



SUMMERHILL INFANT SCHOOL



Inspiring, nurturing and supporting each child, every day to develop citizens for the future. Our School lays the foundation for a lifetime love of learning

DATA RETENTION POLICY

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Introduction

The purpose of this policy is to detail the procedures for the retention and disposal of information to ensure that the school carries this out consistently and fully document any actions taken. Unless otherwise specified the retention and disposal policy refers to both hard and soft copy documents.

By efficiently managing its data and records, the school will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

Information held for longer than is necessary carries additional risk and cost and can breach data protection rules and principles. Summerhill Infant School only ever retains records and information for legitimate or legal business reasons and always complies fully with the data protection laws, guidance and best practice.

Scope of the policy

This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.

Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives and for historical research.

Responsibilities

The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Head of the School.

The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines.

Personal Information and Data Protection

Summerhill Infant School collects and uses personal information about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable it to provide education and other associated functions. In addition, there may be legal requirements to collect and use information to ensure that the school complies with its statutory obligations.

This information can include, but is not limited to, name, address, email address, date of birth, IP address, identification number, private and confidential information, sensitive information and bank details.

The school is committed to collecting, processing, storing and destroying all information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA).

Our Data Retention Policy and processes comply fully with the fifth key principle of Article 5 of the UK GDPR:

kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with [Article 89\(1\)](#) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation')

Record retention

Records should be kept for as long as they are needed to meet the operational needs of the school, together with legal and regulatory requirements. Retention schedules will govern the period that records will be retained and will be found in Appendix A: Record Retention Schedule.

Records should be assessed to:

- Determine their value as a source of information about the school, its operations, relationships and environment
- Assess their importance as evidence of business activities and decisions

- Establish whether there are any legal or regulatory retention requirements (including: Public Records Act 1958, UK General Data Protection Regulation, Data Protection Act 2018, the Freedom of Information Act 2000, the Limitation Act 1980).
- Where records are likely to have a historical value, or are worthy of permanent preservation, we will transfer them to the County Archives Service if appropriate.

Disposal schedule

Records should not be kept longer than is necessary for the purposes for which the personal data are processed.

The school's records manager will ensure that records are regularly reviewed and that once a record or data has reached its retention period date, the owner should refer to the retention schedule for the action to be taken. Not all data or records are expected to be deleted upon expiration; sometimes it is sufficient to anonymise the data in accordance with the UK GDPR requirements or to archive records for a further period.

Destruction and disposal of records and data

All information of a confidential or sensitive nature must be securely destroyed when it is no longer required to ensure compliance with the data protection laws and the duty of confidentiality that the school owes its staff, pupils and parents.

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

Paper records

The school uses Evergreen Secure Shredding & Recycling to dispose of all paper records. Confidential waste bins are made available and collections take place to ensure that confidential data is disposed of appropriately. Evergreen Secure Shredding & Recycling dispose of the records in accordance with the Information Destruction Standards BS EN15713 and a confirmation certificate is provided by the company to the school to state that secure shredding and disposal has taken place.

Electronic and IT records and systems

The deletion of electronic records must be organised in conjunction with the IT Department who will ensure the removal of all data so that it cannot be reconstructed. When disposing of IT equipment or systems, information should be wiped where possible through use of software and formatting. It is the responsibility of the asset owner and the IT Department to ensure that relevant data has been sufficiently removed from the IT device before requesting disposal.

CDs / DVDs / Floppy Disks

These should be cut into pieces to ensure that the information cannot be reconstructed.

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 County Archives Service. The school should contact the local record office if there is a requirement to permanently archive the records, and the records will continue to be managed via the Data Protection Act 2018 and the Freedom of Information Act 2000.

CCTV/Surveillance

Images captured by CCTV/Surveillance will not be kept for longer than 28 days. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated. The CCTV footage would be kept on an encrypted memory stick which would be locked in a key safe.

Neither the UK GDPR & the Data Protection Act 2018 nor the Information and Records Management Society prescribe any specific minimum or maximum periods which apply to CCTV recorded images. The school ensures that the images are not retained for longer than is necessary. Once the retention period has expired, the images are permanently erased.

