



The Societas Trust

Data Retention Policy

Date of Policy	2021
Reviewed and Agreed by	The Directors' Board
Review Date	14 July 2021
Next Review Date	Summer 2022

The Trust and Academies therein have a responsibility to maintain its records and record keeping systems in line with statutory requirements. Records are defined as all those documents that facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically. Records provide evidence for protecting the legal rights and interests of the school and provide evidence or demonstrating performance and accountability. When doing this, the Trust 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 Trust's policy framework and current practice, the requirements of current legislation and best practice and guidance. It may be amended by the Trust 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 Trust may also vary any parts of this procedure, including any time limits, as appropriate in any case.

Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the school's retention guidelines.

RESPONSIBILITY AND MONITORING

The CEO is responsible for monitoring the effectiveness of this policy and dealing with any queries on its interpretation in conjunction with the headteacher at each academy. The suitability and adequacy of this policy will be evaluated on an annual basis in liaison with the DPO, and any recommended improvements will be carried out as part of the policy review process.

The Trust has appointed SBM Services (uk) Ltd as the Data Protection Officer who will advise and update the Trust on the UK GDPR and other data protection laws. They will monitor the Schools compliance with the UK GDPR and recommend internal data protection activities are performed through annual Audits. Their contact details are Unit 12 Park Lane Business Centre, Park Lane, Langham, Colchester. CO4 5WR Tel 01206 671103 info@sbmservices.co.uk

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.

This policy is implemented in accordance with the following school policies and procedures:

- Freedom of Information Policy
- Data Protection Act 2018
- UK GDPR Data Protection Regulation
- Data (Information) Security Policy
- CCTV Policy
- Online Safety Policy
- Safeguarding and Child Protection Policy
- ICT UK GDPR Guide
- Social Networking Policy
- Mobile Phone and Photography Policy

DATA PROTECTION

This policy sets out how long data including 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 UK General Data Protection Regulation (UKGDPR), the Freedom of Information Act 2000 and the Data Protection Act 2018. Data will be stored and processed to allow for the efficient operation of the Trust and the Academies therein. The Trust's Data Protection Policy outlines its duties and obligations under the UK GDPR not to retain data longer than for the purpose to which the data was originally collected.

As a result of the EU exit, completed 1 January 2021, data controllers and processors follow the UK GDPR, and the Data Protection Act 2018, where:

- As UK data controllers, they collect, store or process the personal data of individuals residing in the UK.
- As non-UK data controllers, they offer goods or services to, or monitor the behaviour of, UK residents.

Data controllers and processors follow the EU GDPR where:

- They collect, store or process the personal data of individuals residing in the EU.

THE STORAGE AND SECURITY OF DIGITAL DATA

(Please see Information Security Policy for extended details)

Back-up system: The school will ensure in liaison with the IC Technicians/Consultants that there are regular back-ups of all information held electronically to enable restoration of the data in the event of an environmental or data corruption incident.

The IT Technicians tests the integrity of the back-ups and restoration on a regular basis.

Personal information is not to be stored on the hard drive of any PC unless the device is running encryption software.

Password Control: The school will ensure that data is subject to a robust password protection regime. Password sharing is not encouraged and staff are required to lock their PC's when they are away from their desks to prevent unauthorised use.

The Storage and Security of Hard Copy Data

Storage of Physical records: The Trust recommends that all physical records are stored in lockable filing cabinets drawers and storage areas. Not only is this to protect against unauthorised access but also from Fire and Water Damage

Clear Desk Policy; a clear desk policy is encouraged to avoid unauthorised access to sensitive or personal information.

DISCLOSURE/CONFIDENTIALITY

Staff are made aware of the importance of ensuring that personal information is only disclosed to people who are entitled to receive it and that consideration has been given to the UK General Data Protection Regulations. This is outlined in the Staff Code of Conduct Policy.

