



# **Greenway Primary and Nursery School**

## **Data Retention Policy**

**Date approved: 10 December 2020**

**Date of next review: Autumn term 2021**

## **1. Policy statement and objectives**

1.1 Greenway School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the school. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability.

## **2. Scope of the policy**

2.1 This policy applies to all records created, received or maintained by permanent and temporary staff of the school in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school.

2.2 Records are defined as all 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 electronic format e.g. paper documents, scanned documents, e-mails which document business activities and decisions, audio and video recordings, text messages, notes of telephone and Skype conversations, spreadsheets, Word documents, presentations etc.

## **3. Responsibilities**

3.1 The governing body of a school has a statutory responsibility to maintain the school records and record keeping systems in accordance with the regulatory environment specific to the school. The responsibility is delegated to the head teacher.

3.2 The person responsible for day-to-day operational management in the school will give guidance on good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

3.3 The person responsible for records management will also ensure that:

- records are adequately stored and backed up
- access controls are in place
- a business recovery plan is in place

3.4 The school will manage its records disposal process in line with the Data Retention Schedule (see below).

3.5 Individual staff and employees must ensure, with respect to records for which they are responsible, that they:

- 3.5.1 Manage the school's records consistently in accordance with the school's policies and procedures;
- 3.5.2 Properly document their actions and decisions;
- 3.5.3 Hold personal information securely;
- 3.5.4 Only share personal information appropriately and do not disclose it to any unauthorised third party;
- 3.5.5 Retain and dispose of records securely in accordance with the school's Data Retention Schedule.

## DATA RETENTION SCHEDULE

GOVERNING BODY				
	Retention Period	How will data be stored?	Who is responsible?	Justification
Agendas	Permanent	Hard copy	Clerk to the Governors	Minutes are a permanent record of business and public documents, which need to be available for public inspection.
Minutes – signed set	Permanent	Hard copy	Clerk to the Governors	
Reports presented to Governors	<b>6 years</b> or permanently if referred to in the minutes	Hard copy	Clerk to the Governors	
Instruments of Government	Permanent	Hard copy	Clerk to the Governors	
Policy documents created by the GB	Life of policy + <b>3 years</b>	Soft copy	Clerk to the Governors	May be referred to as part of a complaint
Records relating to complaints dealt with by the GB	Date of resolution of complaint plus a <b>minimum of 6 years</b> then review	Soft copy	Clerk to the Governors	Might be a contentious dispute
Proposals concerning the change of status of a maintained school	Date proposal accepted or declined <b>+3years</b>	Soft copy	Clerk to the Governors	For public reference
CENTRAL GOVERNMENT AND LOCAL AUTHORITY				
School census returns	Current year <b>+5 years</b>	Hard copy	Office Manager	Audit purposes
Returns made to central government	Current year <b>+6 years</b>	Hard copy	Office Manager	Audit purposes
OFSTED reports and papers	Life of report then review	Soft copy	Head Teacher	Reference and action plans
PUPIL'S EDUCATIONAL RECORD				
Pupil file	Retain while child remains at this school then the file follows the pupil to the next school. Electronic data will be deleted 5 years after date of leaving	Hard/SIMS	Office Manager	Educational record
Child protection information held in separate files	DOB of child <b>+ 25 years</b>	Hard/soft	DSP	All data on the safeguarding file may be needed retrospectively for many years. Pupil identifiers are needed to be retained along with those records.
Nursery admission application form	Date of admission <b>+ 1 year</b>	Soft copy	Office Manager	Admission information is transferred to our database and also used for entries to the Early Years Portal.
SPECIAL EDUCATIONAL NEEDS				
SEN files, reviews and IEPs, EHCPs (and old Statements of Educational Need)	DOB of child <b>+25years</b> . Pass on pupil file of all documentation to next school. EHCP's & funding information kept with HCC	Soft – on SIMS and CPOMS.	INCO	Possibility of 'failure to educate' claim
Advice and information provided to parents regarding educational needs	DOB of child <b>+25 years</b> . Included in the pupil file which is passed to next school.	Soft - CPOMS	INCO	
Accessibility strategy	DOB of child <b>+25 years</b> . Included in the pupil file which is passed to next school.	Soft - CPOMS	INCO	

