

**WHITE NOTLEY C OF E PRIMARY SCHOOL
DATA AUDIT & RETENTION POLICY**



Data Audit & Retention Timescales

Personal data is not held any longer than is necessary. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained, but should be determined in a manner consistent with our data retention timescales detailed below.

Records relating to child protection

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
1.1	Child protection files	Yes	Education Act 2002, s175, related guidance "Safeguarding Children in Education", September 2004	Date of birth + 25 years	Transfer securely to next school
1.2	Allegation of 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). Education Act 2002 Guidance "Dealing with Allegations of Abuse against Teachers and Other Staff" November 2005	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer	Secure disposal

Records relating to pupils

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
2.1	Admission registers	Yes		Entry + 7 years	Retain in school for 7 years from entry. Can consider archiving these records if have the facility.

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
2.2	Attendance registers	Yes		Date of register + 3 years	Secure disposal
2.3	Pupil admission files files retained in schools	Yes			
2.3a	Primary assessment data and educational reports	Yes		Retain for time which the pupil remains at the primary school + 3 years for school improvement evaluation.	Transfer to the secondary school (or other primary school) when the child leaves the school.
2.4	Pupil files	Yes			
2.4a	Primary – teacher records and pupils work	Yes		Retain for time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school.
2.5	Special Educational Needs files, reviews and individual education plans	Yes		Date of birth + 25 years	Secure disposal
2.6	Correspondence relating to authorised absence and issues	Yes		Date of absence + 2 years	Secure disposal
2.7	Examination results				
2.7a	Public	No		Year of examination + 6 years	Secure disposal
2.7b	Internal examination results	Yes		+ 3 years after the child leaves	Secure disposal
2.8	Any other records created in the course of contact with pupils	Yes/No		+ 3 years after the child leaves	Review at the end of 3 years and retain with pupil file if necessary. Secure disposal
2.9	EHCP (SEN)	Yes	Special Educational Needs and Disability Act 2001 Section 1	Date of birth + 30 years	Secure disposal unless legal action is pending
2.10	Proposed EHCP or amended EHCP	Yes	Special Educational	Date of birth + 30 years	Secure disposal unless legal action is pending

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
			Needs and Disability Act 2001 Section 1		
2.11	Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12 years	Secure disposal unless legal action is pending
2.12	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years	Secure disposal unless legal action is pending
2.13	Parental permission slips for school trips, where there has been no major incident	Yes		Conclusion of the trip	Secure disposal unless legal action is pending
2.14	Parental permission slips for school trips, where there has been a major incident	Yes	Limitation Act 1980	Date of birth of pupil involved in the incident + 25 years	Secure disposal. Permission slips for all pupils on trip need to be retained for period to show that the rules had been followed for all pupils.
2.15	Records created by schools to obtain approval to run an educational visit outside the classroom, primary schools	No	3 part supplement of the Health & Safety of Pupils on Educational Visits (HASPEV) (1998)	Date of visit + 14 years	Secure disposal
2.16	Records created by schools to obtain approval to run an educational visit outside the classroom, secondary schools	No	3 part supplement of the Health & Safety of Pupils on Educational Visits (HASPEV) (1998)	Date of visit + 10 years	Secure disposal
2.17	Breakfast Club registers	Yes		Date of register + 3 years	This takes into account that if an incident requiring an accident report, the register will be submitted with the accident report and kept for the retention time for accident reporting. Secure disposal

Records relating to Parents

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
3.1	Contact details	Yes		6 months after pupil has left	Secure disposal
3.2	Personal Information Form	Yes	Administration Act 1992 Section 8. Limitation Act 1980	Retain for time which the pupil remains at the primary school	Secure disposal
3.3	Request for leave of absence and response letter	Yes		Retain for time which the pupil remains at the primary school	Secure disposal
3.4	Personal letters	Yes		Retain for time which the pupil remains at the primary school	Secure disposal
3.3	Financial accounts e.g. outstanding dinner money, trip payments etc	Yes		Retain for time which the pupil remains at the primary school	Where appropriate an additional retention period may be allocated. Secure disposal
3.4	Complaints files	Yes		Date of resolution of complaint + 6 years	Review for further retention in the case of contentious disputes. Secure disposal.

Records relating to personnel records

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
4.1	Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	Secure disposal
4.2	Staff personnel files	Yes		Termination + 25 years	Secure disposal
4.3	Interview notes and recruitment records	Yes		Date of interview notes + 6 months if unsuccessful. If successful place in personnel file.	Secure disposal
4.4	Pre-employment vetting information (including CRB checks)	Yes	CRB guidelines	Date of check + 6 months	Secure disposal
4.5	Disciplinary	Yes	Where the		

