

Data Retention Policy

Gayton Junior School



Manager:	Mrs J Hill
Date Adopted:	Spring 2024
Date for review:	Spring 2027

Aims & Objectives:

The School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

1. Scope of the policy

1.1 This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.

1.2 Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

1.3 A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives and for historical research. This should be done in liaison with the County Archives Service.

2. Responsibilities

2.1 The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Head of the School.

2.2 The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

2.3 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines.

3. Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

Records Management Guidelines

At Gayton, we follow the Information and Records Management Society guidelines (2019) for the maintaining and disposal of school records. These can be found on the following pages.

Management of the School

This section contains retention periods connected to the general management of the school. This covers the work of the Governing Board, the Headteacher and the Senior Leadership Team, the admissions process and operational administration.

Governing Board				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Agendas for Governing Board meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of.	Secure disposal - shredded
Minutes of Governing Board meetings				
Principal set (signed)			PERMANENT	If the school is unable to store these then they should be offered to the County Archives Service
Inspection copies			Date of meeting + 3 years	If these minutes contain any sensitive, personal information, they must be shredded
Reports presented for the Governing Board	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently.	Secure disposal – shredded or retain with the signed set of minutes

Governing Board				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Instruments of Government including Articles of Association	No		PERMANENT	These should be retained by the school whilst it is open and then offered to Country Archive Services when the school closes
Trusts and endowments managed by the Governing Board	No		PERMANENT	
Action plans created and administered by the Governing Board	No		Life of the action plan + 3 years	Secure disposal - shredded
Policy documents created and administered by the Governing Board	No		Life of the policy + 3 years	Secure disposal – shredded
Records relating to complaints dealt with by the Governing Board	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes.	Secure disposal – shredded
Annual reports created under the requirements of the Education Regulations 2002	No	Education Regulations 2002 SI 2002 No 1171	Date of report + 10 years	Secure disposal – shredded
Proposals concerning the change of status of a maintained school	No		Date proposal accepted or declined + 3 years	Secure disposal – shredded

Headteacher and Senior Leadership Team (SLT)				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Log books of activity in the school maintained by the Headteacher	There may be data protection issues if the log book refers to pupils or members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate
Minutes of Senior Leadership Team meetings and the meetings of other internal administrative bodies			Date of the meeting + 3 years then review	Secure disposal – shredded
Reports created by the Headteacher of the SLT			Date of report + a minimum of 3 years then review	Secure disposal – shredded
Records created by the headteacher, deputy or assistant headteachers or other members of staff with administrative duties			Current academic year + 6 years then review	Secure disposal – shredded
Correspondence created by headteachers, deputy or assistant headteachers or other members of staff with administrative duties			Date of correspondence + 3 years then review	Secure disposal – shredded

Headteacher and Senior Leadership Team (SLT)				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Professional development plans	Yes		Life of the plan + 6 years	Secure disposal – shredded
School development plans	No		Life of the plan + 3 years	

Admissions Process				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
All records relating to the creation and implementation of the school admissions policy	No	School Admissions Code 2014	Life of the policy + 3 years then review	Secure disposal – shredded
Admissions – if the admission is successful	Yes		Date of admission + 1 year	
Admissions – if the appeal is unsuccessful	Yes		Resolution of case + 1 year	

Admissions Process				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Register of Admissions	Yes	School Attendance 2014	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made.	Review – schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school
Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code 2014	Current year + 1 year	Secure disposal – shredded
Supplementary information form including additional information such as religion, medical conditions, etc.	Yes		The information should be added to the pupil file	Secure disposal – shredded

Operational Administration				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
General file series	No		Current year + 5 years then review	Secure disposal – shredded
Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	Standard disposal
Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current Year + 1 year	Standard disposal
Newsletters and other items with a short operational use	No		Current Year + 1 year	Standard disposal
Visitors books and signing in sheets	Yes		Current year + 6 years then review	Secure disposal – shredded
Records relating to the creation and management of Parent Teacher Associations	No		Current year + 6 years then review	Secure disposal – shredded