DISPOSAL OF DATA AND DESTRUCTION OF RECORDS

Where disposal of information is outlined as secure disposal, this will be shredded and electronic information will be archived. If the record is in need of review prior to disposal then information will be checked for administrative value, a record kept and then destroyed.

Where records have been identified for destruction they should be disposed of in an appropriate way. Where information must be kept permanently this information is exempt from review procedures. 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 using a cross cutting shredder where possible. All other paper records should be disposed of by an appropriate waste paper merchant. All electronic information will be deleted. When using external providers, records should be shredded on site and a certificate of destruction be issued. This also applies to destruction of hardware; the disposal company must provide a certificate of destruction. When performed by the ICT Technicians, a Certificate of Destruction should also be signed and dated.

Records and information that might be of relevance to the Independent inquiry into child sexual abuse will not be disposed of or destroyed.

Electronic copies of any information and files will also be destroyed in line with the retention periods.

- CDs/DVDs/Floppy Discs should be cut into pieces
- Hard discs should be dismantled and sanded.
- Audio/Video Tapes should be dismantled and shredded.

The Trust and Academies therein maintain a record of documents 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 at each academy. 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. Advice should be sought from the IT Representative/Business Manager within the academy.

Retention of Emails

1. All Staff members with an email account will be responsible for managing their inbox.
2. The school's expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in the school's E Safety Policy
3. Group email addresses will have an assigned member of staff who takes responsibility for managing the account and ensuring the correct disposal of all sent and received emails
4. E mails can act as evidence of the school's activities in fulfilling statutory duties so all relevant emails will be retained for at least 12 months.
5. Invoices received and sent in emails will be printed off and retained or saved in dropbox
6. Emails will be automatically deleted after 12 months unless stated otherwise
7. Staff members will review and delete any emails they no longer require at the end of every term
8. Staff members will be aware that the emails they send could be required to fulfil a SAR or FoI request. Emails will be drafted carefully and staff members will review the content before sending
9. Individuals including children have the right to submit an SAR to gain access to their personal data to verify the lawfulness of the processing – this includes accessing emails
10. All SAR's will be handled in accordance with the school's data protection policy
11. Where a SAR has been made electronically, the information will be provided in a commonly used electronic format
12. All FoI requests will be handled in accordance with the school's freedom of information policy
13. Staff members will discuss any queries regarding email retention with the headteacher, or DPO

Please note that reference can be made to the Information Records Management Society www.irms.org.uk .

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 and Electronic records will be regularly monitored by the CEO, CFM and through the Internal Audit Process.

The schedule is a relatively lengthy document listing the many types of records used by the academies and the applicable retention periods for each record type. The retention periods of some of the records are governed by statute and every effort has been made to ensure that they comply with the UK GDPR Guidelines and the Data Protection Act 2018.

RETENTION SCHEDULE

FILE DESCRIPTION	RETENTION PERIOD AND DISPOSAL METHOD
Governance	
<p>Agendas for Governing Board Meetings</p> <p>There may be DP issues if the meeting is dealing confidential issues relating to staff</p>	<p>One copy should be retained with the master signed set of minutes – all other copies can be disposed of securely. (NB – Note any confidential or sensitive items re GDPR issues)</p>
	<p>NB Data Protection issues if the meeting is dealing with confidential issues. One set to be stored securely and kept permanently If Minutes contain any personal information they must be shredded.</p> <p>Inspection copies kept for three years then disposed of securely if they contain any sensitive and personal information</p>
<p>Reports presented to Governing Board that are referred to in the minutes</p>	<p>Reports should be kept for a minimum of 6 years unless they refer to individual reports – these are kept permanently. Keep one copy securely with the signed set of minutes.</p> <p>NB Data Protection issues re Confidential items</p>
<p>Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002 (DP Issues)</p>	<p>Date of meeting plus a minimum of 6 years then securely disposed of</p>
<p>Instruments of Government, including articles of association (DP Issues)</p>	<p>Kept permanently and stored securely</p>
<p>Trusts and Endowments managed by the Governing Board</p>	<p>Kept permanently in the Academy whilst it remains open, then provided to the County Archive services when it closes</p>
<p>Action plans created and administered by Governing Board</p>	<p>Duration of the action plan until superseded or whilst relevant plus three years then securely disposed of.</p>

