



Sutton Valence Senior School

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Document Retention Policy



1. Introduction

- 1.1. The main aim of this policy is to enable Sutton Valence School to manage its records effectively and in compliance with data protection and other regulations. As an organisation the School collects, holds, stores and creates significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.
- 1.2. Sutton Valence School is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.
- 1.3. The table in Appendix 1 sets out the main categories of information that is held by the School, the length of time that the School intends to hold them, and the reason for this.
- 1.4. For information, the appendix also sets out the legal requirements for certain categories of document. Where a decision is made to keep information longer than the statutory requirement, this has been explained in the table at Section 3.
- 1.5. Section 4 of this policy sets out the destruction procedure for documents at the end of their retention period. The Data Compliance Officer shall be responsible for ensuring that this is carried out appropriately, and any questions regarding this policy should be referred to the post holder.
- 1.6. If a document or piece of information is reaching the end of its stated retention period, but a member of staff is of the view that it should be kept longer, please refer to the Data Compliance Officer, who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.

2. The Independent Inquiry into Child Sex Abuse (IICSA)

- 2.1. This policy should be read in conjunction with the guidance provided by the IICSA (<https://www.iicsa.org.uk/document/guidance-note-retention-instructions-and-data-protection-requirements>) which supersedes any guidance contained in this document.

3. Document Retention Period

The policy contains an appendix setting out the category and data retention period.

4. Deletion of Documents

- 4.1. When a document is at the end of its retention period, it should be dealt with in accordance with this policy.

Confidential waste

- 4.2. This should be taken (not sent) to the School Office to be shredded or destroyed in an appropriate manner.
- 4.3. Anything that contains personal information should be treated as confidential.
- 4.4. Where deleting electronically, please refer to the Data Compliance Officer to ensure that this is carried out effectively.

Other documentation

- 4.5. Other documentation can be deleted or placed in recycling bins where appropriate.

Automatic deletion

- 4.6. Certain information will be automatically archived by the computer systems, details of which are set out below. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact the Data Compliance Officer

Individual responsibility

- 4.7. Much of the retention and deletion of documents will be automatic, but when faced with a decision about an individual document, staff should ask themselves the following:
 - 4.7.1. Has the information come to the end of its useful life?
 - 4.7.2. Is there a legal requirement to keep this information or document for a set period? (Refer to Appendix 1 for more information);
 - 4.7.3. Would the information be likely to be needed in the case of any legal proceedings? In particular, is it potentially relevant to an historic child abuse enquiry? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?);
 - 4.7.4. Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
 - 4.7.5. Is the document of historic or statistical significance?
- 4.8. If the decision is made to keep the document, this should be referred to the Data Compliance Officer and reasons given.

