

St Jude's Church of England Primary School

GDPR and Record Retention Policy



Agreed by governors on 15th October 2019

1. Child Protection						
These retention periods should be used in conjunction with the document "Keeping Children Safe in Education" which can be downloaded from: https://www.gov.uk/government/publications/keeping-children-safe-in-education--2 .						
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
1.1	Child Protection files	Yes	Education Act Keeping Children Safe in Education	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. The following is an extract from 'Safeguarding Children and Safer Recruitment in Education'
1.2	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); Keeping Children Safe in Education	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer	SHRED	Record keeping 171. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

2. Governors						
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
2.1	Minutes					
	Principal 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	SHRED	[If these minutes contain any sensitive personal information they should be shredded] Transfer to Archives
2.2	Agendas	No		Date of meeting	Retain in school for 6 years from date of meeting	
2.3	Reports	No		Date of meeting + 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]
2.4	Annual Parents' meeting papers	No		Date of meeting + 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]
2.5	Instruments of Government	No		Permanent	Retain in school whilst school is open	Transfer to Archives when the school has closed
2.6	Trusts and Endowments	No		Permanent	Retain in school whilst operationally required	
2.7	Action Plans	No		Date of action plan + 3 years	SHRED	It may be appropriate to offer to the Archives for a sample to be taken if the school has been through a difficult period
2.8	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) Retain in school for the first six years	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
2.9	Complaints files	Yes		Date of resolution of complaint + 6 years		Review for further retention in the case of contentious disputes SHRED routine complaints Transfer to Archives
2.10	Annual Reports required by the Department for Education	No	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI 2002 No 1171	Date of report + 10 years		[The appropriate archivist will then take a sample for permanent preservation]

2.11	Proposals for schools to become, or be established as Specialist Status schools	No		Current year + 3 years		Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
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3. Management						
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
3.1	Log Books	Yes		Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry.	Transfer to the Archives
3.2	Minutes of the Senior Management Team and other internal administrative bodies	Yes		Date of meeting + 5 years	Retain in the school for 5 years from meeting	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
3.3	Reports made by the head teacher or the management team	Yes		Date of report + 3 years	Retain in the school for 3 years from meeting	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
3.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities Correspondence created by	Yes		Closure of file + 6 years	SHRED	
3.5	head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities Professional development plans	No		Date of correspondence + 3 years	SHRED	
3.6		Yes		Closure + 6 years	SHRED	
3.7	School development plans	No		Closure + 6 years	Review	Offer to the Archives
3.8	Admissions – if the admission is successful	Yes		Admission + 1 year	SHRED	
3.9	Admissions – if the appeal is unsuccessful	Yes		Resolution of case + 1 year	SHRED	
3.10	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SHRED	
3.11	Proofs of address supplied by parents as part of the admissions process	Yes		Current year + 1 year	SHRED	

4. Pupils						
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
4.1	Admission Registers	Yes		Date of last entry in the book (or file) + 6 years Date of register + 3 years	Retain in the school for 6 years from the date of the last entry.	Transfer to the Archives
4.2	Attendance registers	Yes			SHRED [If these records are retained electronically any back up copies should be destroyed at the same time]	
4.3	Pupil record cards	Yes				
4.3a	Primary			Retain for the time which the pupil remains at the primary 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 SHRED	
4.3b	Secondary		Limitation Act 1980	DOB of the pupil + 25 years		In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service
4.4	Pupil files	Yes				
4.4a	Primary			Retain for the time which the pupil remains at the primary school DOB of the pupil + 25 years	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
4.4b	Secondary		Limitation Act 1980		SHRED	In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service
4.5	Special Educational Needs files, reviews and Individual Education Plans	Yes		DOB of the pupil + 25 years then review NOTE: This retention period is the minimum period that any pupil file should be kept.	Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period.	

	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
4.6	Letters authorising absence	No		Date of absence + 2 years	SHRED	
4.7	Absence books			Current year + 6 years	SHRED	
4.8	Examination results	Yes				
4.8a	Public	No		Year of examinations + 6 years	SHRED	Any certificates left unclaimed should be returned to the appropriate Examination Board
4.8b	Internal examination results	Yes		Current year + 5 years	SHRED	If these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary.
4.9	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 SHRED SHRED unless	
4.10	Statement maintained under The Education Act 1996 - Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	legal action is pending	
4.11	Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1 Special Educational	DOB + 30 years	SHRED unless legal action is pending	
4.12	Advice and information to parents regarding educational needs	Yes	Needs and Disability Act 2001 Section 2 Special Educational Needs and	Closure + 12 years	SHRED unless legal action is pending	
4.13	Accessibility Strategy	Yes	Disability Act 2001 Section 14	Closure + 12 years	SHRED unless legal action is pending	
4.14	Children's SEN Files	Yes		DOB of pupil + 25 years then review – it may be appropriate to add an additional retention period in certain cases	SHRED unless legal action is pending	

