

This policy was reviewed in October 2022
This policy is due to be reviewed in June 2023

This policy applies to the whole school including EYFS

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Introduction

- 1 This policy sets out a structured approach to reviewing and destroying records in relation to Pipers Corner School (the **School**).
- 2 The retention period for each type of record is shown in the table below. The General Data Protection Regulations 2018 (GDPR) make it unlawful to keep the information when it is no longer needed for the purpose for which it is held. This requirement is uncertain and allows discretion and may vary according to the circumstances, but in practice it means that the School should promptly destroy the record once the retention period in the table below has been reached. Occasionally there may be special circumstances which mean that a record should be kept for longer (for example where there is a risk of a student bringing a claim against the School). The School will refer to its insurance policies and seek further legal advice should this be necessary.
- 3 Information must be securely deleted. This applies to paper records, electronic information and biometric information. A record of the destruction of documents should be maintained.
- 4 This policy does not apply to records connected with commercial activities.
- 5 In the event that the School receives legal advice or guidance from its insurers recommending a longer retention period for particular circumstances then these will prevail over those stated in this policy.
- 6 If an email falls into one of the categories set out in the table then it should be filed appropriately as soon as is reasonable.
- 7 Routine emails which do not fall into any of the categories in the table may be kept in inboxes for up to six months and should then be deleted. Examples of routine emails:
 - 7.1 An internal email advising staff that the weekly meeting is cancelled; and
 - 7.2 An internal email attaching a staff rota for an open day.
- 8 Independent Inquiry into Child Sexual Abuse (**IICSA**):
 - 8.1 The IICSA (formerly the Goddard Inquiry) has issued retention instructions to a range of institutions regarding records relating to the care of children. In light of this, although the School has not received any such notice, it has been decided to temporarily cease the routine destruction of such records which might be relevant to the Inquiry in case they are requested by the Inquiry or made subject to a disclosure order. This means that before destroying any document the School should consider if it contains information that may fall within the Inquiry's remit (this particularly relates to student records due to be destroyed on the 25th birthday of the student).
 - 8.2 The range of documentation which might need to be kept is wider than just student records however. It includes any information linked to alleged or established historic child sexual abuse, whether by staff, volunteers or students with no limitation date. For example, a list of students who attended an overnight school trip or admission registers which show which students were at the School at a given time. As such, documents should be kept for longer than the retention periods listed in the policy if they concern information which might be relevant to the Inquiry.
 - 8.3 Please note that the School should keep this under review so that it recommences document destruction at the appropriate time.

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
1	Students				
1.1	Admission registers (however held)	Three years from the date of the last entry	Transfer to the archives and shred or delete copies and back-ups	Yes	Director of Admissions and Marketing
1.2	Attendance registers (however held – including iSAMS)	Three years from the date of the last entry	Review for further retention in the case of contentious dispute Transfer to the archives and shred or delete copies and back-ups	Yes	Deputy Head Pastoral
1.3	Child protection records	DOB of the student + 50 years	Review for further retention in the case of contentious dispute Shred as appropriate. Notes 1 Child protection information must be copied and sent under separate cover to the new school whilst the child is still under 18. Schools should ensure secure transit and confirmation of receipt should be obtained 2 Where a child is removed from roll to be educated at home, the file should be copied to the Local Authority (LA) 3 In accordance with the terms of reference of the Independent Inquiry into Child Sexual Abuse all Schools are required to retain information which relates to allegations (substantiated or not) of organisations and individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; institutional failures to protect children from sexual abuse or	No	Deputy Head Pastoral

