



Data Retention Schedule  
25 May 2018

This document forms the data retention schedule for the St Francis of Assisi Academies Trust and is derived from the DFE publication Data protection: a toolkit for schools (April 2018).

## Student information

Data item group	Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
Admissions		X (admissions files)	X (admissions appeals)		<p><b>Admissions files</b></p> <p>Admissions data is used extensively from the period of the school receiving it up until the point where children enrol.</p> <p>It is then used for some validation and cross checking of enrolment details. Once enrolled, the child's records in the MIS become the core record.</p> <p>Data about children who enrolled but didn't get in is useful, but any intelligence gathered from it (for example, where in the city children are interested in our school, or the SEN make up) is aggregated within the first year to a level being non-personal, after that, the detailed data within the admission file could be deleted.</p> <p>It is important to retain detailed data for a year, any appeals for which richer data about other successful/unsuccessful appeals may be relevant typically happen in the first year.</p> <p><b>Information about admissions appeals</b></p> <p>When dealing with appeals, having a reasonable history of any other appeals in some detail can be needed to deal with the particular appeal. The information is needed alongside the admissions policies of the time.</p>

Attainment			X		<p>Formative assessment data is useful as a child is building towards a particular more formal assessment. Once the child leaves the school, it has little value in terms of retention.</p> <p>Summative attainment is the main outcome of what children 'attain' in school. It is important that future schools where pupils go on to learn can understand previous attainment. Whilst often that information is 'passed on' smoothly as children move phase, it is not always the case, and thus retaining the names alongside the main attainment data for 1 year after the pupil has left the school feels proportionate.</p> <p>Trend analysis is important, 3 to 5 years is often the 'trend' people look at, but longer may be relevant. Whilst this must be fully flexible in reporting small sub groups, and the data would wish to be retained at individual level, some personal data (for example, name) could be removed from the data to reduce sensitivity.</p> <p>After 3 to 5 years, then aggregated summaries that have no risk of identifying individuals are all that are typically needed to be retained.</p>
Attendance		X			<p>Attendance data probably resides in some 'operational' systems in schools, such as cashless catering. In these systems, the data should only be retained until the associated business processes have concluded (for example, payment of meals). The start of the next academic year once all bills are settled feels proportionate.</p> <p>Attendance is related to individual attainment and so being able to relate attendance to attainment whilst in our care is important. Keeping it in detailed, individual form for one year after the pupil leaves school support conversations about detailed attendance that may be needed to best support that child.</p> <p>After that period, non-identifiable summary statistics are all that is required to support longer term trend analysis of attendance patterns.</p>

					We noted another GDPR principle here that may apply to attendance. Under data minimisation, where 'paper records' capture attendance, this paper record duplicates the electronic version and is probably required once the paper has been transferred to a stable electronic format.
Behaviour		X			This is all relevant for managing children when with at your school. 1 year allows a period of 'handover' to next institution with conversations supported by rich data if relevant.
Exclusions		X			Exclusion data should be 'passed on' to subsequent settings. That school then has responsibility for retaining the full history of the child. If a private setting or the school is unsure on where the child has gone, then the school should ensure the LA already has the exclusion data.
Identity management and authentication	X (images used for identity management)				
Catering and free school meal management		X (meal administration)	X (free school meal eligibility information)		<p>A short historic record of what a child has had may be useful in case of any food-related incidents at school, or parental queries about the types of meals their children are choosing. Keeping for up to one year also allows time to do accounting work associated with catering. Typically 'one month' may not be enough, but 'one year' feels enough.</p> <p>Due to the way school funding works, free school meal eligibility is a financial matter, and thus keeping this data for 6+1 feels appropriate. This 7- year record also needs to be portable with the pupil, as historic dates can be used for funding.</p>

