



Sheep Dip Lane  
PRIMARY SCHOOL

# Records Management Policy & Data Retention

Summer 2019

Status	Statutory
Governing Body Committee	Finance, Facilities & Human Resources (FFHR)
Responsible Persons	Mrs F Parish Head Teacher Mrs S Foster School Business Manager
Date the policy was agreed	September 2018 & reviewed Sept 19
Review date	September 2020

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*Growing Gifts*

Mrs F Parish  
Head Teacher



## Sheep Dip Lane Primary School: Records Management Policy & Data Retention

Ratified on: September 2018, reviewed Sept 19

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The 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 institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

When, for unavoidable reasons, the school does not either have an appointed Data Protection Officer (DPO) or access to someone acting in that capacity for the school, the duties ascribed in this document to the DPO will be conducted by the Chief Privacy Officer (School Business Manager) in conjunction with the Headteacher.

### 1. Scope

- 1.1 This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.
- 1.2 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 electronically.
- 1.3 A small percentage of the schools records will be selected for permanent preservation as part of the institution's archives and for historical research.

### 2. Responsibilities

- 2.1 The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher.
- 2.2 The Chief Privacy Officer, Mrs S Foster will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. She will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- 2.3 Individual staff must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with these guidelines.

### 3. Relationship with existing policies

3.1 This policy has been drawn up within the context of:

- Freedom of information policy
- Data Protection policy
- Safeguarding policy
- ICT policy
- Subject Access Request Policy

### 4. Pupil Records

These guidelines apply to information created and stored in both physical and electronic format.

4.1 The pupil record should be seen as the core record charting an individual pupils progress through the Education System. The pupil record should accompany the pupil to every school they attend and should contain information that is accurate, objective and easy to access.

4.2 Pupils have a right of access to their educational record and so do their parents under the Education (Pupil information) (England) Regulations 2005. Under the Data Protection Act 1998 a pupil or their nominated representative has a right to see information held about them. This right exists until the point that the file is destroyed. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

4.3 The pupil record starts its life when a file is opened for each new pupil as they begin school. This is the file which will follow the pupil for the rest of their school life. The following information should appear on the front of any paper file:

- Surname
- Forename
- DOB
- UPN

The file cover should also contain a note of the date when the file was opened and the date when the file is closed if it is felt to be appropriate.

An electronic basic details page is also available on the schools MIS system, SIMS with the following information. Access to this information is limited.

- Surname
- Forename
- DOB
- UPN
- Gender
- Preferred name
- Home address
- Ethnic Origin (*classed as sensitive information*)

- Admission date & date of leaving if appropriate
- Registration information i.e. class, year
- Emergency contact details
- Pupil's doctor & medical needs
- First language
- Religion (*classed as sensitive information*)
- Any allergies or other medical conditions (*classed as sensitive information*)
- Contact details for parent/carer
- Any Free School Meal or Pupil Premium information
- Any SEN needs
- Any other agency involvement
- School History

A contacts file can be found in the school office. This file must be kept secure. Every pupil will have a record in the contacts file which will contain the following information:

- Surname
- Forename
- Chosen Name
- Gender
- DOA
- Year Group
- Class
- DOB
- Address
- Emergency contact details
- The name of the pupil's doctor & medical needs
- Ethnicity
- Home Language
- Dietary Needs

The contacts file also contains a Medical Needs Register and a Dietary Register (both updated as changes occur)

An emergency contact list is kept securely in the Chief Privacy Officers, Mrs S Foster office as part of the Schools Emergency Procedures.

Further information found within the paper file may include

- Any transfer information
- Admission form
- Privacy notice

- Photography consents
- Years record
- Annual written report to parents
- Incident reports
- Any reports written about the child
- Any statement information
- Any relevant medical information (should be stored in the file in a sealed envelope, clearly marked as such)
- Any information relating to exclusions
- Any correspondence with parents or outside agencies relating to major issues
- Details of any complaints made by the parents or the pupil.

The following records should be stored separately to the pupil record as they are subject to shorter retention periods and if they are placed on the file then it will involve a lot of unnecessary weeding of the files before they are transferred on to another school.

- Absence notes
- Parental consent forms for trips/outing
- Correspondence about minor issues
- Accident forms

## **5. Responsibility for the pupil record once the pupil leaves the school**

The school which the pupil attended until statutory school leaving age currently 18 is responsible for retaining the pupil record until the pupil reaches the age of 25 years.

