



Data Retention Policy

Adopted On:	November 2019
Review Date:	November 2020
Review Frequency:	Annually
Approved By:	FGB

The school needs to create and maintain accurate records in order for it to function. The policy for managing records at Moss Lane School has been drawn up in conformity with legislation, regulations affecting schools and best practice as publicised by the Records Management Society of Great Britain.

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). It should be read and used in conjunction with the following school policies and documents: -

- Management Information Systems and Data Protection Policy
- Privacy Notices
- Information Asset Register

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

A file is kept on each pupil in a locked filing cupboard within the office. The file holds hard copies of information about that pupil e.g. school reports, reports from external agencies, copies of letters.

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.

Confidentiality of personal information is protected in accordance with the BCPS Management Information Systems and Data Protection Policy.

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 the staff server managed by our SENDco. Paper copies of documents are stored, securely, in a locked filing cabinet in The Nest, the SENDco office and also within pupils' folders.

Pupils receiving Pupil Premium (PPG) funding / Looked After Children (LAC) / Service Pupil Premium funding (SPP)

The names of pupils in receipt of additional funding due to their PPG, LAC, post-LAC or service family status are recorded in SIMS. Information regarding these individual pupils are made available to staff with a need to know that information. Electronic copies of PPG/SPP review / LAC review documents are stored on the staff server managed by our Headteacher and SENDco. Paper copies of review documents are stored within pupils' individual files.

Medical Records

Information regarding medical needs is provided by parents / carers on admission. Information provided includes any significant known drug reactions, major allergies and notable medical conditions. This information is available to staff likely to administer medication or treatment. This information is shared with external providers (trips) or external bodies (caterers) only with parental permission.

All children who have a more serious level of medical need (e.g. diabetes, anaphylaxis) have an Individual Health Care Plan (IHCP) which is put together by the parents/guardian with the GP's/consultant's instructions for care within school should the event arise. The IHCPs are then checked by our SENDco and stored securely on the staff server.

These records will be shared with school staff to ensure pupil safety. The photographs of children (for whom parents have given permission) will be displayed in the office to help identification. The office holds the original copies in a locked cabinet in the office. These records are shared with the medical services in case of emergency.

Financial Records

The finance and office staff have access to information regarding school dinner payments and school trip payments.

Access by Staff

The head teacher 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. Other data e.g. discretionary absence request letters / attendance letters etc. are stored securely and only available to the necessary staff on request.

Data Protection Policy

Parents accept a place for their child at Moss Lane 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. Any information which is held is to

be kept in accordance with BCPS' Management Information System and Data Protection Policy.

Retention Periods

The table at the end of this policy provides guidance on retention periods for different records held by Moss Lane 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 the 'Shred On Site' bin at the bottom of the staffroom stairs. Any 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

1. Child Protection The retention and use of records relating to child protection matters concerning pupils, and child protection allegations against staff requires specific guidance in this schedule				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Child Protection files	Yes	Until child leaves MLS (Moss Lane School) then transfer to the new education provider	DO NOT DESTROY ANY RECORDS	Child Protection information must have sent to the new school. New school will sign to say they have received the file. All files sent securely via Egress, recorded delivery or hand delivered. Where a child is removed from roll to be educated at home – or is registered as missing the file should be copied to the Local Education Authority.
CPOMS	Yes			
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	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

				<p>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”.</p> <p>Summary record to be retained on confidential personnel file, and a copy given to the person concerned.</p>
--	--	--	--	--

2. Governors & School Committee Meetings

Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record.	
Instrument of Government including articles of association.	No	Permanent	ARCHIVE	Stored in Office Governor's folder
Get Information About Schools.	Yes	Retain during governor's term of office. Update termly.	DELETE	
Governors minutes – principle set signed with appropriate agenda & any reports referred to.	Part 11 Confidential minutes	Permanent	ARCHIVE	Stored in Office Governor's folder. Confidential minutes locked into HT office.
Governors eligibility forms, training logs and pecuniary interests forms.	Yes	Retain during governor's term of office	SHRED	Stored in Office Governor's folder
Governor documentation -agendas, action plans and policy documents.	No Except Part 11 Confidential	Date of meeting +3 years	SHRED	Store in Governors' folder – in back office.
Inspection copies		Date of meeting +3 years	If these contain any personal, sensitive information they must be shredded	
Governor reports and reports presented to governors	No	Date of meeting + 6 years	SHRED If the minutes refer directly to individual reports then the	Stored on HT computer monitoring file.

			reports should be kept permanently	
--	--	--	------------------------------------	--