Policy documents created and administered by the Governing Board	Duration of the policy until superseded or whilst relevant plus three years then securely disposed of. Keep all documents regarding safeguarding and child protection such as exclusion until the IICSA has issued recommendations
Records relating to complaints dealt with by the Governing Board or headteacher (DP Issues)	Date of the resolution of the complaint plus a minimum of six years – reviewed for further retention in case of contentious disputes then securely disposed of If negligence is involved, records are retained for the current academic year, plus 15 years If Child Protection or Safeguarding issues are involved, the records are retained for the current academic year, plus 40 years
Annual Reports created under the requirements of the Education (Governors Annual Reports) (England) (Amendment) Regulations 2002 required for the DfE	Date of the report plus 10 years then securely disposed of
Proposals concerning changing the status of the academy	Date proposal accepted or declined plus three years then securely disposed of
Records relating to the appointment of co-opted governors (DP Issues)	Date of election plus six months
Records relating to the election of the chair and vice chair to the Board (DP Issues)	Destroyed after the decision has been recorded in the minutes
Scheme of Delegation and Terms of Reference for Committees (DP Issues)	Until superseded or whilst relevant and then offered to local archives if appropriate
Meeting Schedule	Current academic year then secure disposal
Register of Attendance at full Governing Body Meetings (DP Issues)	Date of the last meeting of the Academic Year plus 6 years then securely disposed of. This should also be included on the Websites.
Records relating to governing monitoring visits	Date of the visit plus three years then

(DP Issues)	securely disposed of
Academies/Schools converting to Academy Status	Permanent
Correspondence sent and received by the governing board or headteacher (Potential DP Issues)	Current Academic year plus three years then securely disposed of
Records relating to the appointment of the clerk to the governing board (DP Issues)	Date on which the clerk's appointment ends plus 6 years then securely disposed of
Records relating to the terms of office of serving governors, including evidence of appointment (DP Issues)	Date on which the governor's appointment ends plus 6 years then securely disposed of
Records relating to governor declaration against disqualification criteria (DP Issues)	Date on which the governor's appointment ends plus 6 years then securely disposed of
Register of Business Interests (DP Issues)	Date on which the governor's appointment ends plus 6 years then securely disposed of
Governor code of conduct	Classed as dynamic document kept permanently and in the event the academy cease to exists then securely disposed of
Records relating to the training required and received by governors (DP Issues)	Date the governor steps down plus 6 years then securely disposed of
Records relating to the induction programme for new governors (DP Issues)	Date on which the governor's appointment ends plus 6 years then securely disposed of
Records relating to DBS checks carried on the clerk and members of the governing board (DP Issues)	Date of the DBS check plus 6 months ten securely disposed of
Governor Personnel Files (DP Issues)	Date on which the governor's appointment ends, plus 6 years then securely disposed of

Local Authority and Central Government	
Secondary Transfer Sheets DP Issues	Current year plus 2 years then secure disposal
Attendance Returns (DP Issues)	Current year plus 1 year then secure disposal
School Census Returns	Current year plus 5 years then secure disposal
Circulars and other information sent from LA	Operational use then secure disposal
Ofsted Reports and papers	Life of the Report then Review then secure disposal
Returns made to Central Government	Current Year plus 6 years
Circulars and other information sent from central government	Operational use then secure disposal
Property Management	
Title deeds of properties belonging to the school	Permanent, then transferred to new owners if the building is leased or sold. This should follow the property unless the property has been registered with the Land Registry
Plans of property belonging to the school	Retained whilst the building belongs to the school then passed to new owners if building leased or sold
Leases of property leased by or to the school	Expiry of lease plus 6 years then secure disposal
Records relating to the letting of school premises	Current financial year plus 6 years
Valuations of Property	Retained whilst the building belongs to the school then passed to new owners when sold or leased

