



**Hawridge & Cholesbury CE School**

# **Information and Records Retention Policy**

**Last reviewed February 2024**

**Next review February 2027**

## Introduction

- 1 This policy sets out a structured approach to reviewing and destroying records in relation to Hawridge & Cholesbury CE School (the **School**).
- 2 The retention period for each type of record is shown in the table below. In addition, data protection legislation makes it unlawful to keep the information when it is no longer needed for the purpose for which it is held. This requirement is uncertain and allows discretion and may vary according to the circumstances, but in practice it means that the School should promptly destroy the record once the retention period in the table below has been reached. Occasionally there may be special circumstances which mean that a record should be kept for longer (for example where there is a risk of litigation or a request from an outside body).
- 3 The retention periods stated in the table below are the minimum storage requirements; in practice the School carries out a data cleanse of its files every 12 months. Accordingly, a 3-year retention period means 3 years plus up to 12 months to allow the School to securely dispose of the information.
- 4 Information must be securely deleted. This applies to paper records, electronic information and biometric information.
- 5 This policy does not apply to records connected with commercial activities.
- 6 If an email falls into one of the categories set out in the table then it should be filed centrally as soon as is reasonable.
- 7 "Routine" emails which do not fall into any of the categories in the table may be kept in inboxes for up to six months and should then be deleted. An example of a routine email is an internal email advising staff that the weekly meeting is cancelled.