3. Staff Records

Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
EPM database	Yes	TBC	FILES DELETED	Ensure no back up retained on BCPS system
Staff personnel files	Yes	7 years from when staff member leaves (oral or written) 1 st warning=6 months 2 nd warning=12months 3 rd final warning= 18 months, Maternity= 3 years	SHRED	Within 6 months of staff member leaving all documentation should be printed and in staff personnel file. Everything else deleted from individual files / folders / server.
Staff historic allegation files	Yes	10 year from allegation or normal retirement age (whichever is longer)	SHRED	Within 6 months of staff member leaving all documentation should be printed and in staff personnel file. Everything else deleted from individual files/ folders/server .
Staff appraisal files	Yes	5 years	SHRED	By October, following academic year - all documentation should be printed and in staff personnel file. Everything else deleted from individual files / folders / server.
Emergency contacts folder - staff	Yes	Updated termly and previous records removed.	SHRED	Only latest copy to be retained
Appointment documents, unsuccessful candidates	Yes	6 months	SHRED	Ensure all emails / files stored electronically are deleted after interview / selection date.
Trainee Teacher records	Yes	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.	SHRED/ DELETE	Ensure all electronic documents removed by mentor / class teachers etc. Teacher training college to provide BCPS / student with user agreement re. data
Teacher mark book / folder	Yes	Current year + 1	SHRED	
Assessment files	Yes	Destroy 6 months after end of school year once data stored electronically	SHRED	

4. Pupil Information

Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
------------------------	------------------------	------------------	--	--

Risk Reduction Plans	Yes	Retain for 6 years after plan created. Staff to delete from own PC / memory stick annually.	SHRED / DELETE	Ensure each updated copy is signed and copy stored in manilla folder and in central file on office shared server.
EHA records / CAF /	Yes	TAF Retain for 6 years after plan created. Staff to delete from own PC / memory stick annually.	SHRED / DELETE	Ensure each updated copy is signed and copy stored in manilla folder and in central file on office shared server.
Books, folders & test papers	Yes	Send books / papers home and shred test papers after 1 year	SHRED / SEND HOME	Shred front page of test papers – remainder can be recycled
Pupil Premium tracking documents / passports. LAC tracking.	Yes	Sent with child to next school	SHRED / DELETE	Ensure each updated copy is signed and copy stored in manilla folder and in central file on office shared server.
Pupil files	Yes	Sent with child to next school	SEND TO NEXT SCHOOL	
Referral forms	Yes	Sent with child to next school	STORE IN MANILLA FOLDER	Ensure each updated copy is signed and copy stored in manilla folder – if CP store in CP file.
Behaviour book / record	Yes	2 years after incident	SHRED	Copies of letters re. behaviour slips to be stored in pupil files.
Emergency pupil contacts register & medical list	Yes	12 months	SHRED/ DELETE	
SEND folders / plans / TAF / Behaviour plans.	Yes	Retain for 6 years after plan created. Staff to delete from own PC/ memory stick annually.	SHRED/ DELETE	Within 3 months of child leaving all documentation should be printed and in SEND folder. Everything else deleted from files / server / folders
Intimate care plans / Manual handling risk assessments	Yes	Retain for 6 years after plan created.	SHRED/ DELETE	Within 3 months of child leaving all documentation should be printed and in SEND folder. Everything else deleted from files / server / folders.
Medical Health Assessments including dietary assessments	Yes	Updated termly unless changes warrant this sooner. Latest copy retained until child has left the school.	SHRED /DELETE	

5. Curriculum

Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Target tracker data records	Yes	7 years	DELETED BY CLASSROOM MONITOR	Target Tracker GDPR compliant
2Simple Build a profile	Yes	1 year beyond pupil leaving the school	DELETED BY 2BUILD	Ensure 2Simple Build GDPR compliant
Data Tracker FFT Aspire	Yes	1 year beyond pupil leaving the school	DELETED BY FFT ASPIRE	Ensure FFT Aspire GDPR compliant

Data Tracker NCA Tools	Yes	1 year beyond pupil leaving the school	DELETED BY NCA TOOLS	Ensure NCA Tools GDPR compliant
Data Tracker Perspective Lite	Yes	1 year beyond pupil leaving the school	DELETED BY PERSPECTIVE LITE	Ensure Perspective Lite GDPR compliant
Class Dojo	Yes	1 year beyond pupil leaving the school	DELETED BY CLASS DOJO	Class Dojo GDPR compliant
Accelerated Reader / Renaissance Learning	Yes	1 year beyond pupil leaving the school	DELETED BY AR/RL	Ensure Renaissance Learning GDPR compliant
Education City	Yes	2 years after last used. Score data deleted after 5 years.	DELETED BY EDUCATION CITY	Education City GDPR compliant
Purple Mash	Yes	2 years after last used. Score data deleted after 5 years.	DELETED BY Purple Mash	Purple Mash GDPR compliant
PUMA maths	Yes	2 years after last used. Score data deleted after 5 years.	DELETED BY PUMA	Rising stars PUMA maths GDPR compliant
Mathletics	Yes	2 years after last used. Score data deleted after 5 years.	DELETED BY MATHELETICS	Mathletics GDPR compliant

