



Bridgelea Primary School
Bridgelea Road
Withington
Manchester
M20 3FB

Bridgelea Primary School
Plymouth Grove West
Longsight
Manchester
M13 0AQ

Data Retention Policy

Article 28

You have the right to a good quality education. You should be encouraged to go to school to the highest level you can.

Article 29

Your education should help you use and develop your talents and abilities. It should also help you learn to live peacefully, protect the environment and respect other people.

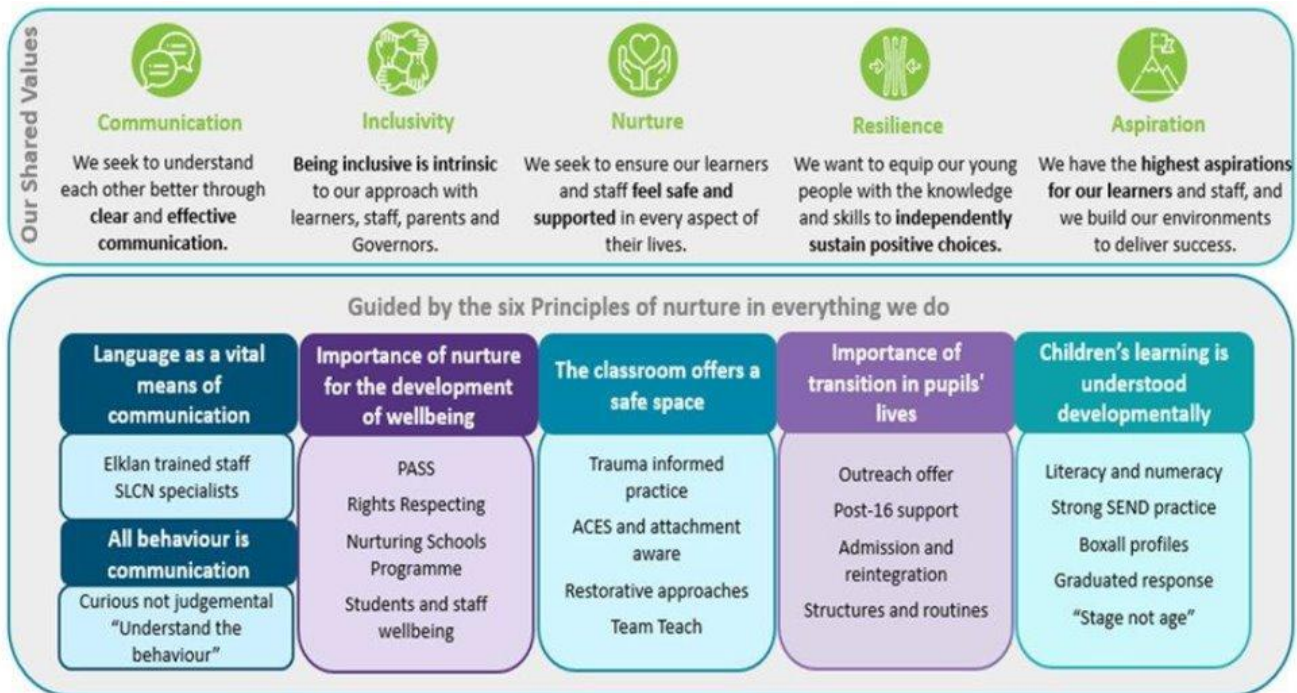
Article 31

You have the right to play and rest.

Implemented	SLT
Presented by	Diane Hallworth
Ratified by Governors	Nov 2024
Review Date	Autumn Nov 2025

Bridgelea Primary School Vision & Mission Statement

Our overall vision of '**Understanding People**' captures our core purpose perfectly. At Bridgelea we want to help our children, families, and communities to understand themselves and others more, whilst keeping their understanding of the statutory and wider curriculum.



Gold Rights Respecting School

Through the School Council the children decided they would like to focus on the following 10 Articles, whilst understanding no right is more important than another:

Article 12: You have the right to give your opinion, and for adults to listen and take it seriously.

Article 13: You have the right to find out things and share what you think with others, by talking, drawing, writing or in any other way unless it harms or offends other people.

Article 15: You have the right to choose your own friends and join or set up groups, as long as it isn't harmful to others.

Article 24: You have the right to the best health care possible, safe water to drink, nutritious food, a clean and safe environment, and information to help you stay well.

Article 27: You have the right to food, clothing, a safe place to live and to have your basic needs met. You should not be disadvantaged so that you can't do many of the things other kids can do.

Article 28: You have the right to a good quality education. You should be encouraged to go to school to the highest level you can.

Article 29: Your education should help you use and develop your talents and abilities. It should also help you learn to live peacefully, protect the environment and respect other people.