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
	proceedings		warning relates to child protection issues see 1.2		
4.5a	Oral warning	Yes		Date of warning + 6 months	Secure disposal
4.5b	Written warning - level one	Yes		Date of warning + 6 months	Secure disposal
4.5c	Written warning - level one	Yes		Date of warning + 12 months	Secure disposal
4.5d	Final warning	Yes		Date of warning + 18 months	Secure disposal
4.5e	Case not found	Yes		If child protection see 1.2, otherwise destroy immediately	Secure disposal
4.6	Records relating to accident/injury at work	Yes		Date of incident + 12 years	In case of serious accidents a further retention period will need to be applied. Secure disposal
4.7	Annual appraisal and assessment records	Yes		Current year + 5 years	Secure disposal
4.8	Salary cards	Yes		Last date of employment + 85 years	Secure disposal
4.9	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI 1999/567)	Current year + 3 years	Secure disposal
4.10	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	Secure disposal
4.11	Proofs of identity collected as part of the process for checking "portable" enhanced CRB disclosure	Yes		Where possible these should be checked and a note/copy of what was checked placed on personnel file. If felt necessary to keep any documentation this should also be placed in personnel file.	Secure disposal of notes/copies and return of originals.

Records relating to governors

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
5.1	Minutes - electronic	No		Permanent	Must be available in school for 6 years from the meeting. Can then be archived/stored elsewhere.
5.1a	Principal set (signed)	No		Permanent	Must be available in school for 6 years from the meeting. Can then be archived/stored elsewhere.
5.1b	Inspection copies	No		Date of meeting + 3 years	Secure disposal
5.2	Agendas	No		Date of meeting	Secure disposal
5.3	Reports	No		Date of report + 6 years	Retain in school for 6 years from report date. Can consider archiving/storing anything important.
5.4	Annual parents' meeting papers	No		Date of meeting + 6 years	Retain in school for 6 years from meeting date. Can consider archiving/storing anything important.
5.5	Instruments of Government	No		Permanent	Retain in school whilst school open. Can then be archived/stored elsewhere.
5.6	Trusts and Endowments	No		Permanent	Retain in school whilst operationally required. Can then be archived/stored elsewhere.
5.7	Action plans	No		Date of action plan + 3 years	Secure disposal
5.8	Policy documents	No		Expiry of policy	Retain in school whilst policy operational (this includes if the expired policy is part of a past decision making process).
5.9	Complaints files	Yes		Date of resolution of complaint + 6	Review for further retention in the case of contentious disputes.

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
				years	Secure disposal.
5.10	Annual reports required by Dept of Education	No	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI2002 No1171	Date of report + 10 years	Secure disposal
5.11	Proposals for schools to become or be established as Specialist Status schools	No		Current year + 3 years	Secure disposal

Records relating to school management

Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
6.1	Minutes of the senior management team and other internal administrative bodies	Yes	Date of meeting + 5 years	Retain in school for 5 years from meeting date. Can consider archiving/storing anything important.
6.2	Reports made by the head teacher or management team	Yes	Date of report + 3 years	Retain in school for 3 years from report date. Can consider archiving/storing anything important.
6.3	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes	Closure of file + 6 years	Secure disposal
6.4	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	No/Yes	Date of correspondence + 3 years	Secure disposal
6.5	Professional development plans	Yes	Closure + 6 years	Secure disposal
6.6	School development plans	No	Closure + 6 years	Review for further retention. Secure disposal.
6.7	Admissions - if the admission is successful	Yes	Admission + 1 year	Secure disposal
6.8	Admissions - if the appeal is unsuccessful	Yes	Resolution of case + 1 year	Secure disposal
6.9	Admissions - secondary schools - casual	Yes	Current year + 1 year	Secure disposal
6.10	Proof of address supplied by parents as part of the admissions process	Yes	As the corresponding admission record	Secure disposal
6.11	Supplementary information form including additional information such as religion, medical conditions supplied as part of the admissions process	Yes	As the corresponding admission record	Secure disposal

Records relating to child Curriculum

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
7.1	School development plan	No		Current year + 6 years	Secure disposal
7.2	Curriculum returns	No		Current year + 3 years	Secure disposal
7.3	Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
7.4	Timetable	No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
7.5	Class record books	Yes/No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
7.6	Mark books	Yes/No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
7.7	Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
7.8	Pupils' work	Yes		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
7.9	Examination results	Yes		Current year + 6 years	Secure disposal
7.10	SATs records, examination papers and results	Yes		Current year + 6 years	Secure disposal
7.11	PAN reports	Yes		Current year + 6 years	Secure disposal
7.12	Value added and contextual data	Yes		Current year + 6 years	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
7.13	Self evaluation forms	Yes		Current year + 6 years	Secure disposal

