

GDPR Policy:

Record Management and Data Retention Policy

23/24



Document Control

A. Confidentiality Notice

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D. Contents	Section	Page No
	1. Introduction	3
	2. Scope	3
	3. Responsibilities	3-4
	4. Retention Policy overview	4
	5. Destruction	4-5
	6. Information Access requests	5
	7. GDPR related policies	5
	Appendix 1: Data and Document retention schedule	6

Record Management and Data Retention Policy

1. Introduction: St Modwen's Catholic Primary Records Management Policy

Management of records is a legal obligation (Section 46 of the Freedom of Information Act 2000). By ensuring that our records are well managed and controlled we can provide a better service to staff, pupils, parents/carers and others. The legal and regulatory obligations from many sources rely on effective record management. Information management is also a part of the IT strategy, Data Protection and UK GDPR compliance obligations. This policy provides a framework that covers records management in the trust and the academies. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

2. Scope

This policy applies to all records created, received or maintained by staff of St Modwen's Catholic Primary School, whether centrally or in individual schools, in the course of carrying out its functions.

Records exist in the St Modwen's Catholic Primary School and originate from a variety of sources. School staff will create some. Others are provided by parents/carers and pupils, others are shared with the trust and its schools by external professionals. The policy applies to all records and the management of the records in the trust and its schools. **See Appendix 1 Document Retention schedule.**

Records may be hard copy, electronic, digital, images, audio recordings or any other source that can be viewed, heard or interrogated. They may relate to individuals, financial planning, contracts, commercial organisations, public authorities or charitable organisations. Some will include personal data about individuals.

How the schools use, maintain and manage records will be dependent on the purpose, origin and source of the records. Other policies will govern this in many instances.

Some records will be retained for historical and archiving purposes.

3. Responsibilities

St Modwen's Catholic Primary School has a corporate responsibility to maintain, use, store and delete its records to comply with regulatory requirements. The person with overall responsibility for this policy is the Headteacher, and this will be delegated to individuals in each school.

Good record management practice will be the responsibility of all staff. Individual responsibility will be determined by job description and practice. A senior leader (Headteacher) will also monitor compliance with this policy at least annually.

Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the schools policies and records management guidelines.

4. Retention Policy Overview

A comprehensive retention policy is in place, is enclosed in Appendix 1 and is published on the website.

The Data Controller must ensure that a suitable retention policy is in place and is effective. This will be with the support of the DPO. Procedures to manage disposal and retrieval of stored data, such as encryption keys and passwords, must also be set out within the retention policy.

Within schools responsibility for secure retention and review is as follows

Type of Data	Responsible Person
Pupil Progress and Attainment	Headteacher
Pupil data (Arbor or equivalent)	Headteacher, ICT Technician, School Business Manager, School Business Team, SENDCO, Inclusion Support Manager
Financial	Headteacher/School Business Manager
Human Resources	Headteacher/School Business Manager
Health and Safety Records	Headteacher/School Business Manager/Office Manager/Caretaker
Governance	Headteacher/Clerk of Governors/Chair of Governors
Hardware	ICT Technician/Headteacher
Software	ICT Technician/Headteacher/School Business Manager
Statutory and Regulatory	Headteacher
SEN and Health	Headteacher/Senco/Inclusion Support Manager
Safeguarding	Headteacher (DSL) Deputy DSL's, Inclusion Support Manager
Servers	Headteacher/ICT Technician
IT to include PCs, laptops and portable storage	Headteacher/ICT Technician/School Business Manager/ Staff
Digital records	Headteacher/ICT Technician/School Business Manager/Staff
Emails	Headteacher/ICT Technician/School Business Manager/Staff

Access Control Rules and Rights for Users guidance sets out the level of access across the organisation.

5. Destruction

At the point of destruction the 'Data Destruction Log' will be completed

6. Information Access requests

School will retain information on Information Access requested on pupils in school – reference below. The Headteacher will approve all Information Access requests.

Pupil / individual name	
Date of birth	
Date info requested	
Who was the requester?	
How were they positively identified?	
What information was requested?	
Basis for the request?	

