

Data Retention Policy 2023-2024

Please be aware that, under the terms of The Independent Inquiry into Child Sexual Abuse (the Goddard Inquiry), it is an offence to destroy any records that might be of relevance to the inquiry: https://www.iicsa.org.uk/sites/default/files/retention-instructions-and-data-protection-requirements.pdf. This overrides all business, statutory, regulatory or legal retention requirements, including data protection requirements and the data subject's right to erasure. It is anticipated that upon conclusion of the inquiry, further guidance regarding retention will be published.

1. Managing Records Retention

The fifth data protection principle states that "Personal data must be kept for no longer than is necessary for the purposes for which it is processed". Therefore, all records, in all formats, should be subject to an applicable retention period, as defined by business, statutory, regulatory, legal or historical requirements.

The Bursar is responsible for records management, with responsibility for ensuring records are retained, reviewed and destroyed in accordance with requirements, and as soon as possible once their lifespan has expired. The local review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained for ongoing business or legal purposes.

All records in all formats must be assigned a retention period and disposal data, either upon creating or when they cease to be in active use, in accordance with this policy. A system is implemented to routinely identify records as soon as they reach their disposal date. This may form part of an electronic record-keeping system or a manual system.

Disposal must be carried out in a timely manner to:

- Ensure compliance with business and legal retention requirements
- Improve the efficiency of the record keeping system
- Free up storage space
- Reduce associated storage and management costs

Destruction must include all backup and duplicate copies, in all formats. This is especially vital for personal information which may be kept in various hybrid record keeping systems.

2. Principles of Disposal

This policy is communicated to all employees and reinforced annual to avoid any possible data breach or the requirements to provide material in a Data Subject Access request or Freedom of Information request.

The disposal methods must be applicable to the content and format of the information. Paper and electronic records should be disposed of separately, i.e. floppy disks, CDs, DVDs, tapes, USBs, etc should not be put into confidential waste containers containing paper as they require different disposal methods and could damage shredding equipment.

Destruction must be undertaken in a way that preserves the confidentiality of the information and which makes it permanent unreadable or unable to be reconstructed or re-instated. Special care should be taken when destroying personal, sensitive or commercial information and confidentiality should be paramount at all stages of the process.

3. Destruction of Records by Type

3.1. Paper Records

All hard copies of official records and those containing personal data must be destroyed using confidential methods rather than being placed in general waste bins skips, which could result in a data breach. Specialist companies can provide confidential waste bins and other services to ensure records are disposed of in an appropriate way or office shredders should be used.

3.2. Electronic and Other Media Records

Deletion of electronic records should be managed in the same manner as paper records. Records should be routinely identified for deletion and should be authorised by the relevant senior officer. Before deletion, it must be determined that all legal and business requirements have expired, and that there is no related litigation or investigation. Records must be securely deleted in accordance with the School's security policy. Process must be in place to ensure that all backups and copies are included in the deletion process.

4. Transfer of Information to Other Media

Where lengthy retention periods have been allocated to records, the School may wish to consider converting paper records to an alternative format, such as microfilm or digital media.

Consideration should also be given to the legal admissibility of records that have been converted from paper to electronic media. It is essential to have procedures in place so that conversion is done in a standardised fashion to ensure the quality of the electronic version. The School must be able to evidence that the electronic version is a genuine copy of the original, and that the integrity of the data has not been compromised.

5. Retention Periods

The School follows the IRMS Toolkit for Schools Information Management Toolkit for Schools.

Type of Record/Document		Retention Period
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Gov	Governing Body			
1.	Records relating to the Appointment of Governors	1.	When the Governor has finished their term of	
2.	Meeting Schedule		office (except where there have been allegations	
	Agendas		concerning children where it should be 25 years)	
4.	Minutes	2.	Current year	
5.	Reports made to Governors	3.	10 years from the date of the meeting	
6.	Register of attendance	4.	10 years from the date of the meeting	
7.	Complaints made to and investigated by the	5.	10 years from the date of the meeting	
	governing body or the headteacher	6.	Date of last meeting+6 year	
8.	Correspondence sent and received by the	7.	Major Complaints – current year+6 years. If	
	Governing Body or Head		negligence involved then current year+15 years.	
9.	Policy documents created and administered by the		If child protection or safeguarding issues are	
	Governing Body		involved then current year+40 years.	
		8.	General correspondence should be retained for	
			current year + 3 years	
		9.	Until superseded	
Gov	vernor Management			
1.	Records relating to the appointment of the clerk to	1.	Date appointment ceases+6 years	
	the Governing Body	2.	Date appointment ceases+6 years	
2.	Records relating to governor declaration against	3.	Date appointment ceases+6 years	
	disqualification criteria	4.	Date appointment ceases+6 years	
3.	Register of business interests	5.	Date appointment ceases+6 years	
4.	Records relating to training required and received	6.	Date appointment ceases+6 years	
	by Governors			
5.	Records relating to the induction programme for			
	new governors			
6.	Governor personnel files			
Ма	nagement of the School			
1.	Log books of activity in the School maintained by a		Date of last entry in the book+6 years	
	member of SLT	2.	Date of the meeting+3 years	
	Minutes of SLT meetings	3.	Date of the report+3 years	
		4.	Current year+3 years	
	Correspondence	5.	Held on individual's personnel record.	
5.	Professional development plans		Termination+6 years	
6.	School Development Plans	6.	Life of the plan+3 years	
7.	Records relating to the creation and publication of	7.	Current year+3 years	
	the prospectus	8.	Current year+1 year	
8.	Records relating to the creation and distribution of		Until superseded+6 years	
	information to staff, parents or pupils	10.	Consent will last whilst the pupil attends the	
	Privacy Notice		school and can be destroyed when the pupil	
	Consents relating to school activities		leaves	
11.	Newsletter and other items with a short	11.	Current academic year+1 year (with a decision	
17	operational use	12	being taken as to whether it should be arch)	
	Visitor Management systems	דר .	6 years	
	nan Resources - Recruitment	1	Unaverage ful emplicante - Data of any sint such	
1.	All records leading up to the appointment of a	1.	Unsuccessful applicants – Date of appointment of successful candidate+6 months. Successful	
-	headteacher			
2.	All records leading up to the appointment of a		applicants – add to personnel file and retain until	
	member of staff/Governor – Unsuccessful candidates		termination+6 years except in the cases of	
	canuludles			