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
			other exploitation. Fifty years from the date of birth of the student involved should be a sufficient period of retention but this should be kept under review		
1.4	<i>Biometric information (e.g. fingerprints to be used as part of an automated biometric recognition system)</i> (Not currently used in the School)	<i>For as long as the School requires the information for the automated biometric recognition system</i>	<i>This information must not be kept for longer than it is needed. The information must be destroyed if the student no longer uses the system including when they leave the School, where a parent withdraws consent or the student objects to its use</i>	No	n/a
1.5	Medical records held by the School	DOB of the student + 24 years; or Six years from the date of an incident which may become contentious if the student was 18 years old at the date of the incident The 24 year period is based on the fact that once the child turns 18 years old they have a certain amount of time (known as a limitation period) in which to bring claims against the School. The longest of these limitation periods is six years, albeit that some periods can be extended by the courts	Becomes part of student record when student leaves the school (but to be remain confidential). Review for further retention in the case of contentious disputes Transfer to the archives (medical data held separately) and shred or delete copies and back-ups	No	School Nurses/ Deputy Head Pastoral

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
1.6	Annual Medical Information Sheet	No long-term requirement to hold (other than incidents at 1.5 above)	Replaced annually - electronic record	No	School Nurses
1.7	Medical Information Form		Replaced annually - electronic record	No	School Nurses
1.8	Head Injury Form	As per accident form at 1.5 above	Retain in student file	No	School Nurses
1.9	Vaccination Programme	Held on student file	Retain in student file	No	School Nurses
1.10	Counselling records held by the School	DOB of the student + 24 years; or Six years from the date of an incident which may become contentious if the student was 18 years old at the date of the incident	Review for further retention in the case of contentious disputes Transfer to the archives and shred or delete copies and back-ups	No	Deputy Head Pastoral
2	Students' files				
2.1	Student files (including internal and public examination scripts, marks and results)	DOB of the student + 24 years; or Six years from the date of an incident which may become contentious if the student was	Review for further retention in the case of contentious disputes, for example, parental complaints, disciplinary matters, student exclusions, bullying incidents and Data Protection Act requests Transfer to the archives and shred or delete copies and back-ups Notes	No	Deputy Head Pastoral

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
		18 years old at the date of the incident	1 When reviewing student files, the School should have regard to other applicable sections of this policy 2 Any examination certificates left unclaimed should be returned to the appropriate Examination Board		
2.2	Special Educational Needs files, reviews and Individual Education Plans	DOB of the student + 24 years; or Six years from the date of an incident which may become contentious if the student was 18 years old at the date of the incident	Review for further retention in the case of contentious disputes Transfer to the archives and shred or delete copies and back-ups	No	Deputy Head Pastoral
2.3	Statement of Special Education Needs (SEN) and Education Healthcare (EHC) Plans	Statements of SEN (including appendices) and EHC Plans should never be retained once the student has left the School?	SHRED unless legal action pending The Statement / Plan belongs to the LA which makes and maintains the Statement / Plan	Yes	Deputy Head Pastoral
2.4	Letters authorising absence	At least three years from the date of the last entry on the attendance register	Transfer to the archives and shred or delete copies and back-ups	No	Deputy Head Pastoral
3	Permissions				
3.1	Parental permission slips for school trips – where there has been no major incident, accident, injury or	Conclusion of the trip plus three years	Held on Operoo. Download parental permission and store centrally Transfer to the archives and shred or delete copies and back-ups	No	Deputy Head Pastoral

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
	near miss involving anyone on the trip				
3.2	Parental permission slips for school trips – where there has been a major incident, accident, injury or near miss involving anyone on the trip	<p>DOB of the student involved in the incident plus 24 years; or</p> <p>Six years from the date of the incident if the student was 18 years old at the date of the incident</p> <p>The permission slips for all students on the trip need to be retained to show that the rules had been followed for all students</p>	<p>Held on Operoo.</p> <p>Download parental permission and store centrally</p>	No	Deputy Head Pastoral/ Bursar
4	Admission department and bursarial records				
4.1	Admission and parent contract documents including registration form, letter of offer and acceptance form	At least six years from date of leaving the School	<p>Review for further retention in the case of contentious disputes</p> <p>Destroy whole student record</p>	No	Deputy Head Pastoral
4.2	Admissions documents relating to applicants who did not join the School	<p>Retained until a student is too old to join the school.</p> <p>(Note: The documents can be kept for as long as the School considers that they are required, subject to the</p>	Destroy whole prospective student record	No	Director of Admissions and Marketing

