



## **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 Data and Office Manager under the direction of the Business Manager.

Electronic records will be regularly monitored by Data and Office Manager under the direction of the Business Manager.

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 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 Business Manager 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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| <b>Employment Records</b>   |   |
| Job applications and interview records of unsuccessful candidates   | Six months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their forms 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  | 2 years after employment ceases   |
| Immigration checks  | Two years after the termination of employment   |
| 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  | 6 years after employment ceases   |
| Emergency contact details   | Destroyed on termination  |
| Personnel and training records  | While employment continues and up to six years after employment ceases  |
| Annual leave records  | 2 years after the termination of employment.  |
| Consents for the processing of personal and sensitive data  | For as long as the data is being processed and up to 6 years afterwards   |
| Working Time Regulations: <ul style="list-style-type: none"> <li>• Opt out forms</li> <li>• Records of compliance with WTR</li> </ul> | <ul style="list-style-type: none"> <li>• Two years from the date on which they were entered into</li> <li>• Two years after the relevant period</li> </ul>  |
| Disciplinary and training records   | 6 years after employment ceases   |
| 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). Unfounded or malicious allegations should be removed.   |



| <b>Financial and Payroll Records</b>   |  |
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| Pension records  | 12 years   |
| Retirement benefits schemes – notifiable events (for example, relating to incapacity)                  | 6 years from the end of the scheme year in which the event took place                                |
| Payroll and wage records   | 6 years after end of tax year they relate to   |
| Maternity/Adoption/Paternity Leave records   | 3 years after end of tax year they relate to   |
| Statutory Sick Pay   | 3 years after the end of the tax year they relate to   |
| Current bank details   | No longer than necessary. These are transferred to Ealing payroll.                                   |
| <b>Agreements and Administration Paperwork</b>   |  |
| 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   | 3 years from the life of the plan  |
| Professional Development Plans   | 6 years from the life of the plan  |
| Visitors signing in records  | 6 years  |
| Newsletters and circulars to staff, parents and pupils   | Minimum of 1 year  |
| <b>Health and Safety Records</b>   |  |
| Health and Safety consultations  | Permanently  |
| 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 twelve years from the date the report was made  |
| Accident reporting   | Adults – 6 years from the date of the incident<br>Children – when the child attains 25 years of age. |
| Fire precaution log books  | 6 years  |
| Medical records and details of: -<br>· control of lead at work<br>· employees exposed to asbestos dust | 40 years from the date of the last entry made in the record  |

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| records specified by the Control of Substances Hazardous to Health Regulations (COSHH)  |  |
| Records of tests and examinations of control systems and protection equipment under COSHH   | 5 years from the date on which the record was made   |
| <b>Temporary and Casual Workers</b>   |  |
| Records relating to hours worked and payments made to workers   | 3 years  |
| <b>Pupil Records</b>  |  |
| Admissions records  | 1 year from the date of admission  |
| Admissions register   | Entries to be preserved for three years from date of entry   |
| Free School Meals Registers   | 6 years  |
| Pupil Record  | Whilst the pupil is on roll, then transferred to next primary or high school. The school reserves the right to retain data for longer in circumstances which it deems to be exceptional. |
| Attendance Registers  | Whilst the pupil is on roll and for three years after leaving  |
| Special Educational Needs files, reviews and individual education plans (this includes any statement and all advice and information shared regarding educational needs) | Transferred to next primary or high school where they will be retained until the subject turns 25.   |
| <b>Emails</b>   |  |
| Relating to employment, appraisal or disciplinary action in respect of individual staff members   | For the duration of their employment   |
| Day to day operational emails mentioning staff members or pupils or parents/carers  | Delete annually or ad hoc unless falling into the employment, appraisal or disciplinary category   |
| Email correspondence from parents/carers  | Significant emails will be attached to MIS pupil records and deleted from email inboxes within one year.   |
| <b>Text messages and phone calls</b>  |  |
| Sickness absence messages   | To be deleted once sickness absence has been recorded  |

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| Audio Recordings of Incoming and Outgoing Telephone Calls | To be deleted within 14 working weeks of recording. |
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