



FOREMARKE HALL

REPTON PREPARATORY SCHOOL

Information and Records Retention Policy:

Repton Preparatory School

August 2018

Introduction

- 1 This policy sets out a structured approach to reviewing and destroying records in relation to Repton Preparatory School (the **School**).
- 2 The retention period for each type of record is shown in the table below. In addition, data protection legislation makes 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 will generally 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 will be kept for longer (for example where there is a risk of litigation or a request from an outside body such as the Independent Inquiry into Child Sexual Abuse (IICSA) - see below. In such circumstances the School will seek legal advice and advice from its insurers.
- 3 The retention periods stated in the table below are the minimum storage requirements; in practice the School carries out a data cleanse of its files at the end of each academic/school year. Accordingly, a 3 year retention period means 3 years plus up to 12 months to allow the School to securely dispose of the information.
- 4 Information must be securely deleted. This applies to paper records, electronic information and biometric information.
- 5 This policy does not apply to records connected with commercial activities.
- 6 If the School's insurers specify longer retention periods than detailed in the table then the longer period will prevail.
- 7 With regard to the retention and deletion of emails, work is ongoing to have specific policies and procedures in place as soon as possible. Provision should be made to keep emails that fall into the categories set out in the table below. It is likely that routine emails will be deleted after six months – an example of a routine email is an internal email advising staff that the weekly meeting is cancelled.
- 8 Independent Inquiry into Child Sexual Abuse (**IICSA**):
 - 8.1 The IICSA has issued retention instructions to a range of institutions regarding records relating to the care of children. In light of this, we are temporarily ceasing the routine destruction of those 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 will consider if it contains information that may fall within the Inquiry's remit.
 - 8.2 The range of documentation which might need to be kept is wide. It includes any information linked to alleged or established child sexual abuse, whether by staff, volunteers or pupils with no limitation date. For example, a list of pupils who attended an overnight school trip or admission registers which show which pupils were at the School at a given time. As such, documents will 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 The School will keep this under review so that destruction of documents is recommenced at the appropriate time.

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
1	Pupils			
1.1	Admission registers (however held)	Three years from the date of the last entry	Review for further retention in the case of contentious dispute SHRED/DELETE or delete including back-ups and copies	Yes
1.2	Attendance registers (including those held electronically in the Management information System (MIS))	Three years from the date of the last entry	Review for further retention in the case of contentious dispute SHRED/DELETE or delete including back-ups and copies	Yes
1.3	Child protection records	DOB of the pupil + 68 years	Review for further retention in the case of contentious dispute SHRED/DELETE Notes 1 Child protection information is copied and sent under separate cover to the new school if the child is still under 18. We ensure secure transit and ask for confirmation of receipt 2 Where a child is removed from the roll to be educated at home, the file will be copied to the Local Authority (LA) 3 In accordance with the terms of reference of	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
			<p>the IICSA 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 other exploitation. 50 ? years from the pupil's 18th birthday should be a sufficient period of retention but this will be kept under review</p>	
1.4	Medical records held by the School	DOB of the pupil + 25 years	<p>Review and retain by exception in the case of ongoing / contentious disputes</p> <p>SHRED/DELETE</p>	No

1.5	Counselling records held by the School	DOB of the pupil + 25 years; or	Review and retain by exception in the case of ongoing / contentious disputes SHRED/DELETE	No
2	Pupil files			
2.1	Pupil files (including public examination scripts, marks & results, and data held electronically in the MIS)	At the end of the academic/school year in which the pupil reaches age 24 years Consideration is being given to retaining some basic pupil data indefinitely to maintain the history of the School: name, DOB, House, address, year of entry/exit, particular achievements	Review and retain by exception in the case of ongoing / contentious disputes, for example, parental complaints, disciplinary matters, pupil exclusions, bullying incidents and subject access requests. See 1.3 above re. Child Protection records. SHRED/DELETE Notes 1 When reviewing pupil files, the School will have regard to other applicable sections of this policy 2 Any examination certificates left unclaimed will be returned to the appropriate Examination Board	No
2.2	Internal examination scripts, marks & results	<u>Scripts:</u> Scripts from weekly or monthly tests: Kept until the end of the next term. Scripts from termly or yearly tests: handed back to pupils or kept until	Keep for longer in accordance with the retention periods and guidance set out at 2.1 above if risk of contentious disputes, for example, parental complaints, disciplinary matters, pupil exclusions, bullying incidents and subject access requests. SHRED/DELETE	No

