

## Data Retention Policy

### Introduction

Caversham Preparatory School has a responsibility to maintain its records and record keeping systems. When doing this, the School will take account of the following factors: -

1. The most efficient and effective way of storing records and information;
2. The confidential nature of the records and information stored;
3. The security of the record systems used;
4. Privacy and disclosure; and
5. Their accessibility.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the School's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the School from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect. The School may also vary any parts of this procedure, including any time limits, as appropriate, in any case.

### Data Protection

This policy sets out how long employment-related and pupil data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the General Data Protection Regulation (GDPR) and the Freedom of Information Act 2000. Data will be stored and processed to allow for the efficient operation of the School. The School's Data Protection Policy outlines its duties and obligations under the GDPR.

### Checklist

This checklist has been produced in accordance with the guidance produced by the DfE in April 2018 in the 'GDPR Toolkit for Schools' and is in accordance with the Data Protection rules and Freedom of Information Act (2000) legislation.

This is a checklist to enable School Staff to carry out an efficient annual review and safe destruction of school records and information.

Where there is legal statute behind a requirement this is detailed.

### Safe Destruction of Data

#### (i) Disposal of records that have reached the end of the minimum retention period allocated

The fifth data protection principle as per the data protection rules (updated for GDPR) states that:

*"Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes"*

In each school, the leadership must ensure that records that are no longer required for business use are reviewed as soon as possible under the criteria set out so that only the appropriate records are destroyed.

The school review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained by the school for research or litigation purposes.

Whatever decisions are made they must be documented as part of the records management policy within the school.

**(ii) Safe destruction of records**

All records containing personal information, or sensitive policy information should be made either unreadable or unreconstructable.

- Paper records should be shredded using a cross-cutting shredder
- CDs / DVDs / Floppy Disks should be cut into pieces
- Hard Disks/USB sticks should be dismantled and sanded
- Any other records should be bundled up and disposed of by a secure disposal company.
  - a) Where an external provider is used, the organisation must also be able to prove that the records have been destroyed by the company who should provide a Certificate of Destruction. Staff working for the external provider should have been trained in the handling of confidential documents.

The shredding needs to be planned with specific dates and all records should be identified as to the date of destruction.

- b) Where records are destroyed internally, the process must ensure that all records are recorded and are authorised to be destroyed by a member of the Leadership team and the destruction recorded.

**(iii) Freedom of Information Act 2000 (FoIA 2000)**

The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction

Members of staff should record at least:

- File title (or brief description);
- Number of files and date range
- The name of the authorising officer
- Date action taken

Following this guidance will ensure that the school is compliant with the Data Protection rules and the Freedom of Information Act 2000.

---

Version Control History

First Edition – October 2018 written by J Lawson and approved by the Board November 2018.

## Annual Review of School Records

**Completion page**

Review completed by: \_\_\_\_\_

Date: \_\_\_\_\_

Approved by Head Teacher: \_\_\_\_\_

Date: \_\_\_\_\_

Note – The completion of this review should be shared at the Board meeting and minuted.

**A. Summary of areas reviewed:**

<b>Ref</b>	<b>Area</b>	<b>Annual Review Completed Tick (✓)</b>	<b>Reviewer Initials</b>
1	Management of the School		
2	Human Resources		
3	Financial Management of the School		
4	Property Management		
5	Pupil Management		
6	Curriculum Management		
7	Extra-Curricular Activities		
8	Government, Local Authority and ISI/ISA/ISC		
9	List of School Records and Data safely destroyed		

**1. Management of the School**

*This section contains retention periods connected to the general management of the school. This covers the work of the Board, the Head Teacher and the Senior Management Team, the admissions process and operational administration.*

**1.1 The Board**

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1.1.1	Agendas for 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 <sup>1</sup>	
1.1.2	Minutes of Board meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)		PERMANENT		
	Inspection Copies		Date of meeting + 3 years	SECURE DISPOSAL	
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the report deals 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 or retain with the signed set of the minutes	
1.1.4	Action plans created and administered by the Board	No	Life of the action plan + 3 years	SECURE DISPOSAL	
1.1.5	Policy documents created and administered by the Board	No	Life of the policy + 3 years	SECURE DISPOSAL	
1.1.6	Records relating to complaints dealt with by the 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	
1.1.7	Annual Reports	No	Date of report + 10 years	SECURE DISPOSAL	

