



## Data Retention Policy



Chelsea Community Hospital School

DATE JULY 2023

THIS IS A **DATA RETENTION** POLICY FOR CHELSEA COMMUNITY HOSPITAL SCHOOL WHICH HAS BEEN WRITTEN IN CONSULTATION WITH REPRESENTATIVES FROM THE WHOLE SCHOOL COMMUNITY INCLUDING STAFF, GOVERNORS, RESPECTIVE HEALTH TRUSTS, LOCAL AUTHORITY, PUPILS AND PARENTS.

# **School Mission Statement**

**The Chelsea Community Hospital School aims to ensure that children and young people have their rights to education preserved as hospital school pupils, community pupils or home tuition pupils.**

**We aim to provide a broad and balanced curriculum, in line with the National Curriculum, taking into consideration each student's individual needs, and through this to extend the development of the whole child, spiritually, socially and intellectually.**

**We firmly believe that education is a partnership between school and home, and we actively seek parental involvement in the learning process.**

## **SCHOOL BACKGROUND INFORMATION**

- We are a Community Special School providing education for students and young people while they are in hospital.
- We also provide places for a number of pupils who cannot access mainstream school due to their medical conditions.
- Our school is based across six NHS hospital sites in central London as well as a site for community pupils, they are: The Chelsea and Westminster Hospital, The Royal Brompton Hospital, St. Mary's Hospital, The Collingham Child and Family Centre, Lavender Walk Adolescent Unit and The Bayswater Children's Center for our community pupils. We also work with children and young people in their home settings when necessary.
- We teach across all key stages in both primary and secondary.

## **TOTAL NO. OF PUPILS**

Variable due to hospital admissions.

## **DISSEMINATION**

Key information from this policy will be incorporated into the following documents where appropriate:

- School website
- Staff induction materials
- Governor induction materials
- Pupil documentation
- Newsletters
- Staff meetings
- Parent events
- On request from the school office

POLICY IMPLEMENTATION DATE

**July 2018**

POLICY REVIEW DATE

**July 2023**

NAME: Marie Sherlock

DATE: July 2023

## **DATA RETENTION POLICY**

### **1. The purpose of the Retention Policy**

This Retention Policy sets down the length of time records need to be retained and the action taken when the specified retention period has lapsed. The guidelines followed are set out by the Information and Records Management Society.

Staff members are expected to manage their current record keeping systems using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems. This refers to all information, regardless of the media in which they are stored.

The retention periods should be communicated with data subjects when data requests are made.

### **2. Methods of Disposal**

- All paperwork containing personal or sensitive information should be cross shredded.
- Where records are considered worthy of permanent preservation Record Office, RBKC should be contacted directly and arrangements made.
- Records relating to pupils leaving the school during the academic year must be forwarded immediately to the next school. For pupils moving to secondary school the records are to be forwarded prior to the end of term.

CHILD PROTECTION				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
Child Protection Files	Yes	Safeguarding Children in Education	DOB + 25 years	SECURE DISPOSAL
Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code. Records of Disciplinary and Grievance. Education Act guidance "Dealing with Allegations of Abuse against Teachers and Other Staff"	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer.	SECURE DISPOSAL

GOVERNORS				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
Complain Files	Yes		Date of resolution + 6 years	Retain in school for the first six years. Review for further retention in the case of contentious disputes. SECURE DISPOSAL routine complaints
Annual Reports required by the Department for Education	No	Education (Governors' annual reports) (England)(Amendment) Regulations 2002.SI 2002 No 1171	Date of Report + 10 years	

Proposal for schools to become, or be established as Specialist Status Schools	No			Current year + 3 years
Minutes				
Principal Set (Signed)	No		Permanent	Retain in school for 6 years from date of meeting
Inspection Copies	No		Date of meeting + 3 years	SECURE DISPOSAL (If these minutes contain any sensitive information they should be shredded)
Agendas	No		Date of meeting	SECURE DISPOSAL
Reports	No		Date of report + 6 years	Retain in school for 6 years from date of meeting
Instruments of Government	No		Permanent	Retain in school whilst school is open
Action Plans	No		Date of action plan + 3 years	SECURE DISPOSAL
Policy Documents	No		Expiry of policy	Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)

MANAGEMENT				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
Log Books	Yes		Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry
Minutes of the Senior Management Team and other internal administrative bodies	Yes		Date of meeting + 5 years	Retain in the school for 5 years from meeting
Reports made by the head teacher or the management team	Yes		Date of report + 3 years	Retain in the school for 3 years from meeting
Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Closure of file + 6 years	SECURE DISPOSAL
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	No		Date of correspondence + 3 years	SECURE DISPOSAL
Professional Development Plans	Yes		Closure + 6 years	SECURE DISPOSAL