**Sutton Valence School
Retention Policy**

| Record | Retention period | Action | Statutory provisions / Reason | Personal information - legal basis (GDPR) |
|---|--|-------------------------|--|---|
| Governance | | | | |
| Registration documents of School | Retain permanently | Retain | Operational need | n/a |
| Governors' meeting (agenda and minutes) | Retain permanently | Retain | Operational need | Legitimate interest |
| Reports to the governing body | Retain permanently | Retain | Operational need | Legitimate interest |
| Complaints dealt with by Governing Body | Review 6 years after resolution of complaint | Review / Destroy | Operational need | Legitimate interest |
| School policies | Retain permanently | Retain | Operational need | n/a |
| Staff policies - non statutory | Current academic year + 7 years | Destroy | Operational need | n/a |
| Academic handbook | Current academic year + 7 years | Destroy | Operational need | n/a |
| Procedures | Current academic year + 7 years | Destroy | Operational need | n/a |
| Headteacher and SMT | | | | |
| Minutes of SMT meetings and other internal administrative bodies | Current academic year + 7 years | Destroy | Operational need | Legitimate interest |
| Records created by headmaster, SMT for administrative responsibilities | Current academic year + 7 years | Destroy | Operational need | Legitimate interest |
| Correspondence created by headmaster, SMT for administrative responsibilities | Current academic year + 7 years | Destroy | Operational need | Legitimate interest |
| School development plans | Retain permanently | Offer to School archive | Operational need | n/a |
| Parental complaints dealt with by the headteacher and/or SMT | Review 6 years after resolution of complaint | Review / Destroy | Operational need | Legitimate interest |
| Statistics and Management Information | | | | |
| Curriculum returns | Current academic year + 7 years | Destroy | | n/a |
| Value added and contextual data | Current academic year + 7 years | Destroy | | |
| Central Government and Local Authority | | | | |
| Attendance returns to local authority | Current academic year + 1 year | Destroy | The Education Act 1996 The Education (Pupil Registration) (England) Regulations 2006 and subsequent amendments DfE School attendance: Guidance for maintained schools, academies, independent schools and local authorities (2016) | Compliance with legal obligations |
| School census returns | Current academic year + 7 years | Destroy | | |
| Returns made to central government | Current academic year + 7 years | Destroy | | n/a |
| Information sent from LA or central government for operational use | for operational use | Destroy | Operational need | n/a |
| School Inspections | | | | |
| SEF | Current academic year + 7 years | Destroy | | n/a |
| ISI reports | Permanent | Retain | ISSR (2014) | n/a |
| Pupil Files | | | | |
| Pupil record (electronic (iSAMS) and paper record) | Date of birth + 25 years | Destroy | ISSR (2014) require annual written report is provided - pupil file makes this possible | Legitimate interest |
| Pupil public examination results (in pupil files) | Current academic year + 7 years | Destroy | Operational need | Legitimate interest |
| Medical records (including records of medication prescribed) | Date of birth + 25 years | Destroy | Limitation Act 1980 | Legitimate interest |
| Counselling records | Date of birth + 25 years | Destroy | Limitation Act 1980 | Legitimate interest / consent |
| Arrangements for music lessons | Current academic year + 7 years | Destroy | Operational need | Legitimate interest |
| Letters authorising absence | Current academic year + 7 years | Destroy | Education Act 1996 section 7 | Compliance with legal obligations |

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|---|-------------------------------------|---------|---|---|
| Special Educational Needs | | | | |
| Special Educational Needs files, reviews and Individual Education Plans | Date of birth + 25 years | Destroy | Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1 | Compliance with legal obligations |
| Statement of Special Education Needs (SEN) and Education Healthcare (EHC) Plans | Date of birth + 25 years | Destroy | Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1 | Compliance with legal obligations |
| Advice and information provided to parents relating to educational needs | Date of birth + 25 years | Destroy | Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1 | Compliance with legal obligations |
| Accessibility strategy | Date of birth + 25 years | Destroy | Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1 | Compliance with legal obligations |
| Admissions, Attendance and Fees | | | | |
| Registration form, acceptance form and parent contract and data collection sheet | Date of birth + 25 years | Destroy | Operational need | Legitimate interest |
| Admissions documents relating to applicants who did not join the School | Current academic year | Destroy | Operational need | Legitimate interest |
| Admission registers (however held) | Retain permanently | Retain | Operational need | Legitimate interest |
| Attendance registers (however held) | Retain permanently | Retain | School attendance: departmental advice for maintain schools, academic, independent schools and local authorities (2014) | Legitimate interest |
| Absence book/register | Date of book/register + three years | Destroy | | Legitimate interest |
| Financial information in respect of fees | School career + 7 years | Destroy | | Legitimate interest / Performance of contract |
| Financial information in regard to examination fees (including fees for remarks etc) | Current academic year + 2 years | Destroy | Operational need | Legitimate interest |
| Bursary applications/forms | For duration of School career | Destroy | Operational need | Legitimate interest |
| Documents that are required to be retained for each migrant enrolled under Tier 4 (General) Student or Tier 4 (Child) Student visa | Duration of School career + 1 year | Destroy | Home Office Tier 4 Sponsor Guidance Appendix D | Compliance with legal obligations |
| Educational Visits | | | | |
| Parental permission slips for School residential trips – where there has been no major incident, accident, injury or near miss involving anyone on the trip | Conclusion of the trip + 3 years | Destroy | Operational need | Legitimate interest |
| Parental permission slips for School trips – where there has been a major incident, accident, injury or near miss involving anyone on the trip | Date of birth + 25 years | Destroy | Limitation Act 1980 | Legitimate interest |
| Records of approval to run visit | Current academic year + 10 years | Destroy | Outdoor Education Advisors' Panel National guidance Section 3 - Legal Framework and Employer Systems' and section 4 - Good Practice | n/a |

