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'Every child, every chance, every day'
'Pob plentyn, pob cyfle, pob dydd'

BRYNFORD PRIMARY DATA RETENTION POLICY

| Policy Number | Date Reviewed | Date Adopted | Date of Next Review |
|---------------|---------------|--------------|---------------------|
| YBGP50 | November 2024 | | November 2025 |

The School has a responsibility to maintain its records and record keeping systems. When doing this, the School will take account of the following factors: -

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Their accessibility.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the School's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the School from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect. The School may also vary any parts of this procedure, including any time limits, as appropriate in any case.

Data

This policy sets out how long employment-related and pupil data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the General Data Protection Regulation (UK GDPR) and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of the School. The School's Data Protection Policy outlines its duties and obligations under the UK GDPR.

Retention schedule

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the School will adhere to the standard retention times listed within that schedule.

The schedule is a relatively lengthy document listing the many types of records used by the school and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

Destruction of records

Where records have been identified for destruction, they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information, or sensitive policy information should be destroyed compliantly to align to GDPR. All electronic information will be deleted.

Record keeping of safeguarding

Any allegations made that are found to be malicious must not be part of the personnel records.

For any other allegations made, the School must keep a comprehensive summary of the allegation made, details of how the investigation was looked into and resolved and any decisions reached. This should be kept on the personnel files of the accused.

Any allegations made of sexual abuse should be preserved by the School for the term of an inquiry by the Independent Inquiry into Child Sexual Abuse. All other records (for example, the personnel file of the accused) should be retained until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. Guidance from the Independent Inquiry Child Sexual Abuse states that prolonged retention of personal data at the request of an Inquiry would not contravene data protection regulation provided the information is restricted to that necessary to fulfil potential legal duties that a School may have in relation to an Inquiry.

Whilst the Independent Inquiry into Child Sexual Abuse is ongoing, it is an offence to destroy any records relating to it. At the conclusion of the Inquiry, it is likely that an indication regarding the appropriate retention periods of the records will be made.

Archiving

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. The school follow the Local Government Retention Schedule with regard to archiving records. The archiving of information not listed, is decided by the school Governing Body.

Transferring 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 or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

Transferring information to another school

We retain the Pupil's educational record whilst the child remains at the school. Once a pupil leaves the school, the file should be sent to their next school. The responsibility for retention then shifts onto the next school. We may delay destruction for a further period where there are special factors such as potential litigation.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy.

Responsibility and monitoring

The Headteacher has primary and day-to-day responsibility for implementing this Policy. The Data Protection Officer, in conjunction with the School is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The Data Protection Officer will consider the suitability and adequacy of this policy and report improvements directly to management.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

Emails

Emails accounts are not a case management tool in itself. Generally emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost.

Pupil records

All maintained schools, are under a duty to maintain a pupil record for each pupil, including Early Years. If a child changes schools, the responsibility for maintaining the pupil record moves to the next school.

Records for Early Years Pupils are kept in the same way as Y1 – Y6 children.

Retention schedule

| FILE DESCRIPTION | RETENTION PERIOD |
|---------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| Employment Records | |
| Job applications and interview records of unsuccessful candidates | Date of Appointment of the successful candidate + 6 months |
| Job applications and interview records of successful candidates | Relevant information is added to the staff personnel file any other information is retained for 6 months. |
| Written particulars of employment, contracts of employment and changes to terms and conditions | Retained by HR Flintshire County Council |
| Right to work documentation including identification documents | Retained by HR Flintshire County Council |
| Immigration checks | Retained by HR Flintshire County Council |
| DBS checks and disclosures of criminal records forms | A copy of the DBS is not retained however the date it is obtained and the DBS number is retained for renewal purposes only. |
| Change of personal details notifications | Term of Employment + 6 Years |
| Emergency contact details | Term of Employment + 6 Years |
| Personnel records | Term of Employment + 6 Years |
| Annual leave records | Term of Employment + 6 Years |
| Consents for the processing of personal and sensitive data | For Staff HR Flintshire County Council For Pupils the period the pupil is in Primary then passed to High School. |
| Working Time Regulations: <ul style="list-style-type: none"> • Opt out forms • Records of compliance with WTR | Retained by HR Flintshire County Council Retained by HR Flintshire County Council |
| Disciplinary / Training records | Verbal or Written Warning Level 1 is the date of the warning + 6 Months Level 2 or Final written warning is date of the warning + 12 months. |
| Staff training where it relates to safeguarding or other child related training | Current Year + 40 years |
| Allegations of a child protection nature against a member of staff including where the allegation is founded | Founded - As long as they are needed. Unfounded allegation is retained until Retirement Age +10 years |
| Financial and Payroll Records | |
| Pension records | Retained by HR Flintshire County Council |
| Payroll and wage records | Retained by HR Flintshire County Council |
| Maternity/Paternity/Leave records | Retained by HR Flintshire County Council |
| Statutory Sick Pay | Retained by HR Flintshire County Council |
| Pupil Premium Fund records | N/A |

