

ST BERNARD'S HIGH SCHOOL

A Catholic Academy for Arts and Science



RETENTION POLICY

Drafted: January 2017

FGB:

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Chair of Governors

Date of next review: January 2020

Mission Statement

St Bernard's is a school community which aims to live by Jesus' commandment "Love one another as I have loved you".

We are a Catholic learning community committed to the ongoing development of the entire potential of every person, achieved through a broad, balanced and relevant curriculum.

We care for each other as individuals of equal worth, regardless of status, sex, race or religion and thus actively seek to promote safeguarding, justice and fairness.

We provide an atmosphere in which we can grow in our Faith, and encourage this faith by a lively and relevant liturgy.

We work with parents, parishes, local communities and industry to prepare our students for the opportunities of adulthood.

This retention schedule contains recommended retention periods for the different record series created and maintained by the school in the course of its business.

The schedule refers to all information regardless of the media in which it is stored. The schedule will be reviewed on a regular basis by the School Business Manager.

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 1998 and the Freedom of Information Act 2000.

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.

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1. Acknowledgements

This retention schedule for schools is based on the guidelines issued by the Local Government Group of the Records Management Society of Great Britain and the Shropshire Council Education authority.

2. The purpose of the school retention schedule

The purpose of the retention schedule 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.

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 all information, regardless of the media in which they are stored.

3. Benefits of a school 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.
- Providing staff are managing record series using the retention schedule, they cannot be found guilty of unauthorised tampering with files once a freedom of information request or a data subject access request has been made.
- Staff can be confident about destroying 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 records and storing information unnecessarily.

4. Maintaining and amending the school retention schedule

Where appropriate this retention schedule will be reviewed by the School Business Manager and amended to include any new record series created. It will also remove any obsolete record series.

5. What to do with records once they have reached the end of their administrative life:

5.1. Destruction of records

Once records have been identified for destruction they should be disposed of in an appropriate way. All records containing personal information, or sensitive policy information should be sent for confidential shredding (if possible).

Any other records should be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways.

The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction.

Staff should record at least:

- File reference (or other unique identifier)
- File title (or brief description)
- Number of files
- The name of the authorising officer. This could be kept in an Excel spreadsheet or other database format.

5.2. Transfer of information to other media

Where lengthy retention periods have been allocated to records, staff may wish to consider converting paper records to other media such as microform or digital media.

The lifespan of the media and the ability to migrate data where necessary should always be considered.

6. Data Protection Officer

The Head Teacher fulfils the role of Data Protection Officer. Any queries regarding the status of records or the method of disposal should be referred to the Head Teacher.

7. School retention schedule

7.1 Child Protection: The retention and use of records relating to child protection matters concerning students and child protection allegations against staff requires specific guidance in this schedule. This will be subject to update following implementation of the recommendations by Sir Michael Bichard.				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Child protection	YES	Education Act 2002, s175, related guidance 'Safeguarding Children in Education', Sept 2004	DOB + 25 years (Amended in consultation with Safeguarding Children Group)	SHRED – Child protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (ie the information does not need to be sent to a university for example). Where a child is removed from roll to be educated at home, the file should be copied to the Local Education Authority.
Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance) Education Act 2002 guidance "Dealing with Allegations of Abuse against Teachers and Other Staff" November 2005	Until the person's normal retirement age, or 10 years from the date of the allegation if that's longer	(Records of Disciplinary and Grievance): 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 its own protection the employer has to keep a limited record that an allegation relates to abuse and the worker is employed to work with children or other vulnerable individuals summary record to be retained on confidential personnel file and a copy given to the person concerned.