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|--|---|-----------------------------------|---|---|
| Safeguarding | | | | |
| Safeguarding policies and procedures | Retain permanently | Retain | KCSIE Working together to safeguard children | n/a |
| Child Protection (CP) files | If referred - retain permanently If low level - destroy Date of Birth + 50 years | | KCSIE Working together to safeguard children | Compliance with legal obligations |
| CP allegation against member of staff (including unfounded) | Until retirement or 10 years, whichever is longer. Unfounded should be removed from personnel files. If founded kept on file and a copy given to person concerned | Retain | KCSIE Working together to safeguard children | Compliance with legal obligations |
| Examination results | | | | |
| Public examination scripts, marks & results | Examination year + 10 years | Destroy | Operational need | Legitimate interest |
| Internal examination scripts, marks & results | Current academic year + 5 years | Destroy | Operational need | Legitimate interest |
| Any other examination-related records created in the course of contact with pupils | Current academic year + 5 years | Destroy | Operational need | Legitimate interest |
| CCTV, videos, and photographs | | | | |
| CCTV footage | 30 days unless required for an investigation | Destroy | General Data Protection Regulations (2016) (GDPR) Police recommendations | Legitimate interest |
| Photographs of pupils for internal administration purposes e.g. to identify the pupil or photographs used on security passes | Retained for as long as they are required for the purpose for which they were taken. | Destroy | General Data Protection Regulations (2016) (GDPR) | Legitimate interest |
| Photographs or videos of pupils taken for marketing reasons e.g. photographs for use in the School prospectus or a video of pupils on the School's website | Retained for as long as they are required for the purpose for which they were taken. | Destroy / Offer to School archive | General Data Protection Regulations (2016) (GDPR) | Legitimate interest / consent |
| Photographs or videos of pupils used as part of the curriculum e.g. a video of a drama lesson/ performance or as part of an art project | Retained for as long as they are required for the purpose for which they were taken. | Destroy / Offer to School archive | General Data Protection Regulations (2016) (GDPR) | Legitimate interest |
| Implementation of Curriculum | | | | |
| Annual curriculum | Review at the end of the each academic year. If no longer required, keep for 1 year | Destroy | Operational need | n/a |
| Schemes of work | Review at the end of the each academic year. If no longer required, keep for 1 year | Destroy | Operational need | n/a |
| Timetable | Review at the end of the each academic year. If no longer required, keep for 1 year | Destroy | Operational need | n/a |
| Class record books | Review at the end of the each academic year. If no longer required, keep for 1 year | Destroy | Operational need | Legitimate interest |
| Mark books | Review at the end of the each academic year. If no longer required, keep for 1 year | Destroy | Operational need | Legitimate interest |
| Record of homework set | Review at the end of the each academic year. If no longer required, keep for 1 year | Destroy | Operational need | n/a |
| Pupils' work | Return to pupils OR Current academic year + 1 year OR For exemplary work see Archives | Destroy / Offer to School archive | Operational need | Legitimate interest |

