



## Christ Church & Holy Trinity CofE Primary Schools Data Retention Policy

Date:	September 2019
Reviewed by:	Avis Hawkins & Achievement Committee
Next review date:	September 2021
Signed	

The school needs to create and maintain accurate records for it to function. The policy for managing records at Christ Church & Holy Trinity C of E Primary Schools has been drawn up in conformity with legislation, regulations affecting schools and best practice as publicised by the Records Management Society of Great Britain.

This policy sets out guidelines for recording, managing, storing and disposing of data, whether they are held on paper or electronically in order to assist staff, and the School, to comply with the General Data Protection Regulation (2018) and the Freedom of Information Act 2000 (FIA). It should be read and used in conjunction with the following school policies and documents:

- Management Information Systems and Data Protection Policy
- Privacy Notices
- Information Asset Register

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

### **Benefits of the Retention Policy**

There are a number of benefits which arise from the use of a complete Retention Policy:

- Managing records against the Retention Policy is deemed to be "normal processing" under the GDPR (2018) and the Freedom of Information Act 2000. Provided members of staff are managing record series using the Retention Policy they cannot be found guilty of unauthorised tampering with files once a freedom of information request or a subject access request (SAR) has been made.
- Members of staff can be confident about destroying information at the appropriate time and in a secure manner.
- Information which is subject to Freedom of Information and GDPR legislation will be available when required.
- The school is not maintaining and storing information unnecessarily.

### **Current Pupil Records**

A manilla file is kept on each pupil in a locked filing cupboard within their classroom. The file holds hard copies of information about that pupil e.g. school reports, reports from external agencies, copies of letters.

The information held on the school's electronic database SIMS is provided by parents on admission. Information includes: the pupil's name, address, house, emergency contact details, free school meals status, statutory test results and daily attendance. Confidentiality of personal information is protected in accordance with the BCPS Management Information Systems and Data Protection Policy.

### **Pupils with Special Educational Needs**

The names of pupils with special educational needs are recorded in SIMS and information regarding these individual pupils are made available to those staff with a need to know that information. Electronic copies of documents are stored, securely, on the staff server managed by our SENCO. Paper copies of documents are stored, securely, in a locked filing cabinet in the SENCO office and also within pupils' manilla folders.

### **Pupils receiving Pupil Premium (PP) funding / Looked After Children (LAC) / Military funding**

The names of pupils in receipt of additional funding due to their PP, LAC, post-LAC or military family status are recorded in SIMS. Information regarding these individual pupils are made available to staff with a need to know that information. Electronic copies of PP review / LAC review documents are stored on the staff server managed by our Headteachers. Paper copies of review documents are stored within pupils' manilla folders.

### **Medical Records**

Information regarding medical needs is provided by parents / carers on admission. Information provided includes any significant known drug reactions, major allergies and notable medical conditions. This information is available to staff likely to administer medication or treatment. This information is shared with external providers (trips) or external bodies (caterers) only with parental permission.

All students who have a more serious level of medical need (e.g. diabetes, anaphylaxis) have an individual Health Care Plan (HCP) which is put together by the parents/guardian with the GP's/consultant's instructions for care within school should the event arise. The HCPs are then checked by our SENCO and stored securely on the staff server.

These records will be shared with school staff to ensure pupil safety. The photographs of children (for whom parents have given permission) will be displayed in the staff room to help identification. The Headteachers hold the original copies in a locked cabinet in their office. These records are shared with the medical services in case of emergency.

### **Financial Records**

The finance and office staff have access to information regarding school dinner payments and school trip payments.

### **Access by Staff**

All teaching and office staff can access the school's password protected database (SIMS). Teaching staff may consult the pupil records held in the School Office including emergency contact phone numbers. Other data e.g. discretionary absence request letters / attendance letters etc. are stored securely and only available to the necessary staff on request.

### **Data Protection Policy**

Parents accept a place for their child at Christ Church & Holy Trinity CofE Primary Schools in the knowledge that data about pupils and their parents will be collected on admission to allow for the efficient operation of the school. This data will be updated regularly and stored/processed in order with the GDPR (2018) rules for good information handling.

