

Records Management and Retention Policy

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1.0 Introduction

- 1.1 Katharine Lady Berkeley's School processes a significant amount of personal information about its pupils, parents, staff, volunteers and other individuals that we come into contact with. This can include sensitive information ("Special Category Data").
- 1.2 The UK General Data Protection Regulation (the retained EU law version of the General Data Protection Regulation (EU) 2016/679) ("GDPR") requires that we keep personal information for no longer than it is necessary for the purposes that it was processed. This is known as the principle of 'Storage Limitation'. This Policy has been implemented to ensure that we meet this important requirement.
- 1.3 This procedure applies to all School staff, trustees, volunteers and contractors.

2.0 The importance of storage limitation

- 2.1 It is important to understand why we must not keep personal information for longer than is necessary.
- 2.2 Where the School holds personal information, it will always do so for a purpose that is necessary for it to function effectively. Once it becomes unnecessary to hold personal information, it creates risks that the data will become irrelevant, excessive or inaccurate. This can create risks to individuals because using their data could have negative consequences for them. Holding information for longer than necessary can also create operational inefficiencies for the School, for example, unnecessary costs associated with storage and security of data, or increased time spent responding to subject access requests due to the time spent reviewing records unnecessarily.
- 2.3 When this policy operates correctly, the School will be meeting its legal obligations under the UK GDPR, but also operating efficiently.

3.0 The procedure

- 3.1 Our Procedure is designed to be user friendly and easy to follow. There are 3 specific stages which are as follows:
 - 3.1.1 Review
 - 3.1.2 Destruction
 - 3.1.3 Archive
- 3.2 Each step is set out below.

4.0 Review

4.1 Retention Periods

4.1.1 Review both manual and electronic records, and determine whether they have met the date for destruction set out in the Retention Schedule. The purpose of the Retention Schedule is to set out how long we will hold different categories of personal information for before it can be destroyed.

4.1.2 There is little use in having a Retention Schedule if no steps are taken to review these data sets, and to destroy those that have reached or surpassed the stated retention date. Our Policy is that we will carry out a review of records annually. We have determined this review period based on our available resources and taking into account privacy risks to individuals.

4.1.3 Accordingly, on an annual basis, the School will review the records that it holds against the Retention Schedule. The Headteacher will delegate this task to an individual and/or team. The Headteacher may delegate different parts of the Retention Schedule to the most appropriate individual(s) for review e.g. the SENCo may be best placed to review SEN records, the DSL may be best placed to review safeguarding records.

5.0 Destruction

5.1 Where it is determined that a particular data set is “no longer necessary”, then it must be deleted or destroyed in accordance with the guidelines below:

5.1.1 Hard copy records – Shredded or placed in approved confidential waste bins. No other form of destruction should be used without first obtaining approval from The Headteacher.

5.1.2 Electronic records – Irretrievably delete records from systems where it is possible to do so. Where it is not possible to irretrievably delete records, for example, because deleting a particular set of personal information will result in other personal information that remains necessary also being deleted, this personal information must be ‘put beyond use’. This means that the School:

5.1.2.1 will be unable, or will not attempt, to use the personal data to inform any decision in respect of any individual or in a manner that affects the individual in any way;

5.1.2.2 does not give any other organisation access to the personal data;

5.1.2.3 surrounds the personal data with appropriate technical and organisational security; and

5.1.2.4 commits to permanent deletion of the information if, or when, this becomes possible.

5.2 A record of the records deleted should be entered into the destruction log.

6.0 Archive

6.1 The school will contact Gloucestershire Archives to determine whether the records listed under Archive Action will be transferred to them.

6.2 Gloucestershire Archives gathers, keeps and shares historic archive collections and local and family history resources relating to Gloucestershire and South Gloucestershire, their collections include records of schools across the county and they want to ensure they continue to document the rich resources relating to schools, especially those in digital formats.

6.3 Gloucestershire Archives can preserve digital records relating to the governance of the school, including records of the governing body such as minutes and policies, records relating to the management of the school including school log books and prospectuses and records relating to pupils such as admission registers.

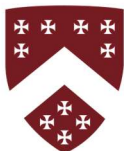
7.0 Retention Schedule

Record Series	Trigger Point	Minimum Retention period at School	Basis for keeping records	Action
Accident Reports (children)	Date of birth of child	25 years	Limitation Act 1980, Section 2	Destroy
Accident/injury at work records (staff)	Date of incident	4 years	Limitation Act 1980, Section 11	Review
Accounting records	End of financial year	6 years	HMRC - Compliance Handbook Manual CH15400	Review: Archive annual accounts
Administrative files (routine)	End of administrative use	6 years	Limitation Act 1980, Section 2	Review
Admission registers	Date of last entry	6 years	Limitation Act 1980, Section 2	Archive

Attendance registers	End of academic year	3 years		Destroy
Contracts under seal	End of contract	12 years	Limitation Act 1980, Section 8	Destroy
Contracts under hand	End of contract	6 years	Limitation Act 1980, Section 2	Destroy
Contract monitoring records	End of Current year	2 years		Destroy
Development plans (School)	End of administrative use	6 years	Limitation Act 1980, Section 2	Archive
Examination certificates (public)				Any certificates left unclaimed should be returned to the appropriate Examination Board
Examination results - internal	End of academic year	5 years		Destroy
Examination results - public	End of academic year	6 years	Limitation Act 1980, Section 2	Destroy
Free School Meal Registers	End of current year	6 years	Limitation Act 1980, Section 2	Destroy
Trustees' reports	Date of meeting	6 years	Limitation Act 1980, Section 2	Archive
Instruments of Government	Date Instruments drawn up	Retain permanently until closure of school		Archive
Log book	Date of last entry	6 years		Archive
Maintenance logs	Date of last entry	10 years	Limitation Act 1980, Section 2	Destroy
Minutes of trustees, staff meetings	End of academic year	6 years	Limitation Act 1980, Section 2	Archive

OFSTED reports and papers	Superseded by new report	Review on replacement by new inspection report		Archive
Policies	Superseded by new policy			
Property title deeds and architect's plans	No longer used regularly	Permanent		Archive
Pupil files and record cards (primary)	Pupil leaves school	Immediate	Transfer records to secondary (or other primary) school	
Pupil files and record cards (secondary)	Date of birth of pupil	25 years	Limitation Act 1980, Section 2	Destroy
SATs/PAN/Value added records	End of academic year	6 years		Destroy
School Prospectus	End of academic year	3 years		
Special Educational Needs (SEN) files	Date of birth of pupil	31 years	Children and Families Act 2014; Limitation Act 1980, Section 2	Review. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a “failure to provide a sufficient education” case
Special Educational Needs and Disability Act 2001 Section 1: statements	Date of birth of pupil	31 years	Children and Families Act 2014; Limitation Act 1980, Section 2	Review
Staff - personnel files	End of employment	6 years	Limitation Act 1980, Section 2	Destroy

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