## 1.2 Head Teacher and Senior Management Team

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
1.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff	Date of last entry in the book + a minimum of 6 years then review	SECURE DISPOSAL	
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff	Date of the meeting + 3 years then review	SECURE DISPOSAL	
1.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff	Date of the report + a minimum of 3 years then review	SECURE DISPOSAL	

1.2.4	Records created by the Head Teacher, Deputy Head Teacher and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff	Current academic year + 6 years then review	SECURE DISPOSAL	
1.2.5	Correspondence created by the Head Teacher, Deputy Head Teacher and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff	Date of correspondence + 3 years then review	SECURE DISPOSAL	
1.2.6	Professional Development Plans	Yes	Life of the plan + 6 years	SECURE DISPOSAL	
1.2.7	School Development Plans	No	Life of the plan + 3 years	SECURE DISPOSAL	

<b>1.3 Admissions Process</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (v)</b>
1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No	Life of the policy + 3 years then review	SECURE DISPOSAL	
1.3.2	Admissions – if the admission is successful	Yes	Date of admission + 1 year	SECURE DISPOSAL	
1.3.3	Admissions – if the application is unsuccessful	Yes	Date + 1 year	SECURE DISPOSAL	
1.3.4	Register of Admissions	Yes	Every entry in the admission register must be preserved permanently		
1.3.6	Proofs of address supplied by parents as part of the admissions process	Yes	Current year + 1 year	SECURE DISPOSAL	
1.3.7	Supplementary Information form including additional information such as religion, medical conditions etc	Yes			
	For successful admissions		This information should be added to the pupil file	SECURE DISPOSAL	
	For unsuccessful admissions		Until the process is completed	SECURE DISPOSAL	

<b>1.4 Operational Administration</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (v)</b>

1.4.1	General file series	No	Current year + 5 years then REVIEW	SECURE DISPOSAL	
1.4.2	Records relating to the creation and publication of the school brochure or prospectus	No	Current year + 3 years	STANDARD DISPOSAL	
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No	Current year + 1 year	STANDARD DISPOSAL	
1.4.4	Newsletters and other items with a short operational use	No	Current year + 1 year	STANDARD DISPOSAL	
1.4.5	Visitors' Books and Signing in Sheets	Yes	Current year + 6 years then REVIEW	SECURE DISPOSAL	
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No	Current year + 6 years then REVIEW	SECURE DISPOSAL	

## 2. Human Resources

2.1 Recruitment					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes	Date of appointment + 6 years	SECURE DISPOSAL	
2.1.2	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	
2.1.3	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 personal file (see below) and all other information retained for 6 months	SECURE DISPOSAL	
2.1.4	Pre-employment vetting information – DBS Checks	No	Added to personnel file	SECURE DISPOSAL	

2.1.5	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	Where possible these documents should be added to the Staff Personal 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	SECURE DISPOSAL	
-------	---	-----	---	-----------------	--

## 2.2 Operational Staff Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.2.1	Staff Personal File	Yes	Termination of Employment + 6 years	SECURE DISPOSAL	
2.2.2	Annual appraisal/ assessment records	Yes	Current year + 5 years	SECURE DISPOSAL	

## 2.3 Management of Disciplinary and Grievance Processes

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.3.1	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. 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	
2.3.2	Disciplinary Proceedings	Yes			
	oral warning		Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file]	
	written warning – level 1		Date of warning + 6 months	SECURE DISPOSAL- as above	
	written warning – level 2		Date of warning + 12 months	SECURE DISPOSAL – as above	
	final warning		Date of warning + 18 months	SECURE DISPOSAL – as above	
	case not found		If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL – as above	