7.2 Governors					
Basic description	file	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Minutes					
Principal (signed)	set	No		Permanent	RETAIN in school for 6 years from date of meeting and then offer to Archives
Inspection copies		No		3 years from date of meeting	DESTROY – If these Minutes contain any sensitive information, they should be shredded
Agendas		No		Date of meeting	DESTROY
Reports				Date of meeting + 6 years	RETAIN in school for 5 years from date of meeting and then offer to Archives
Annual parents' meetings		No		Date of meeting + 6 years	RETAIN in school for 6 years from date of meeting and then offer to Archives
Instruments of government		No		Permanent	RETAIN in school whilst school is open and then offer to Archives
Trusts and endowments		No		Permanent	RETAIN in school whilst operationally required and then offer to Archives
Action plans		No		Date of plan + 3 years	DESTROY under normal circumstances, but consider offering to Archives for a sample to be taken if the school has been through a difficult period
Policy documents		No		Expiry of policy	RETAIN in school whilst operationally required. This includes if the expired policy is part of a past decision making process – offer to Archives.

7.3 School management				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Log books (Books where the Head Teacher or another member of staff keeps a record of what happens in the school, this may include details of events, photographs and other information)	Yes	Activities of individual students and staff are subject to data protection	Date of last entry in the book + 6 years	RETAIN in the school for 6 years from the date of the last entry – Offer to Archives
Minutes (Senior Management Team and other internal administrative bodies)	Yes	Amended in consultation with Safeguarding Children Group	Date of meeting + 5 years	RETAIN in school for 5 years from meeting and offer to Archives. The appropriate archivist will then take a sample for permanent preservation
Head Teacher reports (Made by the Head Teacher of the Management Team)	Yes	Amended in consultation with Safeguarding Children Group	Date of report + 3 years	RETAIN in school for 3 years from completion of report/meeting and offer to Archives. The appropriate archivist will then take a sample for permanent preservation
School correspondence created by all staff with administrative responsibilities (except child protection records which are dealt with in section 7.1 above)	Yes	Amended in consultation with Safeguarding Children Group	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 (6 years for financial correspondence)	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 – Offer to Archives
Employer's liability	Yes		Permanent	Offer to Archives
Performance reviews	Yes		Permanent	Offer to Archives

7.4 Students				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Admission registers	Yes		Date of last entry in the book (or file) + 6 years	RETAIN in the school for 6 years from the date of the last entry – Offer to Archives
Attendance registers	Yes		Date of register + 3 years	DESTROY – If these records are retained electronically, any back-up copies should also be destroyed at the same time
Student record cards	Yes		DOB of the student + 25 years	SHRED – In the case of exclusion, retain in school
Student files	Yes		DOB of the student + 25 years	SHRED – In the case of exclusion, retain in archive
Special education needs files, reviews and individual education plans	Yes		DOB of the student + 25 years	SHRED – In the case of exclusion, retain in archive
Letters authorising absence	No		Date of absence + 2 years	SHRED
Absence books	No		Current year + 6 years	SHRED
Examination results	Yes			
Public	No		Year of examinations + 6 years	DESTROY – Any certificates left unclaimed should be returned to the examination board.
Internal examination results	Yes		Current Year + 5 years	DESTROY – If these records are retained on the student file, or in their National Records of Achievement, they need only be kept for as long as operationally necessary.
Student correspondence	Yes		Current year + 3 years	REVIEW – Consider allocating a further retention period or DESTROY

7.4 Students (cont.d)				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Statement maintained under Education Act 1996 – Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	DESTROY – Unless legal action is pending
Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	DESTROY – Unless legal action is pending
Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12 years	DESTROY – Unless legal action is pending
Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years	DESTROY – Unless legal action is pending
Children SEN files	Yes		Closure + 35 years	DESTROY – Unless legal action is pending

7.5 Curriculum				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Curriculum development	Yes		Current year + 6 years	DESTROY
Curriculum returns	No		Current year + 3 years	DESTROY
School syllabus	No		Current year + 1 year	DESTROY – It may be appropriate to review these records at the end of each year and allocate a new retention period
Schemes of work	No		Current Year + 1 year	DESTROY – It may be appropriate to review these records at the end of each year and allocate a new retention period
Timetable	No		Current year + 1 year	DESTROY – It may be appropriate to review these records at the end of each year and allocate a new retention period
Class books	No		Current year + 1 year	DESTROY – it may be appropriate to review these records at the end of each year and allocate a new retention period
Mark books	No		Current year + 1 year	DESTROY – It may be appropriate to review these records at the end of each year and allocate a new retention period
Records of homework set	No		Current year + 1 year	DESTROY – It may be appropriate to review these records at the end of each year and allocate a new retention period
Student's work	No		Current year + 1 year	DESTROY – It may be appropriate to review these records at the end of each year and allocate a new retention period
SATS results	Yes		Current year + 6 years	DESTROY – These records should be shredded
PANDA reports	Yes		Current year + 6 years	DESTROY – These records should be shredded