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|--|--|---------|--|--|
| Employee files | | | | |
| Single central register | To date of next inspection | Retain | KCSIE | Performance of contract / Compliance with legal obligations |
| Employment contracts | End of contract + 25 years | Destroy | Operational need | Performance of contract / Compliance with legal obligations (safeguarding) |
| Appraisals and reviews | End of contract + 25 years | Destroy | Operational need | Performance of contract |
| Staff personnel file | End of contract + 25 years | Destroy | Operational need | Performance of contract |
| Redundancy details, calculations of payments, refunds, notification | Date of redundancy + 25 years | Destroy | Operational need | Performance of contract |
| Parental leave | Current year + 7 years | Destroy | Operational need | Performance of contract |
| Payroll and salary | Current financial year + 25 years | Destroy | Operational need | Performance of contract |
| Sick pay records, certifications and self-certificates | End of contract + 25 years | Destroy | Operational need | Performance of contract |
| Maternity pay records | Current financial year + 7 years Year the maternity period ends | Destroy | Operational need | Performance of contract |
| Pension or other benefit scheme records | 12 years after the ending of any benefit payable under the policy | Destroy | The Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103) | Operational need |
| Unsuccessful applications | Application decision + 20 months | Destroy | Operational need | Legitimate interest / Compliance with legal obligations |
| DBS certificates | Employment date + 6 months | Destroy | KCSIE ISSR | Performance of contract |
| Proof of identity and driving | Retain copy of passport, evidence of DoB and driving licence - Date of employment + 25 years | Retain | Operational need | Performance of contract |
| Pre-employment checks - unsuccessful applicants | Application decision + 20 months | Destroy | Operational need | Compliance with legal obligations |
| pre-employment checks - successful applicants | End of contract + 25 years | Destroy | Operational need | Performance of contract |
| Immigration records | End of contract + 25 years | Destroy | Home Office | Compliance with legal obligations |
| Health records | End of contract + 25 years | Destroy | Operational need | Performance of contract |
| Settlement agreements | Permanent | Retain | Operational need | Performance of contract |
| Disciplinary proceedings Written - level 1 Written - level 2 Final warning Dismissal Case not found | Date of warning + 2 years Date of warning + 2 years Date of warning + 2 years Retain permanently, only destroy if not CP-related records must be weeded from personnel file | Destroy | Staff Handbook | Performance of contract |

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|---|----------------------------------|---------|---|---|
| Health and Safety | | | | |
| First aid/accident book | Current calendar year + 12 years | Destroy | The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended Limitation Act 1980 | |
| Accident reports - children | Date of Birth + 25 years | Destroy | The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended Limitation Act 1980 | Compliance with legal obligations |
| Accident reports - staff | Current calendar year + 25 years | Destroy | Social Security (Claim and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8 The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended Limitation Act 1980 | Compliance with legal obligations |
| Reportable injuries, diseases and dangerous occurrences (RIDDOR) reports or own record | Date of birth + 25 years | Destroy | The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended | Compliance with legal obligations |
| Incident investigations and reports, risk assessments and other relevant documents where there has been an accident or incident | Date of birth + 25 years | Destroy | The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended Limitation Act 1980 | |
| Internal reports and investigations into accidents / incidents | Date of birth + 25 years | Destroy | The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended Limitation Act 1980 | Legitimate interest |
| Records relating to asbestos monitoring | 40 years | Destroy | Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19 | Compliance with legal obligations |
| Records relating to radiation monitoring | 50 years | Destroy | The Ionising Radiation Regulations 1999 (SI 1999/3232) | Compliance with legal obligations |
| Fire precaution logs | Current calendar year + 7 years | Destroy | | n/a |
| Fire drill and lockdown records | Current calendar year + 20 years | Destroy | | n/a |
| Records of tests and examinations of control systems and protective equipment under COSHH | 7 years | | Control of Substances Hazardous to Health 2002 SI 2002 Ni 2677 Regulation I | Compliance with legal obligations |
| Records of staff using hazardous substances | Current calendar year + 7 years | Destroy | Limitation Act 1980 | Compliance with legal obligations |
| Risk assessments for using hazardous substances | Current calendar year + 7 years | Destroy | Limitation Act 1980 | Legitimate interest |