Was information disclosed? Yes/No	
Reason for decision	
What was disclosed?	
If CP or Criminal concern is this whole record confidential? Give reasons and make clear on system.	
Authorisation by	
Date	
Staff member(s)	

7. GDPR related policies and procedures

	Review Date
01 Data Protection Policy	September 2024
02 Breach and Non-Compliance Policy	September 2024
03 Confidentiality Policy and Confidential Agreements	September 2024
04 CCTV Policy	September 2024
05 Workforce Acceptable use Policy	September 2024
06 Freedom of Information Policy	September 2024
07 Document and Data Retention Policy	September 2024
08 Privacy Notices: <ul style="list-style-type: none"> • Pupils Data • School Trips • Staff Workforce • Governors • Job Applicants • PTA • External School Photographer 	September 2024
09 GDPR Workforce and Governor Training/CPD <ul style="list-style-type: none"> • GDPR Guidelines for staff 	September 2024
10 GDPR Checks, Compliance and Audit Toolkit (GoGDPR)	September 2024
11 GDPR Subject Access Request Management and Procedures	September 2024
12 GDPR My rights a guide for data subjects	September 2024
13 GDPR Home School Communication Charter	September 2024
14 GDPR Information Security Protocol	September 2024
15 Cyber Response Plan	September 2024

Appendix 1: Data/Document Retention Schedule

1. 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	Secure disposal
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

2. Records relating to governors

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
2.1	Minutes -				
2.1a	Principal set (signed)	No		Permanent	Must be available in school for 6 years from the meeting. Can then be archived/stored elsewhere.
2.1b	Inspection copies	No		Date of meeting + 3 years	Secure disposal
2.2	Agendas	No		Date of meeting	Secure disposal
2.3	Reports	No		Date of report + 6 years	Retain in school for 6 years from report date. Can consider archiving/storing anything important.
2.4	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.

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
2.5	Instruments of Government	No		Permanent	Retain in school whilst school open. Can then be archived/stored elsewhere.
2.6	Trusts and Endowments	No		Permanent	Retain in school whilst operationally required. Can then be archived/stored elsewhere.
2.7	Action plans	No		Date of action plan + 3 years	Secure disposal
2.8	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).
2.9	Complaints files	Yes		Date of resolution of complaint + 6 years	Review for further retention in the case of contentious disputes. Secure disposal.
2.10	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
2.11	Proposals for schools to become or be established as Specialist Status schools	No		Current year + 3 years	Secure disposal

3. Records relating to school management

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
3.1	Log books	Yes		Date of last entry in book + 6 years	Secure disposal
3.2	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.
3.3	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.
3.4	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
3.5	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
3.6	Professional development plans	Yes		Closure + 6 years	Secure disposal
3.7	School development plans	No		Closure + 6 years	Review for further retention. Secure disposal.
3.8	Admissions - if the admission is successful	Yes		Admission + 1 year	Secure disposal
3.9	Admissions - if the appeal is unsuccessful	Yes		Resolution of case + 1 year	Secure disposal
3.10	Admissions - secondary schools - casual	Yes		Current year + 1 year	Secure disposal
3.11	Proof of address supplied by parents as part of the admissions process	Yes		As the corresponding admission record	Secure disposal
3.12	Supplementary information form including additional information such as religion, medical conditions supplied	Yes		As the corresponding admission record	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
	as part of the admissions process				

4. Records relating to pupils

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
4.1	Admission registers	Yes		Entry + 7 years	Retain in school for 7 years from entry. Can consider archiving these records if have the facility.
4.2	Attendance registers	Yes		Date of register + 3 years	Secure disposal
4.3	Pupil files retained in schools	Yes			
4.3a	Primary	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.
4.3b	Secondary	Yes	Limitation Act 1980	Date of birth + 25 years	Transfer to another secondary school if required. In the case of exclusion it may be appropriate to transfer the record to the Pupil Referral Unit. Secure disposal
4.4	Pupil files	Yes			
4.4a	Primary	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.
4.4b	Secondary	Yes	Limitation Act 1980	Date of birth + 25 years	Transfer to another secondary school if required. In the case of exclusion it may be appropriate to transfer the record to the Pupil

