

Data Retention Policy

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).

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

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.

Individual paper based pupil files are also held by the school containing admission information and copies of correspondence eg: letters re: attendance, requests for holiday, health etc. Files are stored securely, in a locked filing cabinet in the main office area.

Contact details

A record card for each child in school is kept containing contact details. These are stored in a locked cupboard in the main office and used in the event that SIM is unavailable or in the event of evacuation from the building (fire etc.)

Photographic identification

We hold a printed photograph of every child in school in case of a critical emergency (fire, explosion etc.) These photos are stored in a locked cupboard in the main office.

Assessment Information

All assessment information is stored on either the teacher or admin server. (Password protected). . Reception assessment is collected and stored on Primary Essence (Web based and password protected)

Any paper based records must only contain a child's forename (+ initial, in cases where more than one child in a class has the same forename).

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 CPOMS or on the Admin server.

Paper copies of documents are stored, securely, in a locked filing cabinet in the Headteacher's office.

Pupils receiving Pupil Premium (PP) funding / Looked After Children (LAC)

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 is made available to staff on a need to know basis.

Any tracking of these pupils is stored electronically on the Admin server by the headteacher.

LAC review documents are stored electronically on CPOMS.

Medical information

Information provided includes any significant known drug reactions, major allergies and notable medical conditions. This information is stored in individual paper pupil files (stored securely in a locked filing cabinet in the main office) and is available to staff likely to administer medication or treatment. This information is shared with external providers or external bodies (caterers) only with parental permission. A paper record summary is held in each classroom for health and safety reasons. Paper records include a cover sheet marked 'private and confidential' to minimise the risk of inappropriate viewing. 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 CPOMS/the admin server. These records will be shared with school staff to ensure pupil safety. These records are shared with the medical services in case of emergency.

First Aid

All incidents requiring first aid are recorded in a paper format. The original document is sent home and a paper copy is stored in the First Aid file in the lockable cupboard outside the Year 2 classroom.

Financial Records

The finance and office staff have access to information regarding any payments made for trips, breakfast club, after school clubs and music lessons.

Access by Staff

The headteacher, deputy headteacher 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.

Data Protection

Parents accept a place for their child at St Paul's CE 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 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.

Retention Periods

The table at the end of this policy provides guidance on retention periods for different records held by St Paul's CE 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.

FILE DESCRIPTION	RETENTION PERIOD	ACTION AT THE END OF THEIR ADMINISTRATIVE LIFE OF THE RECORD
Child Protection		
Child protection files	Until child leaves St Paul's CE Primary School then transfer to the new education provider	Where the receiving school is a CPOMS user, records should be transferred electronically. Where the receiving school is not a CPOMS user Child Protection information must be printed off and sent under separate cover to new school. 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 child protection nature against a member of staff, including where the allegation is unfounded	Until the person's normal retirement age, or 10 years from the date of the allegation if that's longer	SHRED ICO Employment Practices Code: Supplementary Guidance 2.13.1 (Discipline, grievance and dismissal) "Records of allegations about workers who have been investigated and found to be without substance should not normally be retained once an investigation has been completed. There are some exceptions to this where for its own protection the employer has to keep a limited record that an allegation was received and investigated, for example, where the allegation relates to abuse and the worker is employed to work with children or other vulnerable individuals". Summary record to be retained on confidential personnel file, and a copy given to the person concerned.
Governors & School Committee Meetings		
Instrument of Government including articles of association	Permanent	ARCHIVE Stored in locked cabinet in cellar
Governors minutes – principle set signed with appropriate agenda & any documents or reports referred to	Permanent	ARCHIVE Stored in locked cabinet in cellar
STAFF records		
Staff personnel files	7 years from when staff member leaves (oral or written 1 warning 6 months, warning 2 12 months, final warning 18 months, maternity 3 years)	Stored in locked cabinet in cellar SHRED
Staff appraisal files	5 years	Stored in locked cabinet in cellar SHRED
Emergency contacts details - staff	Only latest details to be kept	SHRED
Recruitment documents, unsuccessful candidates	6 months	SHRED Ensure all emails / files stored electronically are deleted after interview / selection date
Trainee Teacher records	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.	Ensure all electronic documents removed by mentor / class teachers etc