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
1	<b>Pupils</b>			
1.1	Admission registers (however held)	Three years from the date of the last entry	Review for further retention in the case of contentious dispute SHRED/DELETE or delete copies and including back-ups and copies	Yes
1.2	Attendance registers (however held)	Three years from the date of the last entry	Review for further retention in the case of contentious dispute SHRED/DELETE including back-ups and copies	Yes
1.3	Child protection records	DOB of the pupil + 25 years	Review for further retention in the case of contentious dispute SHRED/DELETE  <b>Notes</b> <ul style="list-style-type: none"> <li>• Child protection information must be copied and sent under secure separate cover to the new school. Confirmation of receipt should be obtained</li> <li>• Where a child is removed from roll to be educated at home, the file should be copied to the Local Authority (<b>LA</b>)</li> </ul>	No
1.4	Medical records held by the School	DOB of the pupil + 22 years	Review for further retention in the case of contentious disputes SHRED/DELETE	No
1.5	Counselling records held by the School	DOB of the pupil + 25 years	Review for further retention in the case of contentious disputes SHRED/DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
2	<b>Pupil files</b>			
2.1	Pupil files (including public examination scripts, marks & results)	Retain whilst child remains at school	File should follow the pupil when he/she leaves the primary school. This will include to another primary schools, to a secondary school or to a pupil referral unit.	No
2.2	Internal test scripts, marks and results	<p>Scripts:</p> <p>Scripts from weekly or monthly tests: Keep until the end of the next term.</p> <p>Scripts from termly or yearly tests: Keep until the end of the next academic year.</p> <p>Marks and results:</p> <p>If the purpose of the test is to progress the child (either internally or externally) then keep marks and results in accordance with the retention periods and guidance set out in row 2.1 above.</p> <p>If the purpose of the test is for general internal assessment of academic performance then keep marks and results for the same period as the scripts themselves.</p>	Keep for longer in accordance with the retention periods and guidance set out in row 2.1 above if risk of contentious disputes, for example, parental complaints, disciplinary matters, pupil exclusions, bullying incidents and subject access requests.	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
2.3	Special Educational Needs files, reviews and Individual Education Plans	DOB of the pupil + 25 years	Review for further retention in the case of contentious disputes SHRED/DELETE	No
2.4	Statement of Special Education Needs ( <b>SEN</b> ) and Education Healthcare ( <b>EHC</b> ) Plans	Statements of SEN (including appendices) and EHC Plans should never be retained once the pupil has left the School	SHRED/DELETE unless legal action pending The Statement / Plan belongs to the LA which makes and maintains the Statement / Plan	Yes
2.5	Letters authorising absence	Three years from the date of the last entry on the attendance register	SHRED/DELETE	No
<b>3</b>	<b>Permissions</b>			
3.1	Parental permission slips for school trips – where there has been no major incident, accident, injury or near miss involving anyone on the trip	Conclusion of the trip + three years	Review for further retention in the case of contentious disputes otherwise SHRED/DELETE	No
3.2	Parental permission slips for	DOB of the pupil involved in the incident + 25 years	Review for further retention in the case of relevance to contentious disputes.	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	school trips – where there has been a major incident, accident, injury or near miss involving anyone on the trip	The permission slips for all pupils on the trip may need to be retained to show that the rules had been followed for all pupils	SHRED/DELETE	
<b>4</b>	<b>Admission department</b>			
4.1	Admission documents including enrolment forms	Six years from date of leaving the School	Review for further retention in the case of contentious disputes SHRED/DELETE	No
4.2	Admissions documents relating to applicants who did not join the School	One year (subject to requirements for admission appeal documents - see below). If there is a risk that parents or a pupil might bring a claim against the School then the documents should be retained.  The documents can be kept for as long as the School considers that they are required, subject to the School's obligation not to keep the documents for longer than is necessary	SHRED/DELETE	No
4.3	Documents relating to admission appeal	At least two years	Review for further retention in the case of relevance to contentious disputes.	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	proceedings		SHRED / DELETE	
5	<b>Employment</b>			
5.1	Employment or personnel records including contracts of employment, changes to terms and conditions, disciplinary matters, grievance procedures	For at least six years after date of termination of employment For at least 12 years after date of termination if any of the documents were signed as a deed	If on a date no earlier than six years after the termination date there has been no recent contact from the relevant individual and no apparent breach of contract claim, dispose securely of documentation unless any child protection concerns. Records of anyone with child protection concerns (even if not proved) should be retained	No
5.2	Single central register (SCR)	Staff members who leave are moved to a 'leavers' tab and retained.	Review whether further retention is necessary. If so, these reasons must be documented. If not SHRED/DELETE	No
5.3	Records and documents relating to membership of and contributions to the Teachers' Pension Scheme	While employment continues and at least up to six years after employment terminates	Review whether further retention is necessary. Decisions in relation to the Teachers' Pension Scheme may have ramifications beyond six years, and may be queried at any time by members and the Teachers' Pension Scheme	No
5.4	Employment references received and references provided (where	While employment continues and at least up to six years after employment terminates	Consider whether any recent reference requests for the relevant individual have been received.  If any concerns are/have been raised by social services or other agencies see 5.5 below.	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	no safeguarding concerns have arisen or are known)		If none, SHRED/DELETE	
5.5	Employment reference where an individual's employment ended for a safeguarding reason or where safeguarding was outstanding at the time of termination	At least for 10 years after the person has retired or until the individual reaches the age of 75, whichever is the later	Consider whether any recent reference requests for the relevant individual or new concerns raised by social services or other agencies  If none, SHRED/DELETE	Yes
5.6	Working time opt-out forms	Two years from the date on which they were entered into	SHRED/DELETE	Yes
5.7	Records to show compliance with the Working Time Regulations	Two years after the relevant period	SHRED/DELETE	Yes
5.8	Payroll and wage records  These include records of:	Six years from the financial year end in which payments are made	SHRED/DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	<ul style="list-style-type: none"> <li>•Details on overtime.</li> <li>•Bonuses.</li> <li>•Expenses.</li> <li>•Benefits in kind.</li> </ul>			
5.9	PAYE Records	Six years from the financial year end in which payments are made	SHRED/DELETE	Yes
5.10	<p>Maternity/paternity records</p> <p>These include:</p> <ul style="list-style-type: none"> <li>•Records regarding Maternity payments made save for where those include payroll records.</li> <li>•Maternity certificates showing the expected week of confinement</li> </ul>	Three years after the end of the tax year in which the maternity pay period ends	SHRED/DELETE	Yes
5.11	Sickness records required for the purposes of	During employment and for a period of three years after employment has ended and to be kept separate from	SHRED/DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	Statutory Sick Pay ( <b>SSP</b> )	absence records which merely demonstrate the dates absent and not the health issue.		
5.12	Records in relation to hours worked and payments made to workers	For a period of three years beginning with the last day of the following month to which the records relate	SHRED/DELETE	Yes
5.13	Consents for the processing of personal data and sensitive personal data (known as special category personal data under the GDPR)	For as long as the data is being processed and up to six years afterwards  For consent to be valid it must be "freely given".	SHRED/DELETE	Yes
5.14	Disclosure and Barring Service ( <b>DBS</b> ) checks and disclosures of criminal record forms	Dispose of securely after the recruitment process unless assessed as relevant to ongoing employment relationship. Once the conviction is spent, should be deleted unless it is an excluded profession.	Enter DBS certificate number, date, initials on Single Central Register  SHRED/DELETE	Yes
5.15	Immigration checks	Throughout employment and then retained for two years after the termination of employment	SHRED/DELETE	Yes

