SUTTON VALENCE SCHOOL
SINCE 1576

Document Retention Policy

(Prep School and Senior School)

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This Policy applies to Sutton Valence School (including as the context requires, the Nursery, the Prep School and Senior School).

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-dataprotection-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. Where the retention period is based on dates of birth, the action will be taken at the end of the academic year in which the age is reached.

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

Record	Retention period	Action	Statutory provisions / Reason	Personal information - legal basis (GDPR)
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	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

Record	Retention period	Action	Statutory provisions / Reason	Personal information - legal basis (GDPR)
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
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

Record	Retention period	Action	Statutory provisions / Reason	Personal information - legal basis (GDPR)
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 is regard of 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 + 1 year	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 of the youngest person on the trip	Destroy	Limitation Act 1980	Legitimate interest

Record	Retention period	Action	Statutory provisions / Reason	Personal information - legal basis (GDPR)
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
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

Record	Retention period	Action	Statutory provisions / Reason	Personal information - legal basis (GDPR)
CCTV, videos, photographs and network usage logs				
CCTV footage	90 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
Network logs of device and internet usage	90 days unless required flagged and required for an investigation or safeguarding	Destroy	KCSIE Working together to safeguard children	Compliance with legal obligations
Access Control Logs	90 days unless required flagged and required for an investigation	Destroy	General Data Protection Regulations (2016) (GDPR)	Legitimate Interest
Implementation of Curriculum				
Annual curriculum	Review at the end of each academic year. If no longer required, keep for 1 year	Destroy	Operational need	n/a

Record	Retention period	Action	Statutory provisions / Reason	Personal information - legal basis (GDPR)
Schemes of work	Review at the end of each academic year. If no longer required, keep for 1 year	Destroy	Operational need	n/a
Timetable	Review at the end of each academic year. If no longer required, keep for 1 year	Destroy	Operational need	n/a
Class record books	Review at the end of each academic year. If no longer required, keep for 1 year	Destroy	Operational need	Legitimate interest
Mark books	Review at the end of 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 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
Employee files				
Single central register	To date of next inspection	Retain	KCSIE	Performance of contract / Compliance with legal obligations

Record	Retention period	Action	Statutory provisions / Reason	Personal information - legal basis (GDPR)
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

Record	Retention period	Action	Statutory provisions / Reason	Personal information - legal basis (GDPR)
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
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

Record	Retention period	Action	Statutory provisions / Reason	Personal information - legal basis (GDPR)
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

Record	Retention period	Action	Statutory provisions / Reason	Personal information - legal basis (GDPR)
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 Regulation1	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
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 *For allegations of abuse or disease claims, see below*	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

Record	Retention period	Action	Statutory provisions / Reason	Personal information - legal basis (GDPR)
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

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 *This is subject to any longer retention period set out above. For example, records of relevance to IICSA should be kept indefinitely*	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. *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.*	Retain in School archive		

Record	Retention period	Action	Statutory provisions / Reason	Personal information - legal basis (GDPR)
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