School Development Plans	Yes		Closure + 6 years	Review
Admissions – if the admission is successful	Yes		Admission + 1 year	SECURE DISPOSAL
Admissions – if the appeal is unsuccessful	Yes		Resolution of case + 1 year	SECURE DISPOSAL
Proofs of address supplied by parents as part of the admissions process	Yes		Current year + 1 year	SECURE DISPOSAL

PUPILS				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
Admission Registers	Yes		Date of last entry in the book (or file) + 6 years Re consider Retention period. Feedback from Teaching Relative was thought to be 7 year retention. These records are no longer generated in paper but electronically held using SIMS BROCON software	Retain in the school for 6 years from the date of the last entry then consider transfer to the Archives
Attendance Registers	Yes		Date of register + 3 years	SECURE DISPOSAL (If these records are retained)



				electronically any back up copies should be destroyed at the same time)
Pupil files retained in schools	Yes			
<ul style="list-style-type: none"> <li>Primary</li> </ul>			Retain for the time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school. In the case of exclusion it may be appropriate to transfer the record to the pupil referral unit.
Pupil Files	Yes			
<ul style="list-style-type: none"> <li>Secondary</li> </ul>			Retain for the time which the pupil remains at the secondary school	Transfer to the 6 <sup>th</sup> Form or college (or other secondary school) when the pupil leaves the school. In the case of exclusion it may be appropriate to transfer the record to the Pupil Referral Unit
Special Educational Needs files, reviews and individual education plans	Yes		DOB of the pupil + 25 years the review NOTE: The retention period is the minimum period	SECURE DISPOSAL

			that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a “failure to provide sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period	
Correspondence Relating to Authorised Absences and Issues	No		Date of absence + 2 years	SECURE DISPOSAL
Examination results	Yes			
• Public	No		Year of examinations + 6 years	SECURE DISPOSAL
• Internal examination results	Yes		Current year + 5 years	SECURE DISPOSAL
Any other records created in the course of contact with pupils	Yes/No		Current year + 3 years	Review at the end of 3 years and either allocate a further retention period or SECURE DISPOSAL

Statement maintained under The Education Act 1996 – Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SECURE DISPOSAL unless legal action is pending
Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SECURE DISPOSAL unless legal action is pending
Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 1	Closure + 12 years	SECURE DISPOSAL unless legal action is pending
Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 1	Closure + 12 years	SECURE DISPOSAL unless legal action is pending
Parental Permission slips for school trips – where there has been no major incident	Yes		Conclusion of the trip	SECURE DISPOSAL
Parental Permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years The permission slip for all pupils on the trip need to be retained to show pupils that the rules had been followed for all pupils	SECURE DISPOSAL

FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
School Development Plan	No		Current year + 6 years	SECURE DISPOSAL
Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
Timetable	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
Class record books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
Mark books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
Record of	No		Current year + 1	It may be

homework set			year	appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
Pupils' work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL

CURRICULUM				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
Examination results	Yes		Current year + 6 years	SECURE DISPOSAL
SATS records – Examination Papers and Results	Yes		Current year + 6 years	SECURE DISPOSAL
PAN Reports	Yes		Current year + 6 years	SECURE DISPOSAL
Value Added & Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
Self-Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL

PERSONNEL RECORDS HELD IN SCHOOLS				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
Timesheets, sick pay	Yes	Financial	Current year + 6	SECURE DISPOSAL

		Regulations	years	
Staff Personal Files	Yes		Current year + 6 years	SECURE DISPOSAL
Interview notes and recruitment records	Yes		Current year + 6 years	SECURE DISPOSAL
Pre – employment vetting information (including CRB checks)	Yes	CRB Guidelines	Current year + 6 years	SECURE DISPOSAL
Disciplinary Proceedings	Yes	When the warning relates to a child protection issue see 1.2. If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice.	Current year + 6 years	SECURE DISPOSAL
<ul style="list-style-type: none"> <li>• Oral Written Warnings</li> </ul>			Date of warning + 6 months	SECURE DISPOSAL
<ul style="list-style-type: none"> <li>• Written warning – level one</li> </ul>			Date of warning + 6 months	SECURE DISPOSAL
<ul style="list-style-type: none"> <li>• Written warning – level two</li> </ul>			Date of warning + 12 months	SECURE DISPOSAL
<ul style="list-style-type: none"> <li>• Final Warning</li> </ul>			Date of warning + 18 months	SECURE DISPOSAL
<ul style="list-style-type: none"> <li>• Case not found</li> </ul>			If child protection related please see 1.2 otherwise SECURE DISPOSAL immediately at the conclusion of	SECURE DISPOSAL