Property Maintenance	
Records relating to the maintenance of the school carried out by contractors	Retained for as long as the school owns the building and then passed onto any new owners if the building is leased or sold then secure disposal
Records relating to the maintenance of the school carried out by school employees including maintenance logs	For as long as the school owns the building then passed onto any new owners if the building is leased or sold then secure disposal
Risk Management and insurance	
Employers Liability Insurance Certificate	Closure of the school plus 40 years then securely disposed of. Passed to the LA if the academy closes.
Asset Management	
Inventories of furniture and equipment	Current academic year plus 6 years then secure disposal
Reports Forms of Burglary, Theft and Vandalism	Current academic year plus 6 years
Accounts, Statements and Budget Management	
Annual Accounts	Current academic year plus 6 years then disposed of against common legislative standards
Loans and grants managed by the school	Date of last payment of loan plus 12 years then review and securely disposed of
Records relating to the creation of budgets including the annual budget statement and background papers	Life of budget plus 3 years then securely disposed of
Invoices, receipts, order books and requisitions, delivery notes, bacs (cheque) runs	Current financial years plus 6 years then secure disposal
Records relating to the collection and banking of monies	Current financial year plus 6 years then secure disposal

Records relating to the identification and collection of debt	Final Payment plus 6 years then secure disposal
School Fund – Cheque Books, Paying in Books, Ledger, Invoices, Receipts, Bank Statements	Current academic plus 6 years then secure disposal
Admissions Process	
All records relating to the creation and implementation of the School Admissions' Policy	Life of the Policy plus 3 years then a review and secure disposal
Admissions – if the admission is successful DP Issues	Date of admission plus one year then secure disposal
Admissions – if the appeal is unsuccessful DP Issues	Resolution of the case plus one year then secure disposal
Register of Admissions DP Issues	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school.
Proof of address supplied by parents as part of the admissions process (DP Issues)	Current academic year plus one then secure disposal
Supplementary Information form submitted including additional information such as religion, medical conditions etc where the admission was successful (DP Issues)	Information added to pupil file then secure disposal
Supplementary Information form submitted including additional information such as religion, medical conditions etc where the admission was not successful (DP Issues)	Information added to pupil file until the appeals process is complete then secure disposal
Personal Identifiers, contacts and personal characteristics	
Images used for identification purposes	For the duration of the event/activity, or whilst the pupil remains at school,

	whichever is less, plus one month then securely disposed of
Images used in displays	Whilst the pupil is at school then securely disposed of
Images used for Marketing Purposes	In line with the consent period then securely disposed of
Biometric data	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month then securely disposed of
Postcodes, names and characteristics	Whilst the pupil is at school, plus five years then securely disposed of
House number and road	For the duration of the event/activity, plus one month then securely disposed of.
Pupil's educational records - ALL DP issues	
Primary School Education Record	<p>Retain whilst the child remains at the school but should follow the pupil to</p> <ul style="list-style-type: none"> • Another primary school • Secondary school • Pupil referral unit • If the pupil dies it should be returned to the LA <p>If the pupil transfers to an independent school, home schooling or leaves the country then it should be returned to the LA</p>
Examination Certificates	Added to the pupil file and transferred to the next school
Behaviour Records	Added to the pupil's record and transferred to the next school. Copies are held whilst the pupil is at school plus one year then securely disposed of.

