

DATA RETENTION POLICY

Rooted in Christ and Catholic tradition and under the guidance of its patrons St Edmund and St Hugh, the College aims to realise the God-given potential, in body, mind and spirit, of all members of its community through service and leadership.

Avita Pro Fide!

St Edmund's is committed to ensuring the welfare and protection of children in their care and this commitment is a fundamental part of the role of every employee.

INTRODUCTION

The main aim of this policy is to enable St Edmund's College to manage our records effectively and in compliance with data protection and other regulations. As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.

St Edmund's College is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.

The table below sets out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.

Where appropriate the retention schedule will be reviewed and amended to include any new record types created and remove any obsolete record types.

Where records have been identified for destruction they will be disposed of in an appropriate way. All records containing personal information, special category personal information or sensitive policy information will be shredded onsite before disposal using an accredited and reputable company. The Data Protection Officer shall be responsible for ensuring that this is carried out appropriately, and any questions regarding this policy should be referred to them.

Where lengthy retention periods have been allocated to records, the College may look to convert these to electronic format for secure storage on the College network. These will be backed up securely in an encrypted format.

If a document or piece of information is reaching the end of its stated retention period, but we are of the view that it should be kept longer, the Data Protection Officer who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.

Any queries regarding this data retention policy can be directed to our Data Protection Officer. They can be contacted by email dpo@stedmundscollege.org, by phoning main College reception on 01920 821504 or by writing to us at the address below:

Data Protection Officer
St Edmund's College
Old Hall Green
Ware
Herts
SG11 1DS

1 Governing Body				
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record	
Minutes				
<ul style="list-style-type: none"> <i>Final Version</i> 	No	Permanent	Retain in school for 6 years from date of meeting	Transfer to Archives
<ul style="list-style-type: none"> <i>Inspection copies</i> 	No	Date of meeting + 3 years	DESTROY [If these minutes contain any sensitive personal information they should be shredded]	Transfer to Archives
Agendas	No	Date of meeting	Retain in school for 6 years from date of meeting	Transfer to Archives
Reports	No	Date of report + 6 years	Retain in school for 6 years from date of meeting	Transfer to Archives
Action Plans	No	Date of action plan + 6 years	DESTROY	
Policy documents	No	Expiry of policy + 6 years	Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)	Transfer to Archives
Complaints files	Yes	Date of resolution of complaint + 6 years	Retain in school for the first six years Review for further retention in the case of contentious disputes Destroy routine complaints	
Articles of Government	No	Permanent	Transfer to Archives.	

2 Head Teacher and Senior Management Team				
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record	
Minutes of the Senior Management Team and other internal administrative bodies	Yes	Date of meeting + 5 years	Retain in the school for 5 years from meeting	SHRED
Records created by head teachers, deputy head teachers, heads of year/house and other members of staff with administrative responsibilities	Yes	Closure of file + 6 years	DESTROY If these records contain sensitive information they should be shredded	
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	No	Date of correspondence + 3 years	DESTROY If these records contain sensitive information they should be shredded	
Professional development plans	Yes	Closure + 6 years	SHRED	
School development plans	No	Closure + 6 years	Review	

3 Admissions Process				
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record	
All records relating to the creation and implementation of the admissions policy	No	Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry.	SHRED
Admissions – if the admission is successful	Yes	Information added to the pupil file		
Admissions – if the admission is unsuccessful	Yes	Resolution of case + 1 year	SHRED	
Proof of address and identity supplies by parents	Yes	Current year + 1	SHRED	

4 Pupils				
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record	
Admission Registers	Yes	Date of last entry + 6 years	Retain in the school for 6 years from the date of the last entry.	SHRED
Attendance registers	Yes	Date of register + 3 years	SHRED	
Pupil files	Yes			
<ul style="list-style-type: none"> Primary 		Retain for the time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school.	
<ul style="list-style-type: none"> Secondary 		DOB of the pupil + 25 years	SHRED	
Special Educational Needs files, reviews and Individual Education Plans	Yes	DOB of the pupil + 25 year	REVIEW	SHRED
Letters authorising absence	No	Date of absence + 2 years	SHRED	
Absence records		Current year + 6 years	SHRED	
Examination results	Yes			
<ul style="list-style-type: none"> Public 	No	Year of examinations + 7 years	DESTROY	Any certificates left unclaimed should be returned to the appropriate Examination Board
<ul style="list-style-type: none"> Internal examination results 	Yes	Current year + 5 years	DESTROY	
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 either allocate a further retention period or DESTROY	
Statement maintained under The Education Act 1996 - Section 324	Yes	DOB + 25 years	DESTROY unless legal action is pending	
Proposed statement or amended statement	Yes	DOB + 25 years	DESTROY unless legal action is pending	
Advice and information to parents regarding educational needs	Yes	Closure + 12 years	DESTROY unless legal action is pending	

4 Pupils				
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record	
Accessibility Strategy	Yes	Closure + 12 years	DESTROY unless legal action is pending	
Children SEN Files	Yes	DOB + 25 years	DESTROY unless legal action is pending	

5 Child Protection				
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record	
Child Protection Files	Yes	Date of birth + 25 years but review sensitive case files every 5-6 years thereafter. (MUST BE STORED SEPARATE TO THE PUPIL FILE)	SHRED	
Safeguarding Policies and Procedures	No	Permanent	Archive	
Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Until the person's normal retirement age, or 10 years from the date of the allegation if that's longer	SHRED	

6 Curriculum				
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record	
Curriculum development	No	Current year + 6 years	DESTROY	
Curriculum returns	No	Current year + 3 years	DESTROY	

