



“Who you are is God’s gift to you. Who you become is your gift to God.”

Reepham Church of England Primary School

GDPR Record Management

Statement of intent

This policy outlines the management of records by the school, including retention periods and how records are removed.

Management of pupil records

- a) Pupil records are specific documents that are used throughout a pupil’s time in the education system – they are passed to each school that a pupil attends and include s all personal information relating to them. These records may be digital (ie: via Integris or CPOMs).
- b) The following information is stored on a pupil record (pupil records are held in the school office).
 - o Forename, surname, gender and date of birth
 - o Unique Pupil Number (UPN)
 - o Note of the date when the file was opened
 - o Note of the date when the file was closed, if appropriate
 - o First language (if not English)
 - o Any preferred names
 - o Position in their family, e.g. eldest sibling
 - o Emergency contact details and the name of the pupil’s doctor
 - o Any allergies or other medical conditions that are important to be aware of
 - o Names of parents, including their home address (es), telephone number (s) and email address(es)
 - o Name of the school, admission number, the date of admission and the date of leaving , where appropriate
 - o If the pupil has attended an Early Years setting, the record of transfer
 - o National curriculum and agreed syllabus record sheets
 - o Notes relating to major incidents and accidents involving the pupil
 - o Any correspondence with parents or external agencies relating to major issues, e.g. mental health
 - o Notes indicating that records of complaints made by parents or the pupil are held
 - o Absence notes



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- o Parental consent forms for educational visits, photographs and videos, etc. Reepham Church of England Primary School
- o Any information relating to exclusions
- c) The following information may be held by the SENDCo on separate pupil files, kept locked in a filing cabinet in the Meeting Room or kept digitally via CPOMs:
 - o Any other agency involvement, e.g. speech and language therapist
 - o Details of any SEND
 - o Any information about an education and healthcare (EHC) plan and support offered in relation to the EHC plan
 - o Any notes indicating child protection disclosures and reports are held
- d) Historic Safeguarding records, including disclosures and reports relating to child protection are stored in a file in a locked cupboard in the Headteacher’s office.
- e) The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.
- f) The only exception to the above is if any records placed on the pupil’s file have a shorter retention period and may need to be removed. In such cases, the DPO responsible for disposing records, will remove these records.
- g) Electronic records relating to a pupil’s record will also be transferred to the pupils’ next school.
- h) The school will not keep any copies of information stored within a pupil’s record, unless there is ongoing legal action at the time during which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.
- i) The school will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the school.

3) Retention of pupil records and other pupil -related information

- a) The table below outlines the school’s retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.
- b) Electronic copies of any information and files will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Images used for identification purposes	Duration of event/activity or whilst pupil is at school (whichever is less) + 1 month	Securely disposed of
Images used in school displays	Whilst the pupil is at school	Securely disposed of



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Images used for marketing purposes	In line with consent period	Securely disposed of
Postcodes, names and characteristics	Whilst pupil is at school + 5 years	Securely disposed of
House number and road	Whilst pupil is at school + 5 years	Securely disposed of

Admissions

Register of admissions	Whilst pupil remains at school + 1 year	Reviewed; may be kept permanently
Admissions appeals	Whilst pupil remains at school + 5 years	Securely disposed of
Proof of address (supplied as part of the admissions process)	Whilst pupil remains at school + 1 year	Securely disposed of
Supplementary information submitted including religious and medical information etc (where the admission was successful)	Whilst pupil remains at school + 1 year	Securely disposed of
Supplementary information submitted including religious and medical information etc (where the admission was not successful)	Whilst pupil remains at school + 5 years	Securely disposed of

Pupils' educational records

Pupil educational record	Whilst pupil remains at school	Transferred to next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period.
Public exam results	Added to the pupil's record and transferred to next school	Securely disposed of

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	<p>Copies with pupils' names are held whilst the pupil is at school, plus 5 years</p> <p>Copies with the pupils' names removed are held for 25 years after the pupil's date of birth</p>	
Internal exam results	<p>Added to pupil's records and transferred to next school</p> <p>Copies with pupils' names are held whilst the pupil is at school, plus 5 years</p> <p>Copies with the pupils' names removed are held for 25 years after the pupil's date of birth</p>	Securely disposed of
Behaviour records	<p>Added to pupil's records and transferred to next school</p> <p>Copies are held whilst the pupil is at the school, plus 1 year</p>	Securely disposed of
Exclusion records	<p>Added to pupil's records and transferred to next school</p> <p>Copies are held whilst the pupil is at the school, plus 1 year</p>	Securely disposed of
Child protection information on pupil's record	Stored in a sealed envelope for the same length as pupil's record	Securely disposed of (shredded)
Child protection (separate file)	25 years after date of birth	Securely disposed of (shredded)

Attendance

Attendance registers	Whilst pupil at school + 1 year; anonymised data retained 25 years	Securely disposed of
Letters authorising absence	Whilst pupil at school + 1 year; anonymised data retained 25 years	Securely disposed of



