



NOWER HILL HIGH SCHOOL

Title:	Data Retention Policy
Date of Last Review:	October 2019
Date of Ratification by Governing Body:	7th November 2019
Status:	Not Statutory
Approval Authority:	Staffing Committee
Staff Lead:	Deputy Headteacher
Governor Lead:	Chair of Staffing Committee
Review Frequency:	2 years
Location:	Website Policies
Date of Next Review:	2021

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 and electronic records will be regularly monitored by the HR Manager, Executive Assistant, Data Manager, Student Services Manager, 6th form Administrator, Office Manager and IT Network 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.

An up to date record of what has been archived can be found on the shared drive in the following location: <O:\Other\GDPR\Records Archive>

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 [HR Manager, Executive assistant, Data Manager, Student services manager, 6th form Administrator, Office manager, IT Network manager] and can be found in the following location <O:\Other\GDPR\Records Archive>. 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

Deputy Head Teaching and Learning, 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

Document	Period of Retention
Application Process	
Application forms and interview notes (for unsuccessful candidates)	Six months. <i>Recommended.</i>
Original job application form for successful candidate	Termination + 6 years <i>Recommended</i>
Documents Relating to Appointment Process	
Confirmation of pre-employment medical check clearance	Termination + 6 years <i>Recommended</i>
DBS certificates/copies	No requirement to retain <i>Recommended</i> If retained, maximum period six months and if, in very exceptional circumstances, it is considered necessary to retain a copy of the original certificate for longer than six months, consent should be sought from the applicant and retained on file.
Confirmation of DBS outcome and any associated docs (e.g. risk assessment or certificate of good conduct)	Termination + 25 years <i>Recommended</i> within the DFE guidance, ' Data Protection: a toolkit for schools ', April 2018
Barred list clearance	Termination + 25 years <i>Recommended</i> within the DFE guidance, ' Data Protection: a toolkit for schools ', April 2018
Prohibition check	Termination + 25 years <i>Recommended</i> within the DFE guidance, ' Data Protection: a toolkit for schools ', April 2018
Copies of documents used for identity authentication for DBS and Asylum and Immigration Act purposes	Termination + 2 years <i>Recommended</i> within Home Office ' An Employers Guide to Right to Work Checks ', August 2017

UK Border Agency Documentation (Work permit)	Termination + 2 years <i>Recommended</i> within Home Office 'An Employers Guide to Right to Work Checks' , August 2017
Records relating to employees from outside of the UK e.g. visa, work permits, etc.	Termination + 2 years <i>Recommended</i> within Home Office 'An Employers Guide to Right to Work Checks' , August 2017
Copies of qualifications certificates relevant to employment	Termination + 6 years <i>Recommended</i>
NQT – Satisfactory completion of skills tests.	Termination + 6 years <i>Recommended</i>
Two original references	Termination + 6 years <i>Recommended</i>
Original contract acceptance	Termination + 6 years <i>Recommended</i>
Copy of Contract of employment and any variation letters or side letters	Termination + 6 years <i>Recommended</i>

Disciplinary Records	
Formal disciplinary warnings – child protection related	Termination + 25 years <i>Recommended</i> within the DFE guidance, 'Data Protection: a toolkit for schools' , April 2018
Formal disciplinary warnings – not child protection related	Termination + 6 years <i>Recommended.</i>
Accidents at Work	
Records relating to accident/injury at work	Termination + 6 years <i>Recommended</i>

	<p>(or, if the accident involves a child/ young adult, then until that person reaches age 21)</p> <p>In the case of serious accidents a further retention period may need to be considered</p>
Financial Information	
Inland Revenue/HMRC correspondence	<p>Termination + 6 years</p> <p><i>Statutory</i></p>
National minimum wage records	<p>Three years after the end of the pay reference period following the one that the records cover.</p> <p><i>Statutory</i></p>
Wage/salary records (also overtime, bonuses, expenses)	<p>Termination + 6 years</p> <p><i>Statutory</i></p>
Time sheets	<p>Current year + 6 years</p> <p><i>Recommended</i></p>
Sickness and Maternity Information	
Medical certificates/ Occupational Health reports and sickness absence record	<p>Current year + 6 years</p> <p><i>Recommended</i></p>
SMP, SAP, SSPP records, calculations, certificates (Mat B1s) or other medical evidence, notifications, declarations and notices	<p>Termination + 6 years</p> <p><i>Statutory</i></p>
Statutory Sick Pay records, calculations, certificates, self-certificates	<p>Six years after the employment ceases</p> <p><i>Recommended</i></p>
Parental leave records	<p>Termination + 6 years</p> <p><i>Recommended</i></p>
Other special leave of absence including parental leave, maternity leave	<p>Termination + 6 years</p> <p><i>Recommended</i></p>
Leavers Information	

Letter of resignation and acceptance of resignation or other documentation relating to the termination of employment.	Termination + 6 years <i>Recommended</i>
Exit interview notes	Termination + 6 years <i>Recommended</i>
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	Six years from the date of redundancy <i>Recommended</i>
Retirement Benefits Schemes – records of notifiable events, for example, relating to incapacity	Six years from the end of the scheme year in which the event took place <i>Statutory</i>
Additional Employee Information	
Salary assessment forms – teachers	Current year + 6 years <i>Recommended</i>
Appraisal information	Current year + 6 years <i>Recommended</i>
Staff induction including NQTs Induction	Completion + 6 years <i>Recommended</i> within DFE statutory guidance ' Induction for newly qualified teachers (England) ', April 2018

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
<ul style="list-style-type: none"> School Development Plans 	<ul style="list-style-type: none"> 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 the incident was reported Children – when the child attains 25 years of age.
Fire precaution log books	6 years
Medical records and details of: - <ul style="list-style-type: none"> control of lead at work employees exposed to asbestos dust 	40 years from the date of the last entry made in the record

<ul style="list-style-type: none"> 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
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
Pupil Record	Until the child turns 25
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)	Until the child turns 25.
Emails –	No more than 2 years, policy in place to ensure this is the case within outlook.
<ul style="list-style-type: none"> Other Records 	
Governor minutes	Permanent