



St Paul's School
FOUNDED 1509

Data Retention Policy

Author/reviewer responsible:	Operations and Compliance Manager	Date of last review:	06/25
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Authorised by resolution of:	Full Governing Body	Date of next review:	06/26
Applicable:	SPJ & SPS		

This policy is available on the Handbook page of the School Intranet and policies page of the School website and can be made available in large print or other accessible format if required; such requests can be made to policyquery@stpaulsschool.org.uk

Introduction

The School has a responsibility to maintain its records and record keeping systems. When doing this, the School will take account of the following factors:

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Accessibility of records and record keeping systems.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the requirements of current legislation and best practice and guidance. It may be amended by the School from time to time and any changes will be notified to

employees within one month of the date on which the change is intended to take effect. The School may also vary any parts of this procedure, including any time limits, as appropriate in any case.

Data Protection

This policy sets out how long employment-related and pupil data will normally be held by the School and when that information will be confidentially destroyed in compliance with the terms of the UK General Data Protection Regulation (UK GDPR) and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of the School. The School's [Data Protection Policy](#) outlines its duties and obligations under the UK GDPR.

Retention Schedule

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the School will adhere to the standard retention times listed within that schedule unless reasons have been noted for retaining them for longer.

The retention schedule refers to all records regardless of the media (e.g., paper, electronic, microfilm, photographic etc) in/on which they are stored. All records will be regularly monitored by the relevant department.

Destruction of Records

The schedule lists the many types of records used by the School and the applicable retention periods for each record type, in the absence of any specific reason for retaining them for longer. The retention periods are based on business needs and legal requirements and the School will run a regular cycle of review and destruction.

Where records have been identified for destruction, they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information or sensitive policy information should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate wastepaper merchant. All electronic information will be deleted.

The School will maintain a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in this list the following: -

- File reference (or other unique identifier);
- File title/description;
- Number of files;
- Name of the authorising officer;
- Date destroyed or deleted from system; and
- Person(s) who undertook destruction.

Retention of Safeguarding Records

Any allegations made that are found to be malicious must not be part of the personnel records. For any other allegations made, the School must keep a comprehensive summary of the allegation made, details of how the investigation was looked into and resolved and any decisions reached. This should be kept on the personnel files of the accused.

The School is committed to protecting and safeguarding our pupils and is persuaded by the recommendations of the Independent Inquiry into Child Sexual Abuse that safeguarding records should be retained for 75 years. Any allegations made of sexual abuse will be preserved by the School for no longer than 75 years from when the allegation is first made.

Archiving

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. A database of the records sent to the archives is maintained by The Archivist. The appropriate staff member, when archiving documents should record in this list the following information: -

- File reference (or other unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising officer.

Transferring Information to Other Media

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

Transferring Information to Another School

We retain the pupil's educational record whilst the child remains at the School. Where we are a pupil's final school of compulsory education, we will retain the pupil record for the full retention period as specified in this policy. Where a pupil transfers to another school before completion of their compulsory education, the file should be sent to their next school. The responsibility for retention then shifts onto the next school. We retain the file for a year following transfer in case any issues arise as a result of the transfer. We may delay destruction for a further period where there are special factors such as potential litigation.

Responsibility and Monitoring

The Operations and Compliance Manager has primary and day-to-day responsibility for implementing this policy. The Data Protection Officer, in conjunction with the School, is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The Data Protection Officer

will consider the suitability and adequacy of this policy and report improvements directly to management.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Emails

Email accounts are not a case management tool in itself. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost.

Pupil Records

If a child changes schools, the responsibility for maintaining the pupil record moves to the next school. We retain the file for a year following transfer in case any issues arise as a result of the transfer.

Retention Schedule

FILE DESCRIPTION	RETENTION PERIOD
Employment Records	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference. In this case, application forms will give applicants the opportunity to object to their details being retained
Job applications and interview records of successful candidates	Added to staff personnel file and retained in line with that record (6 years after employment ceases)
Written particulars of employment, contracts of employment and changes to terms and conditions	Added to staff personnel file and retained in line with that record (6 years after employment ceases)
Right to work documentation including identification documents and immigration checks	Kept separately from personnel file and retained for 2 years after employment ceases. <i>Employer's guide to right to work checks: 21 June 2024</i>

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 6 months
Change of personal details notifications	No longer than 6 months after receiving this notification
Emergency contact details	Destroyed on termination
Personnel records	While employment continues and up to six years after employment ceases (Limitation Act 1980). A basic record of the employee's name and dates of employment may be kept to enable references to be given.
Annual leave records	Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards
Working Time Regulations: <ul style="list-style-type: none"> • Opt out forms • Records of compliance with WTR 	<ul style="list-style-type: none"> • Two years from the date on which they were entered into • Two years after the relevant period
Disciplinary records	6 years after employment ceases (<i>Limitation Act 1980</i>)
Grievance records	6 years after employment ceases (<i>Limitation Act 1980</i>)
Training	6 years after employment ceases (<i>Limitation Act 1980</i>) or length of time required by the professional body
Staff training where it relates to safeguarding or other child related training	Date of the training plus 40 years (This retention period reflects that the IICSA may wish to see training records as part of an investigation)
Annual appraisal/assessment records	Current year plus 6 years
Professional Development Plans	6 years from the life of the plan
Allegations of a child protection nature against a member of staff including where the allegation is founded	10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed.