Records relating to health and safety

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
8.1	Accessibility plans	Yes	Disability Discrimination Act	Current year + 6 years	Secure disposal
8.2	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	3 years	Secure disposal
8.2a	Adults	Yes		Date of incident + 7 years	Secure disposal
8.2b	Children	Yes		When child turns 18 + 3 years	Secure disposal
8.3	COSHH	No		Current year + 10 years	Where appropriate an additional retention period may be allocated. Secure disposal
8.4	Incident reports	Yes		Current year + 20 years	Secure disposal
8.5	Policy statements	No		Date of expiry + 1 year	Secure disposal
8.6	Risk assessments	No		Current year + 3 years	Secure disposal
8.7	Process of monitoring areas where employees and persons are likely to have come in contact with asbestos	Yes		Last action + 40 years	Secure disposal
8.8	Process of monitoring	Yes		Last	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
	areas where employees and persons are likely to have come in contact with radiation			action + 50 years	
8.9	Fire precautions log book	No		Current year + 6 years	Secure disposal
8.10	Hazard reporting forms	No		Current year + 6 years	Secure disposal

Administrative records

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
9.1	Employer's liability certificate	No		Closure of school + 40 years	Secure disposal
9.2	Inventories of equipment and furniture	No		Current year + 6 years	Secure disposal
9.3	General file series	No		Current year + 5 years	Review to see if further retention period required. Secure disposal
9.4	School website or prospectus	No		Current year + 3 years	Disposal
9.5	Circulars (staff, parents, pupils)	Yes		Current year + 1 year	Review to see if further retention period required. Secure disposal
9.6	Newsletters, ephemera	Yes		Current year + 1 year	Review to see if further retention period required. Secure disposal
9.7	Visitors book	Yes		Current year + 2 year	Review to see if further retention period required. Secure disposal
9.8	FOSA/Old Pupils Associations	Yes		Current year + 6 years	Review to see if further retention period required. Secure disposal

Records relating to Finance

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
10.1	Annual accounts	Yes	Financial Regulations	Current year + 6 years	Secure disposal
10.2	Loans and grants	No	Financial Regulations	Date of last payment on loan + 12 years	Secure disposal
10.3	Contracts	No			
10.3a	Under seal	No		Contract completion date + 12 years	Secure disposal
10.3b	Under signature	No		Contract completion date + 6 years	Secure disposal
10.3c	Monitoring records	No		Current year + 2 years	Secure disposal
10.4	Copy orders	No		Current year + 2 years	Secure disposal
10.5	Budget reports, budget monitoring etc.	No		Current year + 3 years	Secure disposal
10.6	Invoice, receipts and other records covered by the Financial Regulations	No	Financial Regulations	Current year + 6 years	Secure disposal
10.7	Annual budget and background papers	No		Current year + 6 years	Secure disposal
10.8	Order books and requisitions	No		Current year + 6 years	Secure disposal
10.9	Delivery documentation	No		Current year + 6 years	Secure disposal
10.10	Debtors' records	No	Limitations Act	Current year + 6 years	Secure disposal
10.11	School fund - Cheque books	No		Current year + 3 years	Secure disposal
10.12	School fund - Paying in books	No		Current year + 6 years	Secure disposal
10.13	School fund - Ledger	No		Current year + 6 years	Secure disposal
10.14	School fund - Invoices	No		Current year + 6 years	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
10.15	School fund - Receipts	No		Current year + 6 years	Secure disposal
10.16	School fund - Bank statements	No		Current year + 6 years	Secure disposal
10.17	School fund - School journey books	No		Current year + 6 years	Secure disposal
10.18	Free school meals registers	Yes		Current year + 6 years	Secure disposal

Records relating to property

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
11.1	Title deeds	No		Permanent	These should follow the property
11.2	Plans	No		Permanent	Retain in school whilst operational. Can then be archived/stored elsewhere.
11.3	Maintenance and contractors	No	Financial Regulations	Current year + 6 years	Secure disposal
11.4	Leases	No		Expiry of lease + 6 years	Secure disposal
11.5	Burglary, theft and vandalism report forms	No		Current year + 6 years	Secure disposal
11.6	Maintenance log books	No		Last entry + 10 years	Secure disposal
11.6	Contractors' reports	No		Current year + 6 years	Secure disposal

Records relating to local authorities

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
12.1	Secondary transfer sheets (primary)	Yes		Current year + 2 years	Secure disposal
12.2	Attendance returns	Yes		Current year + 1 year	Secure disposal
12.3	Circulars from LEA	No		Whilst required operationally	Review to see if further retention period required. Disposal

Records relating to the Department of Education

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
13.1	HMI reports	No		These do not need to be kept any longer	Secure disposal
13.2	OFSTED reports and papers	No		Replace former report with new inspection report	Review to see if further retention period required. Secure disposal
13.3	Returns	No		Current year + 6 years	Secure disposal
13.4	Circulars from Department of Education	No		Whilst required operationally	Review to see if further retention period required. Disposal

Records relating to school meals

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
14.1	Dinner register	Yes		Current year + 3 years	Secure disposal
14.2	School meals summary sheets	No		Current year + 3 years	Secure disposal

Records relating to Family Worker/Home Visits

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
15.1	Record of visit/actions plans	Yes		Current year + 2 years	Review to see if further retention period required. Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
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	Secure disposal
15.3	Referral forms	Yes		While the referral is current	Secure disposal
15.4	Contact data sheets	Yes		Current year then review	If contact is no longer active secure disposal