6. SLT / Office records

Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Discriminatory incident log	Yes	Retained whilst pupil at primary school	SHRED	
Behaviour book	Yes	Retained 2 years	SHRED	Class teacher to shred If going up to juniors can be shared with them.
Behaviour / anti-bullying logs	Yes	Retained whilst pupil at school	SHRED	Escalating concerns to be recorded as risk reduction
Accident / incident report	Yes	7 years after incident for adults; 25 years after birth for children	SHRED	
First Aid books	Yes	Date of incidents plus 12 year adults, 25 years from DOB for child. More serious incidents longer	SHRED	
Emergency contacts folder - pupils	Yes	Update annually at least	SHRED	
Medicine administration	Yes	records 1 year. Emergency non-routine medicine - records to be kept for 21 years and 6 months from date of birth.	SHRED	
Physical restraint log	Yes	25 years from DOB for child.	SHRED	
Evolve School Trip Records including trip risk	Yes	Paper copies to be shredded on return except copy in HT office to be kept.	DELETED BY EVOLVE SHRED / DELETE	Evolve GDPR compliant for one year

assessments and pupil lists				
Visitors Signing in / out sheets	Yes	7 years	SHRED	
Signing in / out book / late book	Yes	1 year	SHRED	
Parental absence request forms	Yes	3 years	SHRED	
Permission forms	Yes	Until event has occurred without issue.	SHRED	Permission may be given via letter GDPR compliant
Catering Returns	Yes	1 year	SHRED	Ensure Innovate GDPR compliant
Admissions documentation, parent correspondence	Yes	Delete when processed via SIMS or matter resolved	SHRED	Ensure SIMS GDPR compliant
HT/HSLW Attendance monitoring folder	Yes	3 years	SHRED	

6. SLT/Office Records (continued)

Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
HT Data folder	Yes	Current academic year	SHRED	
HT Key Information folder	Yes	Current academic year	SHRED	
School Server – staff individual documents	Yes	6 months beyond end of academic year	DELETE	Within 6 months (beyond end of academic year), data should be stored with SENCO / HT and not be in individual files on school server any more.
Scanning folder	Yes	Termly	DELETE	
Single Central Record	Yes	Permanent – continual update	Updated as current	
DBS application information	Yes	Number to be retained on SCR but not copy of certificate	SHRED	
Secure Access (DfE)	Yes	TBC	DELETE	Ensure Secure Access / DfE GDPR compliant
Leave of Absence Requests - Staff	Yes	3 academic years	SHRED	
Images of staff and pupils stored on SIMS	Yes	Current academic year – if permission given	DELETE	
Emails	Yes	12 months beyond end of academic year	DELETE	
SIMS	Yes	TBC	DELETE	Ensure SIMS GDPR compliant

7. Health and Safety				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
CCTV footage	Yes	See CCTV policy	DELETE	
Volunteer information / emergency contact / health information	Yes	Request on parent induction and destroy when consent withdrawn or when child leaves BCPS. Update annually	SHRED / DELETE	Also destroy old copies / files if update provided.
8. Administrative				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Staff PC	Yes	Not determined. PC wiped before decommission.	SPECIALIST DECOMMISSION	
Staff memory sticks	Yes	Memory stick to be returned to school before staff member leaves	ALL FILES DELETED /	Memory sticks not to be used as we can now log on to server at home .
School website / emails	Yes	Annual update of photos/documents. Remove photos of any children for whom permission is retracted.	DELETE	
9. Finance				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
FMS	Yes	7 years	SHRED / DELETE	Ensure FMS GDPR compliant
School Gateway	Yes	1 year	SHRED / DELETE	School Gateway GDPR compliant
Signed payroll, variance info etc.	Yes	7 years	SHRED / DELETE	
Service level agreements	No	Until superseded	SHRED	
Payment documentation re. bills / payments made	Yes	7 years	SHRED/ DELETE	Ensure Bank are GDPR compliant
10. Work Experience				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Work Experience agreement & Risk Assessments	Yes	DOB of child + 18 years	SHRED	Retain if a claim arises relating to work experience