Financial and Payroll Records	
Pension records	12 years
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	7 years from the end of the scheme year in which the event took place
Payroll and wage records	7 years after end of tax year they relate to (<i>Taxes Management Act 1970; Income and Corporation Taxes 1988</i>)
Maternity/Adoption/Paternity Leave records	7 years after end of tax year they relate to (<i>Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)</i>)
Statutory Sick Pay	7 years after end of tax year they relate to (<i>Taxes Management Act 1970; Income and Corporation Taxes 1988</i>)
Current bank details	Held on the personnel file for 7 years after employment ceases. (<i>Taxes Management Act 1970; Income and Corporation Taxes 1988</i>)
Bonus Sheets	Current year plus 7 years (<i>Taxes Management Act 1970; Income and Corporation Taxes 1988</i>)
Time sheets/clock cards/flexitime	Current year plus 7 years (<i>Taxes Management Act 1970; Income and Corporation Taxes 1988</i>)
Bursary records	Date pupil leaves the provision plus 6 years
National Insurance (schedule of payments)	Current year plus 7 years (<i>Taxes Management Act 1970; Income and Corporation Taxes 1988</i>)
Insurance	Current year plus 7 years (<i>Taxes Management Act 1970; Income and Corporation Taxes 1988</i>)
Overtime	Current year plus 7 years (<i>Taxes Management Act 1970; Income and Corporation Taxes 1988</i>)
Annual accounts	Current year plus 7 years
Loans and grants managed by the School	Date of last payment on loan + 6 years if the loan is under 10,000 or date of last payment on loan + 12 years if the loan is over 10,000
All records relating to the creation and management of budgets	Life of the budget plus 3 years (minimum)
Invoices, receipts, order books and requisitions, delivery notices	Current financial year plus 7 years (minimum)
School fund documentation (including but not limited to invoices, cheque books, receipts, bank statements etc).	Current year plus 7 years (minimum)
Free school meals eligibility registers (where the register is used as a basis for bursary funding)	Current year plus 6 years

Agreements and Administration Paperwork	
Collective workforce agreements and past agreements that could affect present employees	Permanently
Trade union agreements	10 years after ceasing to be effective
School Development Plans	Life of plan or until plan superseded + 3 years. If major changes are made to the plan then an archive copy of previous plans should be retained
Visitors Book and Signing In Sheets	6 years
Newsletters and circulars to staff, parents and pupils	1 year (and the School may decide to archive one copy)
Minutes of Senior Management Team meetings	Date of the meeting plus 3 years or as required
Reports created by the Head Teacher or the Senior Management Team.	Date of the report plus a minimum of 3 years or as required
Records relating to the creation and publication of the school prospectus	Current academic year plus 3 years
Health and Safety Records	
Health and Safety consultations	Permanently
Health and Safety Risk Assessments	Life of the risk assessment plus 3 years
Health and Safety Policy Statements	Life of policy plus 3 years
Any records relating to any reportable death, injury, disease or dangerous occurrence	Date of incident plus 3 years provided that all records relating to the incident are held on personnel or pupil file
Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	Until the child reaches the age of 21 but if there is possibility of negligence allegation then date of incident + 15 years or date of settlement + 6 years. (<i>Limitation Act 1980</i>)
Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	Date of last entry in the accident book + 3 years but if there is possibility of negligence allegation then date of incident + 15 years or date of settlement + 6 years. (<i>Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</i>)
Fire precaution log books	Current year plus 6 years

<p>Medical records and details of: -</p> <ul style="list-style-type: none"> • control of lead at work • employees exposed to asbestos dust • records specified by the Control of Substances Hazardous to Health Regulations (COSHH) 	40 years from the date of the last entry made in the record (<i>Control of Substances Hazardous to Health Regulations (COSHH); Control of Asbestos at Work Regulations</i>)
Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made
Temporary and Casual Workers	
Records relating to hours worked and payments made to workers	7 years (<i>in case of HMRC query</i>)
Governing Body Documents	
Instruments of government	For the life of the School
Meetings schedule	Current year
Minutes – principal set (signed)	Generally kept for the life of the organisation
Agendas – principal copy	Where possible the agenda should be stored with the principal set of the minutes
Agendas – additional copies	Date of meeting
Policy documents created and administered by the governing body	Until replaced
Register of attendance at full governing board meetings	Date of last meeting in the book plus 6 years
Annual reports required by the Department of Education	Date of report plus 10 years
Records relating to complaints made to and investigated by the governing body or head teacher	Major complaints: current year plus 6 years. If negligence involved: current year plus 15 years. If child protection or safeguarding issues are involved then: current year plus 40 years. If the complaint relates to child sexual abuse, then indefinitely. (<i>Based on recommendations left by the IICSA. To be reviewed upon publication of ICO guidance</i>)
Correspondence sent and received by the governing body or head teacher	General correspondence should be retained for current year plus 3 years