7.6 School personnel				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	SHRED
Staff personal files	Yes		Termination + 15 years	SHRED
Interview notes and recruitment records	Yes		Date of interview + 6 months	SHRED
Pre-employment vetting information – including unsuccessful CRB checks	No	CRB guidelines	Date of check + 1 year	SHRED – This information should be placed on the personnel file if the applicant is successful
Disciplinary files (not child protection – see 7.1)	Yes			
Oral warning	Yes		Date of warning + 6 months	SHRED – If this is placed on a personal file, it must be weeded from the file.
Written warning – level one	Yes		Date of warning + 6 months	SHRED – if this is placed on a personal file, it must be weeded from the file
Written warning – level two	Yes		Date of warning + 2 years	SHRED – If this is placed on a persona file, it must be weeded from the file
Final warning	Yes		Date of warning + 2 years	SHRED – If this is placed on a personal file, it must be weeded from the file
Case not found	Yes		DESTROY	Immediately at the conclusion of the case, except Child Protection allegations (see 7.1)
Annual appraisal and assessment records	No		Current year + 6 years	SHRED
Salary cards	Yes		Last date of employment + 6 years	Retain in archive
Maternity pay records	Yes	Statutory maternity pay	Current year + 3 years	SHRED
Records held under retirement benefits schemes	Yes	Information Powers Regulations 1995	DOB + 70 years	SHRED

7.7 School health and safety				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Accessibility plans	No	DDA	Current year + 6 years	DESTROY
Accident reporting	Yes			
Adults – Accident book	Yes		Last entry in book + 10 years	SHRED
Adults – Internal reports	Yes		Current year + 6 years	SHRED
Students	Yes		DOB + 25 years	SHRED – A child may make a claim for negligence 7 years from their 18 th birthday. All records are kept until the student reaches the age of 25 years
Records relating to serious injury at work	Yes		Date of incident + 12 years	REVIEW
COSHH	Yes		Current year + 10 years	REVIEW
Incident reports	Yes		Current year + 20 years	SHRED
Risk assessments	Yes		Date assessment superseded + 3 years	DESTROY
Asbestos monitoring	Yes		Last action + 40 years	DESTROY – The process where employees and persons are likely to have come into contact with asbestos
Radiation monitoring	Yes		Last action + 50 years	DESTROY – The process where employees and persons are likely to have contact with radiation

7.8 School administration				
Basic file description	Date Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
School brochure/prospectus	Yes		Current Year + 3 years	Offer to Archives – The appropriate archivist will then take a sample for permanent reservation
Circulars (staff/parents/students)	No		Current year + 1 year	DESTROY
Newsletters	No		Current year + 1 year	REVIEW to see whether any further retention is required – Offer to Archives (The appropriate archivist will then take a sample for permanent reservation)
Visitor's book	No		Current year + 2 years	REVIEW to see whether any further retention is required – Offer to Archives (The appropriate archivist will then take a sample for permanent reservation)
PSFA	Yes		Current year + 6 years	Offer to Archives – The appropriate archivist will then take a sample for permanent reservation
Cooks day book	No		Current year + 3 years	DESTROY
Leaflets and publications	No		When superseded	DESTROY