<b>2.4 Health and Safety</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (v)</b>
2.4.1	Health and Safety Policy Statements	No	Life of policy + 3 years	SECURE DISPOSAL	
2.4.2	Health and Safety Risk Assessments	No	Life of risk assessment + 3 years	SECURE DISPOSAL	
2.4.3	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	SECURE DISPOSAL	
2.4.4	Accident Reporting	Yes			
	Adults		Date of the incident + 6 years	SECURE DISPOSAL	
	Children		DOB of the child + 25 years	SECURE DISPOSAL	
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Current year + 40 years	SECURE DISPOSAL	
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Last action + 40 years	SECURE DISPOSAL	
2.4.7	Fire Precautions log books	No	Current year + 6 years	SECURE DISPOSAL	

<b>2.4 Payroll and Pensions</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (v)</b>
2.5.1	Monthly pay records	Yes	Current year + 3 years	SECURE DISPOSAL	
2.5.2	Maternity pay records	Yes	Current year + 3 years	SECURE DISPOSAL	
2.5.3	Timesheets	Yes	Current year + 3 years	SECURE DISPOSAL	
2.5.4	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Current year + 6 years	SECURE DISPOSAL	

### 3. Financial Management of the School

<b>3.1 Risk Management and Insurance</b>					
<b>Ref</b>	<b>Basic file description</b>	<b>Data Protection Issues</b>	<b>Retention Period [Operational]</b>	<b>Action at the end of the administrative life of the record</b>	<b>Annual Review Completed Tick (v)</b>
3.1.1	Employer's Liability Insurance Certificate	No	Closure of the school + 40 years	SECURE DISPOSAL	

### 3.2 Asset Management



Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.2.1	Inventories of furniture and equipment	No	Current year + 6 years	SECURE DISPOSAL	
3.2.2	Burglary, theft and vandalism report forms	No	Current year + 6 years	SECURE DISPOSAL	

3.3 Accounts and Statements including Budget Management					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.3.1	Annual Accounts	No	Current year + 6 years	SECURE DISPOSAL	
3.3.2	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	SECURE DISPOSAL	
3.3.3	Invoices, receipts, order books and requisitions, delivery notices	No	Current financial year + 6 years	SECURE DISPOSAL	
3.3.4	Records relating to the collection and banking of monies	No	Current financial year + 6 years	SECURE DISPOSAL	
3.3.5	Records relating to the identification and collection of debt	No	Current financial year + 6 years	SECURE DISPOSAL	

3.4 Contract Management					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.4.1	All records relating to the management of contracts under seal	No	Last payment on the contract + 12 years	SECURE DISPOSAL	
3.4.2	All records relating to the management of contracts under signature	No	Last payment on the contract + 6 years	SECURE DISPOSAL	
3.4.3	Records relating to the monitoring of contracts	No	Current year + 2 years	SECURE DISPOSAL	

3.5 School Finances					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.5.1	Cheque books	No	Current year + 6 years	SECURE DISPOSAL	
3.5.2	Paying in books	No	Current year + 6 years	SECURE DISPOSAL	
3.5.3	Invoices	No	Current year + 6 years	SECURE DISPOSAL	

3.5.4	Receipts	No	Current year + 6 years	SECURE DISPOSAL	
3.5.5	Bank statements	No	Current year + 6 years	SECURE DISPOSAL	

## 4. Property Management

4.1 Property Management					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
4.1.1	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		
4.1.2	Plans of property belong 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.		
4.1.3	Leases of property leased by or to the school	No	Expiry of lease + 6 years	SECURE DISPOSAL	
4.1.4	Records relating to the letting of school premises	No	Current financial year + 6 years	SECURE DISPOSAL	

4.2 Maintenance					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
4.2.1	All records relating to the maintenance of the school carried out by contractors	No	Current year + 6 years	SECURE DISPOSAL	
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No	Current year + 6 years	SECURE DISPOSAL	

## 5. Pupil Management

*This section includes all records which are created during the time a pupil spends at the school. For information about accident reporting see under Health and Safety above*

