



Data Retention Policy

This school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment

Governor's Committee Responsibility:	Resources
Date Approved:	Spring 2024
Review Period:	Every 3 years
Next Review Date:	Spring 2027

The Limpsfield Grange Values:

At Limpsfield Grange we believe in working together to make a difference.

We are a tolerant community; we accept, value and understand others.

We care for all members of our community without judgement.

We are responsible for our own learning, behaviour and actions.

We accept that sometimes things go wrong. We work together to take responsibility for our mistakes and for putting things right.

We are a respectful community and we treat others as we would like to be treated, even if they have different views and opinions to our own.

We understand that good behaviour helps us to prepare for life beyond Limpsfield Grange.

We are positive and resilient. We celebrate difference in everything that we do.

We are all proud to be part of the Limpsfield Grange community.

July 2023

Limpsfield Grange School

Data Retention Policy

Background and rationale

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

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Accessibility of records and record keeping systems

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.

Aims of the policy

This policy sets out how long employment-related and student data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the UK General Data Protection Regulation (UK GDPR) and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of Limpsfield Grange School. The school's Data Protection Policy outlines its duties and obligations under the UK GDPR.

Scope of the Policy

This policy applies to all records created, received or maintained by staff at Limpsfield Grange School in the course of carrying out its functions.

- Records are defined as those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.
- A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives and for historical research.

Responsibilities

- Limpsfield Grange School has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The Headteacher has overall responsibility for this policy.
- The School Business Manager will give guidance for good records management practice and will promote compliance with this policy to ensure that information can be retrieved easily, appropriately and in a timely manner.
- Individual school staff must ensure that the records for which they are responsible are accurate, and are maintained and disposed of in line with the Information and Records Management Society Retention Guidelines for Schools (see link at the end of this policy).

Retention Schedule

Information (hard copy and electronic) will be retained for at least the period specified in the record retention schedule (Appendix 1)

The retention schedule refers to all records regardless of media (e.g., paper, electronic, photographic etc.) in/on which they are stored.

Destruction of Records

The retention schedule is a relatively lengthy document listing the many types of records used by the school and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

Where records have been identified for destruction, they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information or sensitive policy information should be shredded before disposal where possible. Large amounts of paper records will be put into confidential waste bags and sealed ready for collection by an approved supplier. All electronic information will be deleted.

Limpsfield Grange maintains a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in this list the following:

- File reference (or other unique identifier);
- File title/description;
- Number of files;
- Name of the authorising member of SLT;
- Date destroyed or deleted from system; and
- Person(s) who undertook destruction.

Retention of Safeguarding Records

Any allegations made that are found to be malicious must not be part of the personnel records.

For any other allegations made, the school must keep a comprehensive summary of the allegation made, details of how the investigation was looked into and resolved and any decisions reached. This should be kept on the personnel files of the accused.

Any allegations made of sexual abuse should be preserved by the school for the term of an inquiry by the Independent Inquiry into Child Sexual Abuse. All other records (for example, the personnel file of the accused) should be retained 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. Guidance from the Independent Inquiry Child Sexual Abuse states that prolonged retention of personal data at the request of an Inquiry would not contravene data protection regulation provided the information is restricted to that necessary to fulfil potential legal duties that a school may have in relation to an Inquiry.

Whilst the Independent Inquiry into Child Sexual Abuse is ongoing, it is an offence to destroy any records relating to it. At the conclusion of the Inquiry, it is likely that an indication regarding the appropriate retention periods of the records will be made.

Archiving

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. The appropriate staff member must give all sorted files for archiving to the main school office. A database of the records sent to the archives is maintained by the main school office.

Transfer of Information

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered

Student records

We retain the student's educational record whilst the child remains at the school. Once a student leaves the school, their electronic file is sent to their next placement who are then responsible for maintaining the records. Paper copies of student files are retained for at least 25 years. Safeguarding files are sent securely to the student's confirmed placement, the school office keeps a copy of the proof of receipt.

Emails

Emails accounts are not a case management tool in itself. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a student record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost.

Responsibility and Monitoring

The School Business Manager has primary and day-to-day responsibility for implementing this policy. The Data Protection Officer, in conjunction with the school, is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The Data Protection Officer will consider the suitability and adequacy of this policy and report improvements directly to management.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

Senior Leaders at all levels are responsible for ensuring those reporting to them are made aware of and understand of our data retention responsibilities.

