

Matthew Arnold Primary School and Granby & Dingle Children's Centre



Data Retention Policy

Signed _____ Chair of Governors

_____ Head Teacher

Dated : September 2024

Review Date: September 2025

The purpose of the Data Retention Policy

This policy sets down the length of time records need to be retained and the action taken when the specified retention period has lapsed. The guidelines followed are set out by the Information and Records Management Society.

Staff members 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 they are creating new record keeping systems. This refers to all information, regardless of the media in which they are stored.

The retention periods should be communicated with data subjects when data requested are made.

Methods of Disposal

- All paperwork containing personal or sensitive information should be cross shredded
- Where records are considered worthy of permanent preservation, arrangements will be made for storage
- Records relating to pupils leaving the school during the academic year must be forwarded immediately to the next school. For pupils moving to secondary school, the records are to be forwarded prior to the end of term

Child Protection				
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Child Protection files	Yes	Safeguarding Children in Education	DOB plus 25 years	Secure disposal
Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code. Records of Disciplinary and Grievance. Education Act guidance 'Dealing with Allegations of Abuse against Teachers and Other Staff'	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is longer	Secure disposal

Governors				
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Complain files	Yes		Date of resolution plus 6 years	Retain in school for the first 6 years. Review for further retention in the case of contentious disputes. Secure disposal for routine complaints
Annual reports required by the Department for Education	No	Education (Governors' annual reports) (England) (Amendment) Regulations 2002.SI 2002 No 1171	Date of reports plus 10 years	
Proposal for schools to become, or be established as Specialist Status Schools	No			Current year plus 3 years

Inspection copies	No		Date of meeting plus 3 years	Secure disposal (If the minutes contain
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				any sensitive information they should be shredded)
Agendas	No		Date of meeting	Secure disposal
Reports	No		Date of report plus 6 years	Retain in school for 6 years from the date of meeting
Instrument of Government	No		Permanent	Retain in school whilst school is open
Action Plans	No		Date of action plan plus 3 years	Secure disposal
Policy documents	No		Expiry of policy	Retain in school whilst policy is operational (this includes the expired policy as part of a past decision making process)

		Management		
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Log books	Yes		Date of last entry in the book plus 6 years	Retain in school for 6 years from the date of the last entry.
Minutes of the Senior Management Team and other internal administrative bodies	Yes		Date of meeting plus 5 years	Retain in the school for 5 years from the meeting
Reports made by the Headteacher or the management team	Yes		Date of report plus 3 years	Retain in the school for 3 years from the meeting
Records created by the Headteacher, Deputy	Yes		Closure of file plus 6 years	Secure disposal

Headteacher and other members of staff with administrative responsibilities				
Correspondence created by the Headteacher, Deputy Headteacher and other members of staff with administrative responsibilities	Yes		Date of correspondence plus 3 years	Secure disposal
Professional Development plans	Yes		Closure plus 6 years	Secure disposal
School Development plans	Yes		Closure plus 6 years	Review
Admissions – if the admission is successful	Yes		Admission plus 1 year	Secure disposal
Admissions – if the appeal is unsuccessful	Yes		Resolution of case plus 1 year	Secure disposal
Proof of address supplied by parents by parents as part of the admissions process	Yes		Current year plus 1 year	Secure disposal

		Pupils		
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Admission Registers	Yes		Every entry from the date made plus 3 years	Secure disposal
Attendance Registers	Yes		Date of register plus 3 years	Secure disposal (If these records are retained electronically any backup copies should be destroyed at the same time)

Pupils files retained in school	Yes			
Primary			Retain for the time which the pupil remains at the school	Transfer to secondary school (or other primary school) when child leaves the school. In the case of exclusion it may be appropriate to transfer the record
Special Educational Needs files, reviews and individual education plans	Yes		DOB of the pupil plus 25 years then review NOTE: The retention period is the minimum period that any pupil file should be kept. Some authorities choose to keep for a longer period of time to defend themselves in a 'failure to provide sufficient education' case.	Secure disposal
Correspondence relating to authorized absences and issues	No		Date of absence plus 2 years	Secure disposal
Examination results	Yes			
Public	No		Year of examination plus 6 years	Secure disposal
Internal examination results	Yes		Current year plus 5 years	Secure disposal
Any other records created in the course of contact with pupils	Yes / No		Current year plus 3 years	Review at the end of 3 years and either allocate a further retention period or secure disposal
Statement maintained under The Education Act 1996 – Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB plus 30 years	Secure disposal unless legal action is pending

Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB plus 30 years	Secure disposal unless legal action is pending
Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 1	Closure plus 12 years	Secure disposal unless legal action is pending
Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 1	Closure plus 12 years	Secure disposal unless legal action is pending
Parental permission slips for school trips – where there has been no major incident	Yes		Conclusion of the trip	Secure disposal
Parental permission slips for school trips – where there has been major incident	Yes	Limitation Act 1980	DOB of the pupil involved in the incident plus 25 years. The permission slip for all pupils on the trip need to be retained to show pupils that the rules had been followed for all pupils	Secure disposal

Curriculum				
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Examination results	Yes		Current year plus 6 years	Secure disposal
PAN reports	Yes		Current year plus 6 years	Secure disposal
Value Added & Contextual Data	Yes		Current year plus 6 years	Secure disposal
Self-evaluation forms	Yes		Current year plus 6 years	Secure disposal

Personnel Records held in Schools				
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Working time records	Yes	The Working Time Regulations 1998	Date of record plus 2 years	Secure disposal
Payroll Records	Yes	Taxes Management Act 1970	Current year plus 3 years	Secure disposal
Staff personnel files	Yes	Limitation Act 1980	End of employment plus 6 years	Secure disposal
Interview notes and recruitment records	Yes		Date of interview notes plus 6 months if unsuccessful. If successful place in personnel file	Secure disposal
Pre-employment vetting information (including DBS checks)	Yes	DBS Guidelines	Do not need to keep copies. If copies are kept, it must not be retained for more than 6 months	Secure disposal
Disciplinary Proceedings	Yes	Where the warning relates to child protection, please see Child Protection section		
• Oral warning			Date of warning plus 6 months	Secure disposal
• Written warning – level 1			Date of warning plus 6 months	Secure disposal
• Written warning – level 2			Date of warning plus 12 months	Secure disposal
• Final warning			Date of warning plus 18 months	Secure disposal
• Case not found			If child protection related please see	Secure disposal

			Child Protection section	
Records relating to accident / injury at work	Yes		Date of incident plus 12 years. In case of serious accidents a further retention period will need to be applied	Secure disposal
Annual appraisal / assessment records	No		Current year plus 5 years	Secure disposal
Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986	Current year plus 3 years	Secure disposal
Records held under Retirement Benefits Schemes (Information Powers Regulations 1995)	Yes		Current year plus 6 years	Secure disposal
Proof of identity collected as part of 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 necessary, copy documentation and place on the member of staff's personnel file	

Health and Safety				
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Accessibility plans		Disability Discrimination Act	Current year plus 6 years	Secure disposal
Accident reporting		Social Security (claims and payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		Secure disposal
• Adults	Yes			Secure disposal

			Date of incident plus 7 years	
• Children	Yes		Date of incident plus 25 years	Secure disposal
COSHH			Current year plus 10 years (where appropriate an additional retention period may be allocated)	Secure disposal
Incident reports	Yes		Current year plus 20 years	Secure disposal
Policy statements			Date of expiry plus 1 year	Secure disposal
Risk assessments			Current year plus 3 years	Secure disposal
• Written warning – level 2			Date of warning plus 12 months	Secure disposal
Process of monitoring areas where employees and persons are likely to have come in contact with asbestos			Last action plus 40 years	Secure disposal
Process of monitoring areas where employees and persons are likely to have come in contact with radiation			Last action plus 50 years	Secure disposal
Fire precautions log books			Current year plus 6 years	Secure disposal

Health and Safety				
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Accessibility plans				Secure disposal