## **6. Transfer of a pupil record outside the EU area**

If requested to transfer a pupil file outside the EU, the school must contact the Local Authority for further advice.

## **7. Storage of pupil records**

- 7.1 All pupil records should be kept securely at all times. Paper records are kept in lockable storage areas with restricted access, and the contents secure within the file. Equally electronic records has limited access to appropriate staff. All electronic data is backed up for our IT provider Advanced Computer Systems Ltd in two individual accredited data centres numbers ISO27001.
- 7.2 As far as possible, keep personal data in an electronic formant on a server that staff can access remotely when working from home. Ensuring this data is stored remotely means it can't be misplaced or lost.
- 7.3 Documents with little personal data, such as student work books or coursework, are suitably low risk that we do allow them to be taken home by staff. This is also practical, as it allows teachers to mark work more easily. Documents with more substantial amounts of

personal data need more scrutiny in how they're handled. These include pupil records, annual or termly pupil reports.

- 7.4 If staff are removing documents with significant amounts of personal data, these must be signed out by the Chief Privacy Officer and signed back in once they have been returned. This ensures school is aware of who holds documents at all times, and it will remind staff of their responsibility to prevent the documents from being lost or stolen.
- 7.5 Documents should be kept in a closed folder, such as one with a zip lock. Staff should include their name and contact details in case the folder is lost.
- 7.6 Staff should place the documents in a secure area of their house. In particular, staff should avoid leaving documents in their car, as this creates a higher risk of them being stolen.
- 7.7 When returning the documents to school, staff should take them immediately to their original storage place rather than leaving them on desks to return later.

## **8. Disposal of the pupil record**

This guidance applies to all types of record, whether they are in paper or digital format.

- 8.1 The fifth data protection principle states that 'personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes'.
- 8.2 Reviews must be held regularly (termly) to ensure that records that are no longer required for school use are dealt with appropriately either selected for permanent preservation, destroyed, digitised to an electronic format or retained by the school for research or litigation purposes following the criteria set out in the data retention schedule below.

## **9. Safe destruction of records**

- 9.1 All records containing personal information, or sensitive policy information should be made either unreadable or unreconstructable.
  - Paper records should be shredded using a cross-cutting shredder
  - CD/DVD should be cut into pieces
  - Audio/Video tapes should be dismantled and shredded
  - Hard disks should be dismantled and sanded.
- 9.2 Where an external provider is used, records must be shredded on-site in the presence of an employee. The external provider must provide a Certificate of Destruction.
- 9.3 Where records are destroyed internally, the process must ensure that all records are recorded as authorised to be destroyed by the Headteacher. Records should be shredded as soon as the record has been documented as being destroyed.
- 9.4 The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed. Members of staff should record;
  - Unique identifier
  - Brief description

- Date range
- Signature of Headteacher
- Date

## 10. Staff Records

These guidelines apply to information created and stored in both physical and electronic format.

10.1 The staff record is kept to enable the development of a comprehensive picture of the workforce and how it is deployed, to inform the development of recruitment and retention policies and to enable individuals to be paid.

10.2 Staff have a right of access to their record under the Data Protection Act 1998. This right exists until the point that the file is destroyed. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

10.3 The staff record starts its life when an applicant is successful following the recruitment procedure. This is the file which will follow the member of staff during their employment period. The following information should appear on the front of any paper file:

- Surname
- Forename
- Payroll Number
- Start Date

An electronic basic details page is also available on the schools MIS system, SIMS with the following information. Access to this information is limited.

- Surname
- Forename
- DOB
- Payroll Number
- National Insurance Number
- Gender
- Preferred name
- Home address
- Ethnic Origin (*classed as sensitive information*)
- Marital Status
- Start date and continuous service date
- Emergency contact details
- Medical needs
- Qualification details
- Teacher number if appropriate

- Role information
- Salary information
- Absence details
- Training details

Further information found within the paper file may include

- Absence forms
- CPD and performance management
- Personal information as above
- DBS information
- Correspondence e.g. successful letter confirmation
- Contract of employment
- References
- ID proof
- Application Form
- Interview correspondence
- Job Description
- Person Specification
- Original advert
- Any further information/correspondence meeting details

An emergency contacts file and register of business interests file is kept securely in the Chief Privacy Officers, Mrs S Foster, Office at all times along with the emergency plan.