Related policies and documents:

- CCTV Policy
- Child Protection & Safeguarding Policy
- Data Breach Policy
- Data Protection Policy
- Equality & Diversity Policy
- Exams Archiving Policy
- Recruitment & Selection Policy
- Redundancy and Restructuring Policy
- Special Educational Needs Policy
- Staff Behaviour Policy
- Whistleblowing Policy

This policy will be reviewed 3 yearly and additionally in the case of the following:

- Serious or frequent breaches of the Data Retention Policy
- New guidance from the Information and Management Records Society
- Advice from the Local Authority or Police

Data Protection Officer (DPO)

Please find below details of the School’s Data Protection Officer:

Data Protection Officer: Judicium Consulting Ltd.

Address: 72 Cannon Street, London, EC4N 6AE

Email: dataservices@judicium.com

Web: www.judiciumeduation.co.uk

Telephone: 0203 326 9174

Lead Contact: Craig Stilwell

The Data Protection Officer is responsible for overseeing this Data Protection policy and developing data-related policies and guidelines.

Review

The Governing Body of Limpsfield Grange School adopted this policy on:	
It will be reviewed on:	
Signed	
Dated	

FILE DESCRIPTION	RETENTION PERIOD
Employment Records	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates
Job applications and interview records of successful candidates	Indefinitely
Written particulars of employment, contracts of employment and changes to terms and conditions	Indefinitely
Right to work documentation including identification documents	Indefinitely
Immigration checks	Two years after the termination of employment
DBS check ID documents and disclosures of criminal records forms	As soon as practicable after the check has been completed and the outcome recorded, no longer than 6 months
Change of personal details notifications	No longer than 6 months after receiving this notification
Emergency contact details	Archived within SIMS upon leaving
Personnel records	Indefinitely
Annual leave records	Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards
Disciplinary records	Indefinitely
Training	Indefinitely
Staff training where it relates to safeguarding or other child related training	Date of the training plus 40 years (This retention period reflects that the IICSA may wish to see training records as part of an investigation)
Annual appraisal/assessment records	Current year plus 6 years
Professional Development Plans	6 years from the life of the plan
Allegations of a child protection nature against a member of staff including where the allegation is founded	10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed.
Financial and Payroll Records	
Payroll and wage records	6 years after end of tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988)

Maternity/Adoption/Paternity Leave records	3 years after end of tax year they relate to
Current bank details	Until updated plus 3 years
Overtime	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Annual accounts	Current year plus 6 years
Loans and grants managed by the school	Date of last payment on the loan plus 12 years
All records relating to the creation and management of budgets	Life of the budget plus 3 years
Invoices, receipts, order books and requisitions, delivery notices	Current financial year plus 6 years
Student Grant applications	Current year plus 3 years
Pupil Premium Fund records	Date pupil leaves the school plus 6 years
School fund documentation (including but not limited to invoices, cheque books, receipts, bank statements etc).	Current year plus 6 years
Free school meals registers (where the register is used as a basis for funding)	Current year plus 6 years
School meal registers and summary sheets	Current year plus 3 years
Agreements and Administration Paperwork	
Collective workforce agreements and past agreements that could affect present employees	Permanently
Trade union agreements	10 years after ceasing to be effective
School Development Plans	3 years from the life of the plan
Visitors Book and Signing in Sheets	6 years
Newsletters and circulars to staff, parents and pupils	1 year (and the school may decide to archive one copy)
Minutes of Senior Management Team meetings	Date of the meeting plus 3 years or as required
Reports created by the Head Teacher or the Senior Management Team.	Date of the report plus a minimum of 3 years or as required
Health and Safety Records	
Health and Safety consultations	Permanently
Health and Safety Risk Assessments	Life of the risk assessment plus 3 years
Health and Safety Policy Statements	Life of policy plus 3 years

