



Data Retention Policy

Adopted by Board: 26 June 2018
Review Period: 2yr
Review Date: June 2020
Person responsible for policy: Data Protection Officer

Data Retention Policy

In respect of its processing of personal data, the Organisation will comply with the Data Protection Act 2018, the General Data Protection Regulation 2016/679, and related legislation (together, "Data Protection Laws").

This Data Retention Policy should be read in conjunction with the Organisations Data Protection Policy, which sets out the overall approach to data protection matters and sets out the rationale for why a Data Retention Policy is required for personal data.

The Organisation is under a legal obligation only to keep personal data for as long as needed. Once the personal data is no longer required we will securely delete it. The organisation recognises that the correct and lawful treatment of data will maintain confidence in the Organisation and will provide for a successful working environment.

This Policy applies to all employees, consultants, contractors and temporary personnel hired to work on behalf of the organisation ("Personnel").

All Personnel with access to personal data must comply with this Data Retention Policy. If you have any queries regarding this Policy, please consult your manager and/ or the Data Protection Officer. You are advised that any breach of this Data Retention Policy will be treated seriously and may result in disciplinary action being taken against you.

All Personnel will receive a copy of this Policy when they start and may receive periodic revisions of this Policy. This Policy does not form part of any contract of employment and the Organisation reserves the right to change this Policy at any time. All Personnel are obliged to comply with this Policy at all times.

About this Policy

This Data Retention Policy explains how the Organisation complies with our legal obligation not to keep personal data for longer than we need it and sets out when different types of personal data will be deleted. In particular, it sets out details for the retention of Special Category personal data.

Data Retention Period

The Organisation has assessed the types of personal data that the organisation holds and the purposes for which it used.

There are six main functional areas for which the organisation keeps records as follows:

1. Management and Organisation
2. Legislation & Guidance
3. Students
4. Staff
5. Finance
6. Health & Safety

The records contained within these functional areas provide evidence and information about its business activities and are important for the efficient operation of the organisation.

Management and Organisation

This category comprises records held which relate to the management and organisation of the organisation. Typical records would include the minutes of the Board of Governors, the Senior Management Team and Parent/Teachers Association meetings. Also included are records detailing development, planning and curriculum policies as well as those that demonstrate how the organisation reports to its parents and other organisations. Records may include; Development Plans, the Prospectus, Curriculum policies, Annual Report, Emergency Planning and Business Continuity Plan along with the records of meetings, minutes, and policies documenting the decisions and actions taken within this business function.

Legislation and Guidance

Files maintained under this heading contain papers relating to legislation e.g. the Education Guidance, Bulletins from the Dept. of Education and Education & Library Boards, CCMS etc, correspondence in connection with Statistical Returns and documents relating to Dept of Education Inspections and Reports.

Students

Student Files contain vitally important records which, not only capture the progress of the student throughout their time at the Organisation, but also contain personal details and information beneficial to their well-being within the environment. Such records would include admission data, attendance of the students, timetables and class/tutor groupings, education/progress reports of students, special education needs documentation, child protection information, disciplinary action taken, examination results, careers advice, school trip details and medical records (details of medical conditions where medicines are required to be administered).

Staff

Staff category refers to those records required for the Human Resources Management function within the Organisation. These include staff personnel records (recruitment, interview notes, appointments, training, staff development etc), salary records, induction, sickness records, staff performance review, substitute teacher records and student teachers on teaching practice etc.

Finance

This business function maintains records for a range of financial activities such as annual budgets, budget monitoring, Annual Statement of Accounts, procurement, tender information and prices, reconciliation of invoices, audit reports etc.

Health & Safety

The health and safety of our Students and staff is of paramount importance and such records to support this are kept e.g. Accident/Incident Book, legal/accident/incident forms, risk assessments, fire procedure, CCTV, security system files, health and safety policy statement.

Electronic Records

The legal obligation to properly manage records, including compliance with Data Protection legislation, applies equally to electronic records. **The main considerations for the management of electronic records are therefore the same as those for manual records. They include:**

- Staff must be able to use and access electronic information effectively
- Adequate measures must be in place to ensure all information is stored securely and only available to authorised persons.
- The organisation must be able to demonstrate a record's authenticity by ensuring information cannot be altered when declared a record.
- A system must be in place for disposing of electronic records in line with policy once they are no longer needed.

In addition to the above, sufficient backup/recovery processes must be in place. There must also be a process through which links are created from electronic records to any associated manual records. This is to ensure a full record can be considered when necessary i.e. when decision making, providing access or considering a record for disposal.

The table below sets out the retention periods that the organisation has set for the different departments within the organisation, and the different types of data that they each hold. This list is not exhaustive.

If any member of Personnel considers that a particular piece of personal data needs to be kept for more or less time than the period set out in this policy, please contact the Data Protection Officer for guidance.

Changes to this Policy

The organisation reserves the right to change this policy at any time.