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
		School's obligation not to keep the documents for longer than is necessary).			
4.3	Financial information in respect of fees	At least six years from date of leaving the School (this includes Bursary application forms (but not the supporting documentation which should be returned to the Parents))	Review for further retention in the case of contentious disputes Transfer to the archives and shred or delete copies and back-ups	No	Bursar
5	Employment				
5.1	Employment records	For at least six years after date of termination	If no recent contact from the relevant individual and no apparent breach of contract claim, dispose securely of documentation unless any child protection concerns	No	Bursar
5.2	Single Central Register	Legal advice is seven years is reasonable, however, this is at the School's discretion. There is no legal requirement to keep details of those staff who have left on the single central register as it is not relevant for inspection purposes. Many schools move the entry on to an archive register whilst others keep a list of the checks carried out on the personnel file instead and retain that in accordance with their	Review whether further retention is necessary. If so, these reasons must be documented Transfer to the archives and shred or delete copies and back-ups	No	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
		<p>retention policy. As there is no statutory requirement to keep this information in this form you should only keep it for as long as is necessary. As the single central register entry for former staff is not relevant for inspection purposes you should consider and document why it is necessary to keep it for a particular length of time. Reasons for keeping it may include that it will assist in demonstrating that all checks were carried out prior to work starting should there be a need to do so. This could arise in relation to the IICSA or if there is a historic allegation involving a member of staff. Our insurers may also require that this information is kept for a particular period.</p>			
5.3	Records and documents relating to membership of and contributions to the pension schemes for Teaching staff	Indefinitely	Decisions in relation to the pension schemes for Teaching staff may have ramifications beyond six years, and may be queried at any time by members and the pension provider	No	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
5.4	Employment references received and references provided	For a period longer than six years	Transfer to the archives and shred or delete copies and back-ups	No	Bursar
5.5	Employment reference concerning an employee who has been dismissed where a disciplinary sanction was current at the time of termination	For a period longer than six years	Transfer to the archives and shred or delete copies and back-ups If none	No	Bursar
5.6	Employment reference where an individual's employment ended for a safeguarding reason or where safeguarding was outstanding at the time of termination	At least until the person has reached normal retirement age or for a period of ten years from the date of the allegation if that is longer	Consider whether any recent reference requests for the relevant individual or new concerns raised by social services or other agencies Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
5.7	Working time opt-out forms	Two years from the date on which they were entered into	Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
5.8	Records to show compliance with the Working Time Regulations	Two years after the relevant period	Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
5.9	Payroll and wage records	Six years from the financial year end in which payments are made	Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
5.10	PAYE Records	Three years in addition to the current year (or six years where these fall within the definition of Payroll and Wage records)	Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
5.11	Maternity records	Three years after the end of the tax year in which the maternity pay period ends	Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
5.12	Sickness records required for the purposes of Statutory Sick Pay (SSP)	During employment and for a period of three years after employment has ended	Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
5.13	Records in relation to hours worked and payments made to workers	Three years beginning with the day upon which the pay reference period began	Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
5.14	Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to six years afterwards	Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
5.15	Disclosure and Barring Service (DBS) checks and	Dispose of securely after the recruitment process unless assessed as relevant to	Enter DBS certificate number, date on Single Central Register Delete copies and back-ups	Yes	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
	disclosures of criminal record forms	ongoing employment relationship. May retain for a maximum of six months if necessary to do so			
5.16	Immigration checks	Throughout employment and then retained for two years after the termination of employment	Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
5.17	Recruitment records of unsuccessful candidates	Six months after notifying unsuccessful candidates	Transfer to the archives and shred or delete copies and back-ups	No	Bursar
5.18	Personnel and training records	Whilst employment continues and up to six years after employment ceases	Transfer to the archives and shred or delete copies and back-ups	No	Bursar
5.19	Written particulars of employment, contracts of employment and changes to terms and conditions	Whilst employment continues and up to six years after employment ceases	Transfer to the archives and shred or delete copies and back-ups	No	Bursar
5.20	Annual leave records	Six years or possibly longer if leave can be carried over from year to year	Transfer to the archives and shred or delete copies and back-ups	No	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
5.21	Collective / workforce agreements	Permanently or six years after the agreement comes to an end	N/A Transfer to the archives and shred or delete copies and back-ups	No	Bursar
5.22	An Employee's bank details	No longer than necessary	Shred or delete copies and back-ups	No	Bursar
5.23	Records of advances for season tickets and loans to employees	Whilst employment continues and up to six years after repayment	Transfer to the archives and shred or delete copies and back-ups	No	Bursar
5.24	Death Benefit Nomination and Revocation Forms	Whilst employment continues and up to six years after payment of benefit	Transfer to the archives and shred or delete copies and back-ups	No	Bursar
6	Health and safety information - employees				
6.1	Reportable injuries, diseases and dangerous occurrences (RIDDOR) reports or own record	Three years from the date of record If disease - indefinitely	Review for further retention in the case of enforcement action or civil claims for disease or personal injury Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
6.2	First aid / accident book entry	Three years from the date of injury or last record in the book If disease - indefinitely	Review for further retention in the case of enforcement action or civil claims for disease or personal injury Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