		<p>the end of the next academic year.</p> <p><u>Marks & results:</u></p> <p>Marks and results of whole-school internal examinations (as held on MIS) are retained in accordance with 2.1 above retention.</p> <p>Internal assessments by teachers are kept until the end of the next academic year.</p>		
2.3	Special Educational Needs files, reviews and Individual Education Plans	<p>DOB of the pupil + 24 years; or</p> <p>Six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident</p> <p>Whichever is the longer</p>	<p>Review and retain by exception in the case of ongoing / contentious disputes</p> <p>SHRED/DELETE</p>	No
2.4	Statement of Special Education Needs (SEN) and Education Healthcare (EHC) Plans	<p>Statements of SEN (including appendices) and EHC Plans should never be retained once the pupil has left the School</p>	<p>SHRED/DELETE unless legal action pending</p> <p>The Statement / Plan belongs to the LA which makes and maintains the Statement / Plan</p>	Yes
2.5	Letters authorising absence	<p>Three years from the date of the last entry on the attendance register</p>	SHRED/DELETE	No
2.6	Documents that are required to be retained for each migrant enrolled under Tier 4 (General) Student or Tier 4 (Child) Student visas	<p>Through the period of sponsorship and for whichever is the shorter period of either:</p> <ul style="list-style-type: none"> one year from the date that the 	SHRED/DELETE	No

		<p>School ends sponsorship of the Tier 4 student, or</p> <ul style="list-style-type: none"> if the Tier 4 student is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents 		
3	Permissions			
3.1	Parental permission slips for school trips – where there has been no major incident, accident, injury or near miss involving anyone on the trip	Conclusion of the trip + five years	Review and retain by exception in the case of ongoing / contentious disputes otherwise SHRED/DELETE	No
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 pupil involved in the incident + 25 years; or</p> <p>The permission slips for all pupils on the trip may need to be retained to show that the rules had been followed for all pupils</p>	Review and retain by exception in the case of ongoing / contentious disputes SHRED/DELETE	No

4	Admission department and bursarial records			
4.1	Admission and parent contract documents including registration form, letter of offer and acceptance form	Six years from date of leaving the School	Review for further retention in the case of contentious disputes SHRED/DELETE	No
4.2	Admissions documents relating to applicants who did not join the School	To the end of the academic/school year in which the child is 16	Review for further retention in the case of contentious disputes SHRED/DELETE	No
4.3	Financial information in respect of fees	Records are filed by Parent and retained for six years from the end of the financial year that the last sibling leaves School	Review for further retention in the case of contentious disputes SHRED/DELETE	No
4.4	Confidential statements of financial circumstances	For pupils who join the School, these are retained as per 4.3 above. For those who don't join the School they are retained for six years	Review for further retention in the case of contentious disputes SHRED/DELETE	No
5	Employment			
5.1	Employment or personnel records including contracts of employment, changes to terms and condition, disciplinary matters, grievance procedures	Until advised otherwise / the end of the IICSA, all personnel files (pfiles) will be retained for a minimum of 50 years. If it were not for IICSA, pfiles would	Pending the outcome of IICSA, all pfiles will be retained. Post-IICSA, and depending on its outcome, if on a date no earlier than six years after the termination date there has been no recent contact from the	Yes – IICSA. Otherwise, No