Recruitment				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years	Secure disposal – shredded
All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	Secure disposal – shredded
All records leading up to the appointment of a new member of staff – successful candidate	Yes		All the relevant information should be added to the Staff Personnel File (see overleaf) and all other information retained for 6 months	Secure disposal – shredded
Pre-employment vetting information – DBS check	No	DBS Update Service Employer Guide 2014; Keeping Children Safe in Education 2018	The school does not have to keep copies of DBS certificates. If the school does so, the copy must NOT be retained for more than 6 months	

Recruitment				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Proofs of identity collected as part of the process of checking 'portable' enhanced DBS disclosure	Yes		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be placed in the member of staff's personnel file.	
Pre-employment vetting information – evidence proving the right to work in the UK	Yes	An employer's guide to right to work checks (Home Office 2015)	Where possible these documents should be added to the Staff Personnel File (see below), but if they are kept separately then the Home Office requires that the documents are kept for termination of employment plus not less than two years.	
Staff Personnel File	Yes	Limitation Act 1980	Termination of employment + 6 years	Secure disposal – shredded
Timesheets	Yes		Current year + 6 years	Secure disposal – shredded
Annual appraisal/assessment records	Yes		Current year + 5 years	Secure disposal – shredded

Management of Disciplinary & Grievance Processes				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Keeping Children Safe in Education 2018	Until the person's normal retirement age of 10 years from the date of the allegation, whichever is the longer then review. Note allegations that are found to be malicious should be removed from personnel files. If found, they are to be kept on the file and a copy provided to the person concerned	Secure disposal – shredded
Disciplinary Proceedings: a) Oral warning	Yes		Date of warning + 6 months	Secure disposal – shredded (if warnings are placed on personnel files then they must be weeded from the file)
b) Written warning level 1			Date of warning + 6 months	
c) Written warning level 2			Date of warning + 12 months	
d) Final warning			Date of warning + 18 months	
e) Case not found			If the incident is child protection related then see above, otherwise dispose of at the conclusion of the case	Secure disposal – shredded

Health & Safety				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Health and safety policy statements	No		Life of policy + 3 years	Secure disposal – shredded
Health and safety risk assessments	No		Life of risk assessment + 3 years	
Records relating to accident/injury at work	Yes		Date of incident + 12 years in the case of serious accidents a further retention period will need to be applied	
Accident reporting – adults	Yes	Social Security (Claims and Payments) regulations 1979; Social Security Administration Act 1992	Date of the incident + 6 years	
Accident reporting – child	Yes		Date of the incident + 25 years	
Control of Substances Hazardous to Health (COSHH)	No	COSHH Regulations 2002; Records kept under the 1994 and 1999 regulations to be kept as if the 2002 regulations had not been made	Current year + 40 years	

Health & Safety				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012	Last action + 40 years	Secure disposal – shredded
Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	
Fire Precautions log books	No		Current year + 6 years	

Payroll & Pensions				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Maternity pay records	Yes	Statutory Maternity Pay Regulations 1986	Current year + 3 years	Secure disposal – shredded
Records held under Retirement Benefits Schemes Regulations 1995	Yes		Current year + 6 years	

Risk Management & Insurance				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	Secure disposal – shredded

Asset Management				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Inventories of furniture and equipment	No		Current year + 6 years	Secure disposal – shredded
Burglary, theft and vandalism report forms	No		Current year + 6 years	

Accounts & Statements, including Budget Management				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Annual accounts	No		Current year + 6 years	Standard disposal
Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then review	Secure disposal – shredded
All records relating to the creation and management of budgets including the annual budget statement and background papers	No		Life of the budget + 3 years	
Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	
Records relating to the collection and banking of monies	No		Current financial year + 6 years	
Records relating to the identification and collection of debt	No		Current financial year + 6 years	

Contract Management				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	Secure disposal – shredded
All records relating to the management of contracts under signature	No		Last payment on the contract + 6 years	
Records relating to the monitoring of contracts	No		Current year + 2 years	

School Fund				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Cheque books	No		Current year + 6 years	Secure disposal – shredded
Paying in books	No		Current year + 6 years	
Ledger	No		Current year + 6 years	
Invoices	No		Current year + 6 years	
Receipts	No		Current year + 6 years	
Bank statements	No		Current year + 6 years	
Journey books	No		Current year + 6 years	