### **Staff Induction**

All new teaching and office staff will be given training on accessing and managing school records to ensure compliance with these retention time scales. As a guiding principle, GDPR requires that personal data is only retained for as long as necessary - that is, necessary for the specific lawful purpose (or purposes) it was acquired. Any information which is held is to be kept in accordance with BCPS' Management Information System and Data Protection Policy.

### **Retention Periods**

The table at the end of this policy provides guidance on retention periods for different records held by Christ Church & Holy Trinity CofE Primary Schools. Unless there is a specific statutory obligation to hold or destroy records, the retention periods are established by the school for guidance purposes.

### **Disposal of Data**

When information is no longer required, it can be disposed of. For confidential, sensitive or personal information to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed. Skips and 'regular' waste disposal are not considered to be secure.

Paper records should be shredded using a cross-cutting shredder; CDs / DVDs / diskettes should be cut into pieces. Hard-copy images, AV recordings and hard disks should be dismantled and destroyed. Where third party disposal experts are used they should ideally be supervised but, in any event, under adequate contractual obligations to the school to process and dispose of the information securely.

**Avis Hawkins**  
**Headteacher**  
**September 2019**

## Table of Data/Document Retention Periods (to be regularly updated)

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.				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Child Protection files	Yes	Until child leaves BCPS then transfer to the new education provider	DO NOT DESTROY ANY RECORDS	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 – or is registered as missing in education - 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	Until the person's normal retirement age, or 10 years from the date of the allegation if that's longer	SHRED	ICO Employment Practices Code: Supplementary Guidance 2.13.1 (Discipline, grievance and dismissal)  "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.

## 2. Governors & School Committee Meetings

Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Instrument of Government including articles of association	No	Permanent	ARCHIVE	Stored in Office Governor's folder
Get Information About Schools	Yes	Retain during governor's term of office. Update termly.	DELETE	
Governors minutes – principle set signed with appropriate agenda & any reports referred to	Confidential minutes	Permanent	ARCHIVE	Stored in Office Governor's folder. Confidential minutes locked into HT office.
Governors eligibility forms, training logs and pecuniary interests forms	Yes	Retain during governor's term of office	SHRED	Stored in Office Governor's folder
Governor documentation - agendas, action plans and policy documents	No	Date of meeting +3 years	SHRED	Store in Governors' folder – in HT office
Governor reports	No	Date of meeting + 6 years	SHRED	Stored in Governor's folder in HT office

3. Staff Records				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
EPM database	Yes	TBC	FILES DELETED	Ensure no back up retained on BCPS system
Staff personnel files	Yes	7 years from when staff member leaves (oral or written 1 warning 6 months, warning 2 12 months, final warning 18 months, maternity 3 years)	SHRED	Within 6 months of staff member leaving all documentation should be printed and in staff personnel file. Everything else deleted from individual files / folders / server.
Staff historic allegation files	Yes	10 year from allegation or normal retirement age (whichever is longer)	SHRED	Within 6 months of staff member leaving all documentation should be printed and in staff personnel file. Everything else deleted from individual files / folders / server.
Staff appraisal files	Yes	5 years	SHRED	By October, following academic year - all documentation should be printed and in staff personnel file. Everything else deleted from individual files / folders / server.
Emergency contacts folder - staff	Yes	Updated termly and previous records removed.	SHRED	Only latest copy to be retained
Appointment documents, unsuccessful candidates	Yes	6 months	SHRED	Ensure all emails / files stored electronically are deleted after interview / selection date.
Trainee Teacher records	Yes	All copies to be deleted at end of placement and submission of final report; except final report to be kept by mentor / HT for 3 years (maybe required for references) and then deleted.	SHRED / DELETE	Ensure all electronic documents removed by mentor / class teachers etc. Teacher training college to provide BCPS / student with user agreement re. data
Teacher mark book / folder	Yes	Current year + 1	SHRED	
Assessment files	Yes	Destroy 6 months after end of school year once data stored electronically	SHRED	

