

Data Retention Policy

Chisenhale Primary School



Learning Together for a Better Future

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DATA RETENTION POLICY

The School has a responsibility to maintain its records and record keeping systems. When doing this, the School will take account of the following factors: -

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Their accessibility.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the School's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the School from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect. The School may also vary any parts of this procedure, including any time limits, as appropriate in any case.

DATA PROTECTION

This policy sets out how long employment-related and pupil data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the General Data Protection Regulation (GDPR) and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of the School. The School's Data Protection Policy outlines its duties and obligations under the GDPR.

RETENTION SCHEDULE

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the School will adhere to the standard retention times listed within that schedule.

Paper records will be regularly monitored by School Business Manager/School Administration Officer.

Electronic records will be regularly monitored by School Business Manager/School Administration Officer.

The schedule is a relatively lengthy document listing the many types of records used by the school and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

DESTRUCTION OF RECORDS

Where records have been identified for destruction they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information, or sensitive policy information should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate waste paper merchant. All electronic information will be deleted.

The School maintains a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in this list at least: -

- File reference (or other unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising officer.

ARCHIVING

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. A database of the records sent to the archives is maintained by the School Business Manager. The appropriate staff member, when archiving documents should record in this list the following information: -

- File reference (or other unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising officer.

TRANSFERRING INFORMATION TO OTHER MEDIA

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

RESPONSIBILITY AND MONITORING

The Headteacher has primary and day-to-day responsibility for implementing this Policy. The Data Protection Officer, in conjunction with the School is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The data protection officer will consider the suitability and adequacy of this policy and report improvements directly to management.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

RETENTION SCHEDULE

| FILE DESCRIPTION | RETENTION PERIOD |
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| Employment Records | |
| Job applications and interview records of unsuccessful candidates | Six months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference. In this case, application forms will give applicants the opportunity to object to their details being retained |
| Job applications and interview records of successful candidates | 6 years after employment ceases |
| Written particulars of employment, contracts of employment and changes to terms and conditions | 6 years after employment ceases |
| Right to work documentation including identification documents | 6 years after employment ceases |
| Immigration checks | 6 years after employment ceases |
| DBS checks and disclosures of criminal records forms | As soon as practicable after the check has been completed and the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months. |
| Change of personal details notifications | No longer than 6 months after receiving this notification |
| Emergency contact details | 6 years after employment ceases |
| Personnel and training records | While employment continues and up to 6 years after employment ceases |
| Annual leave records | Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year |
| Consents for the processing of personal and sensitive data | For as long as the data is being processed and up to 6 years afterwards |
| Disciplinary records | <p>Oral warning – date of warning + 6 mths</p> <p>Written warning level 1 – date of warning + 6 mths</p> <p>Written warning level 2 – date of warning + 12 mths</p> <p>Final warning - date of warning + 18 mths</p> |
| Training records | 6 years after employment ceases |

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| Allegations of a child protection nature against a member of staff including where the allegation is founded | 10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Allegations should be disposed of, if case not found, immediately at the conclusion of the case. |
| Financial and Payroll Records | |
| Pension records | Current year + 6 |
| Retirement benefits schemes – notifiable events (for example, relating to incapacity) | Current year + 6 |
| Payroll and wage records | 6 years after end of tax year they relate to |
| Maternity/Adoption/Paternity Leave records | 6 years after end of tax year they relate to |
| Statutory Sick Pay | 6 years after the end of the tax year they relate to |
| Current bank details | No longer than necessary |
| All records covered by the Financial Regulations: Annual accounts & background paperwork, annual budget and background paperwork | Current year + 6 |
| PTA documentation/finance | Current year + 6 |
| Agreements and Administration Paperwork | |
| Collective workforce agreements and past agreements that could affect present employees | Permanently |
| Trade union agreements | 10 years after ceasing to be effective |
| School Development Plans | Current year plus 6 years |
| Professional Development Plans | 6 years after employment ceases |
| Visitors and staff inventory signing-in system | Current year plus 6 years |
| Newsletters and circulars to staff, parents and pupils | Electronic - current year plus 1 year Removed to Archive drive |
| Health and Safety Records | |
| Health and Safety consultations | Permanently |

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| Health and Safety Risk Assessments | 3 years from the life of the risk assessment |
| Any reportable accident, death or injury in connection with work | For at least 25 years from the date the report was made |
| LBTH Air Forms - Accident reporting | Adults - 7 years from the date of the incident Children - when the child attains 25 years of age. |
| School Accident/Incident/Illness Report Form | 3 years |
| Fire precaution log books | Current year plus 6 years |
| Medical records and details of: - <ul style="list-style-type: none"> control of lead at work employees exposed to asbestos dust records specified by the Control of Substances Hazardous to Health Regulations (COSHH) | 40 years from the date of the last entry made in the record Current year + 10 year, where appropriate an additional retention period maybe allocated |
| Records of tests and examinations of control systems and protection equipment under COSHH | 10 years from the date on which the record was made |
| Temporary and Casual Workers | |
| Records relating to hours worked and payments made to workers | 6 years after end of tax year they relate to |
| Pupil Records | |
| Admissions records | Electronically kept on MIS system for 7 years once pupil has left the school |
| Admissions register | Entries to be preserved for 7 years after the date of entry |
| School Meals Registers | Parentpay - retained for 1 year after the pupil has left the school. Financial records kept for 7 years Electronically kept on MIS system for 7 years once pupil has left the school |
| Free School Meals Registers | Same as school meals register as above |
| Pupil Record - Hardcopy | Retain for the time which the pupil remains at the primary school. Transfer to the secondary when the child leaves the school |
| Attendance Registers | Electronically kept on MIS system for 7 years once pupil has left the school Hardcopy to keep for 1 complete academic year |
| Special Educational Needs files, reviews and individual education plans (this | DOB plus 30 years |

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| includes any statement and all advice and information shared regarding educational needs) | |
| Pupil inventory signing-in system | Current year plus 6 years |
| Emails | |
| School email system is provided by LGFL | <p>Emails are retained indefinitely within each email account.</p> <p>Deletion and archiving is controlled manually by the individual user.</p> <p>Archive retention is indefinite, unless manually configured to delete.</p> <p>Deleted emails can be recovered up to 30 days after deletion.</p> <p>For emails or accounts that are beyond 30 days deletion – LGFL have a central retention policy of 1 year from date the item was removed.</p> |
| Staff work email addresses | <p>Staff to clear emails every 3 years if there are no legitimate reasons for keeping them.</p> <p>Staff to create subfolders for emails that they wish to keep.</p> <p>School email address is disabled on date of leaving employment</p> |
| Photos | |
| Pupil Photos | <p>Photos on MIS systems kept for 7 years once pupil has left</p> <p>Photos on the server transferred to archive drive and deleted after 7 years once pupil has left</p> |

These retention periods are in line with The Information & Record Management Society Retention Guidelines for Schools (version 4)