Disposal of Records Schedule

For

Summerhill Infant School

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Section 1 – Introduction

1. Functions of Summerhill Infant School

Summerhill Infant School inspires, nurtures and supports each child, every day to develop citizens for the future. Our School lays the foundation for a lifetime love of learning.

E.g. To provide the children in our care with a quality education that caters for their individual needs, supported by highly professional and motivated staff in pleasant and well-resourced surroundings.

2. Purpose of Disposal Schedule

This disposal schedule identifies the disposal arrangements for all manual and electronic records created by Summerhill Infant School.

3. Categories of Disposal

- Destruction
- Permanent preservation

Section 2 – Operation of this Records Disposal Schedule

1. Closing a file

Manual records should be closed as soon as they cease to be of active use other than for reference purposes. When a file is due to be closed an appropriate member of staff should consult the disposal schedule and mark the front cover of the file, indicating the date on which the file can be destroyed, or whether it should be reviewed by a member of staff. Closing a file simply means that no further papers can be added but the file can be used for reference.

2. Minimum Retention Period

With the exception of pupil files, the minimum retention period required for each type of record is calculated from the point the file/record is closed.

3. Destroy

Where the disposal action states 'Destroy' the records should be kept for the period stated and then destroyed securely. A record must be maintained of the files that have been destroyed.

4. Offer to PRONI

Where the disposal action states 'Offer to PRONI' the record must be offered to the PRONI when no longer needed for business purposes.

5. Commitment to preserving files/records

Summerhill Infant School declares that it will take measures to ensure that the records it creates (including electronic records) will be well maintained and protected while they are in its custody.

6. Roles and Responsibilities

The School Board of Governors is responsible for ensuring that the School complies with the commitment laid out in this Policy. The School Principal is charged with operational compliance and will assign any specific staff responsibilities as required in order to help fulfil the School's commitment to effective records management. **All members of staff** are responsible for creating and maintaining records in accordance with good records management practice.

Section 3 – Definitions of Records held by (Name of School) in respect of its Functional Areas.

There are six main functional areas for which Summerhill Infant School keeps records as follows:

1. Management and Organisation
2. Legislation & Guidance
3. Pupils
4. Staff
5. Finance
6. Health & Safety

The records contained within these functional areas provide evidence and information about its business activities and are important for the efficient operation of the school.

1. Management and Organisation

This category comprises records held which relate to the management and organisation of the school. Typical records would include the minutes of the Board of Governors, the Senior Management Team and Parent/Teachers Association meetings which record the major decision making processes of the school. Also included are records detailing development, planning and curriculum policies as well as those that demonstrate how the school reports to its parents and other organisations. Records include the School Development Plan, the School Prospectus, Curriculum policies, Annual Report, Emergency Planning and Business Continuity

Plan along with the records of meetings, minutes, and policies documenting the decisions and actions taken within this business function.

2. Legislation and Guidance from DE, ELBs, ESA, & CCMS

Files maintained under this heading contain papers relating to legislation e.g. the Education (NI) Order, Circulars, Guidance, Bulletins from the Dept of Education and Education & Library Boards, CCMS etc, correspondence in connection with Statistical Returns and documents relating to Dept of Education Inspections and Reports.

3. Pupils

Pupil Files contain vitally important records which, not only capture the progress of the student throughout their time at the school, but also contain personal details and information beneficial to their well being within the school environment. Such records would include admission data, attendance of the pupils at the school, timetables and class groupings, education/progress reports of pupils, special education needs documentation, child protection information, disciplinary action taken, examination results, careers advice, school trip details and medical records (details of medical conditions where medicines are required to be administered at school).

4. Staff

Staff category refers to those records required for the Human Resources Management function within the school. These include staff personnel records (recruitment, interview notes, appointments, training, staff development etc), staff salary records, staff induction, sickness records, staff performance review, substitute teacher records and student teachers on teaching practice etc.

5. Finance

This business function maintains records for a range of financial activities such as annual budgets, budget monitoring, Annual Statement of Accounts, procurement, tender information and prices, reconciliation of invoices, audit reports etc.

6. Health & Safety

The health and safety of children and staff is of paramount importance in the school and such records to support this are kept e.g. Accident/Incident Book, legal/accident/incident forms, risk assessments, fire procedure, CCTV, security system files, health and safety policy statement.

