

The Kingston Academy Document Retention Schedule –May 2018

Note: retention periods will be reviewed at least annually, in line with Department for Education advice and guidance, best practice and statutory requirements.

Part A Pupil Data

1. Admissions				
Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
	Admissions files	Admissions appeals		<p>Admissions files 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. Data about children who enrolled but didn't get in is useful, but any intelligence gathered from it (for example, where in the borough children are interested in our school, or the SEN make up) is aggregated within the first year to a level being non-personal, after that, the detailed data within the admission file could be deleted. It is important to retain detailed data for a year, any appeals for which richer data about other successful/unsuccessful appeals may be relevant typically happen in the first year.</p> <p>Information about admissions appeals When dealing with appeals, having a reasonable history of any other appeals in some detail can be needed to deal with the particular appeal. The information is needed alongside the admissions policies of the time.</p>
2. Attainment				
Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
		Attainment		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. 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. 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. After 3 to 5 years, then aggregated summaries that have no risk of identifying individuals are all that are typically needed to be retained.
3. Attendance				
Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
	Attendance*			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. After that period, non-identifiable summary statistics are all that is required to support longer term trend analysis of attendance patterns (subject to the requirement below). * Computerised registers must be retained until 3 years after the end of the school year during which the entry was made (Pupil Registration Regulations 2006 Regulation 14).
4. Behaviour				
Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
	Behaviour			Relevant for managing children when at the school. 1 year allows a period of 'handover' to next institution with conversations supported by rich data if relevant.
	Exclusions			Exclusion data should be 'passed on' to subsequent settings. That school then has responsibility for retaining the full history of the child.
5. Identity management and authentication				
Short term need (event +1)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until	Justification

month			pupil is aged 25 or older)	
Images used for identity management				
6. Catering and free school meal management				
Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
	Meal administration	Free school meal eligibility information		<p>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.</p> <p>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.</p>
7. Trips and activities				
Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
Field file Educational visitors into school		Financial information related to trips	Major medical events	<p>Financial information related to trips should be retained for 6 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. If there is a major incident (for example, a medical incident that needed outside agency) then retaining the entire file until the time that the youngest child becomes 25 would be appropriate. 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. When we share personal data</p>

				with people providing 'educational visits' into school, sharing is proportionate and appropriately deleted afterwards.
8. Medical Information and administration				
Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
Permission slips	Medical conditions and ongoing management		Medical incidents	To support any handover work about effective management of medical conditions to a subsequent institution. Permission forms that parents sign should 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 is a reasonable window to assume all was administered satisfactorily. 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.
9. Safeguarding				
Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
			Safeguarding	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.
10. Special Educational Needs				
Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
			SEN files Education Health and	Best practice to retain for 25 years from date of birth of the pupil (Limitation Act 1980). 25 years from date of birth of the pupil (Special Educational Needs and Disability Regulations 2014, Children and families Act 2014, part 3)

			Care Plans	
11. Personal identifiers, contacts and personal characteristics				
Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
<p>Images used in identity systems</p> <p>Biometrics</p> <p>House number and road</p>	<p>Images used in displays in school</p>	<p>Postcodes</p> <p>Names</p> <p>Characteristics</p>		<p>Images are used for different reasons, and the reason will dictate the retention period. Images used purely for identification can be deleted when the child leaves the school. 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. Biometric data (typically fingerprints used in things like catering) will be used and retained as set out in the active informed consent gained at the outset, but typically this should not be retained long after the activity that requested its use has finished (for example, the child no longer attends the school to have a meal). As set out in other sections, names are needed for smooth handover to subsequent schools for up to one year. 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. We may 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. Characteristics form an essential part of trend analysis, and so retention is in line with those needs.</p>

Part B Parent/Carer Data

Contact details		
Data	Retention Period	Justification/ legislation
Name and contact details	Usually, for the duration that the parent has a pupil at the school. Otherwise subject to case by case justification.	Pupil Registration Regulations 2006
Financial details	Limited to time required for operational purpose	

Part C Workforce Data

1. Pay		
Data	Retention Period	Justification/ legislation
Payroll / Employee / Income Tax and NI records: P45, P60, etc	6 years from end of current year	Taxes Management Act 1970 / IT (PAYE) Regulations
Maternity pay	3 years after the end of the tax year	Statutory Maternity Pay Regulations
Sick pay	3 years after the end of the tax year	Statutory Sick Pay (General) Regulations
Records re working time	2 years	Working Time Regulations 1998 as amended
2. HR Records		
Data	Retention Period	Justification/ legislation
Foreign national ID documents	Minimum 2 years from end of employment	Immigration (Restrictions on Employment) Order 2007 Independent School Standards Regulations
HR files and training records	Maximum 6 years from end of employment	Limitation Act 1970 and Data Protection regulation
Job applications (CVs and related materials re unsuccessful applicants)	6-12 months from notification of outcome of application	ICO Employment Practices Code (Recruitment & Selection) Disability Discrimination Act 1995 & Race Relations Act 1976
Pre-employment / volunteer vetting	6 months	ICO Employment Practice Code
Disclosure & Barring Service checks	Record only satisfactory / unsatisfactory result and delete other information. If copy is kept, not to be retained beyond 6 months See further DfE statutory Guidance ' Working Together to safeguard children' https://www.gov.uk/government/publications/working-together-to-safeguard-children--2	Single Central Record Requirements under Part 4 of the Schedule to the Education (Independent School Standards) Regulations 2014
Pension records	To retirement age	

Part D Pupils and Workforce

Health and Safety Records		
Data	Retention Period	Justification/ legislation
Accident books / records and reports	3 years after last entry or end of investigation	Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995
Records re work with hazardous substances (staff)	Up to 40 years. Recommend: Permanent	Control of Hazardous Substances to Health Regulations 2002

Part E Trustees

Data	Retention Period	Justification/ legislation
Details of office held, business declarations and attendance	Term of office plus 1 year	To meet publication requirements
Photographs	Term of office	