## **11. Storage of staff records**

- 11.1 All personal records should be kept securely at all times. Paper records are kept in lockable storage areas with restricted access, and the contents secure within the file. Equally electronic records have limited access to appropriate staff. All electronic data is backed up for our IT provider Advanced Computer Systems Ltd in two individual accredited data centres numbers ISO27001.
- 11.2 As far as possible, keep personal data in an electronic format on a server that staff can access remotely when working from home. Ensuring this data is stored remotely means it can't be misplaced or lost.
- 11.3 If staff are removing documents with significant amounts of personal data, these must be signed out by the Chief Privacy Officer (counter signed by a Senior Leader if the Chief Privacy Officer making the request) and signed back in once they have been returned. This ensures school is aware of who holds documents at all times, and it will remind staff of their responsibility to prevent the documents from being lost or stolen.

- 11.4 Documents should be kept in a closed folder, such as one with a zip lock. Staff should include their name and contact details in case the folder is lost.
- 11.5 Staff should place the documents in a secure area of their house. In particular, staff should avoid leaving documents in their car, as this creates a higher risk of them being stolen.
- 11.6 When returning the documents to school, staff should take them immediately to their original storage place rather than leaving them on desks to return later.

## **12. Disposal of the staff record**

This guidance applies to all types of record, whether they are in paper or digital format.

- 12.1 The fifth data protection principle states that ‘personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes’ in this case 6 years from termination date.
- 12.2 Reviews must be held regularly (termly) to ensure that records that are no longer required for school use are dealt with appropriately either selected for permanent preservation, destroyed, digitised to an electronic format or retrained by the school for research or litigation purposes following the criteria set out in the data retention schedule below.

## **13. Safe destruction of records**

13.1 All records containing personal information, or sensitive policy information should be made either unreadable or unreconstructable.

- Paper records should be shredded using a cross-cutting shredder
- CD/DVD should be cut into pieces
- Audio/Video tapes should be dismantled and shredded
- Hard disks should be dismantled and sanded.

13.2 Where an external provider is used, records must be shredded on-site in the presence of an employee. The external provider must provide a Certificate of Destruction.

13.3 Where records are destroyed internally, the process must ensure that all records are recorded as authorised to be destroyed by the Headteacher. Records should be shredded as soon as the record has been documented as being destroyed.

13.4 The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed. Members of staff should record;

- Unique identifier
- Brief description
- Date range
- Signature of Headteacher
- Date

#### **14. Supplier/Contracts Financial Records**

14.1 All supplier contracts financial records including invoices, payments etc are kept for a minimum of 6 years plus the length of the contract in line with section 5 of the Limitation Act 1980

Policy Agreed: September 2018

Signed Head teacher: *F Parish*

Signed: Chair of Governors: *D Wright*

Policy to be reviewed in Autumn 2019

## PUPILS

Data Item Group	Short term need (event +1 month)	Medium term need (pupil at school + 1 year)	Long term need (pupil at school + 5 years)	Very long term need (until pupil is aged 25 or older)	Justification
Admissions		 Admissions Files	 Admissions Appeals		<p>Admissions data is used extensively from the period of the school receiving it up until the point where children enrol.</p> <p>It is then used for some validation and cross checking of enrolment details. Once enrolled, the child's records in the SIMS become the core record.</p> <p>Data about children who enrolled but didn't get in is useful, but any intelligence gathered from it (for example, locality of children applying to our school or the SEN make up) is aggregated within the first year to a level being non-personal, after that, the detailed data within the admission file could be deleted.</p> <p>It is important to retain detailed data for a year, any appeals for which richer data about other successful/unsuccessful appeals may be relevant typically happen in the first year.</p> <p>When dealing with appeals, having a reasonable history of any other appeals in some detail can be needed to deal with the particular appeal. The information is needed alongside the admissions policies of the time.</p>
Attainment					<p>Formative assessment data is useful as a child is building towards a particular more formal assessment. Once the child leaves the school, it has little value in terms of retention.</p>