Section 4 – Electronic Records

The legal obligation to properly manage records, including compliance with Data Protection legislation, applies equally to electronic records. The main considerations for the management of electronic records are therefore the same as those for manual records. They include:

- Staff must be able to use and access electronic information effectively
- Adequate measures must be in place to ensure all information is stored securely and only available to authorised persons.
- A school must be able to demonstrate a record's authenticity by ensuring information cannot be altered when declared a record.
- A system must be in place for disposing of electronic records in line with policy once they are no longer needed.

In addition to the above, sufficient backup/recovery processes must be in place. There must also be a process through which links are created from electronic records to any associated manual records. This is to ensure a full record can be considered when necessary i.e. when decision making, providing access or considering a record for disposal.

The School Board of Governors is ultimately responsible for records management within the School. The decision to move towards electronic records must be taken carefully and the Board of Governors must satisfy itself that the measures identified above can be achieved. Further information and advice on electronic records can be obtained from PRONI <http://www.proni.gov.uk> the lead organisation on public sector records management. A number of International Standards have also been established to help organisations follow best practice when implementing an electronic records strategy. They include:

ISO 15801:2009 - record authenticity and legal admissibility

ISO 27001 - information security management

BS 10008 - legal admissibility of electronic information standards

Section 5 - Records Management Policy Statement

The School recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the school. This document provides the policy framework through which this can be achieved and audited. It covers:

- Scope
- Responsibilities

1 Scope of the policy

This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.

1.2 Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

- 1.3 A number of identified School records will be offered to the Public Record Office (PRONI) for permanent preservation when no longer required by the School

2 Responsibilities

- 2.1 The School Board of Governors has a corporate responsibility to maintain School records and record keeping systems in accordance with the regulatory environment.
- 2.2 The School Principal is charged with day-to-day operational compliance and will assign any specific staff responsibilities as required in order to help fulfil the School's commitment to effective records management.
- 2.3 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's Records Management Policy and Guidelines.

SECTION 6 - School Disposal Schedule

1. Management & Organisation

Ref	Record	Minimum Retention Period	Action After Retention
1.1	Board of Governors – general correspondence	Current school year + 6 years	Destroy
1.2	BOG Meetings Minutes (master)	Current school year + 6 years	Offer to PRONI for Permanent Preservation
1.3	Senior Management Team-Meeting Minutes	Current school year + 6 years	Offer to PRONI for Permanent Preservation
1.4	Staff Meeting Minutes	Current school year + 6 years	Destroy
1.5	School Development Plan	Retain in school for 10 years from closure of Plan	Offer to PRONI for Permanent Preservation
1.6	School Policies	Retain while current. Retain 1 copy of old policy for 2 years after being replaced	Destroy

1.7	PTA – minutes and general correspondence	Current school year + 6 years	Destroy
1.8	Visitors Book	Current school year + 6 years	Destroy
1.9	Circulars to Staff, Parents and Pupils	Current school year + 3 years	Destroy
1.10	School Brochure or Prospectus	Current school year + 3 years	Destroy
1.11	Comments/Complaints	5 years after closing. Review for further retention in the case of contentious disputes	Destroy
1.12	Annual Report	Retain in school for 10 years from date of Report	Offer to PRONI for Permanent Preservation
1.13	School Fund	Current financial year + 6 years	Destroy
1.14	Emergency Planning/Business Continuity Plan	Until superseded	Destroy

2. Legislation and Guidance from DE, ELB, ESA, CCMS etc

Ref	Record	Minimum Retention Period	Action After Retention
2.1	Education (NI) Order	Until superseded	Destroy
2.2	Circulars, Guidance, Bulletins from DE, ELB etc	Until superseded	Destroy
2.3	Correspondence re: Statistical Returns to DE, ELB etc	Current financial year + 6 years	Destroy
2.4	DE Reports, Inspections	Until superseded	Destroy

3. Pupils

Ref	Record	Minimum Retention Period	Action After Retention
3.1	<i>Pupil Admission Data</i>		
3.1a	Applications for enrolment	3 years after enrolment	Destroy
3.1b	Transfer applications (Transfer Forms)	3 years after enrolment	Destroy