		Disability Discrimination Act	Current year plus 6 years	
Accident reporting		Social Security (claims and payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		Secure disposal
• Adults	Yes		Date of incident plus 7 years	Secure disposal
• Children	Yes		Date of incident plus 25 years	Secure disposal
COSHH			Current year plus 10 years (where appropriate an additional retention period may be allocated)	Secure disposal
Incident reports	Yes		Current year plus 20 years	Secure disposal
Policy statements			Date of expiry plus 1 year	Secure disposal
Risk assessments			Current year plus 3 years	Secure disposal
• Written warning – level 2			Date of warning plus 12 months	Secure disposal
Process of monitoring areas where employees and persons are likely to have come in contact with asbestos			Last action plus 40 years	Secure disposal
Process of monitoring areas where employees and persons are likely to have come in contact with radiation			Last action plus 50 years	Secure disposal

Fire precautions log books			Current year plus 6 years	Secure disposal
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Administrative				
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Employer's liability certificate			Closure of the school plus 40 years	Secure disposal
Inventories of equipment and furniture			Current year plus 6 years	Secure disposal
General file series			Current year plus 5 years	Review to see whether a further period of retention is required
School brochure or prospectus			Current year plus 3 years	Secure disposal
Circulars (staff / parents / pupils)			Current year plus 1 year	Secure disposal
Newsletters, ephemera			Current year plus 1 year	Review to see whether a further retention period is required
Visitor books			Date of expiry plus 2 years	Review to see whether a further retention period is required
PTA / old pupils associations			Current year plus 6 years	Review to see whether a further retention period is required

Finance				
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record

		Financial Regulations	Current year plus 6 years	
		Financial Regulations	Date of last payment of loan plus 12 years	Review to see whether a further retention period is required
Contracts				
• Under seal			Contract completion date plus 12 years	Secure disposal
• Under signature			Contract completion date plus 6 years	Secure disposal
• Monitoring records			Current year plus 2 years	Secure disposal
Copy orders			Current year plus 2 years	Secure disposal
Budget reports, budget monitoring etc			Current year plus 3 years	Secure disposal
Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year plus 6 years	Secure disposal
Annual budget and background papers			Current year plus 6 years	Secure disposal
Order books and requisitions			Current year plus 6 years	Secure disposal
Delivery documentation			Current year plus 6 years	Secure disposal
Debtors' records		Limitation Act 1980	Current year plus 6 years	Secure disposal
School Fund – Cheque books			Current year plus 3 years	Secure disposal
School Fund – Paying in books			Current year plus 6 years then review	Secure disposal

School Fund – Ledger			Current year plus 6 years then review	Secure disposal
School Fund – Invoices			Current year plus 6 years then review	Secure disposal
School Fund – Receipts			Current year plus 6 years	Secure disposal
School Fund – Bank statements			Current year plus 6 years then review	Secure disposal
Student grant applications			Current year plus 3 years	Secure disposal
Free school meals registers	Yes		Current year plus 6 years	Secure disposal

		Property		
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Plans			Permanent	Retain in school whilst operational
Maintenance and contractors		Financial Regulations	Current year plus 6 years	Secure disposal
Leases			Expiry of lease plus 6 years	Secure disposal
Lettings			Current year plus 3 years	Secure disposal
Burglary, theft and vandalism and report forms			Current year plus 6 years	Secure disposal
Maintenance log books			Current year plus 6 years	Secure disposal
Contractors' reports			Current year plus 6 years	Secure disposal

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Local Authority				
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Secondary transfer sheets (Primary)	Yes		Current year plus 2 years	Secure disposal
Attendance returns	Yes		Current year plus 1 year	Secure disposal
Circulars from LA			Whilst required operationally	Review to see whether a further retention period is required

Central Government				
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
HMI Reports			These do not need to be kept any longer	
OFSTED reports and papers			Replace former report with any new inspection report	Review to see whether a further retention period is required
Returns			Current year plus 6 years	Secure disposal
Circulars from DfE			Whilst operationally required	Review to see whether a further retention period is required

School Meals				
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Dinner registers			Current year plus 3 years	Secure disposal

School meals summary sheets			Current year plus 3 years	Secure disposal
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Family / Home / School Liaisons				
File Description	Data Protection Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the Administrative Life of Record
Day books	Yes			Secure disposal
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 the school then destroy	Secure disposal
Referrals	Yes		Whilst the referral is current	Secure disposal
Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	Secure disposal
Contact database entries			Current year then review, if contact is no longer active then destroy	Delete