



Data Disposal Policy

Our Lady and St Joseph Catholic Primary School

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DATA DISPOSAL POLICY

‘With Christ at our centre, we love, listen and learn’

Purpose of the Policy

The purpose of this policy is to provide guidelines for how records and documents are to be classified, retained and destroyed to ensure that data is kept for only the period necessary to conduct business and are destroyed in compliance with local authority and government regulations. This policy applies to data in any form (including paper and electronic documents, email and all correspondence) produced, collected or used by Our Lady and St Joseph, its employees, volunteers, student workers, consultants or agents during the course of school business.

Aims

The aims of the data disposal policy are:

- To detail the procedures in place for the disposal of information held by the school, both hard and soft documents
- To provide a clear disposal schedule, listing documents held, retention period, and disposal procedure
- Deemed to be using “normal processing” under the General Data Protection Regulation 2018

Responsibilities

All staff members have a responsibility for ensuring that data they produce, collect, or use, is properly classified, stored and protected and destroyed in accordance with this policy. The Governing Body and Headteacher are responsible for assigning a data custodian to facilitate this policy.

The data custodian must:

- Be familiar with the document retention and destruction policy
- Develop the schools data management procedures and practices, consistent with this policy
- Educate staff in understanding sound data management practices
- Restrict access to protected and sensitive data and information, and co-ordinate the destruction of data
- Data should not be retained beyond the period that it is needed for business processes or business continuity (see grid)

Electronic Data

Computer Hardware

- The school understands the importance of correctly disposing of redundant ICT equipment to ensure safe removal of hazardous substances and sensitive data.

Environmental Considerations

- As part of the European Union Waste Electrical and Electronic Equipment (WEEE) Directive (2003) and existing waste management legislation, including the Duty of Care and the Hazardous Waste Regulations, OLSJ recognises their environmental responsibilities.
- ICT equipment is built using a number of hazardous materials including lead, cadmium and mercury. Disposal poses a real threat of pollution to our water, air and land.
- Components are also made using various materials including precious metals which it is important to reclaim.

Data Protection

- General Data Protection Regulation (2018) protects the use of personal data and ensures that those who are authorised to use it keep it private and secure.
- Formatting disks or deleting data from computer equipment in the usual way is not sufficient to safeguard information from being recovered. Although there are more thorough means of discarding this information there is not a 100% reliable method.
- The school understands the importance of ensuring sufficient removal of personalised data, confidential data and any other data coming within the remit of the GDPR from the disc or memory of the PV/item of ICT equipment.
- This also includes deletion of data from any other computer media disposed with the PC/item of ICT equipment (eg discs or memory sticks)
- We therefore do not sell our ICT equipment to other organisations.
- Hard drives, floppy discs, CD's or other computer media that are faulty or cannot be wiped of data will be physically destroyed on behalf of the school through a registered disposal scheme.

Software Licensing

- The schools ICT technicians shall ensure that all software is removed before equipment is disposed of by suitable disposal company.

Electrical Checks

- The Electricity at Work Regulations (1989) requires the school to regularly test electrical equipment to ensure safety of use
- The school will ensure that all electrical tests have been carried out on any equipment sold to other users

Documentation and Audit Trail

- The school maintains a comprehensive inventory of its ICT equipment. When items of equipment are disposed of through waste, it is recorded against its inventory record.
- Disposal of any IT equipment is logged on the schools asset management software (Parago) and brought to the attention of the governing body resources committee for authorisation as per the terms of the Scheme of Delegation and noted in the Asset Management and Disposal policy.

Paper Records and files which have reached the end of their administrative life

Safe destruction of Records

- Where confidential records have been identified for destruction they should be disposed of in an appropriate way. All records containing personal information, or sensitive policy information is either shredded before disposal using the schools cross cut shredder or collected for shredding by a recognised confidential waste disposal company
- Any other records should be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways. Do not put records in the dustbin or a skip unless there is no other alternative
- There are companies who can provide confidential waste bins and other services which can be purchased to ensure that records are disposed of in an appropriate way.

Transfer of Records to Archives

- Where records have been identified as being worthy of permanent preservation arrangements should be made to transfer the records to the appropriate storage facility.

Transfer of 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 microform or digital media
- The lifespan of the media and the ability to migrate data where necessary should always be considered.