Article 30: You have the right to practice your own culture, language and religion - or any you choose. Minority and indigenous groups need special protection of this right.

Article 31: You have the right to play and rest.

Article 39: You have the right to help if you've been hurt, neglected or badly treated.

Equality and Accessibility

Our school aims to treat all pupils fairly and with respect. This involves providing access and opportunities for all pupils without discrimination of any kind. Our school is committed to ensuring staff are trained in equality issues with reference to the Equality Act 2010, including understanding disability issues.

At Bridgelea we ensure the accessibility of the curriculum, physical environment and information for pupils with special educational needs and disabilities.

Bridgelea Primary School will:

- recognize the potential for vulnerable pupils, reduce barriers to their achievement and inclusion and develop a strong culture for success
- focus on enhancing the life chances of their most vulnerable children
- plan for and teach children with learning needs through a range of proven interventions
- use a range of inclusive teaching strategies
- take an informed view of the possible literacy and mathematic interventions that will be utilized
- ensure effectively support transition of vulnerable children and young people
- evaluate a range of outcomes of their current additional provision and the value for money it provides; make informed decisions about how best to target available funding in the future
- provide professional development for staff and governors
- keep parents and carers informed in line with the school policies and the requirements of the 0 – 25 Code of Practice

The Equality Act defines an individual as disabled if he or she has a physical or mental impairment that has a 'substantial' and 'long term' adverse effect on his or her ability to undertake normal day to day activities.

Bridgelea Primary School will make reasonable adjustments for pupils with disabilities under the Equality Act 2010, to alleviate any substantial disadvantage that a disabled pupil faces in comparison with non-disabled pupils.

Aims

This policy has been produced based on the information management toolkit for schools dated 1st February 2016 and considers the GDPR toolkit for schools – however some of the timeframes differ slightly ensure we simplify the retention periods to avoid confusion and complexity.

This is a checklist developed to enable School Business Managers, Clerks, SENCO and other School Staff to carry out an efficient annual review and safe destruction of school records and information. This document should be completed once a year and shared with governors.

School Agreed Retention Periods

As a school we have agreed the following retention periods:

- Governors related material – 6 Years (or permanent as required)
- Senior Leadership material – 6 Years
- General Administration material – 3 Years
- Human Resources – Until staff member leaves + 2 Years (6 Years if HR matters pending)
- Health and Safety – 6 years (when it will be checked for longer retention dates)
- Finance – 6 years
- Property Management – 6 years
- Children's information – till the child reaches 25

Safe Destruction of Data

As a school we have decided that we will ensure that we securely dispose of all data that comes to the end of its retention period.

When data is to be destroyed, this may be carried out by an appropriately licenced third party, with whom an appropriate Data Processing Agreement is in place and will be subject to adequate contractual obligations to the school to process and dispose of the information confidentially and securely.

School Data Protection Officers

Global Policing support the school with the management of data retention and secure deletion. Should you have any questions or queries, you can contact them directly:

Global Policing Limited
2.04, Flint Glass Works,
64 Jersey Street, Ancoats Urban Village
Manchester
M4 6JW

Email: datarequests@globalpolicing.co.uk

Tel: 0161 212 1682

1. Management of the School

1.1 Governing Body – Agreed retention date **6 Years**

Where possible all Governor minutes will be anonymised and therefore data protection risks will be decreased.

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
1.1.1	Agendas for Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff	One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL ¹	
1.1.2	Minutes of Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)		PERMANENT	County Archives Service	
	Inspection Copies		6 Years	SECURE DISPOSAL	
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the report deals with confidential issues relating to staff	6 Years	SECURE DISPOSAL	
1.1.4	Instruments of Government including Articles of Association	No	PERMANENT	County Archives Service.	
1.1.5	Action plans created and administered by the Governing Body	No	6 Years	SECURE DISPOSAL	
1.1.6	Policy documents created and administered by the Governing Body	No	Life of the policy	SECURE DISPOSAL	
1.1.7	Records relating to complaints dealt with by the Governing Body	Yes	6 Years	SECURE DISPOSAL	

1.2 Head Teacher and Senior Management Team - Agreed retention date 6 Years

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
1.2.1	Log books (IRIS; CPOMS) of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff	6 Years	These could be of permanent historical value and should be offered to the County Archives Service if appropriate	
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff	6 Years	SECURE DISPOSAL	
1.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff	6 Years	SECURE DISPOSAL	
1.2.4	Records created by head teachers, deputy head teachers, and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff	6 Years	SECURE DISPOSAL	
1.2.5	Correspondence created by head teachers, deputy head teachers, and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff	6 Years	SECURE DISPOSAL	
1.2.6	Professional Development Plans	Yes	6 Years	SECURE DISPOSAL	
1.2.7	School Development Plans	No	6 Years	SECURE DISPOSAL	

