

Including Sandlesford, our Early Years Foundation Stage provision

## Retention and Deletion of Records Policy

Authorised by	resolution of the Board of Governors
Date	Spring 2018 - (Version 1-0-0)
Reviewed	

Our aim is to maintain accurate and up-to-date records throughout the school and any data stored or processed should be in accordance with this policy. This policy should be read in conjunction with the Data Protection Policy, the Privacy Notices and the Remote Working Policy.

This policy lists the time periods that records should be kept for (retention period) and after this they should either be deleted, destroyed or transferred to a read-only archive. Data and records should only be kept if this can be justified and the school must be able to meet any legitimate request to amend, delete or transfer data. The school should record how and when any personal data is collected and sensitive personal data must be held securely.

The reasons and basis for holding personal (and sensitive personal data) are communicated to data subjects in the school Privacy Notices.

### Definitions

A **record** means any document or item of data, which contains evidence or information relating to the school, its staff or pupils. This could be in paper or electronic (digital) form, and can include e-mails. An electronic record also includes a digital document's date of creation, its author and the history of its changes. Paper records should be kept in an ordered, accessible and searchable system.

**Secure storage** of data means that paper records should be kept away from unauthorised viewing by others and important paper records should be protected from destruction in the event of a fire etc. Electronic or digital files should only be stored on password protected school systems or encrypted school devices. Staff should ensure they follow the guidelines in the Remote Working policy to keep records safe while working outside school. Backups of electronic records will be carried out.

**Retention periods** start from the last addition or amendment to the paper or electronic record.

**Secure disposal and deletion.** A record has been securely disposed of if it cannot be read or reconstructed. This means paper records must be shredded and electronic records should be deleted from the system it is held on, in accordance with the operating instructions for each system.

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Type of Record/Document	Retention Period
<p><b>SCHOOL-SPECIFIC RECORDS</b>            Registration documents of School             Attendance Register             Minutes of Governors' meetings             Annual curriculum</p>	<p>Permanent (or until closure of the school)             6 years from last date of entry, then archive.             6 years from date of meeting             From end of year: 3 years (or 1 year for other class records: eg marks/timetables/assignments)</p>
<p><b>INDIVIDUAL PUPIL RECORDS</b>            Admissions: application forms, assessments, records of decisions             Examination results (external or internal)             Pupil file including:  <ul style="list-style-type: none"> <li>• Pupil reports</li> <li>• Pupil performance records</li> <li>• Pupil medical records</li> </ul>             Special educational needs records (<i>to be risk assessed individually</i>)</p>	<p><b><i>NB - this will generally be personal data</i></b>            25 years from date of birth (or, if pupil not admitted, up to 7 years from that decision).             7 years from pupil leaving school             ALL: 25 years from date of birth (subject to where relevant to safeguarding considerations: any material which may be relevant to potential claims should be kept for the lifetime of the pupil).             Date of birth plus up to 35 years (allowing for special extensions to statutory limitation period)</p>
<p><b>SAFEGUARDING</b>            Policies and procedures             DBS disclosure certificates (if held)               Accident/Incident reporting              Child Protection files</p>	<p>Keep a permanent record of historic policies   <u>No longer than 6 months</u> from decision on recruitment, unless DBS specifically consulted - but a record of the checks being made must be kept, if not the certificate itself.            Keep on record for as long as any living victim may bring a claim (NB civil claim limitation periods can be set aside in cases of abuse).             If a referral has been made/social care have been involved or child has been subject of a multi-agency plan - indefinitely.             If low level concerns, with no multi-agency act - apply applicable school low-level concerns policy rationale (this may be 25 years from date of birth OR indefinitely).</p>

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Type of Record/Document	Retention Period
<p><b>ACCOUNTING RECORDS</b> Accounting records (<i>normally taken to mean records which enable a company's accurate financial position to be ascertained &amp; which give a true and fair view of the company's financial state</i>)</p> <p>Tax returns</p> <p>VAT returns</p> <p>Budget &amp; internal financial reports</p>	<p>Minimum - 6 years for UK charities (and public companies) from the end of the financial year in which the transaction took place</p> <p>Minimum - 6 years</p> <p>Minimum 6 years</p> <p>Minimum - 3 years</p>
<p><b>CONTRACTS AND AGREEMENTS</b> Signed or final/concluded agreements (<i>plus any signed or final/concluded variations or amendments</i>)</p> <p>Deeds (or contracts under seal)</p>	<p>Minimum - 7 years from completion of contractual obligations or term of agreement, whichever is the later</p> <p>Minimum - 13 years from completion of contractual obligation or term of agreement</p>
<p><b>INTELLECTUAL PROPERTY RECORDS</b> Formal documents of title (trade mark or registered design certificates; patent or utility model certificates)</p> <p>Assignments of intellectual property to or from the school</p> <p>IP/IT agreements (including software licences and ancillary agreements eg. maintenance; storage; development; coexistence agreements; consents)</p>	<p>Permanent (in the case of any right which can be permanently extended, eg trade marks); otherwise expiry of right plus minimum of 7 years.</p> <p>As above in relation to contracts (7 years) or, where applicable, deeds (13 years).</p> <p>Minimum - 7 years from completion of contractual obligation concerned or term of agreement</p>
<p><b>EMPLOYEE/PERSONNEL RECORDS</b> Single Central Record of employees</p> <p>Contracts of employment</p> <p>Employee appraisals or reviews</p> <p>Staff personnel file</p> <p>Payroll, salary, maternity pay records</p> <p>Pension or other benefit schedule records</p>	<p><b><i>NB this will contain personal data</i></b> Keep a permanent record of all mandatory checks that have been undertaken (but <u>not</u> DBS certificate itself: 6 months as above)</p> <p>7 years from effective date of end of contract</p> <p>Duration of employment plus minimum of 7 years As above, but <u>do not delete any information which may be relevant to historic safeguarding claims.</u></p> <p>Minimum - 6 years</p> <p>Possibly permanent, depending on nature of scheme</p> <p>Minimum 3 months but no more than 1 year</p>

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Type of Record/Document	Retention Period
Job application and interview/rejection records (unsuccessful applicants)  Immigration records  Health records relating to employees	Minimum - 4 years  7 years from end of contract of employment
<b>INSURANCE RECORDS</b> Insurance policies (will vary - private, public, professional indemnity)  Correspondence related to claims/renewals/notification re: insurance	Duration of policy (or as required by policy) plus a period for any run-off arrangement and coverage of insured risks: ideally, until it is possible to calculate that no living person could make a claim.  Minimum - 7 years
<b>ENVIRONMENTAL, HEALTH &amp; DATA</b> Maintenance logs  Accidents to children  Accident at work records (staff)  Staff use of hazardous substances  Risk assessments (carried out in respect of above)  Data protection records documenting processing activity, data breaches	10 years from date of last entry  25 years from birth (longer for safeguarding)  Minimum - 4 years from date of accident, but review case-by-case where possible  Minimum - 7 years from end of date of use  7 years from completion of relevant project, incident, event or activity.  No limit: as long as up-to-date and relevant (as long as no personal data held)

Date	Change History
March 2018	Policy written