	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
4.15	Parental permission slips for school trips – where there has been no major incident	Yes		Conclusion of the trip	SHRED	
4.16	Parental permission slips for school trips – where there has been a major incident Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Primary Schools	Yes	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years Date of visit + 14 years	SHRED	The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils This retention period has been set in agreement with the Safeguarding Children's Officer
4.17	Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Primary Schools	No	3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) (1998) 3 part supplement	Date of visit + 14 years	SHRED or delete securely	This retention period has been set in agreement with the Safeguarding Children's Officer
4.18	Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Secondary Schools	No	to the Health & Safety of Pupils on Educational Visits (HASPEV) (1998)	Date of visit + 10 years	SHRED or delete securely	This retention period has been set in agreement with the Safeguarding Children's Officer
4.19	Walking Bus registers	Yes		Date of register + 3 years This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting	SHRED	[If these records are retained electronically any back up copies should be destroyed at the same time]

5. Curriculum					
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
5.1	Curriculum development	No		Current year + 6 years	SHRED
5.2	Curriculum returns	No		Current year + 3 years	SHRED
5.3	School syllabus	No		Current year + 1 years	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.4	Schemes of work	No		Current year + 1 years	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.5	Timetable	No		Current year + 1 years	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.6	Class record books	No		Current year + 1 years	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.7	Mark books	No		Current year + 1 years	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.8	Record of homework set	No		Current year + 1 years	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.9	Pupils' work	No		Current year + 1 years	SHRED
5.10	Examination results	Yes		Current year + 6 years	
5.11	SATS records	Yes		Current year + 6 years	
	PAN reports				
5.12	Value Added records	Yes		Current year + 6 years	SHRED
5.13		Yes		Current year + 6 years	SHRED

6. Personnel Records held in Schools					
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
6.1	Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	SHRED
6.2	Staff Personal files	Yes	Limitation Act 1980	Termination + 6 years	SHRED
6.3	Interview notes and recruitment records	Yes	Limitation Act 1980	Date of interview + 6 months	SHRED
6.4	Pre-employment vetting Information (including DBS checks) Disciplinary proceedings:	No	DBS guidelines	Date of check + 6 months	SHRED [by the designated member of staff]
6.5		Yes	Where the warning relates to child protection issues see 1.2. If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice.		
6.5a	Oral warning			Date of warning + 12 months	SHRED [if this is placed on a personal file it must be weeded from the file]
6.5b	Written warning			Date of warning + 12 months	SHRED
6.5c	Final warning			Date of warning + 24 months	SHRED
6.5d	Case not found		If child protection related please see 1.2 otherwise SHRED immediately at the conclusion of the case		
6.6	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 Current year + 5 years	SHRED
6.7	Annual appraisal/assessment records	No			
6.8	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year + 3 years	SHRED
6.9	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SHRED
6.10	Proofs of identity collected as part of the process of checking "portable" enhanced CRB 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 on the member of staff's personal file.		

7. Health & Safety					
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
7.1	Accessibility Plans		Disability Discrimination Act	Current year + 6 years	SHRED
7.2	Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
7.2a	Adults	Yes		Date of incident + 7 years	SHRED
7.2b	Children	Yes		DOB of child + 25 years - A child may make a claim for negligence for 7 years from their 18th birthday. To ensure that all records are kept until the pupil reaches the age of 25 this retention period has been applied. Current year + 10 years [where appropriate an additional retention period may be allocated]	SHRED
7.3	COSHH			Current year + 20 years	SHRED
7.4	Incident reports	Yes			SHRED
7.5	Policy Statements			Date of expiry + 1 year	SHRED
7.6	Risk Assessments			Risk Assessments	SHRED
7.7	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos			Last action + 40 years	SHRED
7.8	Process of monitoring of areas where employees and persons are likely to have come in contact with radiation Fire Precautions log books			Last action + 50 years	SHRED
7.9				Current year + 6 years	SHRED