<b>SCHOOL – GENERAL ADMINISTRATION</b>				
Newsletters/letters	Current year + <b>1 year</b>	Soft copy	Office Manager	For reference
Visitors signing in sheets	Current year + <b>6 years</b>	Hard copy	Office Manager	Evidence for a complaint or safeguarding concern
Minutes of SLT, Key Stage meetings etc	Date of meetings + <b>3 years</b>	Soft copy	Head Teacher	For reference
School Improvement Plans	Life of Plan + <b>3 years</b>	Soft copy	Head Teacher	For reference
First aid records	DOB + <b>25 years</b>	Hard/soft	Chief First Aider	Legal action possible either up to 6 yrs after an incident or after a child reaches 18
Parental consent for trips where there has been a major incident	DOB + <b>25 years</b>	Hard/soft	Office Manager	Legal action possible either up to 6 yrs after an incident or after a child reaches 18
Attendance registers	Birth + <b>25 years</b>	SIMS/Hard	Office Manager	
Correspondence relating to authorised attendance	Current academic year + <b>2 years</b>	Hard/soft copy	Office Manager	For reference
Free school meal registers	Current year + <b>6 years</b>	SIMS	Office administrator	
School meal Registers and summary sheets	Current year + <b>3 years</b>	SIMS/Hard	Office administrator	
<b>FINANCIAL MANAGEMENT</b>				
Employers liability insurance certificate	Current year + <b>40 years</b>	Record kept with HCC	Head Teacher	Claims from former employees
Inventories of furniture & equipment	Current year + <b>6 years</b>	Soft copy	Office Manager	For audit purposes
Burglary, theft, and vandalism claim forms	Current year + <b>6 years</b>	Soft copy	Office Manager	
Annual accounts & all supporting documents for Fund and General accounts including cheque books, paying in books & statements	Current year + <b>6 years</b>	Hard copy	Office Manager	
Records relating to the letting of school premises	Current year + <b>6 years</b>	Hard copy	Office Manager	
Records relating to creation of budgets	Life of budgets + <b>3 years</b>	Soft copy	Head Teacher	
Records relating to monitoring of contracts	Current year + <b>2 years</b>	Soft copy	Office Manager	
<b>HUMAN RESOURCES</b>				
Recruitment of Headteacher	Date of appointment + <b>6 years</b>	Hard copy	Chair of Governors	For accountability that correct process was followed
Staff appointments – unsuccessful	Appointment date of successful candidate + <b>6 months</b>	Hard copy	Headteacher	For feedback to candidates. Decision not to appoint may be legally challenged
Staff appointments – successful candidates	Interview notes, tests, application form added to personal file. Other information kept for <b>6 months</b>	Hard copy	Headteacher	
Identity check	Termination of employment + <b>6 years</b>	Hard copy	Office Manager	
Right to work evidence	Termination of employment + <b>6 years</b>	Hard copy	Office Manager	
Staff personnel file	Termination of employment + <b>6 years</b>	Hard copy	Headteacher	References, legal claims

Timesheets	Current year + <b>6 years</b>	Hard copy	Office Manager	Audit purposes
Annual appraisal	Current year + <b>5 years</b>	Hard/soft	Headteacher	References, legal claims
Disciplinary – oral & written warning level 1	Date of warning + <b>6 months</b>	Hard copy on personal file	Headteacher	
Disciplinary – written warning level 2	Date of warning + <b>12 months</b>	Hard copy on personal file	Headteacher	
Disciplinary – final warning	Date of warning + <b>18 months</b>	Hard copy on personal file	Headteacher	
<b>HEALTH AND SAFETY</b>				
Health & Safety Policy	Life of policy + <b>3 years</b>	Soft copy	Office Manager	
Risk assessments	Life of risk assessment + <b>3 years</b>	Hard copy	Headteacher	
Records relating to accident/injury at work	Date of incident + <b>12 years</b>	Hard copy	Office Manager	
Accidents to adults	Date of incident + <b>6 years</b>	Hard copy	Office Manager	
Accidents to children	DOB + <b>25 years</b>	Hard copy	Office Manager	
COSHH records	Date of incident + <b>40 years</b>	Hard copy	Headteacher	
Fire precautions log book	Current year + <b>6 years</b>	Hard copy	Headteacher	
Process of monitoring areas where employees and persons are likely to have come into contact with asbestos	Last action + <b>40 years</b>	Hard copy	Headteacher	
<b>PREMISES MANAGEMENT</b>				
All records relating to the maintenance of the school carried out by contractors	Current year + <b>6 years</b>	Hard copy	Headteacher	Evidence of compliance. Legal claims
All records relating to the maintenance of the school carried out by school employees including maintenance	Current year + <b>6 years</b>	Hard copy	Headteacher	Evidence of compliance. Legal claims