7.9 School finance				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Annual accounts	Yes	Financial Regulations	Indefinite	NO NOT DESTROY
Loans and grants	Yes	Financial Regulations	Date of last payment on loan + 12 years	REVIEW to see whether any further retention is required – Offer to Archives (The appropriate archivist will then take a sample for permanent reservation)
Contracts				
Under seal	Yes		Contract completion date + 12 years	REVIEW to see whether any further retention is required – Offer to Archives (The appropriate archivist will then take a sample for permanent reservation)
Under signature	Yes		Contract completion date + 6 years	SHRED
Budget monitoring reports	Yes		Current year + 3 years	SHRED
Invoices and receipts covered by financial regulations	Yes		Current year + 6 years	SHRED
Order books and requisitions	No		Current year + 6 years	SHRED
Delivery notes	No		Current year + 1 year	DESTROY
Debtors' records	Yes		Current year + 6 years	SHRED
School fund records covered by financial regulations	Yes		Current year + 6 years	SHRED
Applications for free school meals, travel, uniforms	Yes		Whilst child is at school	SHRED
Student grant applications	Yes		Current year + 3 years	SHRED
Free school meals registers	Yes	Financial Regulations	Current year + 6 years	SHRED
Petty cash books	No	Financial Regulations	Current year + 6 years	SHRED

7.10 School property				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Title deeds	Yes		Permanent	These should follow the property – Offer to Archives
Plans	Yes		Permanent	Retain until superseded and offer to Archives
Maintenance and contracts	Yes	Financial Regulations	Current year + 6 years	DESTROY
Leases	Yes		Expiry of leave + 6 years	DESTROY
Lettings	Yes		Current year + 3 years	DESTROY
Burglary, theft and vandalism reports	No		Current year + 6 years	SHRED
Maintenance log books	Yes		Last entry + 10 years	DESTROY
Contractors' reports	Yes		Current year + 6 years	DESTROY
Inventory	No		Current year + 6 years	DESTROY

7.11 LA				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Attendance returns	Yes		Current year + 2 years	SHRED
Circulars from LA	No		Whilst operationally required	REVIEW to see whether a further retention period is required – Offer to Archives
Admissions data	Yes		Current year + 5 years	DESTROY/DELETE
Student enrolment	Yes		Current year + 2 years	SHRED

7.12 DfE				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
HMI reports	No		These do not need to be kept any longer	If any are retained – Offer to Archives
Ofsted reports and papers	Yes		Replace former report with any new inspection report	REVIEW to see whether a further retention period is required – offer to Archives
Returns	No		Current year + 6 years	DESTROY
Circulars from DCSF	No		Whilst operationally required	REVIEW to see whether a further retention period is required – offer to Archives

7.13 Partnership working				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Service level agreements	Yes		Until superseded	SHRED
Work experience agreement	Yes		DOB of child + 18 years	SHRED

7.14 School meals (Electronic)				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Dinner register	No		Current year + 3 years	DELETE
School meals summary sheet	No		Current year + 3 years	DELETE
Free school meals register	Yes		Current year + 6 years	DELETE
Free School meals vouchers	Yes		Current year + 5 years	DELETE
School meals vouchers	No		Current year + 5 years	DELETE

7.154 Schools				
Basic file description	Data Protection issues	Statutory Provisions	Retention period (operational)	Action at the end of the administrative life of the record
Tutor folders	Yes		Termination + 6 years	SHRED
Potential tutors	Yes		Current year + 2 years	SHRED
Ex tutor folders	Yes		Termination + 15 years	SHRED
Student enquiry files	Yes		Current year + 2 years	SHRED
Student support files and finance	Yes		Current year + 6 years	SHRED

8. European funded records

Where any record relates to a project that is funded by a European Union (EU) programme, it is essential that all the records are retained together.

All EU funded records (including finance) can only be disposed of **after** the EU funded programme has been nationally signed off. Therefore, records associated with an EU funded programme have a different life cycle to other similar records listed within the Retention Schedule.

9. Finding the School Retention Schedule

This School Retention Schedule can be found in section 7 of this policy. The policy is retained in the school policies folder at t:policies/FGB/Freedom of information.

10. Authorisation

This school retention schedule has been authorised by The Full Governing Body

Date: March 2017