



CHRIST the KING

CATHOLIC PRIMARY SCHOOL and NURSERY with THE ARK, a SPECIALIST RESOURCE



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 School Business Manager.

Electronic records will be regularly monitored by the School 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.

"Loving Learning Growing together as Christ's family"

 Reading Borough Council *Diocese of Portsmouth*

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 School 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
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	Not held in school transferred to RBC HR
Immigration checks	Not held in school transferred to RBC HR
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.
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
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.
Disciplinary proceedings – oral warning	Date of warning + 6 months
Disciplinary proceedings – first written warning	Date of warning + 6 months
Disciplinary proceedings – second written warning	Date of warning + 12 months
Disciplinary proceedings – final warning	Date of warning + 18 months

Payroll Records	
Payroll and wage records	6 years after end of tax year they relate to
Maternity/Adoption/Paternity Leave records	6 years after end of tax year they relate to
Statutory Sick Pay	6 years after the end of the tax year they relate to
Agreements and Administration Paperwork	
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

Pupil Records	
School Meals Registers	3 years
Free School Meals Registers	6 years
Pupil Record	Until the child leaves Christ The King Catholic Primary School when they are transferred to the new school
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.
Parental permission slips for school trips where there has been no major incident	Conclusion of the trip
Parental permission slips for school trips where there has been a major incident	DOB of the pupil involved in the incident + 25 years. All permission slips for the trip should be retained to provide evidence that rules had been followed for all pupils
Governor Records	
Governor Minutes – Principal Set (signed)	Permanent retention
Reports	6 years
Complaints	6 years from resolution of complaint
Financial Records	
Annual Accounts	Current + 6 years
Contracts	Contract completion date + 6 years
Budget reports / monitoring	Current + 6 years
Invoices	Current + 6 years
Orders	Current + 6 years
Delivery documentation	Current + 6 years

Policy Management

Policy owner	Diocese/HT/Bursar/FGB
Approval level:	FGB/Curriculum & Staffing Committee / Finance & Premises Committee
Date of next review	September 2023
Review cycle	Annual / Triennial
Type of Policy:	Statutory/Non statutory/Recommended
Statutory Guidance	<i>Data Protection Act 2018</i> <i>UK General Data Protection Regulation (UK GDPR)</i>