Trips and activities	X (field file)  X (educational visitors into school)		X (financial information related to trips)	X (major medical events)	<p>Financial information related to trips should be retained for 6 years + 1 for audit purposes. This would include enough child identifiers to be able to confirm contributions.</p> <p>A 'field file' is the information that is taken on a trip by a school. This can be destroyed following the trip, once any medicines administered on the trip have been entered onto the core system. If there is a minor medical incident (for example, a medical incident dealt with by staff in the way it would be dealt with 'within school') on the trip, then adding it into the core system would be done.</p> <p>If there is a major incident (for example, a medical incident that needed outside agency) then retaining the entire file until time that the youngest child becomes 25 would be appropriate.</p> <p>Permission to go on the trip slips will contain personal data, and destroying them after the trip unless any significant incident arises is appropriate, otherwise refer to the policies above.</p> <p>Schools sometimes share personal data with people providing 'educational visits' into school. There should be good policies in place to ensure that the sharing is proportionate and appropriately deleted afterwards.</p>
Safeguarding				X	<p>All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained along with those records.</p>
Special educational needs			X (time at school plus 6 years)		<p>Pupil SEN information is retained in line with statutes of limitation.</p> <p>Anonymised data may be used to inform development of strategies and provision longer term within the school, or with assessment and monitoring data.</p>

Medical information and administration	X (permission slips)	X (medical conditions and ongoing management)		X medical incidents (potentially)	<p>To support any handover work about effective management of medical conditions to a subsequent institution.</p> <p>Permission forms that parents sign should to be retained for the period that medication is given, and for 1 month afterwards if no issue is raised by child/parent. If no issue is raised in that time, that feels a reasonable window to assume all was administered satisfactorily. Adding this policy to the permission slip would seem prudent.</p> <p>Medical ‘incidents’ that have a behavioural or safeguarding angle (including the school’s duty of care) should refer to the retention periods associated with those policies.</p>
Personal identifiers, contacts and personal characteristics	<p>X (images used in identity systems)</p> <p>X (biometrics)</p> <p>X (house number and road)</p>	X (images used in displays in school)	<p>X (postcodes)</p> <p>X (names)</p> <p>X (characteristics)</p>		<p>Images are used for different reasons, and the reason should dictate the retention period. Images used purely for identification can be deleted when the child leaves the setting. Images used in displays etc. can be retained for educational purposes whilst the child is at the school. Other usages of images (for example, marketing) should be retained for and used in line with the active informed consent captured at the outset of using the photograph.</p> <p>Biometric data (typically fingerprints used in things like catering) should be used and retained as set out in the active informed consent gained at the outset, but typically this should not be retained long after the activity that requested its use has finished (for example, the child no longer attends the school to have a meal).</p> <p>As set out in other sections, names are needed for smooth handover to subsequent schools for up to one year.</p>

					<p>Postcode data is useful in analysing longer-term performance trends or how catchment/pupil populations are shifting over time, but full address data (house number and road) is not required for that activity.</p> <p>Schools may well provide references for pupils for up to 3 years after they leave, and so retaining the name in the core pupil record is important (this doesn't mean it needs to be retained in all systems).</p> <p>Keeping names attached to safeguarding files for longer than this may be entirely appropriate – see safeguarding section.</p> <p>Characteristics form an essential part of trend analysis, and so retention is in line with those needs.</p>
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### Business Administration

Data Area	Retention period	Justification
Prospective staff. Includes, but not limited to, application forms, interview records and evaluations etc.	Current academic year plus one year	Retention of data to process any applications and follow up actions, review procedure/trends and revisit in light of potential vacancies.
Current and past staff. Employee file – includes, but is not limited to, employment records, appraisal history, absences etc	Current academic year plus 6 years.	Required to administer core business activities, comply with legal and audit requirements, monitor workforce polices and communicate with staff.
Payroll records	Current academic year plus 6 years	In line with HMRC requirements.
Client/Customer/Supplier	Current academic year plus 6 years	All information with financial links or implications is held in line with HMRC requirements.

Governance documents	Indefinitely	Governance documents are a requirement of the legal operation of the business and are held for the lifespan of the business.
Alumni	Current academic year plus 5 years	Alumnus information is collected voluntarily and with informed consent. Alumnus information is used to inform communication of events or items of interest to former students.
Potential students & parent(s)/carer(s)	Current academic year plus 1 year	Used to monitor expressions of interest, market to potential students and evaluate effectiveness of communication.