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| All records relating to the creation and management of budgets | Current Year + 6 Years |
| Invoices, receipts, order books and requisitions, delivery notices | Current Year + 6 Years |
| Pupil Premium Fund records | N/A |
| Free school meals registers (where the register is used as a basis for funding) | Current Year + 3 Years |
| School meal records | Current Year + 6 Years |
| Agreements and Administration Paperwork | |
| Collective staff agreements/past agreements that could affect current staff. | Current Year + 6 Years |
| Trade union agreements | Current Year + 6 Years |
| School Development Plans | Current Year + 6 Years |
| Visitors Book and Signing In Sheets | Current Year + 1 Years |
| Newsletters / circulars to staff, parents and pupils | Current Year + 1 Years |
| Records relating to the creation and publication of the school prospectus | Current Year + 3 Years |
| Health and Safety Records | |
| Health and Safety consultations | Retained for the current Consultation Period |
| Health and Safety Risk Assessments | Life of the Risk Assessment + 3 Years |
| Any records relating to any reportable death, injury, disease or dangerous occurrence | Date of the incident + 3 Years |
| Accident records relating to pupils under 18 at the time of the incident | As Above Unless the incident is serious then retention is date of the incident + 15 years |
| Accident records relating to individuals over 18 at the time of the incident | As Above or Date of settlement + 6 years |
| COSHH Records | Current year + 40 Years |
| Temporary and Casual Workers | |
| Records relating to hours worked and payments made to workers | Retained by HR Flintshire County Council |
| Governing Body Documents | |
| Instruments of government | Life of The School or Date Superceeded + 10 Years |
| Meetings schedule | Current Year + 1 Year |
| Minutes – Signed copy | Date of the Meeting + 10 Years |
| Agendas – principal copy | One Copy to be retained with the minutes – Retention - Date of Meeting + 10 Years |
| Register of attendance at full governing board meetings | Date of last meeting + 10 Years |
| Annual reports required by the DfE. | Date of the Report + 10 Years |
| Records relating to complaints made to and investigated by the governing body or head teacher | Date of the meeting + 10 Years |
| Records relating to terms of office of serving governors, including evidence of appointment | Life of appointment + 6 Years |
| Register of business interests | Date of Resignation + 10 Years |
| Records relating to the training required and received by governors | Date the Governor Steps Down + 6 Years |

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| Records relating to the appointment of a clerk to the governing body | Date of Appointment, Term of Office + 6 Years |
| Pupil Records | |
| Child's admission details | FCC Admissions System and Retained whilst the child is at Primary then follows the pupil. |
| Admissions register | 3 Years after entry in the admission register. |
| Pupil Record | Retained whilst the child is at Primary then follows the pupil. |
| Attendance Registers | Current Year + 3 Years |
| Correspondence relating to any absence (authorised or unauthorised) | Current Academic Year + 2 Years |
| SEND files, reviews & IE plans (inc. statements advice, information shared regarding educ. needs) | Pupil DOB + 25 Years. The record will follow the pupil from Primary to Secondary. |
| Allegations of sexual abuse | Until persons normal retirement age + 10 Years whichever is longer. |
| Child protection information | The record will follow the pupil from Primary to Secondary. |
| Records relating to any allegation of a child protection nature against a member of staff | Founded - As long as they are needed. Unfounded allegation is retained until Retirement Age +10 years |
| Consents relating to school activities as part of GDPR compliance (eg, receive newsletters etc.) | As long as the consent is relied upon. |
| Pupil's work | Only as long as is necessary. |
| Photographs of pupils | Only as long as is necessary for Education then delete. |
| Parental consent forms for school trips where there has been no major incident | Date of the trip + 3 Months |
| Parental permission slips for school trips where there has been a major incident | Date of the trip If the incident is serious then retention is date of the incident + 15 years or Date of settlement + 6 years |
| Other Records | |
| Emails | Length of time differs according to contents of the email. |
| CCTV | N/A no CCTV |
| Privacy notices | Updated and replaced when required |
| Inventories of furniture and equipment | Current Inventory period + 6 Years |
| Contact data sheets | As long as in use then they are destroyed. |