1. Child Protection						
These retention periods should be used in conjunction with the OLSJ policy “Safeguarding Children and Safer Recruitment in Education” Latest Version						
	Basic File Description	Data Protection Issues ?	Statutory Provisions	Retention Period	Action at end of the administrative life of the record	
1.1	Child Protection Files	YES	Education Act 2002, s175, related guidance “Safeguarding Children in Education”, September 2004	DOB + 25 years ¹	SHRED – Child Protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (i.e. the information does not need to be sent to a university) When a child is removed from roll to be educated at home, the file should be copied to the Local Education Authority.	
1.2	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	YES	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of	Until person’s normal retirement age, or 10 years from the date of allegation, whichever is longer	SHRED – The following is an extract from “Safeguarding Children and Safer Recruitment in Education” p60 “Record Keeping 5.10 It is important that a clear	

			<p>Disciplinary and Grievance) Education Act 2002 guidance "Dealing with Allegations of Abuse against Teachers and Other Staff" November 2005</p>		<p>and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's file and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. It will provide clarification in cases where a future DBS Disclosure reveals information from the police about an allegation that did not result in a criminal conviction. And it will help to prevent unnecessary reinvestigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.</p>	
<p>2. Governors</p>						

2.1	Minutes	NO		Permanent	Retain in school for 6 years from date of meeting, then transfer to archives
	<ul style="list-style-type: none"> Principal Set 				
	<ul style="list-style-type: none"> Inspection Copies 	NO		Date of meeting + 3years	SHRED
2.2	Agendas	NO		Date of Meeting	SHRED
2.3	Reports	NO		Date of report + 6years	Retain in school for 6 years from date of meeting, then transfer to archives and sample taken for permanent preservation
2.4	Annual Parents meeting papers	NO		Date of meeting + 6years	Retain in school for 6years from date of meeting, transfer to archives and sample taken for permanent preservation
2.5	Instruments of Government	NO		Permanent	Retain in school whilst school is open, transfer to archives when school is closed
2.6	Trusts and Endowments	NO		Permanent	Retain in school whilst operationally required, then transfer to archives
2.7	Action Plans	NO		Date of action plan +3years	SHRED - It may be appropriate to offer to the Archives for a sample to be taken if the school has been through a difficult period
2.8	Policy Documents	NO		Expiry of Policy	Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process), then transfer to archives, with sample

					taken for permanent preservation
2.9	Complaints files	YES		Date of resolution of complaint +6years	Retain in school for the first 6 years. Review for further retention in the case of contentious disputes SHRED routine complaints
2.10	Annual Reports required by the Department for Education and Skills	NO		Date of report +10years ₁	Transfer to archive and sample taken for permanent preservation
2.11	Proposals for schools to become, or ne established as Specialist Status schools	NO		Current year +3years	Transfer to archives and sample taken for permanent preservation

3. Management					
3.1	Log Books	YES ²		Date of last entry in book +6years	Retain in school for 6 years from date of last entry, then transfer to archive
3.2	Minutes of Senior Management Team and other internal administrative bodies meetings	YES ¹		Date of meeting +5years	Retain in school for 5 years from meeting, transfer to archive and sample taken for permanent preservation
3.3	Reports made by the head teacher or the management team	YES ¹		Date of report +3years	Retain in school from 3years from date of report, transfer to archive
3.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative	YES ¹		Closure of file + 6years	SHRED

	responsibilities				
3.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	NO		Date of correspondence + 3years	SHRED
3.6	Professional Development Plans	YES		Closure + 6years	SHRED
3.7	School Development Plans	NO		Closure + 6years	Review and offer to archives
3.8	Admissions- if admission is successful	YES		Admission + 1Year	SHRED
3.9	Admissions – if appeal unsuccessful	YES		Resolution of case + 1year	SHRED
3.10	Admissions – Secondary Schools- Casual	YES		Current year + 1year	SHRED
3.11	Proof of address supplied by parents as part of admissions process	YES		Current year + 1year	SHRED
4. Pupils					
4.1	Admission Register	YES		Date of last entry in the book + 6years	Retain in school for 6 years from date of last entry, transfer to archives
4.2	Attendance Registers	YES		Date of Register + 3years	SHRED/ If these records are retained electronically any back up copies should be destroyed at the same time
4.3a	Pupil Record Cards <ul style="list-style-type: none"> • Primary 	YES		Retain for the time which the pupil remains at the primary school	Transfer to secondary or other primary school when child leaves.