6.3	Records of maintenance, examination and test control measures relating to substances hazardous to health under the Control of Substances Hazardous to Health (COSHH) regime	Five years	Review for further retention in the case of enforcement action or civil claims for disease or personal injury Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
6.4	Records of monitoring of exposure to substances hazardous to health under the COSHH regime and lead	Five years from the date of the last entry 40 years where a specific employee has been exposed	Review for further retention in the case of enforcement action or civil claims for disease or personal injury Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
6.5	Records of air monitoring of exposure to asbestos or lead where exposure is likely to exceed the control limit or result in significant exposure	Five years from the date of the last entry	Kept by Estates Manager. Review for further retention in the case of enforcement action or civil claims for disease or personal injury Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
6.6	Records of water testing	Five years from the date of the last entry	Review for further retention in the case of enforcement action or civil claims for disease or personal injury Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
6.7	Health records for licensable or non-notifiable licensed work with asbestos	40 years from the date of the last entry	Review for further retention in the case of enforcement action or civil claims for disease or personal injury Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
6.8	Medical and health surveillance reports	40 years from the date of last entry	Review for further retention in the case of enforcement action or civil claims for disease or personal injury Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
6.9	Examination / report of defect for power presses	Two years	Review for further retention in the case of enforcement action or civil claims for disease or personal injury Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar
7	Health and safety information - Students				
7.1	Accident reports including first aid / accident book	DOB of the student involved in the incident + 21 years; or Three years from the date of an incident which may become contentious if the student was 18 years old at the date of the incident	Review for further retention in the case of enforcement action or civil claims for personal injury Transfer to the archives and shred or delete copies and back-ups	No	Bursar
7.2	Reportable injuries, diseases and dangerous occurrences	DOB of the student involved in the incident + 21 years; or Three years from the date of an incident which may	Review for further retention in the case of enforcement action or civil claims for personal injury Transfer to the archives and shred or delete copies and back-ups	Yes	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
	(RIDDOR) reports or own record	become contentious if the student was 18 years old at the date of the incident			
7.3	Incident investigations and reports, risk assessments and other relevant documents where there has been an accident or incident	DOB of the student involved in the incident + 21 years; or Three years from the date of an incident which may become contentious if the student was 18 years old at the date of the incident	Review for further retention in the case of enforcement action or civil claims for personal injury Transfer to the archives and shred or delete copies and back-ups	No	Bursar
8	Generic health and safety records				
8.1	Risk assessments, records of health and safety arrangements, copies of policies and procedures General records of health and safety auditing and monitoring including fire risk assessments, electrical testing, PAT testing and gas appliance testing	These should be kept for as long as they remain relevant - we recommend at least three years (in the absence of a specific accident, incident, dangerous occurrence or notifiable disease)	Review for further retention in the case of enforcement action or civil claims for disease or personal injury Transfer to the archives and shred or delete copies and back-ups	No	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
	<p>Training records and copies of instructions or information</p> <p>Maintenance logs and / or records of plant and / or equipment plus safety manuals / notices / instructions</p> <p>Records of emergency evacuations and fire drills, fire safety risk assessments and fire safety policy / fire arrangements</p>				
8.2	Copies of documents, including health and safety files, prepared pursuant to the Construction (Design and Management) Regulations 2015	To be decided by the School - records should be retained as long as is reasonably necessary to inform on future construction projects at the School site	Transfer to the archives and shred or delete copies and back-ups	N/A	Bursar
9	Insurance				
9.1	Insurance certificates and schedules of cover	Indefinitely	Transfer to the archives	No	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
9.2	Correspondence with insurers related to specific accidents or incidents	<p>Three years generally</p> <p>If the incident involved a student - DOB of the student involved in the incident + 21 years; or</p> <p>Three years from the date of an incident which may become contentious if the student was 18 years old at the date of the incident</p> <p>Disease claims or where there have been allegations of abuse - indefinitely</p>	<p>Review for further retention in the case of civil claims for disease or personal injury</p> <p>Transfer to the archives and shred or delete copies and back-ups</p>	No	Bursar
10	Investigations, reviews and inquiries				
10.1	<p>Internal reports and investigations into accidents / incidents</p> <p>Copies of reports submitted to external agencies / regulations such as Independent Schools Inspectorate, Health and Safety Executive, Local Authority, Charity Commission etc</p> <p>External reports, reviews,</p>	<p>To be decided by the School (3 years)</p> <p>Where the investigation / inquiry / report has been necessitated as a result of a specific incident, we recommend that these documents are stored centrally for at least three years where there is a risk of enforcement action and / or criminal prosecution and / or a civil claim. Where this relates to student DOB +21 years); or</p>	<p>To be held by HR.</p> <p>Transfer to the archives and shred or delete copies and back-ups</p>	No	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
	investigations and inquiries for example inquests and public inquiries	Three years from the date of an incident which may become contentious if the student was 18 years old at the date of the incident			
11	Alumnae records				
11.1	We recommend that alumnae should be treated as employees for the purposes of health and safety records. Although this is not strictly necessary, (some of the health and safety requirements relating to employees do not apply to alumnae), treating them the same can be considered good practice and may be more straightforward to implement in practice	As set out in section 6 above	As set out in section 6 above	No	Director of Admissions and Marketing
11.2	General alumnae correspondence, membership forms etc	Six years after the last time the individual contacted the School	Delete all alumnae records.	No	Director of Admissions and Marketing