Exclusion Records	Added to the pupil's record and transferred to the next school. Copies are held whilst the pupil is at school plus one year then securely disposed of.
Child protection information held on pupil file	If in pupil file it should be in sealed envelope, then retained for the same period of time as the pupil file. These records must be shredded – secure disposal Records are subject to any instruction given by the Independent Inquiry into Child Sex Abuse(IICSA)
Child protection information held in separate files	Dob of the child plus 25 years – Records are subject to any instruction given by the Independent Inquiry into Child Sex Abuse(IICSA). Secure disposal – must be shredded
Attendance DP Issues	
Attendance Registers	Every entry in the attendance register must be preserved for a period of 3 years after which the date on which the entry was made then secure disposal.
Correspondence relating to authorised absence	Current academic year plus 2 years then secure disposal
Medical Information and Administration DP Issues	
Permission Slips	For the duration of the period that medication is given plus one month then securely disposed of
Medical Conditions – Ongoing Management	Added to the pupil's record and transferred to the next school. Copies held whilst the pupil is at school plus one year then securely disposed of
Medical incidents that have a behavioural or safeguarding influence	Added to the pupil's record and transferred to the next school. Copies held whilst the pupil is at school plus 25

	years then securely disposed of
Special Educational Needs –DP Issues	
Special Educational Needs Files, reviews and EHC plans, including advice regarding educational needs and accessibility strategy	Dob of pupil plus 31 years then securely disposed of
Statement maintained under Section 234 of the Education Act 1990 and any amendments to the statement	Dob of pupil plus 31 years – usually held in the pupil file – secure disposal unless the document is subject to legal hold
Advice and information provided to parents regarding educational needs	Dob of pupil plus 25 years – usually held in the pupil file – secure disposal unless the document is subject to legal hold
Accessible Strategy	Dob of pupil plus 25 years – usually held in the pupil file – secure disposal unless the document is subject to legal hold
School Meals Management	
Free School Meals Registers – where the register is use as a basis for funding (DP Issues)	Current Year plus 6 years then secure disposal
School Meals Registers (D P Issues)	Current year plus 3 years then secure disposal
School meals summary sheets	Current year plus 3 years then secure disposal
Meal Administration	Whilst the pupil is at school, plus one year then securely disposed of
Meal eligibility (D P Issues)	Whilst the pupil is at school plus five years then securely disposed of
Operational Administration	
Records relating to the creation and publication of the school brochure or prospectus	Current year plus 3 years then standard disposal if a copy is not required by the academy
Records relating to the creation and distribution of	Current year plus 1 year then standard

circulars to staff and parents, or pupils	disposal
Newsletters and other items with a short operational use	Current year plus 1 year, one copy archived then standard disposal
Visitors books and signing in sheets DP Issues	Current year plus 6 years then review then secure disposal
Records relating to the creation and management of Parent Teacher Associations and pupil associations	Current year plus 6 years then review and secure disposal
School privacy notice which is sent to parents	Until superseded plus 6 years then standard disposal
Consents relating to school activities (DP Issues)	While the pupil attends the school then secure disposal
Head teacher and senior leadership team	
Log books of activity in the school maintained by the head teacher. There may be DP issues if the logbook refers to individual members of Staff	Date of entry of the book and a minimum of 6 years then review (could be offered to the County Archives Service)
Minutes of SLT meetings and meetings of other internal administrative bodies (There may be DP Issues if the minutes refer to pupils or individual members of staff)	Date of the meeting plus 3 years then reviewed annually and if not needed secure disposal
Reports created by the headteacher or SLT, deputy heads, heads of year and other members of staff with administrative responsibilities (there may be DP issues if the report refers to individual pupils or members of staff)	Date of the meeting plus 6 years then a review
Correspondence created by the headteacher, deputy, headteacher, heads of year and other members of staff with administrative responsibilities There may be DP issues if the report refers to individual pupils or members of staff	Current academic year plus 6 years then reviewed annually and securely disposed of if not needed
Correspondence created by the headteacher, deputy, headteacher, heads of year and other members of staff with administrative responsibilities	Current academic year plus 3 years then securely disposed of