School Meals Management				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Free School Meal registers	Yes		Current year + 6 years	Secure disposal – shredded
School Meals registers	Yes		Current year + 3 years	
School Meals summary sheets	No		Current year + 3 years	

Property Management				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry	
Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.	
Leases of property leased by or to the school	No		Expiry of lease + 6 years	Secure disposal – shredded
Records relating to the letting of school premises	No		Current financial year + 6 years	Secure disposal – shredded

Maintenance				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	Secure disposal – shredded
All records relating to the maintenance of the school carried out by school employees including maintenance log books	No		Current year + 6 years	

Pupil's Educational Record				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Pupil's educational record	Yes	The Education Regulations 2005	Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit • If the pupil dies whilst at primary school, the file should be returned to the Local Authority (LA) to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the LA as it is more likely that the pupil will request the record from the LA.
Examination Results – Pupil Copies	Yes			
Public			This information should be added to the pupil file	Uncollected certificates should be returned to the examination board.
Internal				

Pupil's Educational Record				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Child protection information held on pupil file	Yes	Keeping Children Safe in Education 2018	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.	Secure disposal – shredded
Child protection information held in separate files	Yes		DOB of the child +25 years then review	

Attendance				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Attendance registers	Yes	School attendance: Departmental advice for maintained schools 2014	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	Secure disposal – shredded
relating to authorised absence	Yes	Education Act 1996	Current academic year + 2 years	

SEN				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
SEN files, reviews and individual pupil profiles	Yes	Limitation Act 1980	DOB + 25 years – however, our files follow the children to secondary school as this would be retained on the pupil file	
EHCP	Yes	Education Act 1996; Special Educational Needs and Disability Act 2001		Secure disposal – shredded
Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001		Secure disposal – shredded
Accessibility strategy	Yes			Secure disposal – shredded

Curriculum Management – Statistics and Management Information				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Curriculum returns	No		Current year + 3 years	Secure disposal – shredded
SATs results	Yes		The SATs results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for + 6 years for comparison.	

Curriculum Management – Statistics and Management Information				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
SATs papers	Yes		The examination papers should be kept until any appeals/validation process is complete.	Secure disposal – shredded
Published Admission Number (PAN) reports	Yes		Current year + 6 years	
Value added and contextual data	Yes			
Self-Evaluation Forms	Yes			

Curriculum Management – Implementation of Curriculum				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Schemes of work	No		Current year + 1 year	Secure disposal – shredded
Timetable	No			
Class Record Books	No			
Mark Books	No			
Record of homework set	No			
Pupils' Work	No		Where possible, pupils' work should be returned to the pupil at the end of the academic year. If it is not the school's policy, then current year+ 1 year	

Educational Visits Outside the Classroom				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Records created by schools to obtain approval to run an Educational Visit outside the classroom	Yes	Outdoor Education Advisers' Panel National Guidance Website	Date of visit + 14 years	Secure disposal – shredded
Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB + 22years, the requirement for them being needed is low and most schools do not have the storage capacity to retain
Parental consent forms for school trips where there has been a major incident	Yes	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years. Permission slips for all pupils need to be retained to show that rules had been followed for all pupils.	

Family Liaison Officers – Learning Mentors				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Daily Communication Books	Yes		Current year + 2 years	Secure disposal – shredded
Reports for outside agencies – where the report has been included on the case file created by the outside agency	Yes		Whilst the child is attending school then destroy	
Referral forms	Yes		While the referral is current	
Contact data sheets	Yes		Current year then review, if contact is no longer active, then destroy	
Contact database enquiries	Yes			
Group registers	Yes		Current year + 2 years	

Local Authority				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Secondary transfer sheets	Yes		Current year + 2 years	Secure disposal – shredded
Attendance returns	Yes		Current year + 1 year	
School Census returns	No		Current year + 5 years	
Circulars and other LA correspondence	No		Operational use	

Central Government				
Basic Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
OFSTED reports and papers	No		Life of the report	Secure disposal – shredded
Returns made to central government	No		Current year + 6 years	
Circulars and other correspondence	No		Operational use	