Any records relating to any reportable death, injury, disease or dangerous occurrence	Date of incident plus 3 years provided that all records relating to the incident are held on personnel file
Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	Until the child reaches the age of 21.
Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	Accident book should be retained 3 years after last entry in the book. (Social Security (Claims and Payments) Regulations 1979; Social Security Administration Act 1992; Limitation Act 1980)
Fire precaution log books	Current year plus 3 years
Medical records and details of: - <ul style="list-style-type: none"> control of lead at work employees exposed to asbestos dust records specified by the Control of Substances Hazardous to Health Regulations (COSHH) 	40 years from the date of the last entry made in the record (Control of Substances Hazardous to Health Regulations (COSHH); Control of Asbestos at Work Regulations)
Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made
Temporary and Casual Workers	
Records relating to hours worked and payments made to workers	3 years
Governing Body Documents	
Instruments of government	For the life of the school
Meetings schedule	Current year
Minutes – principal set (signed)	Generally kept for the life of the organisation
Agendas – principal copy	Where possible the agenda should be stored with the principal set of the minutes
Agendas – additional copies	Date of meeting
Policy documents created and administered by the governing body	Until replaced
Register of attendance at full governing board meetings	Date of last meeting plus 6 years
Annual reports required by the Department of Education	Date of report plus 10 years
Records relating to complaints made to and investigated by the governing body or head teacher	Major complaints: current year plus 6 years. If negligence involved: current year plus 15 years. If child protection or safeguarding issues are involved then: current year plus 40 years.

Correspondence sent and received by the governing body or head teacher	General correspondence should be retained for current year plus 3 years
Records relating to the terms of office of serving governors, including evidence of appointment	Date appointment ceases plus 6 years
Register of business interests	Date appointment ceases plus 6 years
Records relating to the training required and received by governors	Date appointment ceases plus 6 years
Records relating to the appointment of a clerk to the governing body	Date on which clerk appointment ceases plus 6 years
Student Records	
Details of whether admission is successful/unsuccessful	1 year from the date of admission/non-admission
Proof of address supplied by parents as part of the admissions process	Current year plus 1 year
Admissions register	Entries to be preserved for three years from date of entry
Student Record	Indefinitely
Attendance Registers	3 years from the date of entry
Correspondence relating to any absence (authorised or unauthorised)	Current academic year plus 2 years (Education Act 1996)
Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Indefinitely
Medical Administration Records	15 years
Child protection information (to be held in a separate file).	Indefinitely
Exam results (student copy)	1-3 years from the date the results are released
Examination results (school's copy)	Current year plus 6 years
Allegations of sexual abuse	For the time period of an inquiry by the Independent Inquiry into Child Sexual Abuse
Records relating to any allegation of a child protection nature against a member of staff	Until the accused normal retirement age or 10 years from the date of the allegation (whichever is the longer)
Consents relating to school activities as part of UK GDPR compliance (for example, consent to be sent circulars or mailings)	Consent will last whilst the student attends the school
Student's work	Where possible, returned to student at the end of the academic, otherwise, the work should be retained for the current year plus 1 year
Mark books	Current year plus 1 year

Schemes of work	Current year plus 1 year
Timetable	Current year plus 1 year
Class record books	Current year plus 1 year
Record of homework set	Current year plus 1 year
Photographs of students	For the time the child is at the school and for a short while after. Please note select images may also be kept for longer (for example to illustrate history of the school) Any images of students taken on a personal device must be deleted once transferred to a school device, the deleted folder must then be emptied.
Parental consent forms for school trips where there has been no major incident	End of the trip or end of the academic year (subject to a risk assessment carried out by the school)
Parental permission slips for school trips where there has been a major incident	Date of birth of the student involved in the incident plus 25 years. Permission slips for all the students on the trip should be retained to demonstrate the rules had been followed for all students.
Other Records	
Emails	Hard copies of potential contentious emails should be kept in the student's file. Other emails should be deleted at the end of each academic year unless required for reference.
CCTV	Images are automatically overwritten after 7 days. Viewing logs are kept indefinitely.
Privacy notices	Until replaced plus 6 years
Inventories of furniture and equipment	Current year plus 6 years
All records relating to the maintenance of the school carried out by contractors or employees of the school	Whilst the building belongs to the school
Records relating to the letting of school premises	Current financial year plus 6 years
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	Current year plus 6 years then review
Referral forms	While the referral is current
Contact data sheets	Current year then review, if contact is no longer active then destroy