Records relating to the terms of office of serving governors, including evidence of appointment	Date appointment ceases plus 6 years except where there have been allegations concerning children. In this case retain for 25 years.
Register of business interests	Date appointment ceases plus 10 years (<i>Companies Act 2006</i>)
Records relating to the training required and received by governors	Date appointment ceases plus 6 years
Records relating to the appointment of a clerk to the governing body	Date on which clerk appointment ceases plus 6 years
Governor personnel files	Date appointment ceases plus 6 years
Pupil Records	
Details of whether admission is successful/unsuccessful	1 year from the date of the latest possible point of non-admission or with the Pupil Record if admission successful.
Proof of address supplied by parents as part of the admissions process	Current year plus 1 year from the date of the latest possible point of non-admission or with the Pupil Record if admission successful.
Admissions register	Entries to be preserved permanently in order to assist with enquiries from former pupils
Pupil Record, including non-child protection safeguarding records	Primary – Whilst the child attends the School Secondary – until the child reaches the age of 25 (<i>Limitation Act 1980</i>)
Attendance Registers	6 years from the date of entry (<i>Working together to improve school attendance, DfE 02/2024</i>)
Correspondence relating to any absence (authorised or unauthorised)	Current academic year plus 6 years (<i>Education Act 1996</i>)
Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Date of birth of the pupil plus 31 years (Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan). (<i>Children and Family's Act 2014; Special Educational Needs and Disability Act 2001</i>)
Child protection information (to be held in a separate file).	DOB of the child plus 25 years then review. If aspects of the record relate to child sexual abuse, then these records should be retained indefinitely. (<i>Based on recommendations left by the IICSA. To be reviewed upon publication of ICO guidance</i>)
Exam results (pupil copy)	Only where the certificate is returned undelivered – one year.

Examination results (school's copy)	Indefinitely
Allegations of sexual abuse	If the complaint relates to child sexual abuse then indefinitely. <i>(Based on recommendations left by the IICSA. To be reviewed upon publication of ICO guidance)</i>
Records relating to any allegation of a child protection nature against a member of staff	Until the accused's normal retirement age or 10 years from the date of the allegation (whichever is the longer) <i>(Retention period informed by the guidance of KCSIE)</i>
Consents relating to school activities as part of UK GDPR compliance (for example, consent to be sent circulars or mailings)	Consent will last whilst the pupil attends the school or, in the case of Old Paulines, until consent is withdrawn
Pupil's work	Where possible, returned to pupil at the end of the academic year Otherwise, the work should be retained for the current year plus 1 year
Mark books	Current year plus 1 year
Schemes of work	Current year plus 1 year
Timetable	Current year plus 1 year
Class record books	Current year plus 1 year
Record of homework set	Current year plus 1 year
Photographs of pupils	For the time the child is at the School and for a short while after. Please note select images may also be kept for longer (for example to illustrate history of the school)
Parental consent forms for school trips where there has been no major incident	End of the trip or end of the academic year (subject to a risk assessment carried out by the School)
Parental permission slips for school trips where there has been a major incident	Date of birth of the pupil involved in the incident plus 25 years. Permission slips for all the pupils on the trip should be retained to demonstrate the rules had been followed for all pupils
Other Records	
Emails	5 years
CCTV	Footage is overwritten automatically after three weeks, unless a request to view/save footage has been approved by the Director of Operations under specific circumstances (see CCTV Policy)

Privacy notices	Until replaced plus 6 years
Inventories of furniture and equipment	Current year plus 6 years
All records relating to the maintenance of the School carried out by contractors or employees of the school	Whilst the building belongs to the school
Records relating to the letting of school premises	Current financial year plus 6 years
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	Parent Groups - Current year plus 6 years then review Old Pupil Associations – until consent is withdrawn
Referral forms	While the referral is current
Contact data sheets	Current year then review, if contact is no longer active then destroy
Registration Documents of the School	Permanent (or until closure of the school)
Annual Curriculum	From end of year: 3 years (or 1 year for other class records: eg marks / timetables / assignments)
Certificates of Incorporation	Permanent (or until dissolution of the company)
Minutes, notes and resolutions of boards or management meetings	Minimum - 10 years
Register of Members / Shareholders	Permanent (minimum 10 years for ex-members/shareholders)
Annual Reports	Minimum - 6 years
Signed/final agreements (including any signed variations/amendments)	Minimum – 7 years from completion of contractual obligations or term of agreement, whichever is the later
Deeds (or contracts under seal)	Minimum – 13 years from completion of contractual obligation or term of agreement
Intellectual Property Records	
Formal documents of title (trade mark or registered design certificates; patent or utility model certificates)	Permanent (in the case of any right which can be permanently extended, eg trademarks); otherwise expiry of right plus minimum of 7 years.
Assignments of intellectual property to or from the school	As above in relation to contracts (7 years) or, where applicable, deeds (13 years).
IP / IT agreements (including software licences and ancillary agreements e.g. maintenance; storage; development; coexistence agreements; consents)	Minimum – 7 years from completion of contractual obligation concerned or term of agreement.