Professional Development Plans (May be DP issues)	Held on the individual's personnel record or retained for the life of the plan plus 6 years then secure disposal
School Development plans	Life of the plan plus 3 years then secure disposal
Curriculum Management – Management information and statistics	
Curriculum returns	Current Year plus 3 years then secure disposal
SATS Results	Recorded on the pupils educational file and retained until pupil reaches 25 years. School keeps composite record of whole year SATS results – kept for current year plus 6 to allow suitable comparison then secure disposal
SATS Papers	Until appeals or validation process is complete then secure disposal
Published Admission Numbers Report	Current year plus 6 years then secure disposal
Value added ad contextual data	Current year plus 6 years then secure disposal
Self-evaluation Forms – internal moderation	Current year plus 1 year then secure disposal
Self-evaluation Forms – external moderation	Retained until superseded then securely disposed of
Implementation of Curriculum	
Scheme of Work	Current academic year plus 1 year then review at the end of each year and allocate a further retention period or secure disposal
Timetable	Current academic year plus 1 year then allocate a further retention period or secure disposal

Class Record Books – DP Issues if personal details	Current academic year plus 1 year then review at the end of each year and allocate a further retention period or secure disposal
Mark Books	Current academic year plus 1 year then review at the end of each year and allocate a further retention period or secure disposal
Record of Homework set	Current academic year plus 1 year then review at the end of each year and allocate a further retention period or secure disposal
Pupil's work – D P Issues	Returned to the pupils at the end of the academic year, or retained for the current academic year plus one year then secure disposal.
Educational Visits outside the Classroom – DP Issues	
Field File – Information for Schools Trips	Until the conclusion of the trip plus one month. Where a minor incident occurs, field files are added to the core system as appropriate then securely disposed of
Financial information relating to school trips	Whilst the pupil remains at school, plus one year then securely disposed of
Records created to obtain approval to run an outside classroom	Date of visit plus 14 years then secure disposal
Parental consent forms for school trips where no major incident occurred	Conclusion of the trip then secure disposal then shredded and secure disposal
Parental consent forms for school trips where there has been a major incident	Dob of pupil on pupil's record plus 25 years –permission slips of all pupils on trip need to be retained to show that there had been compliance with procedures
Educational visitors in school – sharing of personal information	Until the conclusion of the visit plus one month then secure disposal

Home School Link/Family Liaison Officers – DP Issues	
Day Books	Current academic year plus 2 years then reviewed and secure disposal if no longer required
Reports for Outside Agencies where the report has been included on the case file created by an outside agency	Whilst child is attending school then destroy
Referral forms	While the referral is current then securely destroyed
Contact data sheets	Current academic year then review – if contact is no longer active then destroy
Contact database entries	Current academic year then review if contact is no longer active then securely destroy
Group registers	Current academic year plus two years then destroy
Contract Management	
Records relating to the management of contracts under seal (Limitation Act 1980)	Last payment of contract plus 12 years then secure disposal
Records relating to the management of contracts under signature (Limitation Act 1980)	Last payment of contract plus 6 years then secure disposal
Records relating to the monitoring of contracts Limitation Act (1980)	Current year plus 2 years then secure disposal

Staff Records/Governor/Trustee/Member -All DP Issues	
All records leading up to the appointment of a new headteacher (DP Issues)	Date of appointment plus 6 years Then secure disposal
All records leading up to the appointment of a new member of staff (DP Issues) both successful and unsuccessful	Date of appointment plus 6 years then secure disposal
Staff Members' personnel file Limitation Act 1980 (Section 2)	Termination of employment, plus 6 years, unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file will be retained until the LLCSA enquiries are complete then secure disposal
Job applications and interview records of unsuccessful members of staff or governors	<i>Date of appointment plus 6 months then securely disposed of Six months after notifying unsuccessful candidates, unless the academy 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 then secure disposal</i>
Job applications and interview records of successful members of staff or governors	Added to the personnel file and retained until the end of the appointment, plus 6 years except in cases of negligence or claims of child abuse then records are retained for at least 15 years
Pre-employment vetting information for successful candidates	For the duration of the employee's employment plus six years
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	Added to the staff personnel file or if kept separately no longer than two years after the date the employment terminated. Then securely disposed of
Immigration checks	Two years after the termination of employment then secure disposal
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 then secure disposal.
Proof of identity collected as part of the DBS process	Details of what was seen and checked should be kept. If it is felt necessary to keep any documentation this should be kept securely in the Personnel File