		<p>be retained:</p> <ul style="list-style-type: none"> For at least six years after date of termination of employment For at least 12 years after date of termination if any of the documents were signed as a deed <p>Post-IICSA consideration will be given to retaining basic information as an historic record: name, DOB, address, start/finish dates, role</p>	<p>relevant individual and no apparent breach of contract claim, the documentation will be securely destroyed unless there any child protection concerns. Records of anyone with child protection concerns (even if not proved) will be retained</p>	
5.2	Single central register (SCR)	<p>There is no legal requirement to keep the SCR entry for staff who have left, as it ceases to be relevant for inspection purposes. Each SCR entry is replicated in the relevant personnel file instead and will be retained indefinitely, at least until IICSA has reported.</p>	<p>The current / 'live' SCR is cleansed of former employees annually at the end of the academic/school year.</p> <p>As a consequence of IICSA, old entries are retained/archived electronically. When IICSA concludes the archiving policy will be reviewed and it is likely that the archive will be SHREDDDED/DELETED</p>	<p>Yes - IICSA Otherwise, No</p>
5.3	Records and documents relating to membership of and contributions to the Teachers' Pension Scheme	<p>Indefinitely, which effectively means 50 years</p>	<p>Review whether further retention is necessary. SHRED/DELETE</p>	<p>No</p>
5.4	Employment references received and references provided (where no safeguarding concerns have arisen or are known)	<p>While employment continues and at least up to six years after employment terminates</p>	<p>Currently, under IICSA retain indefinitely. After IICSA, review the situation – will probably SHRED / DELETE</p>	<p>No</p>
5.5	Employment reference where an	<p>At least for 10 years after the person</p>	<p>Currently, under IICSA retain indefinitely.</p>	<p>Yes</p>

	individual's employment ended for a safeguarding reason or where safeguarding was outstanding at the time of termination	has retired or until the individual reaches the age of 75, whichever is the later	After IICSA consider whether any recent reference requests for the relevant individual or new concerns raised by social services or other agencies. If none, SHRED/DELETE	
5.6	Working time opt-out forms	Retain as long as the pfile	SHRED/DELETE	Yes
5.7	Records to show compliance with the Working Time Regulations	Two years after the relevant period	SHRED/DELETE	Yes
5.8	Payroll and wage records These include records of: <ul style="list-style-type: none"> •Details on overtime. •Bonuses. •Expenses. •Benefits in kind. 	Six years from the financial year end in which payments are made	SHRED/DELETE	Yes
5.9	PAYE Records	Six years from the financial year end in which payments are made	SHRED/DELETE	Yes
5.10	Maternity / paternity records These include: <ul style="list-style-type: none"> •Records regarding Maternity payments made save for where those include payroll records. •Maternity certificates showing the expected week of confinement 	Six years after the end of the tax year in which the maternity pay period ends	SHRED/DELETE	Yes

5.11	Sickness records required for the purposes of Statutory Sick Pay (SSP)	During employment and for a period of six years after employment has ended	SHRED/DELETE	Yes
5.12	Records in relation to hours worked and payments made to workers	For a period of six years beginning with the last day of the following month to which the records relate	SHRED/DELETE	Yes
5.13	Disclosure and Barring Service (DBS) checks and disclosures of criminal record forms	Dispose of securely after the recruitment process unless assessed as relevant to ongoing employment relationship. Once the conviction is spent, delete unless it is an excluded profession.	Enter DBS certificate number, date, initials on Single Central Register SHRED/DELETE	Yes
5.14	Immigration checks	Throughout employment and then retained for two years after the termination of employment	SHRED/DELETE	Yes
5.15	Recruitment records of unsuccessful candidates	Six months after notifying unsuccessful candidates	SHRED/DELETE	No
5.16	Personnel and training records	Whilst employment continues and up to six years after employment ceases	SHRED/DELETE	No
5.17	Annual leave records	Six years	SHRED/DELETE	No
5.18	An Employee's bank details	Until last payment made	SHRED/DELETE	No
5.19	Records of advances for season tickets and loans to employees	Whilst employment continues and up to six years after repayment	SHRED/DELETE	No