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
					Referral Unit. Secure disposal
4.5	Special Educational Needs files, reviews and individual education plans	Yes		Date of birth + 25 years	Secure disposal
4.6	Correspondence relating to authorised absence and issues	Yes		Date of absence + 2 years	Secure disposal
4.7	Examination results				
4.7a	Public	No		Year of examination + 6 years	Secure disposal
4.7b	Internal examination results	Yes		Current year + 5 years	Secure disposal
4.8	Any other records created in the course of contact with pupils	Yes/No		Current year + 3 years	Review at the end of 3 years and retain with pupil file if necessary. Secure disposal
4.9	Statement maintained under the Education Act 1996 Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	Date of birth + 30 years	Secure disposal unless legal action is pending
4.10	Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	Date of birth + 30 years	Secure disposal unless legal action is pending
4.11	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
4.12	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years	Secure disposal unless legal action is pending
4.13	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
4.14	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.

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
4.15	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
4.16	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

5. Records relating to child Curriculum

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
5.1	School development plan	No		Current year + 6 years	Secure disposal
5.2	Curriculum returns	No		Current year + 3 years	Secure disposal
5.3	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.
5.4	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.
5.5	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.
5.6	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.
5.7	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.
5.8	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.

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
5.9	Examination results	Yes		Current year + 6 years	Secure disposal
5.10	SATs records, examination papers and results	Yes		Current year + 6 years	Secure disposal
5.11	PAN reports	Yes		Current year + 6 years	Secure disposal
5.12	Value added and contextual data	Yes		Current year + 6 years	Secure disposal
5.13	Self evaluation forms	Yes		Current year + 6 years	Secure disposal

6. Records relating to personnel records

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
6.1	Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	Secure disposal
6.2	Staff personnel files	Yes		Termination + 25 years	Secure disposal
6.3	Interview notes and recruitment records	Yes		Date of interview notes + 6 months if unsuccessful. If successful place in personnel file.	Secure disposal
6.4	Pre-employment vetting information (including CRB checks)	Yes	CRB guidelines	Date of check + 6 months	Secure disposal
6.5	Disciplinary proceedings	Yes	Where the warning relates to child protection issues see 1.2		
6.5a	Oral warning	Yes		Date of warning + 6 months	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
6.5b	Written warning - level one	Yes		Date of warning + 6 months	Secure disposal
6.5c	Written warning - level one	Yes		Date of warning + 12 months	Secure disposal
6.5d	Final warning	Yes		Date of warning + 18 months	Secure disposal
6.5e	Case not found	Yes		If child protection see 1.2, otherwise destroy immediately	Secure disposal
6.6	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
6.7	Annual appraisal and assessment records	Yes		Current year + 5 years	Secure disposal
6.8	Salary cards	Yes		Last date of employment + 85 years	Secure disposal
6.9	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI 1999/567)	Current year + 3 years	Secure disposal
6.10	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	Secure disposal
6.11	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.

7. Records relating to Health and Safety

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
7.1	Accessibility plans	Yes	Disability Discrimination Act	Current year + 6 years	Secure disposal
7.2	Accident reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		Secure disposal
7.2a	Adults	Yes		Date of incident + 7 years	Secure disposal
7.2b	Children	Yes		Date of birth of child + 7 years	Secure disposal
7.3	COSHH			Current year + 10 years	Where appropriate an additional retention period may be allocated. Secure disposal
7.4	Incident reports	Yes		Current year + 20 years	Secure disposal
7.5	Policy statements			Date of expiry + 1 year	Secure disposal
7.6	Risk assessments			Current year + 3 years	Secure disposal
7.7	Process of monitoring areas where employees and persons are likely to have come in contact with asbestos			Last action + 40 years	Secure disposal
7.8	Process of monitoring areas where employees and persons are likely to have come in contact with radiation			Last action + 50 years	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
7.9	Fire precautions log book			Current year + 6 years	Secure disposal