6 Curriculum				
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record	
School syllabus	No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or DESTROY	
Schemes of work	No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or DESTROY	
Timetable	No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or DESTROY	
Class record books	No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or DESTROY	
Mark Books	No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or DESTROY	
Record of homework set	No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or DESTROY	
Pupils' work	No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or DESTROY	
Examination results	Yes	Current year + 6 years	DESTROY [These records should be shredded]	
SATS records	Yes	Current year + 6 years	DESTROY [These records should be shredded]	

7 Staff Records				
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record	
Timesheets, sick pay	Yes	Current year + 6 years	SHRED	
Staff Personal files	Yes	Termination + 7 years	SHRED	
Interview notes and recruitment records	Yes	Date of interview + 6 months	SHRED	
Pre-employment vetting information (including DBS checks)	Yes	Date of check + 6 months	SHRED	[by the designates member of staff]
Disciplinary proceedings:	Yes	Please note that all these retention periods where the warning relates to child protection issues may change in light of any recommendations made by the Bichard Inquiry.		
• <i>Oral warning</i>		Date of warning + 6 months	SHRED	If this is placed on a personal file, it must be weeded from the file.
• <i>written warning – level one</i>		Date of warning + 6 months	SHRED	If this is placed on a personal file, it must be weeded from the file.
• <i>written warning – level two</i>		Date of warning + 12 months	SHRED	If this is placed on a personal file, it must be weeded from the file.
• <i>final warning</i>		Date of warning + 18 months	SHRED	If this is placed on a personal file, it must be weeded from the file.
• <i>case not found</i>		DESTROY immediately at the conclusion of the case unless in relation to a child protection issue		
Records relating to accident/injury at work	Yes	Date of incident + 12 years	Review at the end of this period. In the case of serious accidents a further retention period will need to be applied	
Annual appraisal/assessment records	No	Duration of employment + 7 years	SHRED	
Maternity pay records	Yes	Current year, +3yrs	SHRED	

7 Staff Records			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Current year + 6 years	SHRED
Employees health records	Yes	End of employment + 7 years	SHRED

8 Health and Safety			
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
Accessibility Plans	No	Current year + 6 years	DESTROY
Accident Reporting			
• <i>Adults</i>	Yes	Date of incident + 12 years	SHRED
• <i>Children</i>	Yes	DOB + 25 years	SHRED
COSHH	No	Current year + 10 years	Review [where appropriate an additional retention period may be allocated]
Incident reports	Yes	Current year + 20 years	SHRED
Policy Statements	No	Date of expiry + 1 year	DESTROY
Risk Assessments	No	Current year + 3 years	DESTROY
Process of monitoring of areas where employees and persons are likely to have come in contact with asbestos	No	Last action + 40 years	DESTROY
Process of monitoring of areas where employees and persons are likely to have come in contact with radiation	No	Last action + 50 years	DESTROY
Fire Precautions log books	No	Current year + 6 years	DESTROY

9 Administrative				
Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record	
Employer's Liability certificate	No	Permanent whilst the school is open	Retain for 40 years after College has closed	
Inventories of equipment and furniture	No	Current year + 6 years	DESTROY	
School brochure/prospectus	No	Current year + 3 years		Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Circulars (staff/parents/pupils)	No	Current year + 1 year	DESTROY	
Newsletters	No	Current year + 1 year	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Visitors' book	Yes	Current year + 2 years	Review to see whether a further retention period is required	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]

10 Finance

Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record	
Annual Accounts	No	Current year + 6 years	SHRED	
Loans and grants	No	Date of last payment on loan + 12 years	Review to see whether a further retention period is required	SHRED
Contracts				
<ul style="list-style-type: none"> under seal 	No	Contract completion date + 12 years	SHRED	
<ul style="list-style-type: none"> under signature 	No	Contract completion date + 6 years	SHRED	
<ul style="list-style-type: none"> monitoring records 	No	Current year + 2 years	SHRED	
Copy orders	No	Current year + 2 years	SHRED	
Budget reports, budget monitoring etc	No	Current year + 3 years	SHRED	
Invoice, receipts and other records covered by the Financial Regulations	No	Current year + 6 years	SHRED	
Annual Budget and background papers	No	Current year + 6 years	SHRED	
Order books and requisitions	No	Current year + 6 years	SHRED	
Delivery Documentation	No	Current year + 6 years	SHRED	
Debtors' Records	No	Current year + 6 years	SHRED	
School Fund – Cheque books	No	Current year + 6 years	SHRED	
School Fund – Paying in books	No	Current year + 6 years	SHRED	
School Fund – Ledger	No	Current year + 6 years	SHRED	
School Fund – Invoices	No	Current year + 6 years	SHRED	
School Fund – Receipts	No	Current year + 6 years	SHRED	
School Fund – Bank statements	No	Current year + 6 years	SHRED	
Bursary applications	Yes	Current year + 3 years	SHRED	

11 Property

Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
Title Deeds	No	Permanent	These should follow the property
Plans	No	Permanent	Retain in school whilst operational then
Maintenance and contractors	No	Current year + 6 years	DESTROY
Leases	No	Expiry of lease + 6 years	DESTROY
Lettings	No	Current year + 6 years	DESTROY
Burglary, theft and vandalism report forms	No	Current year + 6 years	SHRED
Maintenance log books	No	Last entry + 10 years	DESTROY
Contractors' Reports	No	Current year + 6 years	DESTROY

12 School Census Returns

Basic file description	Data Prot Issues	Retention Period [operational]	Action at the end of the administrative life of the record
DFE/ISC/CES Census Returns	No	Current year + 5 years	DESTROY