Change of personal details notifications	No longer than 6 months after receiving this notification – secure disposal
Emergency contact details	Destroyed on termination – secure disposal
Staff Training where training leads to CPD	Length of time required by the CPD professional body then securely disposed of
Staff Training (except where the training relates to dealing with pupils – health and safety, first aid,)	Retained in the personnel file then securely disposed of
Staff Training (where the training relates to pupils – safeguarding or other pupil-related training)	Date of the training plus 40 years then securely disposed of
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 then secure disposal
Maternity Pay Records	Current year plus 3 years then secure disposal
Records under Retirement Benefits Scheme	Current year plus 6 years then secure disposal
Annual appraisal/assessment records	Current year plus 6 years then secure disposal
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"> • Opt out forms • Records of compliance with WTR 	<ul style="list-style-type: none"> • Two years from the date on which they were entered into • Two years after the relevant period
Timesheets	Current year plus 6 years then secure disposal
Disciplinary Proceedings Oral warning Written Warning level 1 Written Warning level 2 Final Warning Case not found	Date of Warning plus 6 months if placed in file removed from file then securely disposed of Date of Warning plus 6 months -if placed in file then remove and secure disposal Date of Warning plus 12 months – if placed in file then remove and secure disposal Date of Warning plus 18 months – if placed in file remove then secure disposal If the incident relates to child protection then see below otherwise dispose of at conclusion of case – secure disposal
Allegations of a child protection nature against a member of staff including where the allegation is founded	Added to the staff personnel file, and until the individual's normal retirement age or 10 years from the date of the allegation (whichever is longer). This should be kept under review. Malicious allegations should be removed from file. If allegations found the they should be kept on file and a copy given to person concerned unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this

	is the case, the file is retained until IICSA enquiries are complete then secure disposal – these records should be shredded.
Financial and Payroll Records – DP Issues	
Staff Returns DP Issues	Current academic year plus three years then securely disposed of
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	Current academic year plus 6 years from the end of the scheme year in which the event took place then securely disposed of
Payroll Reports and Pay Slips and Pension and Superannuation Reports and Adjustments	Current Academic Year plus 6 years then secure disposal
Payroll and Salary Awards	Current Academic Year plus 6 years
Timesheets and flexitime records and bonus sheets and car allowance, overtime claims	Current academic year plus 3 years then securely disposed of
Income Tax P60	Current academic year plus six years then securely disposed of
Payroll and wage records and Tax forms	6 years after end of tax year they relate to
National Insurance schedule of payments	Current Academic Year plus 6 years then securely disposed of
Maternity/Adoption/Paternity Leave records	Current academic year plus 3 years after end of tax year they relate to then secure disposal
Sickness absence monitoring where sickness pay is not paid	Current academic year plus three years then securely disposed of
Sickness Absence Monitoring – where sickness pay is paid	Current academic year plus six years then securely disposed of
Current bank details	until superseded, plus 3 years then shredded secure disposal
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
Other Personnel Records	
Volunteer Personnel Records – DP Issues	Any relevant papers relating to the engagement but retain only as long as engagement with the school lasts
Governor/Trustee Records – DP Issues	Any relevant papers relating to the engagement of governors can be retained for term of office plus one year
Third party workers P Issues	School should receive confirmation that all checks have been undertaken but not copies of evidence from the employing organisation. School may retain copy of identification documents but these documents must be destroyed when the individual ceases working at the school

