**OLDHAM HULME GRAMMAR SCHOOL**

**DATA RETENTION POLICY**

***This policy is applicable from EYFS through to year 13***

**The purpose of the retention Policy**

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

**What to do with records once they have reached the end of their administrative life**

**Destruction of records**

* Where 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 shredded before disposal.

**Transfer of records to the Archives**

* Where records have been identified as being worthy of permanent preservation, arrangements should be made to transfer the records to the Archives.

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

**TABLE OF RETENTION PERIODS**

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| **Type of Record/Document** | **Personal Data****Y/N** | **Suggested Retention Period** |
| **School Specific Records**Registration documents of schoolAttendance RegisterAnnual curriculum | **N****N****N** | Permanent (or until closure of the school)6 Years from last date of entryFrom end of year: 3 years (or 1 year for other class records eg marks/timetables/assignments |
| **Individual Pupil Records**Admissions: application forms, assessments, records of decisionsExamination results (internal or external)*Pupil filing including:*Pupil reportsPupil performance recordsPupil medical recordsSEND records (to be risk assessed individually) | **Y****Y****Y****Y****Y****Y** | 25 years from date of birth (or, if pupil not admitted, up to 7 years from that decision)7 years from pupil leaving schoolALL: 25 years from date of birth (subject where relevant to safeguarding considerations). Any material which may be relevant to potential claims should be kept for a lifetime of the pupil.Date of birth plus up to 35 years (allowing for special extensions to statutory limitation periods. |
| **Safeguarding**Policies and proceduresDBS disclosure certificates (if held)Accident / Incident reportingChild Protection files | **N****Y****Y****Y** | Keep permanent record of historic policiesNo longer than 6 months from decision on recruitment, unless DBS specifically consulted – but a record of checks being made must be kept.Keep on record for as long as any living victim may bring a claim (NB civil limitation periods can be set aside in cases of abuse). Ideally, files to be reviewed from time to time if resources allow and a suitably qualified person is available.If a referral has been made / social care have been involved or child has been subject of a multi-agency plan – indefinitely. If low level concerns, with no multi-agency act – apply applicable low-level concerns policy rationale (this may be 25 years from date of birth OR indefinitely). |
| **Corporate Records**Certificates of IncorporationMinutes, notes and resolution boards or management meetingsRegister of members/shareholdersAnnual reports | **N****N****N****N** | Permanent (or until dissolution of the company)PermanentPermanentPermanent |
| **Accounting Records**Accounting recordsTax returnsBudget and internal financial records | **N****N****N** | 7 yearsNot applicable at this time3 years |
| **Contracts and Agreements**Signed or final/concluded agreements including software licencesDeeds (or contracts under seal) | **N****N** | 7 years from completion of contractual obligations or term of agreement, whichever is the later13 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 certificatesAssignments of intellectual property to or from the school | **N****N** | Permanent (in case of any right which can be permanently extended, eg trade marks); otherwise expiry of right plus minimum of 7 yearsAs above in relation to contracts (7 years) or, where applicable, deeds (13 years) |
| **Employee Personal Records**Single Central Record of employeesContracts of employmentStaff personnel filesPayroll, salary, maternity pay recordsJob application and interview/rejection records (unsuccessful applicants)Immigration recordsHealth records relating to employees | **Y****Y****Y****Y****Y****Y****Y** | Keep a permanent record of all mandatory checks that have been undertaken7 years from effective date of end of contractAs above, but do not delete any information which may be relevant to historic safeguarding claims7 years6 months4 years7 years from end of contract of employment |
| **Insurance Records**Insurance policies (will vary – private, public, professional indemnity)Correspondence related to claims / renewals / notification re: insurance | **N****N** | Duration of policy (or as required by policy) plus a period for any run-off arrangements and coverage of insured risks: ideally, until it is possible to calculate that no living person could make a claim.7 years |
| **Environmental & Health Records**Maintenance logsAccidents to childrenAccident at work records (staff)Risk assessments (carried out in respect of above) | **N****Y****Y****N** | 10 years from date of last entry25 years from birth (unless safeguarding incident)4 years from date of accident, but review case-by-case where possible7 years from completion of relevant project, incident, event or activity |

**Data Retention policy reviewed: April 2018**

Signed: Principal Date:

Signed: Chair of Governors Date:

**Next Review Due: April 2019**