

Data Retention Policy

In the course of carrying out its various functions and activities, the Council collects information from individuals and external organisations and generates a wide range of data/information which is recorded. These records can take many different forms such as:

- letters received from third parties
- copy letters which have been sent out
- file attendance notes
- invoices
- completed application forms
- plans/drawings
- financial records
- registers
- contracts/deeds
- e-mail communications (and any attachments)
- legal documents

Many of the above documents can be retained as 'hard' paper records or in electronic form. Retention of specific documents may be necessary to:

- fulfil statutory or other regulatory requirements
- evidence events/agreements in the case of disputes
- meet operational needs
- ensure the preservation of documents of historic or other value

The purpose of this Policy is to provide a school policy framework to govern management decisions on whether a particular document (or set of documents) should either be:

- retained - and if so in what format, and for what period; or
- disposed of - and if so when and by what method.

Additionally, this Policy seeks to clarify the roles and responsibilities of the school in the decision making process.

It is not concerned with the disposal/retention of unused materials (eg stocks of paper, unused forms, duplicated documents, etc).

Data Item	Short Term Need (event +1 month)	Medium Term Need 9pupil at school + 1 year)	Long Term Need (Pupil at school + 5 years	Very Long Term Need (until pupil reaches 25 years)	Justification
Admissions		X (admissions files)	X (admissions appeal)		Admissions data is used extensively from the period of the school receiving it up until the point where children enrol. It is then used for some validation and cross checking of enrolment details. Once enrolled, the child's records in the MIS become the core record.

Attainment			X		<p>Formative assessment data is useful as a child is building towards a particular more formal assessment. Once the child leaves the school, it has little value in terms of retention.</p> <p>Summative attainment is the main outcome of what children 'attain' in school. It is important that future schools where pupils go on to learn can understand previous attainment. Whilst often that information is 'passed on' smoothly as children move phase, it is not always the case, and thus retaining the names alongside the main attainment data for 1 year after the pupil has left the school feels proportionate.</p> <p>Trend analysis is important, 3 to 5 years is often the 'trend' people look at, but longer may be relevant. Whilst this must be fully flexible in reporting small sub groups, and the data would wish to be retained at individual level, some personal data (for example, name) could be removed from the data to reduce sensitivity.</p> <p>After 3 to 5 years, then aggregated summaries that have no risk of identifying individuals are all that are typically needed to be retained.</p>
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Attendance		X			<p>Attendance is related to individual attainment and so being able to relate attendance to attainment whilst in our care is important. Keeping it in detailed, individual form for one year after the pupil leaves school support conversations about detailed attendance that may be needed to best support that child.</p> <p>After that period, non-identifiable summary statistics are all that is required to support longer-term trend analysis of attendance patterns.</p> <p>We noted another GDPR principle here that may apply to attendance. Under data minimisation, where 'paper records' capture attendance, this paper record duplicates the electronic version and is probably required once the paper has been transferred to a stable electronic format.</p>
Behaviour		X			<p>This is all relevant for managing children when with at your school. 1 year allows a period of 'handover' to next institution with conversations supported by rich data if relevant.</p>
CCTC			X (five years from data)		<p>CCTV is used on the entrance gates to school. It also enables school to monitor who needs to barrier raising.</p>
Exclusions		X			<p>Exclusion data should be 'passed on' to subsequent settings. That school then has responsibility for retaining the full history of the child. If a private setting or the school is unsure on where the child has gone, then the school should ensure the LA already has the exclusion data.</p>

Catering and Free School Meals		X (meal administration)	X (Free school meal eligibility information)		A short historic record of what a child has had may be useful in case of any food-related incidents at school, or parental queries about the types of meals their children are choosing. Keeping for up to one year also allows time to do accounting work associated with catering. Typically 'one month' may not be enough, but 'one year' feels enough. Due to the way school funding works, free school meal eligibility is a financial matter, and thus keeping this data for 6+1 feels appropriate. This 7-year record also needs to be portable with the pupil, as historic dates can be used for funding.
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Trips and activities	X (Field File)		X (Financial Information)		<p>Financial information related to trips should be retained for 5 years + 1 for audit purposes. This would include enough child identifiers to be able to confirm contributions.</p> <p>A 'field file' is the information that is taken on a trip by a school. This can be destroyed following the trip, once any medicines administered on the trip have been entered onto the core system. If there is a minor medical incident (for example, a medical incident dealt with by staff in the way it would be dealt with 'within school') on the trip, then adding it into the core system would be done.</p> <p>If there is a major incident (for example, a medical incident that needed outside agency) then retaining the entire file until time that the youngest child becomes 25 would be appropriate.</p> <p>Permission to go on the trip slips will contain personal data, and destroying them after the trip unless any significant incident arises is appropriate, otherwise refer to the policies above.</p> <p>Schools sometimes share personal data with people providing 'educational visits' into school. There should be good policies in place to ensure that the sharing is proportionate and appropriately deleted afterwards.</p>
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Medical information and administration	X (Permission Slips)	X (Medical conditions and ongoing management)		X (Medical incidents)	<p>To support any handover work about effective management of medical conditions to a subsequent institution.</p> <p>Permission forms that parents sign should to be retained for the period that medication is given, and for 1 month afterwards if no issue is raised by child/parent. If no issue is raised in that time, that feels a reasonable window to assume all was administered satisfactorily. Adding this policy to the permission slip would seem prudent.</p> <p>Medical 'incidents' that have a behavioural or safeguarding angle (including the school's duty of care) should refer to the retention periods associated with those policies.</p>
Safeguarding				X	<p>All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained along with those records.</p> <p>These are passed on to the secondary school.</p>
Special Educational Needs		X			<p>All data will be passed on to the school the child moves to within one week.</p> <p>Data will be kept on the MIS for one year after the child has moved.</p>

Personal identifiers, contacts and personal characteristics		X (images used in displays)	X (postcodes, names, characteristics, address)		<p>Images are used for different reasons, and the reason should dictate the retention period. Images used purely for identification can be deleted when the child leaves the setting. Images used in displays etc. can be retained for educational purposes whilst the child is at the school. Other usages of images (for example, marketing) should be retained for and used in line with the active informed consent captured at the outset of using the photograph.</p> <p>As set out in other sections, names are needed for smooth handover to subsequent schools for up to one year.</p> <p>Postcode data is useful in analysing longer-term performance trends or how catchment/pupil populations are shifting over time, but full address data (house number and road) is not required for that activity.</p> <p>Schools may well provide references for pupils for up to 3 years after they leave, and so retaining the name in the core pupil record is important (this doesn't mean it needs to be retained in all systems). Keeping names attached to safeguarding files for longer than this may be entirely appropriate – see safeguarding section.</p> <p>Characteristics form an essential part of trend analysis, and so retention is in line with those needs.</p>