Health and Safety Records	
Health and Safety Policy Statements	Life of Policy plus 3 years then secure disposal
Health and Safety Risk Assessments DP Issues	3 years from the life of the risk assessment provided that a copy of the risk assessment is stored with the accident report form is an incident has occurred then secure disposal
Records relating to any reportable death, injury, disease or dangerous occurrence under RIDDOR D P Issues	Date of the incident plus three years provided that all records relating to the incident are held on the personnel files. In the case of serious accidents a further retention period will need to be applied
Accident reporting	Adults –3 years from the date of the incident then secure disposal Children – 3 years from the date of the incident then secure disposal Restricted Access DP Act 2018 plus UK GDPR
Records kept under Control of Substances Hazardous to Health	Date of the incident plus 40 years then secure disposal
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action plus 40 years then secure disposal
Information relating to areas where employees and persons are likely to come into contact with radiation (maintenance records or controls, safety features and PPE) Management of Radiation Exposure	Until the person to whom the record relates would have reached 75 years old but in any event for at least 30 years from when the record was made.
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) 	Two years from the date on which the examination was made then securely disposed of.
Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made
Fire precaution log books	Current Year plus 6 years then secure disposal
Health and safety file to show current state of buildings, including all alterations(wiring, plumbing, building works etc CIF improvements to be passed on in the case of a change of ownership	Permanent and pass on to new owner on sale or transfer of building.
Temporary and Casual Workers – DP Issues	
Records relating to hours worked and payments made to workers	3 years

Digital continuity statement

Digital data that is retained for longer than six years will be identified by the academy named as part of a digital continuity statement. The data will be archived to dedicated files on the school's server, which are password-protected – this will be backed-up in accordance with information security policy.

Removable data are stored in line with the Information Security Policy as below:

The designated person will review new and existing storage methods at least annually, where appropriate add them to this statement.

1. Removable Media storing Data must only be used as a last resort, when all other options have been considered, including the need to store or process the data or the secure network service is not available.
2. Only Removable Media provided by the Academy or Trust that has been encrypted should be used for the storing of Data
3. Removable Media should not be used for the storing of Personal Data, Special Category or Sensitive Data unless the device is capable of and has been encrypted.
4. Removable Media must be stored securely
5. If Removable Media used for, or in connection with Academy business is lost or stolen, the loss/theft should be reported to Data Protection Officer and IT Support Team immediately. Where possible the Personal Device should be remotely accessed and the information erased.

The following information will be included within the digital continuity statement:

- A statement of the business purposes and statutory requirements for keeping the records
- The names of the individuals responsible for long term data preservation
- A description of the information assets to be covered by the digital preservation statement
- A description of when the record needs to be captured into the approved file formats
- A description of the appropriate supported file formats for long-term preservation
- A description of the retention of all software specification information and licence information
- A description of how access to the information asset register is to be managed in accordance with the GDPR

Information audit

The school conducts information audits on an **annual** basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the GDPR. This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Microfilm or microfiche
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information
- Knowledge
- Apps and portals

The information audit may be completed in a number of ways, including, but not limited to: Interviews with staff members with key responsibilities – to identify information and information flows, etc.

Questionnaires to key staff members to identify information and information flows, etc.

A mixture of the above

The Head Teacher or someone appointed by them is responsible for completing the information audit. The information audit will include the following:

- The school's data needs
- The information needed to meet those needs
- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

The Head Teacher or someone appointed by them will consult with staff members involved in the information audit process to ensure that the information is accurate.

Once it has been confirmed that the information is accurate, the DPO will record all details on the school's Data Asset Register.

An information asset owner is assigned to each asset or group of assets. They will be responsible for managing the asset appropriately, ensuring it meets the school's requirements, and for monitoring risks and opportunities.

The information displayed on the Data Asset Register will be shared with the headteacher to gain their approval.