3.	Pre-employment vetting information – successful candidates		negligence or claims of child abuse they at least 15 years
4.	Proof of identity	2.	Date of appointment of successful candidate+6 months
		3.	Retained on personnel file – Termination+6 years
			Retained on personnel file – Termination+6 years
Hui	nan Resources – Operational Staff Management		
	Staff personnel file	1.	Termination+6 years
	Annual appraisal/assessment records	2.	Current Year+6 years
	Sickness absence monitoring	3.	Current Year+6 years
	Staff training	4.	Retained on personnel file – Termination+6 years
Hui	man Resources – Disciplinary and Grievance Proces	ses	· · · · · · · · · · · · · · · · · · ·
1.	Records relating to any allegation of a child	1.	Normal retirement age or 10 years from the
_	protection nature against a member of staff		date of allegation (whichever is longer)
2.	Disciplinary proceedings	2.	
	2.1. Oral warning		2.1. Termination+6 years
	2.2. Written warning		2.2. Termination+6 years
	2.3. Final warning		2.3. Termination+6 years
	2.4. Case not found		2.4. If not related to child protection, dispose of
			at the conclusion of the case
Hui	nan Resources – Payroll and Pensions		
	Absence Record	1.	Current year+3 years
2.	Batches	2.	Current year+6 years
	Additional Hours		Current year
	Expenses		Current year+6 years
	Income tax form P60	5.	Current year+6 years
6.	Insurance	6.	Current year+6 years
7.	Maternity payment		Current year+3 years
	Members allowance register		Current year+6 years
	Payroll		Current year+6 years
	, Sickness records		Current year+3 years
11.	Tax forms		Current year+6 years
Нес	alth and Safety		
1.	Health and Safety Policy	1.	Life of policy+3 years
2.	Risk assessments	2.	Life of risk assessment+3 years
3.	Accident reporting – over 18s	3.	Date of entry+3 years
4.	Accident reporting – under 18s	4.	Date of entry+3 years
5.	RIDDOR reporting	5.	Retained on personnel file – Termination+6 years
	COSHH incident	6.	Date of incident+40 years
	Asbestos register	7.	Last action+40 years
8.	Fire precautions log	8.	Current year+3 years
Fine	ance Management – Risk management and Insura	nce	
1.	Employer's Liability Insurance Certificate	1.	Closure of the School+40 years
	ance Management – Asset Management	·	
1.	Inventories of furniture and equipment	1.	Current year+6 years
1. 2.	Burglary, theft and vandalism report forms	1. 2.	Current year+6 years
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-	ance Management – Accounts and Statements (inc		
1.	Annual accounts	1.	Current year+6 years
2.	Loans and grants managed by the School	2.	Date of last payment on the loan+12 years

management of budgets 4. Current year-6 years 6. Invoices, receipts, order books and requisitions, delivery notices 5. Current year-6 years 6. Records relating to the banking of monies 6. Final payment of debt +6 years 7. Records relating to the identification and collection of debt 1. Current Date pupil leaves+6 years 7. Fine invoices and collection 1. Current Date pupil leaves+6 years 7. Fine invoices and collection 1. Last payment on the contract+6 years 7. Title deeds of property belonging to the School 1. Registered at Land Registry 7. Plans of property belonging to the School 2. Retained whilist the building belongs to the School 8. Records relating to the letting of School premises 3. Expiry of lease+6 years 9. Records relating to the maintenance of the School 1. Retained whilist the building belongs to the School 9. Records relating to the maintenance of the School 1. Retained whilist the building belongs to the School 9. Records relating to the creation and implementation of the School Admissions Policy 2. Date of admission-1 year 9. Admission – speels is unsuccessful 4. Date of entry-3 years 9. Addimission papels is unsuccessful admissions 7. Until appeals process completed 9. Information form – unsuccessful admissions 1. Whilst the child remains at the School	3.	All records relating to the creation and	3.	Life of the budget+3 years
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	2.	Timetable		
	3.	Class record books	3.	

Data Retention Policy 2023-2024

4. M	lark books	4.	Current year+1 year
5. Re	ecord of homework set	5.	Current year+1 year
6. Pu	upil's work	6.	Return with pupil at end of year
Curriculum and Extra Curricular activities – School Trips			
1. Pa	arental Permission – no major incident	1.	End of academic year of trip
2. Pa	arent Permission – Major incident	2.	DOB of pupil involved+25 years

Policy Reviewed by:

Ille

Date : September 2023

Next Review Due: September 2024