3.2	Pupil Attendance Information/Registers	Date of Register + 10 years	Offer to PRONI for Permanent Preservation
3.3	Pupil Education Records - School/Progress Reports etc	Until pupil is 23 years old	Destroy
3.4	Pupil Education Records - School/Progress Reports etc (Special Educational Needs)	Until Pupil is 26 years old	Destroy
3.5	Child Protection Information- Record of concerns where case was not referred to Social Services	10 years after last entry on file	Destroy
3.6	Child Protection Information- Social Services investigation outcome was unfounded or malicious	10 years after last entry on file	Destroy
3.7	Child Protection Information- Social Services investigation outcome was inconclusive, unsubstantiated or substantiated	Until pupil is 30 years old	Destroy
3.8	Disciplinary Action (Suspension/Expulsion)/Offences – bullying	Until pupil is 23 years old	Destroy

3.9	Disciplinary Action (Suspension/Expulsion)/Offences – bullying (Special Educational Needs)	Until pupil is 26 years old	Destroy
3.10	Timetables + Class Groupings	Retain while current	Destroy
3.11	Examination Results	Current school year + 6 years	Destroy
3.12	Careers Advice	Current school year + 6 years	Destroy
3.13	School Meals returns	Current financial year + 6 years	Destroy
3.14	Free Meals registers	Current financial year + 6 years	Destroy
3.15	School Trips – Financial & Administration details	Current financial year + 6 years	Destroy
3.16	School Trips-Attendance/Staff Supervision etc	Current financial year + 6 years. In the case of an incident/accident involving a pupil, retain until pupil is 23 years old or 26 for a pupil with special educational needs	Destroy
3.17	Reports of Stolen/Damaged Items	Current financial year + 6 years	Destroy
3.18	Medical Records – records of pupils with medical conditions and details for the administration of drugs when necessary.	Until pupil is 23years old or in the case of a Special Needs Pupil, until 26 years old	Destroy

4. Staff

Ref	Record	Minimum Retention Period	Action After Retention
4.1	Staff Personnel Records (including, appointment details, training, staff development etc.)	7 years after leaving employment	Destroy
4.2	Interview notes and recruitment records	Date of interview + 6 months	Destroy
4.3	Staff Salary Records	7 years after leaving employment	Destroy
4.4	Staff Sickness Records (copies of Medical Certs)	Current school year + 6 years	Destroy
4.5	Substitute Teacher Records	Current school year + 6 years	Destroy
4.6	Substitute Staff Records-non teaching (cover for nursery assistants)	Current school year + 6 years	Destroy
4.7	Student Records-non teaching (e.g. nursery assistant students & pupils from schools on work experience)	Current school year + 6 years	Destroy
4.8	Student Teachers on Teaching Practice – student teacher progress	Current school year + 6 years	Destroy

4.9	Procedures for Induction of Staff	Until superseded	Destroy
4.10	Staff/Teachers' Attendance Records	7 years after leaving	Destroy
4.11	Staff Performance Review	7 years after leaving	Destroy

5. Finance

Ref	Record	Minimum Retention Period	Action After Retention
5.1	Annual budget and budget deployment	Current financial year + 6 years	Destroy
5.2	Budget Monitoring	Current financial year + 6 years	Destroy
5.3	Annual Statement of Accounts (Outturn Statement)	Current financial year + 6 years	Destroy
5.4	Order Books, Invoices, Bank Records, Cash Books, Till Rolls, Lodgement books etc	Current financial year + 6 years	Destroy
5.5	Postage Book	Current financial year + 6 years	Destroy
5.6	Audit Reports	Current financial year + 6 years	Destroy

6. Health & Safety

Ref	Record	Minimum Retention Period	Action After Retention
6.1	Accident Reporting (Adults)	Date of incident + 7 years	Destroy
6.2	Accident Reporting (Children)	Until pupil is 23years old or in the case of a Special Needs pupil, until 26 years old	Destroy
6.3	Risk Assessments – work experience locations/pupils	7 years	Destroy
6.4	H & S Reports	15 years	Destroy
6.5	Fire Procedure	Until superseded	Destroy
6.6	Security System File	For the life of the system	Destroy