8. Administrative records

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
8.1	Employer's liability certificate			Closure of school + 40 years	Secure disposal
8.2	Inventories of equipment and furniture			Current year + 6 years	Secure disposal
8.3	General file series			Current year + 5 years	Review to see if further retention period required. Secure disposal
8.4	School brochure or prospectus			Current year + 3 years	Disposal
8.5	Circulars (staff, parents, pupils)			Current year + 1 year	Review to see if further retention period required. Secure disposal
8.6	Newsletters, ephemera			Current year + 1 year	Review to see if further retention period required. Secure disposal
8.7	Visitors book			Current year + 2 year	Review to see if further retention period required. Secure disposal
8.8	PTA/Old Pupils Associations			Current year + 6 years	Review to see if further retention period required. Secure disposal

9. Records relating to Finance

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
9.1	Annual accounts		Financial	Current year + 6 years	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
			Regulations		
9.2	Loans and grants		Financial Regulations	Date of last payment on loan + 12 years	Secure disposal
9.3	Contracts				
9.3a	Under seal			Contract completion date + 12 years	Secure disposal
9.3b	Under signature			Contract completion date + 6 years	Secure disposal
9.3c	Monitoring records			Current year + 2 years	Secure disposal
9.4	Copy orders			Current year + 2 years	Secure disposal
9.5	Budget reports, budget monitoring etc.			Current year + 3 years	Secure disposal
9.6	Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	Secure disposal
9.7	Annual budget and background papers			Current year + 6 years	Secure disposal
9.8	Order books and requisitions			Current year + 6 years	Secure disposal
9.9	Delivery documentation			Current year + 6 years	Secure disposal
9.10	Debtors' records		Limitations Act	Current year + 6 years	Secure disposal
9.11	School fund - Cheque books			Current year + 3 years	Secure disposal
9.12	School fund - Paying in books			Current year + 6 years	Secure disposal
9.13	School fund - Ledger			Current year + 6 years	Secure disposal
9.14	School fund - Invoices			Current year + 6 years	Secure disposal
9.15	School fund - Receipts			Current year + 6 years	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
9.16	School fund - Bank statements			Current year + 6 years	Secure disposal
9.17	School fund - School journey books			Current year + 6 years	Secure disposal
9.18	Student grant applications	Yes		Current year + 3 years	Secure disposal
9.19	Free school meals registers	Yes		Current year + 6 years	Secure disposal
9.20	Petty cash books			Current year + 6 years	Secure disposal

10. Records relating to property

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
10.1	Title deeds			Permanent	These should follow the property
10.2	Plans			Permanent	Retain in school whilst operational. Can then be archived/stored elsewhere.
10.3	Maintenance and contractors		Financial Regulations	Current year + 6 years	Secure disposal
10.4	Leases			Expiry of lease + 6 years	Secure disposal
10.5	Lettings			Current year + 3 years	Secure disposal
10.6	Burglary, theft and vandalism report forms			Current year + 6 years	Secure disposal
10.7	Maintenance log books			Last entry + 10 years	Secure disposal
10.8	Contractors' reports			Current year + 6 years	Secure disposal

11. Records relating to local authorities

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
11.1	Secondary transfer sheets (primary)	Yes		Current year + 2 years	Secure disposal
11.2	Attendance returns	Yes		Current year + 1 year	Secure disposal
11.3	Circulars from LEA	Yes		Whilst required operationally	Review to see if further retention period required. Disposal

12. 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
12.1	HMI reports			These do not need to be kept any longer	Secure disposal
12.2	OFSTED reports and papers			Replace former report with new inspection report	Review to see if further retention period required. Secure disposal
12.3	Returns			Current year + 6 years	Secure disposal
12.4	Circulars from Department of Education			Whilst required operationally	Review to see if further retention period required. Disposal

13. Records relating to Optum

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
13.1	Service level agreements			Until superseded	Secure disposal
13.2	Work experience agreement	Yes		Date of birth of child + 18 years	Secure disposal

14. 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			Current year + 3 years	Secure disposal
14.2	School meals summary sheets			Current year + 3 years	Secure disposal

15. Records relating to Family Liaison Officers and Home School Liaison Assistants

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
15.1	Day books	Yes		Current year + 2 years	Review to see if further retention period required. Secure disposal
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
15.5	Contact database entries	Yes		Current year then review	If contact is no longer active secure delete
15.6	Group registers	Yes		Current year + 2 years	Secure disposal