5.20	Death Benefit Nomination and Revocation Forms	Whilst employment continues and up to six years after payment of benefit	SHRED/DELETE	No
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 contentious disputes SHRED/DELETE	Yes
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 contentious disputes SHRED/DELETE	Yes
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 contentious disputes SHRED/DELETE	Yes
6.4	Health records for licensable asbestos work	At least 40 years from the date of the last entry	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes
6.5	Medical surveillance certificate for licensable asbestos work	At least four years from the date it was issued	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes
6.6	Records of air monitoring for asbestos	Where a health record is required at least 40 years from the date of the		Yes

		last entry In other cases at least five years from the date of the last entry		
6.7	Records of examinations, tests and repairs carried out in respect of exhaust or respiratory protective equipment under the Control of Asbestos Regulations 2012 (CAR)	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes
6.8	Examination / report of defect for power presses	Two years	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	Yes
6.9	Records of water monitoring, inspection, testing, checks and control measures for legionellosis	Five years from the date of the last entry	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	Yes
7	Health and safety information - pupils			
7.1	Accident reports including first aid / accident books	18 years (on the assumption that the youngest a pupil could be would be 3 years, and the recommendation is that they are kept until DOB of the pupil involved in the incident + 21 years)	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	No
7.2	Reportable injuries, diseases and dangerous occurrences (RIDDOR) reports or own record	18 years (on the assumption that the youngest a pupil could be would be 3 years, and the recommendation is that they are kept until DOB of the	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	Yes

		pupil involved in the incident + 21 years)		
7.3	Incident investigations and reports, risk assessments and other relevant documents where there has been an accident or incident	DOB of the pupil involved in the incident + 21 years; or	Review for further retention in the case of enforcement action or civil claims for personal injury SHRED/DELETE	No
8	Generic health and safety records			
8.1	<p>Risk assessments, records of health and safety arrangements, copies of policies and procedures</p> <p>General records of health and safety auditing and monitoring including fire risk assessments, electrical testing, PAT testing and gas appliance testing</p> <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>	When new versions of Risk Assessments etc. are brought into use, old versions will be kept for no less than three years	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	No

8.2	Copies of documents, including health and safety files, prepared pursuant to the Construction (Design and Management) Regulations 2015	Records will be retained as long as is reasonably necessary to inform on future construction projects at the School site	SHRED/DELETE	N/A
9	Insurance			
9.1	Insurance certificates and schedules of cover	Indefinitely	N/A	No
9.2	Correspondence with insurers related to specific accidents or incidents	Three years generally If the incident involved a pupil - DOB of the pupil involved in the incident + 21 years; or Disease claims or where there have been allegations of abuse - indefinitely	Review for further retention in the case of civil claims for disease or personal injury SHRED/DELETE	No

10	Investigations, reviews and inquiries			
10.1	Documents relevant to IICSA	Indefinitely	Review once the Inquiry has been completed.	No - except the school received a notice from IICSA via ISC
10.2	<p>Internal reports and investigations into accidents / incidents</p> <p>Copies of reports submitted to external agencies / regulators such as Independent Schools Inspectorate, Health and Safety Executive, Local Authority, Charity Commission etc.</p> <p>External reports, reviews, investigations and inquiries for example inquests and public inquiries</p> <p>Retention of CP information relating to a member of staff who may have been involved in an allegation:</p>	<p>Where the investigation / inquiry / report has been necessitated as a result of a specific incident, we will store these documents centrally for at least three years if there is a risk of enforcement action and / or criminal prosecution and / or a civil claim. Where this relates to pupil DOB +21 years); or</p> <p>If concerns have been raised about an adult's behaviour around children, you should keep the records in their personnel file either until they reach the age of 65 or for 10 years - whichever is longer (IRMS, 2016). This applies to volunteers and paid staff. For example:</p>	SHRED/DELETE	No