				<p>Summative attainment is the main outcome of what children ‘attain’ in school. It is important that future schools where pupils go on to learn can understand previous attainment. Whilst often that information is ‘passed on’ smoothly as children move phase, it is not always the case, and thus retaining the names alongside the main attainment data for 1 year after the pupil has left the school feels proportionate.</p> <p>Trend analysis is important, 3 to 5 years is often the ‘trend’ people look at, but longer may be relevant. Whilst this must be fully flexible in reporting small sub groups, and the data would wish to be retained at individual level, some personal data (for example, name) could be removed from the data to reduce sensitivity.</p>
Attendance			 Non-identifiable summary statistics only	<p>Attendance is related to individual attainment and so being able to relate attendance to attainment whilst in schools care is important. To be kept in detailed, individual form for one year after the pupil leaves school.</p> <p>After the period of 1 year following leaving school, non-identifiable summary statistics are all that is required to support longer-term trend analysis of attendance patterns.</p> <p>All attendance data is captured electronically.</p>
Behaviour				<p>This is all relevant for managing children during their time at our school. 1 year allows a period of ‘handover’ to next institution.</p>
Exclusions				<p>Exclusion data should be ‘passed on’ to subsequent settings. That school then has responsibility for retaining the full history of the child. If a private setting or missing in education then the school should ensure the LA already has the exclusion data.</p>

Identity management and authentication					Identity management i.e. child birth certificate, passport is related to admission. Once identity has been confirmed, this information has little use for data retention other than a confirmation signed by the admitting member of staff of identity confirmed.
Catering and free school meal management		 Meal administration	 Free school meal eligibility information		<p>This is little use for day to day data retention of individual children school meal data therefore this should not be kept.</p> <p>School meal data for administration purposes to be retained for medium term need only.</p> <p>Free school meal eligibility is a financial matter therefore data must be retained for the long term need.</p>
Trips and activities	 Trip information and educational visitors into school		 Financial information related to trips	 Major medical events	<p>Trip information and educational visitors into school relates to the information taken on a trip by a school. This must be destroyed following the trip. Should any medicines need to be administered or a minor medical incident should occur then this should be recorded in the usual way. Permission slips should also be destroyed following the trip unless any significant incident arises and is appropriate to keep them.</p> <p>Care should be taken when providing information to educational visitors i.e. names. There should be good policies in place to ensure that the sharing is proportionate and appropriately deleted afterwards.</p> <p>Financial information related to trips should be retained for medium term for audit purposes with only enough child identifiers to be able to confirm contributions i.e. first name/surname only and class at time of trip.</p> <p>If there is a major incident, i.e. any incident outside of school that requires external agencies then retaining the entire file until time that the youngest child becomes 25.</p>

Medical information and administration	 Permission Slips	 Medical conditions and ongoing management		 Medical incidents	<p>Permission slips that parent/carers sign should be retained for the period that medication is given and for 1 month afterwards if no issue is raised by child/parent/carer. <b>This line needs adding to all medical permissions slips.</b></p> <p>Medical incidents that are related to behavioural or safeguarding issues should be retained as appropriate to the retention periods associated with safeguarding.</p>
Safeguarding					All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained along with those records.
Special Educational Needs					All data with regards to Special Educational Needs may be relevant for many years. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained along with those records.
Personal identifiers, contacts and personal characteristics	 Images used in marketing, social media etc.	 Images used in displays in school & identification images (SIMS), full address details			<p>Images are used for different reasons and the reason should dictate the retention period.</p> <p>Images used for marketing i.e. social media should only be retained for and used in line with the active informed consent captured at the outset of using the photograph.</p> <p>Images used in displays etc. can be retained for educational purposes whilst the child is at the school.</p> <p>Images used purely for identification i.e. MIS systems (SIMS) should be deleted when the child leaves the school.</p> <p>Postcode data is useful in analysing longer-term performance trends or how catchment/pupil populations are shifting over time but full address data should not be kept for any longer than medium term need.</p>

## Parents/Carers

Data Item Group	Short term need (event +1 month)	Medium term need (pupil at school + 1 year)	Long term need (pupil at school + 5 years)	Very long term need (until pupil is aged 25 or older)	Justification
Identity management and authentication		✓ Management Systems			Parent/Carer details need be retained for medium term need only. Postcode data is useful in analysing longer-term performance trends or how catchments are shifting over time but full address data should not be kept for any longer than medium term need.
Catering and free school meal management		✓ Management Systems	✓ Free school meal eligibility information		Management system data (cash less system) to be retained for medium term need only. Free school meal eligibility is a financial matter therefore data must be retained for the long term need.
Safeguarding				✓	All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a parent/carer details (name, address) that are needed to identify children with certainty are needed to be retained along with those records.
Special Educational Needs			✓		All data with regards to Special Educational Needs may be relevant for many years. The elements of [parent/carer details (name, address) that are needed to identify children with certainty are needed to be retained along with those records.