4. Pupil Information				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Risk Reduction Plans	Yes	Retain for 6 years after plan created. Staff to delete from own PC/ memory stick annually.	SHRED / DELETE	Ensure each updated copy is signed and copy stored in manilla folder and in central file on office shared server.
EHA records/ CAF / TAF	Yes	Retain for 6 years after plan created. Staff to delete from own PC/ memory stick annually.	SHRED / DELETE	Ensure each updated copy is signed and copy stored in manilla folder and in central file on office shared server.
Books, folders & test papers	Yes	Send books / papers home and shred test papers after 1 year	SHRED / SEND HOME	Shred front page of test papers – remainder can be recycled
Pupil Premium tracking documents / passports. LAC tracking.	Yes	Sent with child to next school	SHRED / DELETE	Ensure each updated copy is signed and copy stored in manilla folder and in central file on office shared server.
Pupil manilla folders	Yes	Sent with child to next school	SEND TO NEXT SCHOOL	
Allyance referral forms	Yes	Sent with child to next school	STORE IN MANILLA FOLDER	Ensure each updated copy is signed and copy stored in manilla folder – if CP store in CP file.
Behaviour slip book / record	Yes	2 years after incident	SHRED	Copies of letters re. behaviour slips to be stored in manilla folders.
Emergency pupil contacts register & medical list	Yes	12 months	SHRED / DELETE	
SEN folders / plans / TAF / Behaviour plans.	Yes	Retain for 6 years after plan created. Staff to delete from own PC/ memory stick annually.	SHRED / DELETE	Within 3 months of child leaving all documentation should be printed and in SEND folder. Everything else deleted from files / server / folders.
Intimate care plans / Manual handling risk assessments	Yes	Retain for 6 years after plan created.	SHRED / DELETE	Within 3 months of child leaving all documentation should be printed and in SEND folder. Everything else deleted from files / server / folders.
Medical Health Assessments including dietary assessments	Yes	Updated termly unless changes warrant this sooner. Latest copy retained until child has left the school.	SHRED / DELETE	

5. Curriculum				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Classroom Monitor data records	Yes	7 years	DELETED BY CLASSROOM MONITOR	Classroom monitor GDPR compliant
2Build a profile	Yes	1 year beyond pupil leaving primary school	DELETED BY 2BUILD	Ensure 2Build GDPR compliant
Data Tracker FFT Aspire	Yes	1 year beyond pupil leaving primary school	DELETED BY FFT ASPIRE	Ensure FFT Aspire GDPR compliant
Data Tracker NCA Tools	Yes	1 year beyond pupil leaving primary school	DELETED BY NCA TOOLS	Ensure NCA Tools GDPR compliant
Data Tracker Perspective Lite	Yes	1 year beyond pupil leaving primary school	DELETED BY PERSPECTIVE LITE	Ensure Perspective Lite GDPR compliant
Class Dojo	Yes	1 year beyond pupil leaving primary school	DELETED BY CLASS DOJO	Class Dojo GDPR compliant
Accelerated Reader / Renaissance Learning	Yes	1 year beyond pupil leaving primary school	DELETED BY AR/RL	Ensure Renaissance Learning GDPR compliant
Education City	Yes	2 years after last used. Score data deleted after 5 years.	DELETED BY EDUCATION CITY	Education City GDPR compliant
SPAG.com	Yes	1 year beyond pupil leaving primary school	DELETED BY SPAG.com	Ensure SPAG.com GDPR compliant
Bikeability / Scootsmart information sharing	Yes	End of training	SHRED / DELETE	Ensure Bikeability / Scootsmart GDPR compliant