1.3 Operational Administration - Agreed retention date 3 Years

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
1.3.1	General file series	No	3 Years	SECURE DISPOSAL	
1.3.2	Records relating to the creation and distribution of circulars to staff, parents or pupils	No	3 Years	SECURE DISPOSAL	
1.3.3	Newsletters and other items with a short operational use	No	3 Years	SECURE DISPOSAL	
1.3.4	Visitors' Books and Signing in Sheets (Inventory/Fob Sheet)	Yes	3 Years	SECURE DISPOSAL	

2. Human Resources

2.1 Recruitment - Agreed retention date Employment + 2 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.1.1	All records leading up to the appointment of a new headteacher	Yes	Whilst Staff member is employed + 2 years	SECURE DISPOSAL	
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes	Date of appointment of successful candidate + 6 months	SECURE DISPOSAL	
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes	Whilst Staff member is employed + 2 years	SECURE DISPOSAL	
2.1.4	Pre-employment vetting information – DBS Checks	No	The school does not have to keep copies of DBS certificates.		
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes	Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the staff's personal file - Whilst Staff member is employed + 2 years		
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	Whilst Staff member is employed + 2 years		

2.2 Operational Staff Management - Agreed retention date Employment + 2 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.2.1	Staff Personal File	Yes	Whilst Staff member is employed + 2 years	SECURE DISPOSAL	
2.2.2	Timesheets; Overtime; mileage	Yes	Whilst Staff member is employed + 2 years	SECURE DISPOSAL	
2.2.3	Annual appraisal/ assessment records (Perspective)	Yes	Whilst Staff member is employed + 2 years	SECURE DISPOSAL	

2.3 Management of Disciplinary and Grievance Processes - Agreed retention date **Employment + 6 years**

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	Until the person's normal retirement age or 10 years from the date of the allegation whichever is longer then REVIEW. Note allegations found to be malicious should be removed after this period.	SECURE DISPOSAL	
2.3.2	Disciplinary Proceedings	Yes	Whilst Staff member is employed + 6 years	SECURE DISPOSAL	
	Management note of guidance		Whilst Staff member is employed + 6 years	SECURE DISPOSAL	
	written warning – level 1		+ 12 months		
	final warning		+ 12 months		
	case not found		If the incident is child protection related then see above otherwise dispose of at the conclusion of the case.	SECURE DISPOSAL	

2.4 Payroll and Pensions - Agreed retention date **6 years (Finance)**

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.4.1	Maternity pay records	Yes	Current year + 3 years	SECURE DISPOSAL	
2.4.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Current year + 6 years	SECURE DISPOSAL	

2.5 Health and Safety - Agreed retention date 6 years (check for longer periods)

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.5.1	Health and Safety Policy Statements	No	Life of Policy + 3 years	SECURE DISPOSAL	
2.5.2	Health and Safety Risk Assessments	No	Life of Risk Assessment + 3 years	SECURE DISPOSAL	
2.5.3	Records relating to accident/ injury at work	Yes	12 Years	SECURE DISPOSAL	
2.5.4	Accident Reporting	Yes			
	Adults		6 Years	SECURE DISPOSAL	
	Children		Age of child 25	SECURE DISPOSAL	
2.5.5	Control of Substances Hazardous to Health (COSHH)	No	Current year + 40 years	SECURE DISPOSAL	
2.5.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Last action + 40 years	SECURE DISPOSAL	
2.5.7	Fire Precautions log books	No	6 Years	SECURE DISPOSAL	

3. Financial Management of the School

3.1 Asset Management - Agreed retention date 6 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.1.1	Inventories of furniture and equipment	No	Current year + 6 years	SECURE DISPOSAL	

3.2 Accounts and Statements including Budget Management - Agreed retention date 6 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.2.1	Annual Accounts	No	Current year + 6 years	STANDARD DISPOSAL	
3.2.2	Loans and grants managed by the school	No	Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL	
3.2.3	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No	Life of the budget + 3 years	SECURE DISPOSAL	
3.2.4	Invoices, receipts, order books and requisitions, delivery notices	No	Current financial year + 6 years	SECURE DISPOSAL	
3.2.5	Records relating to the collection and banking of monies	No	Current financial year + 6 years	SECURE DISPOSAL	
3.2.6	Records relating to the identification and collection of debt	No	Current financial year + 6 years	SECURE DISPOSAL	

3.3 Contract Management and SLA's - Agreed retention date 6 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.3.1	All records relating to the management of contracts under seal	No	Last payment on the contract + 12 years	SECURE DISPOSAL	
3.3.2	All records relating to the management of contracts under signature	No	Last payment on the contract + 6 years	SECURE DISPOSAL	
3.3.3	Records relating to the monitoring of contracts	No	Current year + 2 years	SECURE DISPOSAL	