### 5. Pupil Education Records

5.1 Pupil's Educational Record					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)

5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	Retain whilst the child remains at the school	The file should follow the pupil when he/she leaves the school. <sup>2</sup>	
5.1.2	Examination Results – Pupil Copies	Yes	This information should be added to the pupil file		
5.1.3	Child protection information held in separate files		DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	SECURE DISPOSAL	

## 5.2 Attendance

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
5.2.1	Admissions Register	Yes	Last entry + 6 years	SECURE DISPOSAL	
5.2.2	Attendance Registers	Yes	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	
5.2.3	Correspondence relating to authorized absence	Yes	Current academic year + 2 years	SECURE DISPOSAL	
5.2.4	Care Registers	Yes	Current academic year	SECURE DISPOSAL	
5.2.5	Clubs Registers	Yes	Current academic year	SECURE DISPOSAL	
5.2.6	Holiday Club Registers	Yes	Current academic year	SECURE DISPOSAL	

## 5.3 Special Educational Needs

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Date of Birth of the pupil + 25 years	<p>REVIEW</p> <p>NOTE: This retention period is the minimum retention 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 and this should be documented.</p>	

## 6. Curriculum Management

6.1 Statistics and Management Information					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
6.1.1	Examination Results (Schools Copy)	Yes	Current year + 6 years	SECURE DISPOSAL	
	SATS records –	Yes			
	Results		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 current year + 6 years to allow suitable comparison	SECURE DISPOSAL	
6.1.2	Published Admission Number (PAN) Reports	Yes	Current year + 6 years	SECURE DISPOSAL	
6.1.3	Value Added and Contextual Data	Yes	Current year + 6 years	SECURE DISPOSAL	
6.1.4	Self-Evaluation Forms	Yes	Current year + 6 years	SECURE DISPOSAL	

6.2 Implementation of Curriculum					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
6.2.1	Schemes of Work	No	Current year + 1 year	Review these records at the end of each year and allocate a further retention period or disposal	
6.2.2	Timetable	No	Current year + 1 year	NORMAL DISPOSAL	
6.2.3	Class Record Books	No	Current year + 1 year	NORMAL DISPOSAL (remove personal information or secure disposal)	
6.2.4	Mark Books	No	Current year + 1 year	NORMAL DISPOSAL(remove personal information or secure disposal)	
6.2.5	Record homework set	No	Current year + 1 year	NORMAL DISPOSAL(remove personal information or secure disposal)	
6.2.6	Pupils' Work	No	Where possible pupils' work should be returned to the pupil at the end of the academic year or current year + 1 year	SECURE DISPOSAL	

## 7. Extra Curriculum Management

7.1 Educational Visits outside the Classroom					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)

7.1.1	Parental consent forms for school trips where there has been no major incident	Yes	Conclusion of the trip	SECURE DISPOSAL	
7.1.2	Parental permission slips for school trips – where there has been a major incident	Yes	DOB of the pupil involved in the incident +25years  The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	SECURE DISPOSAL	

7.2 Walking Bus					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
7.2.1	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	SECURE DISPOSAL  [If these records are retained electronically any back-up copies should be destroyed at the same time]	

## 8. Central Government, Local Authority and ISA/ISI/ISC

8.1 Local Authority					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
8.1.1	School Census Returns	No	Current year + 5 years	SECURE DISPOSAL	
8.1.2	Circulars and other information sent from authorities	No	Operational use	SECURE DISPOSAL	
8.1.3	Inspection reports and papers	No	Life of the report then REVIEW	SECURE DISPOSAL	
8.1.4	Returns made to central government	No	Current year + 6 years	SECURE DISPOSAL	

## Appendix A – List of School Records and Data safely destroyed

The following sheet is to be completed.

Ref Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of destruction	<b>Confirm</b> (i) Safely destroyed (ii) In accordance with Data Retention Guidelines
e.g.	School Invoices	Copies of purchase invoices dated 2011/12	Folders marked "Purchase Invoices 2011/12" 1 to 3	3 Folders	Shredding	✓

Ref Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of destruction	<u>Confirm</u> (i) Safely destroyed (ii) In accordance with Data Retention Guidelines
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						