8. Administrative						
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
8.1	Employer's Liability certificate			Closure of the school + 40 years Current year + 6 years	SHRED	
8.2	Inventories of equipment and furniture				SHRED	
8.3	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]
8.4	School brochure or prospectus			Current year + 3 years		Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
8.5	Circulars (staff/parents/pupils)			Current year + 1 year	SHRED	
8.6	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]
8.7	Visitors book			Current year + 2 years	Review to see whether a further retention period is required Review to see whether	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
8.8	PTA/Old Pupils Associations			Current year + 6 years	a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]

9. Finance						
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
9.1	Annual Accounts	Financial Regulations		Current year + 6 years		Offer to the Archives
9.2	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]
9.3	Contracts					
9.3a	Under seal			Contract completion date + 12 years	SHRED	
9.3b	Under signature			Contract completion date + 6 years	SHRED	
9.3c	Monitoring records			Contract completion date + 2 years Current year + 2 years	SHRED	
9.4	Copy orders				SHRED	
9.5	Budget reports, budget monitoring etc			Current year + 3 years	SHRED	
9.6	Invoice, receipts and other records covered by the Financial Regulations Annual Budget and background papers	Financial Regulations		Current year + 6 years	SHRED	
9.7	Order books and requisitions			Current year + 6 years	SHRED	
9.8				Current year + 6 years	SHRED	
9.9	Delivery documentation			Current year + 6 years	SHRED	
9.10	Debtors' Records			Current year + 6 years	SHRED	
9.11	School Fund – Cheque books			Current year + 3 years	SHRED	
9.12	School Fund – Paying in books			Current year + 6 years then review	SHRED	
9.13	School Fund – Ledger			Current year + 6 years then review	SHRED	
9.14	School Fund – Invoices			Current year + 6 years then review	SHRED	

	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
9.15	School Fund – Receipts			Current year + 6 years	SHRED	
9.16	School Fund – Bank statements			Current year + 6 years then review	SHRED	
9.17	School Fund – School Journey books			Current year + 6 years then review	SHRED	
9.18	Applications for free school meals, travel, uniforms etc			Whilst child at school	SHRED	
9.19	Student grant applications			Current year + 3 years	SHRED	
9.20	Free school meals registers	Yes	Financial Regulations	Current year + 6 years	SHRED	
9.21	Petty cash books	Yes	Financial Regulations	Current year + 6 years	SHRED	

10. Property						
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
10.1	Title Deeds			Permanent	Permanent - these should follow the property unless the property has been registered at the Land Registry	Offer to Archives if the deeds are no longer needed
10.2	Plans			Permanent	Retain-in-school-while-operational	Offer to Archives - If the property has been sold for private housing then the archives service will embargo these records for an appropriate period of time to prevent them being used to plan or carry out a crime.
10.3	Maintenance and contractors		Financial Regulations	Current year + 6 years	SHRED	
10.4	Leases			Expiry of lease + 6 years	SHRED	
10.5	Lettings			Expiry of lease + 3 years	SHRED	
10.6	Burglary, theft and vandalism report forms			Expiry of lease + 6 years Last entry + 10 years	SHRED	
10.7	Maintenance log books			Current year + 6 years	SHRED	
10.8	Contractors' Reports				SHRED	

11. Local Authority						
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
11.1	Secondary transfer sheets (Primary)	Yes		Current year + 2 years	SHRED	
11.2	Attendance returns	Yes		Current year + 1 year	SHRED	
11.3	Circulars from LA			Whilst required operationally	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
12. Department for Education						
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
12.1	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]
12.2	OFSTED reports and papers			Replace former report with any new inspection report 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]
12.3	Returns			Whilst operationally required	SHRED	
12.4	Circulars from DfE				Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
13. Connexions						
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
13.1	Service level agreements			Until superseded	SHRED	
13.2	Work Experience agreement			DOB of child + 18 years	SHRED	

14. School Meals						
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
14.1	Dinner Register			Current year + 3 years	SHRED	
14.2	School Meals Summary Sheets			Current year + 3 years	SHRED	
15. Family Liaison Officers and Parent Support Assistants						
	Basic file description	DP Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record	
15.1	Day books	Yes		Current year + 2 years then review	SHRED	
15.2	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	SHRED	
15.3	Referral forms	Yes		While the referral is current then Current year then review, if contact	SHRED	
15.4	Contact data sheets	Yes		is no longer active then destroy Current year then review, if contact	SHRED	
15.5	Contact database entries	Yes		is no longer active then destroy Current year + 2 years	DELETE	
15.6	Group Registers	Yes			SHRED	

Signed Cof G

T. McKenzie

26/11/19