3.4 School Fund - Agreed retention date 6 years

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.4.1	School Fund - cheque books	No	Current year + 6 years	SECURE DISPOSAL	
3.4.2	School Fund – paying in books	Yes	Current year + 6 years	SECURE DISPOSAL	
3.4.3	School Fund – Ledger	No	Current year + 6 years	SECURE DISPOSAL	
3.4.4	School Fund – Invoices	No	Current year + 6 years	SECURE DISPOSAL	
3.4.5	School Fund – Receipts	No	Current year + 6 years	SECURE DISPOSAL	
3.4.6	School Fund – bank statements	No	Current year + 6 years	SECURE DISPOSAL	
3.4.7	School Fund - journals	No	Current year + 6 years	SECURE DISPOSAL	

4. Property Management

4.1 Property Management - Agreed retention date 6 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
4.1.1	Title deeds of properties belonging to the school	No	PERMANENT These should follow the property unless the property has been registered with the Land Registry		(N/A – Maintained)
4.1.2	Plans of property belong to the school	No	These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.		(N/A – Maintained)
4.1.3	Leases of property leased by or to the school	No	6 years	SECURE DISPOSAL	(N/A – Maintained PRU)
4.1.4	Records relating to the letting of school premises	No	6 years	SECURE DISPOSAL	

4.2 Maintenance - Agreed retention date 6 years					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
4.2.1	All records relating to the maintenance of the school carried out by contractors	No	6 years	SECURE DISPOSAL	
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No	6 years	SECURE DISPOSAL	

5. Pupil Management

At this school we have decided to retain pupil information in line with the requirements under Special Educational Needs until the child reaches the age of 25.

5.1 Pupil's Educational Record - Agreed retention date **when the child reaches 25 / Safeguarding 25**

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes			
	Primary		Until the child reaches 25	There is an option for the file to follow the child to high school.	
5.1.2	Examination Results – Pupil Copies	Yes	Until the child reaches 25	All uncollected certificates should be returned to the examination board.	
5.1.3	Child Protection information held on pupil file		Until the child reaches 25	SECURE DISPOSAL	
5.1.4	Child protection information held in separate files		Until the child reaches 25	SECURE DISPOSAL	

5.2 Attendance - Agreed retention date **when the child reaches 18**

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.2.1	Attendance Registers	Yes	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL	
5.2.2	Correspondence relating to authorized absence		Current academic year + 2 years (Until the child reaches 25 in accordance with CPOMS)	SECURE DISPOSAL	

5.3 Special Educational Needs - Agreed retention date when the child reaches 25					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Until the child reaches 25	SECURE DISPOSAL	
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Until the child reaches 25	SECURE DISPOSAL	
5.3.3	Advice and information to parents regarding educational needs		Until the child reaches 25	SECURE DISPOSAL	

5.4 Educational Visits outside the Classroom - Agreed retention date when the child reaches 25					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.4.3	Parental consent forms for school trips where there has been no major incident	Yes	Until the child reaches 25	SECURE DISPOSAL	
5.4.4	Parental permission slips for school trips – where there has been a major incident	Yes	Until the child reaches 25	SECURE DISPOSAL	

5.5 Curriculum Management - Agreed retention date when the child reaches 25					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.5.1	Curriculum Returns	Yes	Until the child reaches 25	SECURE DISPOSAL	
5.5.2	Examination Results/SATS	Yes	Until the child reaches 25	SECURE DISPOSAL	
5.5.3	Schemes of Work	No	Current year	SECURE DISPOSAL	
5.5.4	Class Record Books	No	Current year	SECURE DISPOSAL	
5.5.5	Pupils' Work	No	Where possible pupils' work should be returned to the pupil at the end of the academic year or disposed of.	SECURE DISPOSAL	

Appendix A – List of School Records and Data safely destroyed

School name: _____

Review completed by: _____

Date: _____

Approved by Headteacher: _____

Date: _____

The following sheet can be completed or alternatively documented in a spreadsheet.

Ref Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of destruction	Confirm (i) Safely destroyed (ii) In accordance with Data Retention Guidelines Tick (✓)
<i>e.g.</i>	<i>School Invoices</i>	<i>Copies of purchase invoices dated 2011/12</i>	<i>Folders marked "Purchase Invoices 2011/12" 1 to 3</i>	<i>3 Folders</i>	<i>Shredding</i>	✓
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						

Ref Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of destruction	<u>Confirm</u> (i) Safely destroyed (ii) In accordance with Data Retention Guidelines Tick (✓)
13						
14						