6. SLT / Office records				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
PRIDE (Discriminatory Incident return to county)	No – anonymous	No personal data shared	DELETED BY PRIDE	Ensure Pride GDPR compliant
Discriminatory incident log	Yes	Retained whilst pupil at primary school	SHRED	
Behaviour slip book	Yes	Retained 2 years	SHRED	
Behaviour / anti-bullying logs	Yes	Retained whilst pupil at primary school	SHRED	Escalating concerns to be recorded as risk reduction
Accident / incident report	Yes	7 years after incident for adults; 25 years after birth for children	SHRED	
First Aid books	Yes	Date of incidents plus 12 year adults, 25 years from DOB for child. More serious incidents longer	SHRED	
Emergency contacts folder - pupils	Yes	Update annually at least	SHRED	
Medicine administration records	Yes	1 year. Emergency non-routine medicine - records to be kept for 21 years and 6 months from date of birth.	SHRED	
Physical restraint log	Yes	25 years from DOB for child.	SHRED	
Evolve School Trip Records including trip risk assessments and pupil lists	Yes	Paper copies to be shredded on return except copy in HT office to be kept for one year.	DELETED BY EVOLVE SHRED / DELETE	Evolve GDPR compliant
Bus Register	No	Replace weekly as long as no incidents	SHRED	
Visitors Signing in / out sheets & 5Cs register	Yes	7 years	SHRED	
Signing in / out book / late book	Yes	1 year	SHRED	
Parental absence request forms	Yes	3 years	SHRED	
Permission forms	Yes	Until event has occurred without issue.	SHRED	Permission may be given via school gateway – Gateway/ Schoolscomms GDPR compliant
Catering Returns	Yes	1 year	SHRED	Ensure Caterer GDPR compliant
Admissions documentation, parent correspondence	Yes	Delete when processed via SIMS or matter resolved	SHRED	Ensure SIMS GDPR compliant
HT Attendance monitoring folder	Yes	3 years	SHRED	

6. SLT/Office Records (continued)				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
HT Data folder	Yes	Current academic year	SHRED	
HT Key Information folder	Yes	Current academic year	SHRED	
School Server – staff individual documents	Yes	6 months beyond end of academic year	DELETE	Within 6 months (beyond end of academic year), data should be stored with SENCO/HT and not be in individual files on school server any more.
Scanning folder	Yes	Termly	DELETE	
Single Central Record	Yes	Permanent – continual update	Updated as current	
DBS application information	Yes	Number to be retained on SCR but not copy of certificate	SHRED	
Secure Access (DfE)	Yes	TBC	DELETE	Ensure Secure Access / DfE GDPR compliant
Leave of Absence Requests - Staff	Yes	3 academic years	SHRED	
Images of staff and pupils stored on SIMS	Yes	Current academic year – if permission given	DELETE	
Emails	Yes	12 months beyond end of academic year	DELETE	
SIMS	Yes	TBC	DELETE	Ensure SIMS GDPR compliant

7. Health and Safety				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
CCTV footage	Yes	See CCTV policy	DELETE	
Volunteer information / emergency contact / health information	Yes	Request on parent induction and destroy when consent withdrawn or when child leaves BCPS. Update annually	SHRED / DELETE	Also destroy old copies / files if update provided.

8. Administrative				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Staff PC	Yes	Not determined. PC wiped before decommission.	SPECIALIST DECOMMISSION	
Staff memory sticks	Yes	Memory stick to be returned to school before staff member leaves	ALL FILES DELETED / STICK RESET	
School website - blogs / emails	Yes	Annual update of photos / documents. Remove photos of any children for whom permission is retracted	DELETE	

9. Finance				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
FMS	Yes	7 years	SHRED / DELETE	Ensure FMS GDPR compliant
School Gateway	Yes	1 year	SHRED / DELETE	School Gateway GDPR compliant
Signed payroll, claims, variance info etc.	Yes	7 years	SHRED / DELETE	
Service level agreements	No	Until superseded	SHRED	
Payment documentation re. bills / payments made	Yes	7 years	SHRED/ DELETE	Ensure Barclays GDPR compliant

10. Work Experience				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Work Experience agreement & Risk Assessments	Yes	DOB of child + 18 years	SHRED	Retain if a claim arises relating to work experience.