



Southfields Primary School

Data/Records Retention Schedule

Date agreed: February 2025

Review Date: February 2027

This policy, having been presented to, and agreed upon by the whole staff and Governors, will be distributed to:

- All teaching staff
- School governors

A copy of the policy will also be available in:

- The Staffroom
- The Head's office
- School web site

This will ensure that the policy is readily available to visiting teachers, support staff and parents.

Southfields Primary is totally committed to social justice and improving life chances for potentially vulnerable children. It is dedicated to sharing its work and findings beyond the school to improve outcomes for as many children as it can reach and has a particular specialism in Speech and Language development.

1. Introduction

This policy applies to all employees, workers and contractors.

- 1.1. The Governing Body of *Southfields Primary School* are committed to retaining personal data (which may be held on paper, electronically, or otherwise) about our employees for no longer than necessary for the purpose or purposes for which they were collected. All steps will be reasonably taken to securely destroy or erase from systems, all data which is no longer required.
- 1.2. The Governing Body recognise the need to process data in an appropriate and lawful manner, in accordance with the General Data Protection Regulation (GDPR). The purpose of this policy is to set out the principles by which we will retain your personal data.
- 1.3. Data users are obliged to comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary action, including dismissal.
- 1.4. *The Headteacher* is responsible for ensuring compliance with the GDPR and this policy. Any questions about the operation of this policy or concerns that there has been a breach of this policy should be referred in the first instance to *the Headteacher*.

2. Responsibilities

The Governing Body understand their legal responsibility to comply with the law, including the General Data Protection Regulation. The individual with overall responsibility for this policy is the Data Protection Officer.

3. Retention of Data

- 3.1 The Governing Body will state the purposes for which it holds personal information, and will register with the Data Protection Commissioner all the purposes for which it processes personal data.
- 3.2 Personal data will be retained for employment purposes, to assist in the running of the business and/or to enable individuals to be paid. In such cases we will apply the 'recommended' retention period. Some personal data is retained for statutory purposes, in which case we will apply the 'statutory' retention period.
- 3.3 The Governing Body commit to retaining the minimum amount of data that is necessary for the purpose for which it is held and access to the data will be restricted so that it is used only for the specific purpose.
- 3.4 Data will be held as indicated in Appendix 1 and for no longer than the period specified below. All data will be destroyed securely at the end of the retention period.

4. Retention guidelines

The purpose of the retention guidelines

- Under the Freedom of Information Act 2000, schools are required to maintain a retention schedule listing the record series which the school creates in the

course of its business. The retention schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use. The retention schedule lays down the basis for normal processing under both the Data Protection Act 2018 and the Freedom of Information Act 2000.

- Members of staff are expected to manage their current record keeping systems using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems. The retention schedule refers to records regardless of the media in which they are stored.

5. Benefits of a retention schedule

There are a number of benefits which arise from the use of a complete retention schedule:

- Managing records against the retention schedule is deemed to be “normal processing” under the Data Protection Act 1998 and the Freedom of Information Act 2000. Members of staff should be aware that once a Freedom of Information request is received or a legal hold imposed then records disposal relating to the request or legal hold must be stopped.
- Members of staff can be confident about safe disposal information at the appropriate time. Information which is subject to Freedom of Information and Data Protection legislation will be available when required. The school is not maintaining and storing information unnecessarily.

6. Maintaining and amending the retention schedule

- 6.1 Where appropriate the retention schedule should be reviewed and amended to include any new record series created and remove any obsolete record series. This retention schedule contains recommended retention periods for the different record series created and maintained by schools in the course of their business. The schedule refers to all information regardless of the media in which it is stored.
- 6.2 Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the Data Protection Act 2018 and the Freedom of Information Act 2000.
- 6.3 Managing record series using these retention guidelines will be deemed to be “normal processing” under the legislation mentioned above. If record series are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented.

