 year
3. Class record books	3. Current year+1 year
4. Mark books	4. Current year+1 year
5. Record of homework set	5. Current year+1 year
6. Pupil's work	6. Return with pupil at end of year
Curriculum and Extra Curricular activities – School Trips	
1. Parental Permission – no major incident	1. End of academic year of trip
2. Parent Permission – Major incident	2. DOB of pupil involved+25 years

Policy Reviewed by:

Chair

Date : March 2025

Next Review Due: September 2025