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|---|--|---------|---|---|
| Insurance | | | | |
| Insurance Policies | Duration of policy and until no living person can make a claim | Destroy | | n/a |
| Correspondence with insurers related to specific accidents or incidents <i>For allegations of abuse or disease claims, see below</i> | For adults - Current year + 3 years For pupils - date of birth + 25 years | Destroy | Limitation Act 1980 | Legitimate interest / Compliance with legal obligations |
| Correspondence with insurers related to allegations of abuse | Indefinitely | Retain | Independent Inquiry into Child Sexual Abuse (IICSA) | Legitimate interest / Compliance with legal obligations |
| Correspondence with insurers related to disease claims | Indefinitely | Retain | | Legitimate interest / Compliance with legal obligations |
| Investigations, reviews, and inquiries | | | | |
| Copies of reports submitted to external agencies / regulations such as ISI, HSE, Local Authority, Charity Commission etc | Date of report + three years Where this relates to pupil date of birth + 25 years | Destroy | ISSR (2014) Charities Act (2016) The Education Act (2011) | Compliance with legal obligations |
| External reports and investigations for inquests and public inquiries | Current year + three years Where this relates to pupil date of birth + 25 years | Destroy | | Compliance with legal obligations |
| Documents relevant to the Independent Inquiry into Child Sexual Abuse (IICSA) | Indefinitely | Retain | Independent Inquiry into Child Sexual Abuse (IICSA) | Compliance with legal obligations |
| Property Management | | | | |
| Title deeds for property | Retain permanently | | Operational need | n/a |
| Plans of property | Retain and pass to new owner if building leased or sold | | Operational need | n/a |
| Leases of properties | Expiry of lease + 6 years | | Financial regulations | n/a |
| Records re letting of school premises | Expiry of lease + 6 years | | Financial regulations | n/a |
| Accounting records | | | | |
| Accounting records | Current financial year + 6 years | Destroy | Financial regulations | n/a |
| Tax | Current financial year + 6 years | Destroy | Financial regulations | n/a |
| VAT returns | Current financial year + 6 years | Destroy | Financial regulations | n/a |
| Budget and internal financial reports | Current financial year + 6 years | Destroy | Financial regulations | n/a |
| Contract Management | | | | |
| Contracts under seal | End of contract + 13 years | Destroy | Limitation Act 1980 | n/a |
| Contracts under signature | End of contract + 7 years | Destroy | Limitation Act 1980 | n/a |
| Records re monitoring of contracts | Current calendar year + 2 years | Destroy | Operational need | n/a |

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| Record | Retention period | Action | Statutory provisions / Reason | Personal information - legal basis (GDPR) |
|---|---|--------------------------|-------------------------------|---|
| Development and Communications | | | | |
| General alumni correspondence, membership forms etc | Six years after the last time the individual contacted the School <i>This is subject to any longer retention period set out above. For example, records of relevance to IICSA should be kept indefinitely</i> | Destroy | Operational need | Legitimate interest |
| Alumni event arrangements | Current academic year + 2 years | Destroy | | |
| Circulars and newsletters (and records associated with creation and distribution) | Current academic year + 1 year | Destroy | Operational need | n/a |
| Archive material | | | | |
| Records which do not contain personal data, for example, old photographs of School buildings, title deeds etc | Can be kept indefinitely | Retain in School archive | | Legitimate interest |
| Records relating to a number of pupils, or the School generally, such as old class photographs, pupil lists for any given year, prospectuses, newspapers cuttings etc | Can be kept indefinitely | Retain in School archive | | Legitimate interest |
| Records concerning specific pupils. For example, a poem written by an exceptionally gifted pupil | Can be kept indefinitely subject to the comments below. <i>For example, for historical research purposes such as if the School wished to retain the essays written by pupils which were submitted to an essay competition about growing up in the 2010s.</i> | Retain in School archive | | |
| External Relations | | | | |
| School Open Days | Current academic year + 2 years | Destroy | Operational need | Legitimate interest |
| Creation and publication of School prospectus | Current academic year + 5 years | Destroy | Operational need | n/a |
| Community contact information (including alumnae, parents and grandparents) | Permanent | n/a | Operational need | Legitimate interest |
| Visitors signing in book | Current academic year + 6 years | Destroy | n/a | Legitimate interest |
| School-related email communications | | | | |
| Email correspondence | Current academic year + up to 2 years | Destroy | Operational need | Legitimate interest |

CIPD = Chartered Institute of Personnel and Development
ACA = Advisory, Conciliation and Arbitration Service