					In case of exclusion it may be appropriate to transfer the record to the Behaviour Service
4.3b	<ul style="list-style-type: none"> Secondary 		Limination Act 1980	DOB of pupil + 25years ³	SHRED
4.4a	Pupil Record Cards <ul style="list-style-type: none"> Primary 	YES		Retain for the time which the pupil remains at the primary school	Transfer to secondary or other primary school when child leaves. In case of exclusion it may be appropriate to transfer the record to the Behaviour Service
4.4b	<ul style="list-style-type: none"> Secondary 		Limination Act 1980	DOB of pupil + 25years ⁴	SHRED
4.5	Special Education Needs files, reviews and Individual Education Plans	YES		DOB of the pupil + 25 years the review NOTE: This retention period is the minimum period that any pupil file should be kept. 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. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period.	SHRED

4.6	Letters authorising absence	NO		Date of absence +2years	SHRED
4.7	Absence Book	NO		Current year + 6years	SHRED
4.8a	Examination Results <ul style="list-style-type: none"> Public 	NO		Year of examinations + 6years	SHRED/ Any certificates left unclaimed should be returned to the appropriate Examination Board
4.8b	<ul style="list-style-type: none"> Internal examination results 	YES		Current year + 5years ⁵	SHRED
4.9	Any other records created in the course of contact with pupils	YES/ NO		Current year +3years	Review at the end of 3 years and either allocate a further retention period or SHRED
4.10	Statement maintained under The Education Act 1996 – section 324	YES	Special Education Needs and Disability Act 2001 Section 1	DOB + 30years	SHRED unless legal action is pending
4.11	Proposed statement or amended statement	YES	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30years	SHRED unless legal action is pending
4.12	Advice and information to parents regarding educational needs	YES	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12years	SHRED unless legal action is pending
4.13	Accessibility Strategy	YES	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12years	SHRED unless legal action is pending
4.14	Children's SEN Files	YES		DOB of pupil + 25years then review – it may be appropriate to add an additional retention period in certain cases	SHRED unless legal action is pending
4.15	Parental permission slips for	YES		Conclusion of trip	SHRED

	school trips – where there has been no major incident					
4.16	Parent permission slip for school trips – where there has been a major incident	YES	Limitation Act 1980	DOB of the pupils involved in incident + 25years The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils	SHRED	
4.17	Records created by school to obtain approval to run an Educational Visit outside the classroom – Primary Schools	NO	3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) 1998	Date of visit + 14years ⁶	SHRED or DELETE securely	
4.18	Records created by school to obtain approval to run an Educational Visit outside the classroom – Secondary Schools	NO	3 part supplement to the Health & Safety of Pupils on Educational Visits (HASPEV) 1998	Date of visit + 10 years ⁷	SHRED or DELETE securely	
5. Curriculum						
5.1	Curriculum development	NO		Current Year + 6years	SHRED	
5.2	Curriculum returns	NO		Current Year + 3years	SHRED	
5.3	School syllabus	NO		Current Year +1year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED	
5.4	Schemes of work	NO		Current Year +1year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED	
5.5	Timetable	NO		Current Year +1year	It may be appropriate to review these records at the end of each	

					year and allocate a new retention period or SHRED		
5.6	Class Record Books	NO		Current Year +1year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED		
5.7	Mark Books	NO		Current Year +1year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED		
5.8	Record of Homework Set	NO		Current Year +1year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED		
5.9	Pupils' Work	NO		Current Year +1year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED		
5.10	Examination Results	YES		Current Year + 6years	SHRED		
5.11	SATS Records	YES		Current Year + 6years	SHRED		
5.12	PAN Records	YES		Current Year + 6years	SHRED		
5.13	Value added records	YES		Current Year +6years	SHRED		
6. Personnel Records held in Schools							
6.1	Timesheets, sick pay	YES	Financial Regulations	Current Year +6years	SHRED		
6.2	Staff Personal Files	YES		Termination +7years	SHRED		
6.3	Interview notes and recruitment records	YES		Date of Interview + 6months	SHRED		
6.4	Pre-employment vetting information (inc CRB checks)	NO	CRB Guidelines	Date of check + 6months	SHRED – by designated member of staff		
6.5	Disciplinary Proceedings:	YES	WHERE THE WARNING RELATES TO CHILD PROTECTION ISSUES SEE 1.2. If the disciplinary				

