

# 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

Type of Record/Document	Personal Data Y/N	Suggested Retention Period
<b>School Specific Records</b>		
Registration documents of school	N	Permanent (or until closure of the school)
Attendance Register	N	6 Years from last date of entry
Annual curriculum	N	From end of year: 3 years (or 1 year for other class records eg marks/timetables/assignments)
<b>Individual Pupil Records</b>		
Admissions: application forms, assessments, records of decisions	Y	25 years from date of birth (or, if pupil not admitted, up to 7 years from that decision)
Examination results (internal or external)	Y	7 years from pupil leaving school
<i>Pupil filing including:</i>		
Pupil reports	Y	ALL: 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.
Pupil performance records	Y	
Pupil medical records	Y	
SEND records (to be risk assessed individually)	Y	Date of birth plus up to 35 years (allowing for special extensions to statutory limitation periods).

<b>Safeguarding</b>		
Policies and procedures	N	Keep permanent record of historic policies
DBS disclosure certificates (if held)	Y	<u>No longer than 6 months</u> from decision on recruitment, unless DBS specifically consulted – but a record of checks being made must be kept.
Accident / Incident reporting	Y	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.
Child Protection files	Y	If a referral has been made / social care has 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).
<b>Corporate Records</b>		
Certificates of Incorporation	N	Permanent (or until dissolution of the company)
Minutes, notes and resolution boards or management meetings	N	Permanent
Register of members/shareholders	N	Permanent
Annual reports	N	Permanent
<b>Accounting Records</b>		
Accounting records	N	7 years
Tax returns	N	Not applicable at this time
Budget and internal financial records	N	3 years
<b>Contracts and Agreements</b>		
Signed or final/concluded agreements including software licences	N	7 years from completion of contractual obligations or term of agreement, whichever is the later
Deeds (or contracts under seal)	N	13 years from completion of contractual obligation or term of agreement
<b>Intellectual Property Records</b>		
Formal documents of title (trade mark or registered design certificates; patent or utility model certificates)	N	Permanent (in case of any right which can be permanently extended, eg trade marks); otherwise expiry of right plus minimum of 7 years
Assignments of intellectual property to or from the school	N	As above in relation to contracts (7 years) or, where applicable, deeds (13 years)
<b>Employee Personal Records</b>		
Single Central Record of employees	Y	

Contracts of employment	Y	Keep a permanent record of all mandatory checks that have been undertaken
Staff personnel files	Y	7 years from effective date of end of contract
Payroll, salary, maternity pay records	Y	As above, but <u>do not delete any information which may be relevant to historic safeguarding claims</u>
Job application and interview/rejection records (unsuccessful applicants)	Y	7 years
Immigration records	Y	6 months
Health records relating to employees	Y	4 years
Low-level concerns about adults	Y	7 years from end of contract of employment
		If a referral has been made / social care has 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).
<b>Insurance Records</b>		
Insurance policies (will vary – private, public, professional indemnity)	N	Duration of policy (or as required by policy) plus a period for any runoff arrangements and coverage of insured risks: ideally, until it is possible to calculate that no living person could make a claim.
Correspondence related to claims / renewals / notification re: insurance	N	7 years
<b>Environmental &amp; Health Records</b>		
Maintenance logs	N	10 years from date of last entry
Accidents to children	Y	25 years from birth (unless safeguarding incident)
Accident at work records (staff)	Y	4 years from date of accident, but review case-by-case where possible
Risk assessments (carried out in respect of above)	N	7 years from completion of relevant project, incident, event or activity
<b>Alumni Records and archive information</b>	Y	Permanent for the purpose of archival interest.
<b>Recordings of remote lessons and meetings</b>	Y	Recorded lessons may be retained for the duration of the course for pupil revision purposes. Recording of meetings may be retained until the minutes of the meeting have been agreed.

Data Retention policy reviewed: March 2021

**Next Review Due: March 2023**