Pupil Information		
SIMS record	tbc	DELETE Ensure SIMS GDPR compliant
Pupil file	Until child leaves St Paul's CE Primary School	SHRED
Books	Until end of each academic year	Send books home
Test papers	1 year	Papers to be passed to next class teacher SHRED at the end of that year
School reports	Until child leaves St Paul's CE Primary School	DELETE
Behaviour slips / records	1 year after incident	SHRED
Individual plans (behaviour, risk reduction, SEND, intimate care)	Until child leaves St Paul's CE Primary School then transfer to the new education provider	Where the receiving school is a CPOMS user, records should be transferred electronically. Where the receiving school is not a CPOMS user information must be printed off and sent under separate cover to new school. Where a child is removed from roll to be educated at home – or is registered as missing in education - information should be copied to the Local Education Authority.
Curriculum		
Data Tracker FFT Aspire	DELETED BY FFT ASPIRE	Ensure FFT Aspire GDPR compliant
Data Tracker NCA Tools	DELETED BY NCA TOOLS	Ensure FFT NCA GDPR compliant
Data Tracker Perspective Lite	DELETED BY PERSPECTIVE LITE	Ensure FFT Perspective Lite GDPR compliant
Education City	2 years after last used. Score data deleted after 5 years.	DELETED BY EDUCATION CITY Education City GDPR compliant
Primary Essence	DELETED BY Primary Essence	Ensure Primary Essence GDPR compliant
TT rock stars	DELETED BY TT rock stars	Ensure TT rock stars GDPR compliant
Office/SLT records		
Accident / incident report	7 years after incident for adults; 25 years after birth for children	SHRED
First Aid	Date of incidents plus 12 year adults, 25 years from DOB for child. More serious incidents longer	SHRED
Medicine administration records	1 year. Emergency non-routine medicine - records to be kept for 21 years and 6 months from date of birth.	SHRED
Evolve School Trip Records including trip risk assessments and pupil lists .	Paper copies to be shredded on return except copy in HT office to be kept for one year	DELETED BY EVOLVE SHRED / DELETE
Visitors Signing in / out sheets	1 year	SHRED
Signing in / out book / late book	Until pupil leaves St Paul's	SHRED
Parental absence request forms	Until pupil leaves St Paul's	SHRED
Permission forms	Until event has occurred without issue.	SHRED
Admissions documentation,	Uploaded to SIMS and then stored in pupil file until pupil leaves ST Paul's	SHRED
Parent correspondence	Stored in pupil file until pupil leaves ST Paul's	SHRED
Staff Attendance monitoring folder	3 years	SHRED

Physical restraint log	25 years from DOB for child.	SHRED
HT Data folder	Current academic year +1	SHRED
HT Key Information folder	Current academic year	SHRED
Single Central Record	Permanent – continual update	Updated as current
DBS application information	Number to be retained on SCR but not copy of certificate	SHRED
Secure Access (DfE)	TBC	DELETE Ensure Secure Access / DfE GDPR compliant
Leave of Absence Requests - Staff	3 academic years	SHRED
Emails	12 months beyond end of academic year	DELETE
ICT		
Staff/Admin PC	Not determined. PC wiped before decommission.	SPECIALIST DECOMMISSION
School website/blogs -	Remove photos of any children for whom permission is retracted	DELETE
Finance		
FMS	7 years	SHRED / DELETE Ensure FMS GDPR compliant
Accounting/financial records including: official orders, paid invoices, accounts raised, statements, copies of receipts and cheque stubs.	7 years	SHRED/ DELETE
Annual accounts	Permanent	ARCHIVE Stored in locked cabinet in cellar
Service level agreements	Until superseded	SHRED