			proceedings relate to a child protection matter please contact your safeguarding children officer for further advice.		
6.5a	<ul style="list-style-type: none"> Oral Warning 			Date of Warning + 6months	SHRED ⁷
6.5b	<ul style="list-style-type: none"> Written Warning – level 1 			Date of Warning + 6months	SHRED
6.5c	<ul style="list-style-type: none"> Written Warning – level 2 			Date of warning +12months	SHRED
6.5d	<ul style="list-style-type: none"> Final Warning 			Date of Warning +18months	SHRED
6.5e	<ul style="list-style-type: none"> Case not found 			If child protection related please see 1.2 otherwise shred immediately at the conclusion of the case	SHRED
6.6	Records relating to accident/injury at work	YES		Date of incident +12years. In the case of serious accidents a further retention period will need to be applied	SHRED
6.7	Annual appraisal/assessment records	NO		Current year +5years	SHRED
6.8	Salary Cards	YES		Last date of employment +85years	SHRED
6.9	Maternity pay records	YES	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year +3years	SHRED
6.10	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	YES		Current year +6years	SHRED
6.11	Proofs of identity collected as part of the process of	YES		Where possible these should be checked and a note kept of what	

	checking “portable” enhanced CRB disclosure			was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file		
7. Health & Safety						
7.1	Accessibility		Disability Discrimination Act	Current year +6years	SHRED	
7.2	Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980			
7.2a	• Adults	YES		Date of Incident +7years	SHRED	
7.2b	• Children	YES		DOB of child +25years ⁸	SHRED	
7.3	COSHH			Current year +10 years (where appropriate an additional retention period may be allocated)	SHRED	
7.4	Incident Reports	YES		Current year +6years	SHRED	
7.5	Policy Statements			Date of Expiry +1year	SHRED	
7.6	Risk Assessments			Current Year +3years	SHRED	
7.7	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos			Last action + 40years	SHRED	

7.8	Process of monitoring of areas where employees and persons are likely to have come in contact with radiation			Last action +50years	SHRED	
7.9	Fire Precautions log book			Current year +6years	SHRED	
8. Administrative						
8.1	Employers Liability Certificate			Closure of the school +40years	SHRED	
8.2	Inventories of Equipment & Furniture			Current year +6years	SHRED	
8.3	General File Series			Current year +5years	Review to see whether a further retention period is required, transfer to archives and sample taken for permanent preservation	
8.4	School brochure or prospectus			Current year +3years	Transfer to archive and sample taken for permanent preservation	
8.5	Circulars (staff/pupils/parent)			Current year +1year	SHRED	
8.6	Newsletters, ephemera			Current year +1year	Review to see whether a further retention period is required, transfer to archives and sample taken for permanent preservation	
8.7	Visitors Book			Current year +2years	Review to see whether a further retention period is required, transfer to archives and sample	

					taken for permanent preservation	
8.8	PTA/Old pupils Association			Current year +6years	Review to see whether a further retention period is required, transfer to archives and sample taken for permanent preservation	
9. Finance						
9.1	Annual Accounts		Financial Regulations	Current year +6years	Offer to archives	
9.2	Loans and Grants		Financial Regulations	Date of last payment on loan +12years	Review to see whether a further retention period is required, transfer to archives and sample taken for permanent preservation	
9.3	Contracts					
9.3a	• Under Seal			Contract Completion date +12years	SHRED	
9.3b	• Under Signature			Contract Completion date +6years	SHRED	
9.3c	• Monitoring Records			Current year +2 years	SHRED	
9.4	Copy Orders			Current year +2years	SHRED	
9.5	Budgeting reports, budget monitoring etc			Current year +3years	SHRED	
9.6	Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year +6years	SHRED	
9.7	Annual Budget and background papers			Current year +6years	SHRED	
9.8	Order Books and Requisitions			Current year +6years	SHRED	
9.9	Delivery Documentation			Current year +6years	SHRED	
9.10	Debtors' Records		Limination Act 1980	Current year +6years	SHRED	

