

Data Retention Policy

Review Date: Spring 2022
Reviewed by: Resources Committee
Next review date: Spring 2024



The school needs to create and maintain accurate records in order for it to function. The policy for managing records at Meldreth Primary School 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 and 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 MPS 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 staffroom.

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 Headteacher. 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 SENCo holds the original copies in a locked cabinet in the staff room. 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 are able to 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 Meldreth Primary School 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 M Primary School. 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.

Table of Data/Document Retention Periods

1. Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005

Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 Pupil manilla folders	Yes	Retain whilst the child remains at the primary school	SEND TO NEXT SCHOOL	The file should follow the pupil when he/she leaves the primary school. • If the pupil dies whilst at primary school the file should be returned to the Local Authority 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 Local Authority to be retained for the statutory retention period.
Assessment results – Target Tracker	Yes	Retain electronically for two years following the child leaving primary school.	SHRED / DELETE	This information should be added to the pupil file before transferring. Target Tracker GDPR compliant http://www.eesforschools.org/terms
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 in pupil passports section of SEND area.
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 SEND folder in staffroom locked filing cabinet and in central file in pupil passports section of SEND area.
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.
Allyance referral forms	Yes	Sent with child to next school	STORE IN MANILLA FOLDER	Ensure each updated copy is signed and copy stored in SEND folder in staffroom locked filing cabinet and in central file in pupil passports section of SEND area.
ABC record	Yes	2 years after incident	SHRED	Copies of letters re. behaviour slips to be stored in SEND folder in staffroom locked filing cabinet and in central file in pupil passports section of SEND area.
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. Retained until child has left school.	SHRED / DELETE	https://www.medicaltracker.co.uk/static/assets/pdf/privacy_.pdf
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2. Pupil's Educational Record - 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	DOB of the child + 25 years then review Until child leaves MPS then transfer to the new education provider	DO NOT DESTROY ANY RECORDS	Child Protection information must be sent under separate cover to new school/college with signed receipt 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 whichever is the longer then REVIEW.	SHRED	<p>SECURE DISPOSAL These records must be shredded</p> <p>IRMS Information Management Toolkit for Schools Version 5 · 01 February 2016</p> <p>Note: allegations that are found to be malicious should be removed from personnel files. If found to be true they are to be kept on the file and a copy provided to the person concerned</p>
3. Operational Staff Management - Limitation Act 1980 (Section 2)				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
EPM database	Yes	Termination of Employment + 6 years	FILES DELETED	Ensure no back up retained on MPS system EPM site GDPR readiness programme in place http://360ek.r.a.d.sendibm1.com/4noe1k201mbf.html

Staff personnel files	Yes	Termination of Employment + 6 years (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	Current year + 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 for 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 (may be 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	
Work Experience agreement & Risk Assessments	Yes	DOB of child + 18 years	SHRED	Retain if a claim arises relating to work experience.
Heales Occupational Health	Yes	6 years after staff have left employment		

4. Governing Body

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 Governor's folder in HT office. These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.
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	Store in Governors' folder – in HT office. Confidential minutes locked into HT office.
Governors eligibility forms, training logs and pecuniary interests forms	Yes	Retain during governor's term of office	SHRED/DELETE	Store in Governors' folder – in HT office
Governor documentation - agendas, action plans and policy documents	No	Life of the plan +3 years	SHRED/DELETE	Store in Governors' folder – in HT office
Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Date of report + 10 years	SHRED/DELETE	Stored in Governor's folder in HT office
Records relating to complaints dealt with by the Governing Body	Yes	Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SHRED/DELETE	

5. Head Teacher and Senior Management Team

Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection	Date of the meeting + 3 years then review	DELETE	

Reports created by the Head Teacher or the Management Team	issues if the minutes refers to individual pupils or members of staff	Date of the meeting + a minimum of 3 years then review	SHRED/DELETE	Store in Governors' folder – in HT office. Confidential minutes locked into HT office.
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities		Date of the correspondence + 3 years then review	SHRED/DELETE	Store in Governors' folder – in HT office
Professional Development Plans	Yes	Life of the plan +6 years	SHRED/DELETE	Store in personnel folders – in HT office
School Development Plans	No	Life of the plan +6 years	SHRED/DELETE	Stored in folder in HT office
HT Attendance monitoring folder	Yes	Current year+ 3 years then review	SHRED	Stored in locked folder in HT office

6. Curriculum

Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Target Tracker data records	Yes	7 years	DELETED BY TARGET TRACKER	Target Tracker GDPR compliant http://www.eesforschools.org/TargetTracker/downloads/EYFSPPrimary-Target-Tracker-Student-Data-Policy-Statement.pdf
Tapestry	Yes	1 year beyond pupil leaving primary school	DELETED BY Tapestry	Tapestry GDPR compliant https://tapestry.info/privacy.html
Data Tracker FFT Aspire	Yes	1 year beyond pupil leaving primary school	DELETED BY FFT ASPIRE	FFT Aspire GDPR compliant https://fft.org.uk/gdpr/
Data Tracker NCA Tools	Yes	1 year beyond pupil leaving primary school	DELETED BY NCA TOOLS	Gov.uk managed site
Mathletics - 3P Learning	Yes			3P Learning GDPR compliant http://www.3plearning.com/privacy/
2 Simple Purple Mash	Yes	1 year beyond pupil leaving primary school	DELETED BY EDUCATION CITY	2 Simple Purple Mash GDPR compliant https://www.2simple.com/gdpr
Charanga	Yes		DELETE	Charanga GDPR compliant https://charanga.com/site/gdpr/
SPAG.com	Yes	1 year beyond pupil leaving primary school	DELETED BY SPAG.com	SPAG.com GDPR compliant https://www.spag.com/Content/SPAGDPP-GDPR-Compliant.pdf