			the case	
Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
Annual appraisal/assessment records	No		Current year + 5 years	SECURE DISPOSAL
Salary cards	Yes		Last date of employment + 85 years	SECURE DISPOSAL
Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999(SI 1999/S67)	Current year + 3 years	SECURE DISPOSAL
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SECURE DISPOSAL
Proofs of identify collected as part of the process of checking "portable" enhanced CRB 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 member of staff's personnel	

			file.	
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ADMINISTRATIVE				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
Employer's liability certificate			Closure of the school + 40 years	SECURE DISPOSAL
Inventories of equipment and furniture			Current year + 6 years	SECURE DISPOSAL
General file series			Current year + 5 years	Review to see whether a further retention period is required
School brochure or prospectus			Current year + 3 years	
Circulars (staff/parents/pupils)			Current year + 1 year	SECURE DISPOSAL
Newsletters, ephemera			Current year + 1 year	Review to see whether a further retention period is required
Visitors books			Current year + 2 years	Review to see whether a further retention period is required
PTA/old pupil associations			Current year + 6 years	Review to see whether a further retention period is required

FINANCE				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
		Financial regulations	Current year + 6 years	
		Financial regulations	Date of last payment on loan + 12 years	Review to see whether a further retention period is required
Contracts				



• Under seal			Contract completion date + 12 years	SECURE DISPOSAL
• Under signature			Contract completion date + 6 years	SECURE DISPOSAL
• Monitoring records			Current year + 2 years	SECURE DISPOSAL
Copy orders			Current year + 2 years	SECURE DISPOSAL
Budget reports, budget monitoring etc			Current year + 3 years	SECURE DISPOSAL
Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	SECURE DISPOSAL
Annual budget and background papers			Current year + 6 years	SECURE DISPOSAL
Order books and requisitions			Current year + 6 years	SECURE DISPOSAL
Delivery Documentation			Current year + 6 years	SECURE DISPOSAL
Debtors' Records		Limitation Act 1980	Current year + 6 years	SECURE DISPOSAL
School Fund – Cheque books			Current year + 3 years	SECURE DISPOSAL
School Fund – paying in books			Current year + 6 years then review	SECURE DISPOSAL
Schools Fund - Ledger			Current year + 6 years then review	SECURE DISPOSAL
School Fund - Invoices			Current year + 6 years then review	SECURE DISPOSAL
School Fund – Receipts			Current year + 6 years	SECURE DISPOSAL
School Fund – Bank statements			Current year + 6 years then review	SECURE DISPOSAL
School Fund – School Journey books			Current year + 6 years then	SECURE DISPOSAL

			review	
Student grant applications			Current year + 3 years	SECURE DISPOSAL
Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL

PROPERTY				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
Plans			Permanent	Retain in school whilst operational
Maintenance and contractors		Financial Regulations	Current year + 6 years	SECURE DISPOSAL
Leases			Expiry of lease + 6 years	SECURE DISPOSAL
Lettings			Current year + 3 years	SECURE DISPOSAL
Burglary, theft and vandalism report forms			Current year + 6 years	SECURE DISPOSAL
Maintenance log books			Current year + 6 years	SECURE DISPOSAL
Contractors' Reports			Current year + 6 years	SECURE DISPOSAL

LOCAL AUTHORITY				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
Secondary transfer sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
Circulars from LEA			Whilst required operationally	Review to see whether a further retention period is required

DEPARTMENT FOR CHILDREN, SCHOOLS AND FAMILIES				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
HMI reports			These do not need to be kept any longer	
OFSTED reports and papers			Replace former report with any new inspection report	Review to see whether a further retention period is required
Returns			Current year + 6 years	SECURE DISPOSAL
Circulars from Department of Children, Schools and Families			Whilst operationally required	Review to see whether a further retention period is required

SCHOOLS MEALS				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
Dinner Register			Current year + 3 years	SECURE DISPOSAL
Schools Meals Summary Sheets			Current year + 3 years	SECURE DISPOSAL

FAMILY LIAISON OFFICERS AND HOME SCHOOL LIAISON ASSISTANTS				
FILE DESCRIPTION	DATA PROTECTION ISSUES	STATUTORY PROVISIONS	RETENTION PERIOD (OPERATIONAL)	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF RECORD
Day Books	Yes			SECURE DISPOSAL
Reports for outside agencies – where the	Yes		Whilst the child is attending the school then	SECURE DISPOSAL

report has been included on the case file created by the outside agency			destroy	
Referral Forms	Yes		Whilst the referral is current	SECURE DISPOSAL
Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	DELETE

### **Links with other policies**

#### **This policy is linked to our:**

Data Protection Policy

CCHS Privacy notices for Staff, Pupils, Governors, Volunteers & Visitors

Freedom of Information Policy

Behaviour Policy

Finance Policy

Curriculum Policy