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
		This is subject to any longer retention period set out above. For example, records relating to a reportable disease which an alumnae has caught should be kept indefinitely in accordance with 6.1 above			
12	Material kept for archiving purposes in the public interest or for historical research purposes or statistical purposes				
12.1	Records which do not contain personal data, for example, old photographs of School buildings, title deeds etc	Can be kept indefinitely	Transfer to the archives	No	Bursar
12.2	Records relating to a number of student s, or the School generally, such as old class photographs, lists of students attending the School in any given year, School prospectuses, newspaper cuttings etc	Can be kept indefinitely	Transfer to the archives	No	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
12.3	<p>Records concerning specific students. For example, a poem written by an exceptionally gifted student</p> <p>Please note that this does not apply to more routine student records. Subject to the paragraph below, routine work produced by students should not be kept for longer than the retention periods set out in section 2.1 above unless the School has specifically decided to keep it, e.g. for historical purposes and that decision can be justified.</p> <p>For example, if the School wish to retain a copy of every essay written by a particular year group over the course of a year, or if the School wished to retain a sample of</p>	Can be kept indefinitely subject to our comments to the left	Transfer to the archives	No	Bursar

	Record	Retention period/s	Action at the end of the retention period	Retention period required by law?	Owner
	<p>essays written every year, then this will usually be permissible but further legal advice should be sought.</p> <p>There is always a risk that retaining records for this purpose will be a breach of the DPA. However, provided the guidelines in the above paragraphs are followed we consider that the risks here are very low.</p>				