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
5.16	Recruitment records of unsuccessful candidates	Six months after notifying unsuccessful candidates in order to demonstrate, if required, the fairness and transparency of the recruitment process	SHRED/DELETE	No
5.17	Personnel and training records	Whilst employment continues and up to six years after employment ceases	SHRED/DELETE	No
5.18	Annual leave records	Six years	SHRED/DELETE	No
5.19	Collective / workforce agreements	Permanently or six years after the agreement comes to an end	SHRED/DELETE	No
5.20	Works Council minutes	Permanently	N/A	No
5.21	An Employee's bank details	Until last payment made	SHRED/DELETE	No
5.22	Travel and subsistence claims.	Whilst employment continues and up to six years after employment ends	SHRED/DELETE	
5.23	Records of advances for season tickets and loans to employees	Whilst employment continues and up to six years after repayment or end of employment	SHRED/DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
5.24	Death Benefit Nomination and Revocation Forms	Whilst employment continues and up to six years after payment of benefit	SHRED/DELETE	No
6	<b>Health and safety information - employees</b>			
6.1	Reportable injuries, diseases and dangerous occurrences (RIDDOR) reports or own record	Three years from the date of record If disease - indefinitely	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	Yes
6.2	First aid / accident book entry	Three years from the date of injury or last record in the book If disease - indefinitely	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	Yes
6.3	Records of maintenance, examination and test control measures relating to substances hazardous to health under the Control of Substances Hazardous to Health (COSHH)	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	regime			
6.4	Health records for licensable asbestos work	At least 40 years from the date of the last entry	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes
6.5	Medical surveillance certificate for licensable asbestos work	At least four years from the date it was issued	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes
6.6	Records of air monitoring for asbestos	Where a health record is required at least 40 years from the date of the last entry  In other cases at least five years from the date of the last entry	SHRED/DELETE	Yes
6.7	Records of examinations, tests and repairs carried out in respect of exhaust or respiratory protective equipment under the Control of Asbestos Regulations 2012	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	(CAR)			
6.8	Examination / report of defect for power presses	Two years	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	Yes
6.9	Records of water monitoring, inspection, testing, checks and control measures for legionellosis	Five years from the date of the last entry	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	Yes
<b>7</b>	<b>Health and safety information - pupils</b>			
7.1	Accident reports including first aid / accident book	DOB of the pupil involved in the incident + 21 years	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	No
7.2	Reportable injuries, diseases and dangerous occurrences (RIDDOR) reports or own record	DOB of the pupil involved in the incident + 21 years	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	Yes
7.3	Incident investigations and reports, risk assessments and	DOB of the pupil involved in the incident + 21 years	Review for further retention in the case of enforcement action or civil claims for personal injury SHRED/DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	other relevant documents where there has been an accident or incident			
8	<b>Generic health and safety records</b>			
8.1	<p>Risk assessments, records of health and safety arrangements, copies of policies and procedures</p> <p>General records of health and safety auditing and monitoring including fire risk assessments, electrical testing, PAT testing and gas appliance testing</p> <p>Training records and copies of instructions or information</p> <p>Maintenance logs and / or records of</p>	Three years (in the absence of a specific accident, incident, dangerous occurrence or notifiable disease)	<p>Review for further retention in the case of enforcement action or contentious disputes</p> <p>SHRED/DELETE</p>	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	<p>plant and / or equipment plus safety manuals / notices / instructions</p> <p>Records of emergency evacuations and fire drills, fire safety risk assessments and fire safety policy / fire arrangements</p>			
8.2	<p>Copies of documents, including health and safety files, prepared pursuant to the Construction (Design and Management) Regulations 2015</p>	<p>5 years or as long as is reasonably necessary to inform on future construction projects at the School site</p>	SHRED/DELETE	N/A
<b>9</b>	<b>Investigations, reviews and inquiries</b>			
9.1	<p>Documents relevant to IICSA</p>	<p>Indefinitely</p>	<p>Review once the Inquiry has been completed.</p>	<p>No - unless the school has received a formal</p>