Medical information and administration

Medication permission slips	Duration of medication period + 1 month	Securely disposed of
Medical conditions – ongoing management	Whilst pupil at school + 1 year	Securely disposed of
Medical incidents with safeguarding impact	Whilst pupil at school + 25 years	Securely disposed of

SEND

SEND files and IEPs	25 years after date of birth	Reviewed; may be retained if legally required
EHC plans	25 years after date of birth	Securely disposed of unless legal hold applies
SEND advice to parents	25 years after date of birth	Securely disposed of unless legal hold applies
Accessibility strategy	25 years after date of birth	Securely disposed of unless legal hold applies

Curriculum management

SATs results	25 years after date of birth	Securely disposed of
Examination papers	Until appeals/validation complete	Securely disposed of
PAN reports	Current academic year + 6 years	Securely disposed of
Value added/contextual data	Current academic year + 6 years	Securely disposed of
Self-evaluation forms	Current academic year + 6 years	Securely disposed of
Pupils’ work	Current academic year + 1 year	Securely disposed of

Extra -curricular activities

Trip field files	End of trip + 1 month	Securely disposed of
Trip financial records	Whilst pupil at school + 1 year	Securely disposed of

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Trip consent – no major incident	Until end of trip	Securely disposed of
Trip consent – major incident	25 years after date of birth	Securely disposed of
Educational visitor data	End of visit + 1 month	Securely disposed of

Family Support Work

Family support day books	Current academic year + 2 years	Reviewed and destroyed
Reports to external agencies	Duration of pupil's time at school	Securely disposed of
Referral forms	Whilst referral is current	Securely disposed of
Contact data sheets	Current academic year	Reviewed and destroyed
Group registers	Current academic year + 2 years	Securely disposed of

Catering and free school meal management

Meal administration	Whilst pupil at school + 1 year	Securely disposed of
Free school meal eligibility	Whilst pupil at school + 5 years	Securely disposed of

4) Retention of staff records

a) The table below outlines the school's retention period for staff records and the action that will be taken after the retention period, in line with any requirements.

b) Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Operational

Staff personal file	Termination of employment + 6 years	Securely disposed of
Timesheets	Current academic year + 6 years	Securely disposed of
Annual appraisal records	Current academic year + 5 years	Securely disposed of

Recruitment



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Headteacher appointment records	Date of appointment + 6 years	Securely disposed of
Recruitment records – unsuccessful	Appointment of successful candidate + 6 months	Securely disposed of
Recruitment records – successful	Key info on staff file; others + 6 months	Securely disposed of
DBS certificates	Up to 6 months	Securely disposed of
Proof of identity for DBS	After verification	Reviewed; notes kept if required
Right to work evidence	Termination of employment + up to 2 years	Securely disposed of

Disciplinary and grievance procedures

Child protection allegations (including where the allegation is unproven)	Normal retirement age or 10 years (whichever longer)	Reviewed and shredded
Oral warnings	Date of warning + 6 months	Removed and disposed
Written warning – level 1	Date of warning + 6 months	Removed and disposed
Written warning – level 2	Date of warning + 12 months	Removed and disposed
Final warning	Date of warning + 18 months	Removed and disposed
Unproven incidents	Conclusion of case	Securely disposed of

5) Retention of senior leadership and management records

a) The table below outlines the school’s retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements.

b) Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Governing board

Signed governing board minutes	Permanent	Retained
Governing board agendas	One copy with minutes	Others disposed
Inspection copies of minutes	Date of meeting + 3 years	Shredded if sensitive
Reports to governing board	Minimum 6 years	Disposed or retained with minutes



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Instruments of government	Permanent	Retained
Trusts and endowments	Permanent	Transferred to archives if school closes
Governing board action plans	Duration + 3 years	Securely disposed of
Policies	Duration + 3 years	Securely disposed of
Complaints records	Resolution + minimum 6 years	Reviewed then disposed
Annual governors’ reports	Date of report + 10 years	Securely disposed of
School status change proposals	Decision date + 3 years	Securely disposed of

Headteacher and senior leadership team (SLT)

Headteacher/SLT reports	Date of report + minimum 3 years	Reviewed and disposed
Administrative leadership records	Current academic year + 6 years	Reviewed and disposed
Leadership correspondence	Date + 3 years	Reviewed and disposed
Professional development plan	Duration + 6 years	Securely disposed of
School development plan	Duration + 3 years	Securely disposed of

6) Retention of health and safety records

a) The table below outlines the school’s retention periods for health and safety records, and the action that will be taken after the retention period, in line with any requirements.

b) Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Health & safety

Health and safety policy statements	Duration of policy + 3 years	Securely disposed of
Risk assessments	Duration + 3 years	Securely disposed of
Accidents and injuries at work	Date of incident + 12–15 years	Securely disposed of
Accident reporting – adults	Date of incident + 6 years	Securely disposed of
Accident reporting – pupils	25 years after date of birth	Securely disposed of



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COSHH records	Current academic year + 40 years	Securely disposed of
Asbestos exposure records	Date of last action + 40 years	Securely disposed of
Radiation exposure records	Date of last action + 50 years	Securely disposed of
Fire precautions log books	Current academic year + 6 years	Securely disposed of