Bikeability / Scootsmart information sharing	Yes	End of training	SHRED / DELETE	Bikeability / Scootsmart GDPR compliant The school keeps all the data requested via consent forms, name and any medical conditions, these are recorded on their register and then left in school at all times. The register is completed by the instructors then returned to the office.
Modeshift STARS	Yes	Modeshift STARS Initiatives with accompanying evidence are automatically deleted at the point of expiry which is 3 years and 1 day after the completion date of the initiative.	DELETE	Modeshift STARS GDPR Compliant https://modeshiftstars.org/privacyPolicy.php

6. Operational Administration

Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
CAPITA SIMs - Admissions documentation		Admissions information should be added to the pupil file	SHRED/ DELETED BY SIMS	SIMs GDPR Compliant https://www.capita-sims.co.uk/gdpr
PRIDE (Discriminatory Incident return to county)	No – anonymous	Unknown	DELETED BY PRIDE	LA service - Pride GDPR status pending.
ABC logs	Yes	Retained whilst pupil at primary school	SHRED/DELETE	Transfer electronic copies to paper and place in SEND file to pass to new school. Delete electronic copies from file
Accident / incident report	Yes	7 years after incident for adults; 25 years after birth for children	SHRED	Store in locked cabinet in HT office
First Aid books	Yes	Date of incidents plus 12 years for adults, 25 years from DOB for child.	SHRED	Store in locked cupboard. Emergency non-routine - records to be kept for 21 years and 6 months from date of birth.
Emergency contacts folder - pupils	Yes	Update annually at least	SHRED	Store in locked cupboard out of school hours
Medicine administration records	Yes	1 year.	SHRED	Store in locked cupboard in school office. Emergency non-routine medicine - records to be kept for 21 years and 6 months from date of birth.
Physical restraint log	Yes	For the life of the book	SHRED	Store in locked cupboard in HT office
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 http://edufocus.co.uk/pages/evolve/gdpr.asp
Visitors Signing in / out sheets & 5Cs contractors register	Yes	Current year + 6 years then REVIEW	SHRED	Store in school office and in locked cupboard out of school hours
Signing in / out book / late book	Yes	1 year	SHRED	Store in school office and in locked cupboard out of school hours
Parental absence request forms	Yes	3 years	SHRED	Placed in pupil files with permission letter copy
Event Permission forms	Yes	Until event has occurred without issue.	SHRED	Permission may be given via school email – Email GDPR compliant
Catering return (Caterer)	Yes	Current year + 6 years	DELETED BY CATERER	https://hcl.co.uk/terms-conditions/privacy-notice

Pre-employment vetting information – DBS Checks	No	The school does not have to keep copies of DBS certificates once added to the SCR.	SHRED	Where possible these documents should be added to the Staff Personal File, 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
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6. Operational Administration (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	Store in locked cupboard out of school hours
HT Key Information folder	Yes	Current academic year	SHRED	Store in locked cupboard out of school hours
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.
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		Store in locked cupboard in school office
Secure Access (DfE)	Yes		DELETE	Secure Access / DfE GDPR compliant
Leave of Absence Requests - Staff	Yes	3 academic years	SHRED	Store in locked cupboard in school finance office
Images of staff and pupils stored on Bromcom	Yes	Current academic year – if permission given	DELETE	https://www.bromcom.com/privacy
Emails	Yes	12 months beyond end of academic year	DELETE	
Staff laptop	Yes	Not determined. PC wiped before decommission.	SPECIALIST DECOMMISSION	
Staff encrypted memory sticks	Yes	Numbered memory sticks 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	
Breakfast & After School Club (BASC) Registration & Booking information (Bromcom)	Yes	Retain whilst the child remains at the primary school	SHRED	
Breakfast & After School Club (BASC) Telephone with contact details	Yes	Retain whilst the child remains at the primary school	DELETE	Files to be stored in BASC file locked finance office

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 (none in place)	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 school. Update annually	SHRED / DELETE	Also destroy old copies / files if update provided.

8. Accounts and Statements including Budget Management

Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Bromcom Finance School Fund ledger, invoices, receipts, bank statements	Yes	Current year + 6 years	SHRED / DELETE	https://www.bromcom.com/privacy
Signed payroll, variance info etc.	Yes	Current year + 6 years	SHRED / DELETE	https://www.epm.co.uk/section/personal-information/
Service level agreements	No	Until superseded	SHRED	
Maternity pay	Yes	Current year + 3 years	SHRED / DELETE	Records Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)
Records relating to the collection and banking of monies	No	Current year + 6 years	SHRED / DELETE	
Records relating to the identification and collection of debt	No	Current year + 6 years	SHRED / DELETE	
School meals register including free school meals	Yes	Current year + 6 years	SHRED / DELETE	