Personal identifiers, contacts and personal characteristics	 Images used in marketing, social media etc.				<p>Images are used for different reasons and the reason should dictate the retention period.</p> <p>Images used for marketing i.e. social media should only be retained for and used in line with the active informed consent captured at the outset of using the photograph.</p> <p>Postcode data is useful in analysing longer-term performance trends or how catchment/pupil populations are shifting over time but full address data should not be kept for any longer than medium term need.</p>
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**Staff/Governors/Students/Volunteers**

Data Item Group	Short term need (event +1 month)	Duration of employees employment + 9 months	Short term need 3 years following termination of contract	Long term need 6 years following termination of contract	Very long term need 8 years +	Justification
Personal File containing: Identity management and authentication, electronic on Management System and paper Application form Personal Information Form (ethnic & religious, sensitive data) Interview information including questions and notes (scoring) Offer letter Data consent form						Recruitment information, relating to ID checks, right to work in the work etc. To decide suitability for the post To enable likeness to be checked To measure equality and diversity tracking requirements To record contractually what was offered/committed to the candidate The employer must also keep records on candidates who have applied for positions but have not been successful in order to

Qualifications Training Performance Management						defend any potential claims for discrimination for a period of 1 full year
All personal information included on any MIS system			✓			To uniquely identify the employee for government communication purposes
Job Description/Person Specification				✓		To record details of the job they carry out. To defend any potential dismissal claims
Health questionnaire	✓ plus 6 months from start of employment					To establish if any reasonable adjustments are required.
DBS Check	✓					To establish suitability of working with children. Record DBS check number and date and any relevant information on Single Central Record
References	✓ plus 6 months from start of employment		✓ Future references must be kept for 3 years following			To establish suitability for the post. Record reference information i.e. supplier of reference on Single Central Record prior to destroying reference  Consent must be obtained by the candidate

			request			
Any disciplinary, grievance process	 plus 12 months following any investigation					To make a record of any grievances or grievance investigations that have been carried out in relation to this person (or raised by this person) and a record of any agreed outcomes
Terms of employment including any changes e.g. flexible working requests, current salary information						The <i>Terms of Employment (Information) Act, 1994</i> require that an <b>employee's terms and conditions of employment</b> be retained for the duration of their employment.
Contract Payroll information including bank details, P45/P60/Salary Sacrifice information						Held on an online HR portal. To enable pay to be processed and payments to be made The Statute of Limitations 1957 provides for a limitation period of 6 years from the date of contract. Therefore, contracts should be retained a period of at least 6 years from the date of termination of the employment.
CCJ Instructions/Student Loan information						To enable payments to be processed to external agencies
Special Leave Requests						The <i>Organisation of Working Time Act, 1997</i> , at section 25, and the <i>Organisation of Working Time (Records) Prescribed Form and Exemptions) Regulations 2001</i> ,

						provide for a 3 year retention period for records of <b>weekly working hours, the name and address of employee, the employee's PPS numbers and a statement of their duties.</b>
Parental/Dependant/Carer Leave Requests						The <i>Parental Leave Acts 1998-2006</i> , at section 27, provide for an 8 year retention period of records showing the dates and times an employee availed of <b>parental or force majeure leave.</b>
Redundancy information						The <i>Protection of Employment Acts, 1977-2007</i> , at section 18, provides that where an employer has <b>collective redundancies</b> , it must retain the records to show that the provisions of the Act were complied with for a 3 year period
Taxation & NI information						The <i>Companies Acts and Taxes Consolidation Act, 1997</i> provide for an 8 year retention period of <b>tax records.</b>
Accident information						There is a two year limitation period on taking personal injuries claims. In a situation where there was an accident or injury, employers are advised to keep the records for 10 years following the date of the accident
Personal identifiers, contacts and personal characteristics						Images are used for different reasons and the reason should dictate the retention period.

						Images used for marketing i.e. social media should only be retained for and used in line with the active informed consent captured at the outset of using the photograph.
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