



Document Retention Policy

1. INTRODUCTION

- 1.1. The main aim of this policy is to enable the HawleyHurst School to manage our records effectively and in compliance with data protection and other regulation. As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.
- 1.2. HawleyHurst School is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.
- 1.3. The table opposite sets out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.
- 1.4. For information, the Appendix sets out the legal requirements for certain categories of document. Where we have decided to keep information longer than the statutory requirement, this has been explained in the table at Section 2.
- 1.5. Section 3 of this policy sets out the destruction procedure for documents at the end of their retention period.
- 1.6. If a document or piece of information is reaching the end of its stated retention period, but you are of the view that it should be kept longer, please refer to the Data Protection Officer who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.



2. DOCUMENT RETENTION PERIOD

DOCUMENT CATEGORY	RETENTION PERIOD	REASON
Staff and applicant Records		
Inc pension records, pay and remuneration records, absence records (inc statutory absences from work), employment relations records.	Maximum 6 years from end of employment	Limitation Act 1970 and Data Protection regulation
Pre-employment records	6 months	ICO Employment Practice Code Independent School Standards Regulations
Pupils		
Educational Record	25 years from date of birth of the child	Data Protection regulation
Child Protection information (on child's file)	Indefinitely	Keeping children safe in education Statutory guidance for schools and colleges September 2016; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children February 2017
Child Protection Information in other files	Indefinitely	Keeping children safe in education Statutory guidance for schools and colleges September 2016; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children February 2017
SEN files	25 years from date of birth of the child	Limitation Act 1980



Education Health and Care Plans	25 years from date of birth of the child	Special Educational Needs and Disability Regulations 2014 Children and families Act 2014, part 3
Statements of Special Educational Needs (now historic)	25 years from date of birth of the child	Originally under Special Educational Needs and Disability Regulations 2001
Attendance registers	3 years from the end of the school year.	Pupil Registration Regulations 2006 Regulation 14
Parents		
	Usually, for the duration that the parent has a pupil at the school. Otherwise subject to case by case justification.	Pupil Registration Regulations 2006



3. DELETION OF DOCUMENTS

- 3.1. When a document is at the end of its retention period, it should be dealt with in accordance with this policy.

Confidential waste

- 3.2. This should be made available for collection in the confidential waste bins or sacks located around the office [or shredded, or state how you get rid of confidential information].
- 3.3. Anything that contains personal information should be treated as confidential.
- 3.4. Where deleting electronically, please refer to the IT department to ensure that this is carried out effectively.

Other documentation

- 3.5. Other documentation can be deleted or placed in recycling bins where appropriate.

Automatic deletion

- 3.6. Certain information will be automatically archived by the computer systems, details of which are set out below. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact the IT department.

Individual responsibility

- 3.7. Much of the retention and deletion of documents will be automatic, but when faced with a decision about an individual document, you should ask yourself the following:
- 3.7.1. Has the information come to the end of its useful life?
 - 3.7.2. Is there a legal requirement to keep this information or document for a set period? (Refer to Appendix 1 for more information)
 - 3.7.3. Would the information be likely to be needed in the case of any legal proceedings? In particular, is it potentially relevant to an historic child abuse enquiry? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)
 - 3.7.4. Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
 - 3.7.5. Is the document of historic or statistical significance?
- 3.8. If the decision is made to keep the document, this should be referred to the Data Protection Officer and reasons given.