7) Retention of financial records

a) The table below outlines the school’s retention periods for financial records and the action that will be taken after the retention period, in line with any requirements.

b) Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Payroll pensions

Maternity pay records	Current academic year + 3 years	Securely disposed of
Retirement benefits records	Current academic year + 6 years	Securely disposed of

Risk management and insurance

Employer liability insurance	School closure + 40 years	Securely disposed of
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Asset management

Inventories	Current academic year + 6 years	Securely disposed of
Theft and vandalism reports	Current academic year + 6 years	Securely disposed of

Accounts and statements including budget management

Annual accounts	Current academic year + 6 years	Disposed to common standards
Loans and grants	Last payment + 12 years	Reviewed and disposed
Budget management records	Duration of budget + 3 years	Securely disposed of
Invoices and receipts	Current financial year + 6 years	Securely disposed of



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Banking records	Current financial year + 6 years	Securely disposed of
Debt recovery records	Current financial year + 6 years	Securely disposed of

Contract management

Contracts under seal	Last payment + 12 years	Securely disposed of
Contracts under signature	Last payment + 6 years	Securely disposed of
Contract monitoring	Current academic year + 2 years	Securely disposed of

School fund

School fund records	Current academic year + 6 years	Securely disposed of
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School meals

Free school meals registers	Current academic year + 6 years	Securely disposed of
School meals registers	Current academic year + 3 years	Securely disposed of
School meals summary sheets	Current academic year + 3 years	Securely disposed of

8) Retention of other school records

a) The table below outlines the school’s retention periods for any other records held by the school, and the action that will be taken after the retention period, in line with any requirements.

b) Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Property management

Title deeds	Permanent	Transferred if sold
Property plans	While building belongs to school	Transferred if sold
Leases	Expiry of lease + 6 years	Securely disposed of
Lettings records	Current financial year + 6 years	Securely disposed of



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Maintenance

Contractor maintenance records	Current academic year + 6 years	Securely disposed of
Employee maintenance records	Current academic year + 6 years	Securely disposed of

Operational administration

General administration files	Current academic year + 5 years	Reviewed and disposed
Prospectus records	Current academic year + 3 years	Disposed to common standards
Circular distribution records	Current academic year + 1 year	Disposed to common standards
Newsletters	Current academic year + 1 year	Disposed to common standards
Visitors’ books	Current academic year + 6 years	Reviewed then disposed
PTA and alumni records	Current academic year + 6 years	Reviewed then disposed

9) Identifying information

- a) Under the GDPR, all individuals have the right to data minimisation and data protection by design and default – as the data controller, the school ensures appropriate measures are in place in order for individuals to exercise this right.
- b) Wherever possible, the school uses pseudonymisation, also known as the ‘blurring technique’, to reduce risk of identification.
- c) Where data is required to be retained over time, e.g. attendance data, the school removes any personal data not required and keeps only the data needed – in this example, the statistics of attendance rather than personal information.

10) Storing and protecting information

- a) Our GDPR Data Protection Policy clearly outlines the measures taken to store and protect data.

11) Accessing information

- a) Reepham Church of England Primary School is transparent with data subjects, the information we hold and how it can be accessed.
- b) All members of staff, parents of registered pupils and other users of the school, e.g. visitors and third -party clubs, are entitled to:



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- o Know what information the school holds and processes about them or their child and why.
 - o Understand how to gain access to it.
 - o Understand how to provide and withdraw consent to information being held.
 - o Understand what the school is doing to comply with its obligations under the GDPR .
- c) All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the GDPR , to access certain personal data being held about them or their child.
- d) The school will adhere to the provisions outlined in the school’s Data Protection Policy when responding to requests seeking access to personal information.

12) Digital continuity statement

- a) Digital data that is retained for longer than six years will be named as part of a digital continuity statement.
- b) The DPO will identify any digital data that will need to be named as part of a digital continuity statement.
- c) The data will be archived to dedicated files on the school’s server, which are password -protected – this will be backed -up in accordance with section 1 1 of this policy.
- d) Memory sticks will never be used to store digital data , subject to a digital continuity statement.
- e) The following information will be included within the digital continuity statement:
 - o A statement of purpose and requirements for keeping the records
 - o The names of the individuals responsible for long term data preservation
 - o A description of the information assets to be covered by the digital preservation statement
 - o A description of when the record needs to be captured into the approved file formats
 - o A description of the appropriate supported file formats for long -term preservation
 - o A description of the retention of all software specification information and licence information
 - o A description of how access to the information asset register is to be managed in accordance with the GDPR

13) Disposal of data

- a) Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.
- b) Where disposal of information is outlined as secure disposal, this will be shredded and electronic information will be scrubbed clean and, where possible, cut.



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- c) Where the disposal action is indicated as reviewed before it is disposed, the DPO will review the information against its administrative value – if the information should be kept for administrative value, the DPO will keep a record of this.
- d) If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.
- e) Where information has been kept for administrative purposes, the DPO will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.
- f) Where information must be kept permanently, this information is exempt from the normal review procedures.

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