Disposal Schedule (App 1)

1. Management & Organisation

Ref	Record	Minimum Retention Period	Action After Retention
1.1	Board of Governors – general correspondence	Current year + 6 years	Destroy
1.2	BOG Meetings Minutes (master)	Current year + 6 years	Destroy
1.3	Senior Management Meeting Minutes	Current year + 6 years	Destroy
1.4	Staff Meeting Minutes	Current year + 6 years	Destroy
1.5	Development Plan	Retain for 10 years from closure of Plan	Destroy
1.6	School Policies	Retain while current. Retain 1 copy of old policy for 2 years after being replaced	Destroy
1.7	PTA – minutes and correspondence	Current year + 6 years	Destroy
1.8	Visitors Book	Current year + 6 years	Destroy
1.9	Circulars to Staff, Parents and Students	Current year + 3 years	Destroy
1.10	Brochure or Prospectus	Current year + 3 years	Destroy
1.11	Comments/Complaints	5 years after closing. Review for further retention in the case of contentious disputes	Destroy
1.12	Annual Report	Retain for 10 years from date of Report	Destroy
1.13	School / college Fund	Current financial year + 6 years	Destroy
1.14	Emergency Planning/Business Continuity Plan	Until superseded	Destroy

2. Legislation and Guidance

Ref	Record	Minimum Retention Period	Action After Retention
2.2	Circulars, Guidance, Bulletins from DofE	Until superseded	Destroy
2.3	Correspondence re: Statistical Returns to DofE, ESFA	Current financial year + 6 years	Destroy
2.4	DofE Reports, OFSTED & other Inspections	Until superseded	Destroy

3. Students

Ref	Record	Minimum Retention Period	Action After Retention
3.1	Student Admission forms who do not enrol	2 years	Destroy
3.1a	Applications/Admission forms for enrolment	3 years after enrolment	Destroy
3.1b	Transfer applications (Transfer Forms)	3 years after enrolment	Destroy
3.2	Student Attendance Information/Registers	Date of Register + 10 years	Destroy
3.3	Student Education Records/Progress Reports	Until pupil is 23 years old	Destroy
3.4	Student Education Records/Progress Reports (Special Educational Needs)	Until Pupil is 26 years old	Destroy
3.5	Child Protection Information; Record of concerns where case was not referred to Social Services	10 years after last entry on file	Destroy
3.6	Child Protection Information; Social Services investigation outcome was unfounded or malicious	10 years after last entry on file	Destroy
3.7	Child Protection Information; Social Services investigation outcome was inconclusive, unsubstantiated or substantiated	Until student is 30 years old	Destroy

3.8	Disciplinary Action (Suspension/Expulsion)/Offences, bullying	Until student is 23 years old	Destroy
3.9	Disciplinary Action (Suspension/Expulsion)/Offences, bullying (Special Educational Needs)	Until student is 26 years old	Destroy
3.10	Timetables, Class/YR, Student Groupings,	Retain while current	Destroy
3.11	Examination Results	Current year + 6 years	Destroy
3.12	Careers Advice	Current year + 6 years	Destroy
3.13	School/College canteen Meals returns	Current financial year + 6 years	Destroy
3.14	Free Meals registers	Current financial year + 6 years	Destroy
3.15	School/college Trips; Financial & Administration details	Current financial year + 6 years	Destroy
3.16	Trips/Attendance/Staff Supervision	Current financial year + 6 years. In the case of an incident/accident involving a student, retain until student is 23 years old or 26 for a student with special educational needs	Destroy
3.17	Reports of Stolen/Damaged Items	Current financial year + 6 years	Destroy
3.18	Medical Records – records of students with medical conditions and details for the administration of drugs when necessary.	Until student is 23years old or in the case of a Special Needs student, until 26 years old	Destroy

4. Staff

Ref	Record	Minimum Retention Period	Action After Retention
4.1	Staff Personnel Records (including, appointment details, training, staff development etc.)	7 years after leaving employment	Destroy
4.2	Interview notes and recruitment records	Date of interview + 6 months	Destroy
4.3	Staff Salary Records	7 years after leaving employment	Destroy
4.4	Staff Sickness Records (copies of Medical Certs)	Current year + 6 years	Destroy
4.5	Substitute Teacher Records	Current year + 6 years	Destroy
4.6	Substitute Staff Records-non teaching	Current year + 6 years	Destroy
4.7	Student Records-non teaching	Current year + 6 years	Destroy
4.8	Student Teachers on Teaching Practice – student teacher progress	Current year + 6 years	Destroy
4.9	Procedures for Induction of Staff	Until superseded	Destroy
4.10	Staff/Teachers' Attendance Records	7 years after leaving	Destroy
4.11	Staff Performance Review	7 years after leaving	Destroy

5. Finance

Ref	Record	Minimum Retention Period	Action After Retention
5.1	Annual budget and budget deployment	Current financial year + 6 years	Destroy
5.2	Budget Monitoring	Current financial year + 6 years	Destroy
5.3	Annual Statement of Accounts	Current financial year + 6 years	Destroy
5.4	Order Books, Invoices, Bank Records, Cash Books, Till Rolls, etc	Current financial year + 6 years	Destroy
5.5	Postage Book	Current financial year + 6 years	Destroy
5.6	Audit Reports	Current financial year + 6 years	Destroy
5.7	Bursary Information		

6. Health & Safety

Ref	Record	Minimum Retention Period	Action After Retention
6.1	Accident Reporting (Adults)	Date of incident + 7 years	Destroy
6.2	Accident Reporting (students)	Until student is 23 years old or in the case of a Special Needs student, until 26 years old	Destroy
6.3	Risk Assessments – work experience locations/students	7 years	Destroy
6.4	H & S Reports	15 years	Destroy
6.5	Fire Procedure	Until superseded	Destroy
6.6	Security System File	For the life of the system	Destroy