9.11	School Fund – Cheque Book			Current year +3years	SHRED	
9.12	School Fund – Paying in Books			Current year +6years then review	SHRED	
9.13	School Fund – Ledger			Current year +6years then review	SHRED	
9.14	School Fund – Invoices			Current year +6years then review	SHRED	
9.15	School Fund – Receipts			Current year +6years then review	SHRED	
9.16	School Fund – Bank Statements			Current year +6years then review	SHRED	
9.17	School Fund - School Journey Books			Current year +6years then review	SHRED	
9.18	Applicatins for free school meals, travel, uniforms etc			Whilst child at school	SHRED	
9.19	Student grant applications			Current year +3years	SHRED	
9.20	Free school meals registers	YES	Financial Regulations	Current year +6years	SHRED	
9.21	Petty Cash Books		Financial Regulations	Current year +6years	SHRED	
10. Property						
10.1	Title Deeds			Permanent	Permanent, these should follow the property unless property has been registered at the Land Registry. Offer to archives if deeds no longer needed.	
10.2	Plans			Permanent	Retain in school whilst operational. Offer to archives ⁹	
10.3	Maintenance and Contractors		Financial Regulations	Current year +6years		
10.4	Leases			Expiry of lease +6years	SHRED	
10.5	Lettings			Current Year +3years	SHRED	
10.6	Burglary, theft and vandalism report forms			Current year +6years	SHRED	

10.7	Maintenance log books			Last entry +10 years	SHRED	
10.8	Contractors' Reports			Current year +6years	SHRED	
11. Local Education Authority						
11.1	Secondary transfer sheets - Primary	YES		Current year +2years	SHRED	
11.2	Attendance Returns	YES		Current year +1year	SHRED	
11.3	Circular From LEA			Whilst required operationally	Review to see whether a further retention period is required transfer to archive and sample kept for permanent preservation	
12. Department for children, Schools and Families						
12.1	HMI reports			These do not need to be kept any longer	Transfer to archives and sample taken for permanent preservation	
12.2	OFSTED reports and papers			Replace former report with any new inspection report	Review to see whether a further retention period is required, transfer to archives and sample taken for permanent preservation	
12.3	Returns			Current year +6years	SHRED	
12.4	Circulars from Department for Children, Schools and Families			Whilst operationally required	Review to see if further retention period is required transfer to archive and sample taken for permanent preservation	
13. Connexions						
13.1	Service level agreement			Until Superseded	SHRED	
13.2	Work Experience agreement			DOB of child +18years	SHRED	
14. School Meals						
14.1	Dinner Register			Current +3years	SHRED	

14.2	School Meals Summary Sheets			Current +years	SHRED	
15. Family Liaison Officers and Parent Support Assistants						
15.1	Day Books	YES		Current year +2years then review	SHRED	
15.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency	YES		Whilst child is attending the school then destroy	SHRED	
15.3	Referral forms	YES		While the referral is current	SHRED	
15.4	Contact Data Sheets	YES		Current year then review, if contact is no longer active then destroy	SHRED	
15.5	Contact database entries	YES		Current year then review, if contact is no longer active then destroy	DELETE	
15.6	Group Register	YES		Current year +2years	SHRED	
16. Early Years Provision						
16.1. Records to be kept by Registered Persons – All Care						
16.1.1	The name, home address and date of birth of each child who is looked after on the premises	YES		Closure of setting + 50 years [These could be required to show whether or not an individual child attended the setting in a child protection investigation]	SHRED	
16.1.2	The name, home address and telephone number of a parent of each child who is looked after on the premises	YES		If this information is kept in the same book or on the same form as in 16.1.1 then the same retention period should be used as in 16.1.1 If the information is stored separately, then destroy once the child has left the setting (unless the	SHRED	

				information is collected for anything other than emergency contact)		
16.1.3	The name, address and telephone number of any person who will be looking after children on the premises	YES		See 16.4.5 below		
16.1.4	A daily record of the names of children looked after on the premises, their hours of attendance and the names of the persons who looked after them		The Day Care and Child Minding (National Standards) (England) Regulations 2003	The regulations say that these records should be kept for 2 years (SI20031996 7(1b)). If these records are likely to be needed in a child protection setting (see 16.1.1 above) then the records should be retained for closure of setting + 50 years		
16.1.5	A record of accidents occurring on the premises and incident books relating to other incidents	YES	The Day Care and Child Minding (National Standards) (England) Regulations 2003 ¹⁰	DOB of the child involved in the accident or the incident + 25 years If an adult is injured then the accident book must be kept for 7 years from the date of the incident		
16.1.6	A record of any medicinal product administered to any child on the premises, including the date and circumstances of its administration, by whom it was administered, including medicinal products which the child is permitted to	YES	The Day Care and Child Minding (National Standards) (England) Regulations 2003 ¹¹	DOB of the child being given/taking the medicine + 25 years		

	administer to himself, together with a record of parent's consent					
16.1.7	Records of transfer	YES		One copy is to be given to the parents, one copy transferred to the Primary School where the child is going		
16.1.8	Portfolio of work, observations and so on	YES		To be sent home with child		
16.1.9	Birth Certificate	YES		Once the setting has had sight of the birth certificate and recorded the necessary information the original can be returned to the parents. There is no requirement to keep a copy of the birth certificate.		