Appendix 1: Retention of Data/Records

The Retention Schedule is divided into five sections:

1. Pupil Management
2. Human Resources
3. Financial Management of the School
4. Management of the School/School Administration
5. Health and Safety

TYPE OF RECORD	RETENTION PERIOD
1. Pupil Management	
Admissions – if the admission is successful	Date of admission + 1 year.
Admissions – if the appeal is unsuccessful	Resolution of case + 1 year.
Register of Admissions	Year child left + 1 year
Pupil Record	Year child left + 1 year
Special Educational Needs files, reviews and individual education plans (this includes any EHCP and all advice and information shared regarding educational needs)	All records sent to next school where receipt is recorded- where they should be held for 25 years. In school we will keep our records for an additional 3 years from Pupils end date.
Child Protection	All records sent to next school where receipt is recorded- where they should be held for 25 years. In school we will keep our records for an additional 3 years from Pupils end date.
Safeguarding Records	In school we will keep our records for an additional 3 years from Pupils end date.
Attendance Registers	Year child left + 1 year
School Meals Registers	Year child left + 1 year
Free School Meals Registers	Year child left + 1 year
School Trips	Current year + 6 years unless incident then review.
2. Human Resources	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates.
Job applications and interview records of successful candidates	6 years after employment ceases.
Written particulars of employment, contracts of employment and changes to terms and conditions	6 years after employment ceases.
Right to work documentation including identification documents	2 years after employment ceases.
Immigration checks	2 years after employment ceases.

TYPE OF RECORD	RETENTION PERIOD
DBS checks and disclosures of criminal records forms	As soon as practicable after the check has been completed and the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 1 year.
Change of personal details notifications	No longer than 6 months after receiving this notification.
Emergency contact details	6 years after employment ceases.
Personnel records	While employment continues and 6 years after employment ceases.
Training records	Until the training expires
Annual leave records	Current year + 6 years
Consents for the processing of personal and sensitive data	Current year + 6 years
Allegations of a child protection nature against a member of staff including where the allegation is founded	10 years from date of allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed.
Disciplinary records	<ul style="list-style-type: none"> • Oral warning – date of warning + 6 months. • First written warning - date of warning +12 months. • Final warning – date of warning + 12 months. • Case not found – dispose of at conclusion of process unless child protection related where need to follow above the above entry re. child protection allegations.
Records relating to overtime, and hours worked and payments made to staff	Permanently archived by payroll provider on EPM system
3. Financial Management of the School	
Financial Records	Current year + 6 years.
Pension records	Teachers - managed by Teachers Pensions Support staff – managed by LGPS
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	Teachers - managed by Teachers Pensions Support staff – managed by LGPS
Payroll and wage records	Managed by EPM
Maternity/Adoption/Paternity Leave records	Managed by EPM
Statutory Sick Pay	Managed by EPM
4. Management of the School/School Administration	
School Development Plans	3 years from the life of the plan
Appraisal Cycle	6 years from the completed cycle
Entry Sign System (Inventory)	Photo are retained for 1 year from being taken. Names are permanently archived in Inventory Sign system.

TYPE OF RECORD	RETENTION PERIOD
Letters to staff, parents/carers and pupils	School communications on DoJo
School & Staff Emails	3 years & then auto-delete
Census Returns	Current year + 6 years.
Governors papers/records	From September 2023 permanently archived on Governor Hub – preceding this archived on school Google system.
5. Health and Safety Records	
Health and Safety Risk Assessments	Current year + 3 years.
Records relating to any reportable accident, death or injury in connection with work	Date of incident + 12 years from the date the report was made. In the case of serious accidents this time period will need to be extended further.
Accident reporting	Adults – 6 years from the date of the incident. Children – Until the child turns 25.
Fire precaution log books	Current year + 6 years.
Control of substances hazardous to health (COSHH)	Current year + 10 years
Process of monitoring areas where employees and persons are likely to have come into contact with asbestos	Last action + 40 years.