		<ul style="list-style-type: none"> • If someone is 60 when the investigation into the allegation is concluded, we keep until their 70th bday. • If someone is 30, we keep until they are aged 65. You should keep records for the same amount of time regardless of whether the allegations were unfounded. However if you find that allegations are malicious you should destroy the record immediately. Information should be kept for this length of time even if the person stops working or volunteering for the organisation. 		
11	Alumni records			
11.1	General alumni correspondence, membership forms etc.	<p>At least six years after the last time the individual contacted the School</p> <p>This is subject to any longer retention period set out above. For example, records relating to a reportable disease should be kept indefinitely.</p>	SHRED/DELETE	No

12	Keeping information for longer			
12.1	Records which do not contain personal data, for example, old photographs of School buildings, title deeds etc.	Can be kept indefinitely	N/A	No
12.2	Records relating to a number of pupils, or the School generally, such as old class photographs, lists of pupils attending the School in any given year, School prospectuses, newspaper cuttings etc.	The School has concluded it has a legitimate interest in building up a picture of the history of the School, so records will be kept indefinitely when the School is satisfied (1) there is a legitimate interest in doing so, (2) keeping the record is necessary for that legitimate interest, and (3) the legitimate interest is not overridden by the interests, rights or freedoms of the individuals concerned.	N/A	No
12.3	Records concerning specific pupils kept for a valid reason. For example, a poem written by an exceptionally gifted pupil.	Records of this nature will be kept indefinitely when the School is satisfied that the legitimate interests test set out at paragraph 12.2 above has been met. Please note that this does not apply to more routine pupils records. Routine work produced by pupils will not be kept for longer than the retention period set out in section 2.1 above unless the School has a specific reason for keeping it and that	N/A	No

		<p>decision can be justified on the basis of the legitimate interests test.</p> <p>For example, School may wish to retain essays written by pupils which were submitted to an essay competition. Where there is any doubt, legal advice will be sought</p>		
13	CCTV, videos and photographs			
13.1	CCTV footage	14 days	<p>DELETE</p> <p>But footage will be retained if required for any reason such as in relation to an incident or accident involving any person.</p> <p>CCTV footage may also be needed in relation to parental complaints, disciplinary matters, pupil exclusions, bullying incidents or health and safety matters.</p> <p>If a subject access request has been made for the footage it must be retained.</p> <p>The School will consider the relevant limitation periods for claims being brought against the School and seek advice as necessary.</p>	No
13.2	Photographs of pupils for internal administration purposes e.g. to identify the pupil	<p>These photographs will be retained for as long as they are required for the purpose for which they were taken.</p> <p>Electronic photos stored in the MIS</p>	<p>SHRED/DELETE</p> <p>Review for further retention in the case of relevance to contentious disputes.</p>	No

		will be destroyed when the electronic pupil record is destroyed (see 2.1 above)		
13.3	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	<p>These photographs and videos will be retained for as long as they are required for the purpose for which they were taken.</p> <p>The School may like to retain some images for historical reasons in which case it will do so as per 12.3 above.</p> <p>Photographs and videos uploaded within social media posts will exist indefinitely, but will be deleted from the School's accounts on request</p>	<p>SHRED/DELETE</p> <p>Review for further retention in the case of relevance to contentious disputes.</p>	No
13.4	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	<p>These photographs and videos should be retained for as long as they are required for the purpose for which they were taken.</p> <p>The School may like to retain some images for historical reasons in which case it will do so as per 12.3 above.</p>	<p>SHRED/DELETE</p> <p>Review for further retention in the case of relevance to contentious disputes.</p>	No
14	Estates			
14.1	Information pertaining to assets e.g. buildings such as electrical testing, gas testing etc.	Retained for the full life of the asset, unless the asset is disposed of e.g. sold in which case records will be retained for 5 years'	<p>If the asset is disposed of e.g. demolished the records will be shredded or deleted as soon as practicably possible after demolition.</p> <p>SHRED/DELETE</p>	No