16.2. Records to be kept by Registered Persons – All Care						
16.2. 1	The name and address and telephone number of the registered person and every other person living or employed on the premises	YES	The Day Care and Child Minding (National Standards) (England) Regulations 2003	See 16.4 below		
16.2. 2	A statement of the procedure to be followed in the event of a fire or accident	NO		Procedure superseded +7years		
16.2. 3	A statement of the procedure to be followed in the event of a child being lost or not collected	NO		Procedure superseded +7years		
16.2. 4	A statement of the procedure to be followed where a parent has a complaint about the service being provided by the registered person	NO		Until Superseded		
16.2. 5	A statement of the arrangements in place for the protection of children, including arrangements to safeguard the children from abuse or neglect and procedures to be followed in the event of allegations of abuse or neglect	NO		Closure of setting +50years (these could be required to show whether or not an individual child attended the setting in a child protection investigation)		
16.3 Records to be kept by Registered persons – Overnight provisions – Under 2's						

16.3.1	Emergency contact details for appropriate adult to collect the child if necessary	YES		Destroy once child has left the setting (unless the information collected for anything other than emergency contact)		
16.3.2	Contract, signed by the parent, stating all the relevant details regarding the child and their care, including the name of the emergency contact and confirmation of their agreement to collect the child during the night	YES		Date of birth of the child who is the subject of the contract +25years		
16.4 Other Records – Administration						
16.4.1	Financial Records – Accounts, statements, invoices, petty cash etc	NO		Current year +6years		
16.4.2	Insurance policies – Employers Liability	NO	Employers Liability Financial Regulations	The policies are kept for a minimum of 6 years and a maximum of 40 years depending on the type of policy		
16.4.3	Claims made against insurance policies – damage to property	YES		Case concluded +3years		
16.4.4	Claims made against insurance policies – personal injury	YES		Case concluded +6years		
16.4.5	Personal Files – Records relating to an individual's employment history	YES ¹²		Termination +6years then review		

16.4.6	Pre-employment vetting information (including CRB checks)	NO	CRB guidelines	Date of check +6months		
16.4.7	Staff training records – general	YES		Current year +2years		
16.4.8	Training (proof of completion such as certificates, awards, exam results)	YES		Last action +7years		
16.4.9	Premises and Health & Safety <ul style="list-style-type: none"> • Premises Files (relating to maintenance) • Risk Assessment 	NO		<ul style="list-style-type: none"> • Cessation of use of building +7years then review • Current year +3years 		

¹This amendment has been made in consultation with the Safeguarding Children Group

²From January 1st 2005 subject access is permitted into unstructured filing systems and log books and other records created within the school containing details about the activities of individual pupils and members of staff will become subject to the [General Data Protection Regulation 2018](#)

³In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service

⁴As Above

⁵If these records are retained on the pupil file or in their National record of Achievement they need only be kept for as long as operationally necessary

⁶This retention period has been set in agreement with the Safeguarding Children's Officer

⁷If this is placed on a personal file it must be weeded from the file

⁸A child may make a claim for negligence for 7 years from their 18th Birthday. To ensure that all records are kept until the pupil reaches the age of 25 this retention period has been applied

⁹If the property has been sold private housing then the archives service will embargo these records for an appropriate period of time to prevent them being used to plan or carry out a crime

¹⁰The regulations say that these records should be kept for 2 years (SI20031996 7(1b)). The Statute of Limitations states that a minor may make a claim for 7 years from their 18th Birthday, therefore the retention should be for the longer period.

¹¹The regulations say that these records should be kept for 2 years (SI200319967(1b)). The NHS records retention schedule states that any records relating to a child under the age of 18 should be retained until that child reaches the age of 25 years. Therefore, the retention should be DOB of the child being given/taking the medicine +25years

¹² For General Data Protection Regulation purposes the following information should be kept on the file for the following periods:	
• All documentation on the personal file	Duration of employment
• Pre-employment & vetting information	Start date +6months
• Records relating to accident or injury at work	Minimum of 12 years
• Annual appraisal/assessment records	Minimum of 5 years
Records relating to disciplinary matters (kept on personal file)	
• Oral	6 months
• First level warning	6 months
• Second level warning	12 months
• Final Warning	18 months