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
				notice from IICSA
9.2	<p>Internal reports and investigations into accidents / incidents</p> <p>Copies of reports submitted to external agencies / regulators such as Ofsted, Health and Safety Executive, Local Authority etc</p> <p>External reports, reviews, investigations and inquiries for example inquests and public inquiries</p>	<p>Where the investigation / inquiry / report has been necessitated as a result of a specific incident, for at least three years where there is a risk of enforcement action and / or criminal prosecution and / or a civil claim.</p> <p>Where this relates to pupil DOB +21 years)</p>	SHRED/DELETE	No
10	<b>Keeping information for longer</b>			
10.1	Records which do not contain personal data, for example, old photographs of School buildings,	Can be kept indefinitely	N/A	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	title deeds etc			
10.2	Records relating to a number of pupils, or the School generally, such as old class photographs, lists of pupils attending the School in any given year, School prospectuses, newspaper cuttings etc	<p>Can be kept indefinitely provided the School is satisfied (1) there is a legitimate interest in doing so, (2) keeping the record is necessary for that legitimate interest, and (3) the legitimate interest is not overridden by the interests, rights or freedoms of the individuals concerned.</p> <p>In the vast majority (if not all) cases, the School will be able to conclude that it can keep these records. For example, the School may have a legitimate interest in building up a picture of the history of the School.</p> <p>The School will document its decision based on the three part test above.</p>	N/A	No
10.3	Records concerning specific pupils kept for a valid reason. For example, a poem written by an exceptionally gifted pupil.	Can be kept indefinitely if the School is satisfied that the legitimate interests test set out at paragraph 12.2 above has been met and documented.	N/A	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
11	<b>CCTV, videos and photographs</b>			
11.1	CCTV footage	40 days	<p>DELETE</p> <p>Review for further retention if the recording may be required for any reason such as in relation to an incident or accident involving any person.</p> <p>CCTV footage may also be needed in relation to parental complaints, disciplinary matters, pupil exclusions, bullying incidents or health and safety matters.</p> <p>If a subject access request has been made for the footage it must be retained.</p> <p>The School will consider the relevant limitation periods for claims being brought against the School and seek advice as necessary.</p>	No
11.2	Photographs of pupils for internal administration purposes e.g. to identify the pupil or photographs used on security passes	These photographs will be retained for as long as they are required for the purpose for which they were taken.	<p>SHRED/DELETE</p> <p>Review for further retention in the case of relevance to contentious disputes.</p>	No
11.3	Photographs or videos of pupils taken for marketing reasons e.g. photographs	<p>These photographs and videos will be retained for as long as they are required for the purpose for which they were taken.</p> <p>Where the School would like to retain</p>	<p>SHRED/DELETE</p> <p>Review for further retention in the case of relevance to contentious disputes.</p>	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	for use in the School prospectus or a video of pupils on the School's website	the images for historical reasons the comments in 10.3 above will be relevant.		
11.4	Photographs or videos of pupils used as part of the curriculum e.g. a video of a drama lesson/ performance or as part of an art project	<p>These photographs and videos should be retained for as long as they are required for the purpose for which they were taken.</p> <p>Where the School would like to retain the images for historical reasons the comments in 10.3 above will be relevant.</p>	<p>SHRED/DELETE</p> <p>Review for further retention in the case of relevance to contentious disputes.</p>	No