# CLEARlogoBELVUE SCHOOL 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 the Business Leader. Electronic records will be regularly monitored by the Business Leader.

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 must 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. The destruction of records can only be authorised by the Headteacher, Business Leader or Deputy Headteacher.

When destroying documents, the appropriate member of the administration team, either the pupil and personnel support officer for the main Belvue site or the Key stage 5 administration manager for the Carr Road site, 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

Due to space restrictions, the school has recently transferred all documents from the archive storage into electronic format. They have been scanned by two separate companies, firstly the London Borough of Ealing document management centre and more recently by The Clear Data Group. The electronic files are saved on memory sticks and stored in the school safe. The original paper files have been shredded.

A database of the records in the electronic archives is maintained by the Pupil and Personnel support officer in the main school office. When archiving the documents, the officer 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.

Once a term the pupil and personnel officer will go through the electronic archive files and organise for any files that have completed the retention periods to be destroyed in accordance with the policy.

# TRANSFERRING INFORMATION TO OTHER MEDIA

The school has identified the need to investigate the feasibility of managing and archiving documents in a cloud storage system as part of the school expansion programme. This is due to the lack of space on the school sites. This project has incorporated this in the coming two year’s budget plan priorities. The lifespan of the media and the ability to migrate data where necessary will need to be considered. In the meantime the school continues to hold paper files for current pupils and staff and scanned electronic files for leavers until the retention period has expired.

# RESPONSIBILITY AND MONITORING

The Head Teacher 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

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| **FILE DESCRIPTION** | | **RETENTION PERIOD** |
| **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 | | 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 | | No longer than 6 months after receiving this notification |
| Emergency contact details | | Destroyed on termination |
| Personnel and training records | | While employment continues and up to six 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 |
| Working Time Regulations:   * Opt out forms * Records of compliance with WTR | | * Two years from the date on which they were entered into * Two years after the relevant period |
| 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). This should be kept under review.  Malicious allegations should be removed. |
| **Financial and Payroll Records** | | |
| 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 | |
| **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 | 3 years from the life of the plan | |
| Professional Development Plans | 6 years from the life of the plan | |
| Visitors Book and Signing In Sheets | 6 years | |
| Newsletters and circulars to staff, parents and pupils | 1 year | |
| **Health and Safety Records** | | |
| 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  Children – when the child attains 25 years of age. | |
| Fire precaution log books | 6 years | |
| Medical records and details of: -   * 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 | |
| Records of tests and examinations of control systems and protection equipment under COSHH | 5 years from the date on which the record was made | |
| **Temporary and Casual Workers** | | |
| Records relating to hours worked and payments made to workers | 3 years | |
| **Pupil Records** | | |
| Admissions records | 1 year from the date of admission | |
| Admissions register | Entries to be preserved for three years from date of entry | |
| School Meals Registers | 3 years | |
| Free School Meals Registers | 6 years | |
| Attendance Registers | 3 years from the date of entry | |
| Special Educational Needs files, reviews and individual education plans (this includes any statement and all advice and information shared regarding educational needs)  Child Safeguarding Records to be kept for same retention periods but in a separate file (in line with Keeping Children Safe in Education Guidance) | Until the child turns 25.  Until the child turns 30. | |
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Author C Preston

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