

# COWLEY INTERNATIONAL COLLEGE



## DATA RETENTION POLICY

Status	<b>STATUTORY</b>
Responsible Governors' Committee	Finance, Personnel and Premises
Date first approved by GB	Spring 2018
Responsible Person	Business Manager
Review Date	Spring 2020

## **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.

The Business Manager will regularly monitor paper records.

The Business Manager will regularly monitor electronic records.

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.

## **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. The Office Supervisor maintains a database of the records sent to the archives. 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**

The 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
<b>1.0 Employment Records</b>	
1.1 Job applications and interview records of unsuccessful candidates	6 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
1.2 Job applications and interview records of successful candidates	6 years after employment ceases
1.3 Written particulars of employment, contracts of employment and changes to terms and conditions	6 years after employment ceases
1.4 Right to work documentation including identification documents	2 years after employment ceases
1.5 Immigration checks	2 years after the termination of employment
1.6 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.
1.7 Change of personal details notifications	No longer than 6 months after receiving this notification
1.8 Emergency contact details	Destroyed on termination
1.9 Personnel and training records	While employment continues and up to 6 years after employment ceases
1.10 Annual leave records	6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year
1.11 Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards
1.12 Working Time Regulations: <ul style="list-style-type: none"> <li>• Opt out forms</li> <li>• Records of compliance with WTR</li> </ul>	<ul style="list-style-type: none"> <li>• 2 years from the date on which they were entered into</li> <li>• 2 years after the relevant period</li> </ul>
1.13 Disciplinary and training records	6 years after employment ceases
1.14 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.

## **2.0 Financial and Payroll Records**

2.1	Pension records	12 years
2.2	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
2.3	Payroll and wage records	6 years after end of tax year they relate to
2.4	Maternity/Adoption/Paternity Leave records	3 years after end of tax year they relate to
2.5	Statutory Sick Pay	3 years after the end of the tax year they relate to
2.6	Employers Liability Insurance certificate	Closure of the school + 40 years
2.7	Inventories of furniture and equipment	Current year + 6 years
2.8	Burglary, theft and vandalism report forms	Current year + 6 years
2.9	Annual accounts	Current year + 6 years
2.10	Loans and grants managed by the school	Date of last payment on the loan + 12 years and then review
2.11	All records relating to the creation and management of budgets including the Annual Budget statements and background papers	Life of budget + 3 years
2.12	Invoices, receipts, order books and requisitions, delivery notes	Current financial year + 6 years
2.13	Records relating to the collection and banking of monies	Current financial year + 6 years
2.14	Records relating to identification and collection of debt	Current financial year + 6 years
2.15	All records relating to the management of contracts under seal	Last payment + 12 years
2.16	All relating to the management of contracts under signature	Last payment + 6 years
2.17	Records relating to the monitoring of contracts	Current year + 2 years
2.18	School Fund cheque books, paying in books, ledger, invoices, receipts and bank statements	Current year + 6 years
2.19	Current bank details	No longer than necessary

## **3.0 Agreements and Administration Paperwork**

3.1	Collective workforce agreements and past agreements that could affect present employees	Permanently
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3.2	Trade union agreements	10 years after ceasing to be effective
3.3	Professional Development Plans	6 years from the life of the plan
3.4	Visitors Book and Signing In Sheets	6 years
3.5	Newsletters and circulars to staff, parents and pupils	1 year

#### **4.0 Health and Safety Records**

4.1	Health and Safety consultations	Permanently
4.2	Health and Safety Risk Assessments	3 years from the life of the risk assessment
4.3	Any reportable accident, death or injury in connection with work	For at least twelve years from the date the report was made
4.4	Accident reporting	Adults – 6 years from the date of the incident  Children – when the child attains 25 years of age.
4.5	Fire precaution log books	Current year + 6 years
4.6	Medical records and details of: - <ul style="list-style-type: none"> <li>• control of lead at work</li> <li>• employees exposed to asbestos dust</li> <li>• records specified by the Control of Substances Hazardous to Health Regulations (COSHH)</li> </ul>	40 years from the date of the last entry made in the record
4.7	Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made
4.8	Risk assessments	Current year + 3 years

#### **5.0 Property Management**

5.1	Title deeds of properties belonging to the school	Permanent
5.2	Plan of property belonging to the school	Retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold
5.3	Leases of property leased by or to the school	Expiry of lease + 6 years
5.4	Records relating to the letting of school premises	Current financial year + 6 years
5.5	All records relating to the maintenance of the school carried out by contractors	Current year + 6 years

## **6.0 Temporary and Casual Workers**

6.1 Records relating to hours worked and payments made to workers 6 years

## **7.0 Pupil Records**

7.1 Admissions records 1 year from the date of admission

7.2 Admissions register Permanent

7.3 School Meals Registers 3 years

7.4 Free School Meals Registers 6 years

7.5 Pupil Record Until the child turns 25

7.6 Attendance Registers 3 years from the date of entry

7.7 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

7.8 Letters authorising absence Date of absence + 2 years

7.9 Applications for grants Current year + 6 years

## **8.0 Governing Body records**

8.1 Agendas for Governing Body meetings One copy should be retained with the master set of minutes

8.2 Minutes of Governing Body meetings Principle set (signed) – permanently

Inspection copies – date of meeting + 3 years

8.3 Reports presented to the Governing Body Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently

8.4 Instruments of Government including Articles of Association Permanently

8.5 Trusts and Endowments managed by the Governing Body Permanently

8.6 Action plans created and administered by the Governing Body Life of the action plan + 3 years

8.7 Policy documents created and administered by the Governing Body Date of expiry + 1 year

8.8 Records relating to complaints dealt with by the Governing Body Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes

8.9 Proposals concerning the change of status of a maintained school Date of proposal accepted or declined + 3 years

## **9.0 Management**

9.1 Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies Date of the meeting + 5 years

9.2 Reports created by the Principal or Management Team Date of the report + 3 years

9.3 Records created by the Principal, Management Team and other members of staff with administrative responsibilities Closure of file + 6 years

9.4 Correspondence created by the Principal, Senior Management and other staff with administrative responsibilities Date of correspondence + 3 years

9.5 Professional Development Plans Closure + 6 years

9.6 College Development Plans Closure + 6 years then review

9.7 Accessibility Plans Current year + 6 years

9.8 School brochure/prospectus Current year + 3 years

## **10.0 Curriculum Management**

10.1 Curriculum returns Current year + 3 years

10.2 Examination results (school's copy) Current year + 6 years

10.3 Examination papers The examination papers should be kept until any appeals/validation process is complete

10.4 Published Admission Number Current year + 6 years

10.5 Schemes of Work Current year + 1 year

10.6 Timetable Current year + 1 year

10.7 Class record books Current year + 1 year

10.8 Mark books Current year + 1 year

10.9 Record of homework set Current year + 1 year

10.10 Pupils' work Where possible pupils' work should be given to the pupil at the end of the academic year. If not given to pupil current year + 1 year

## **11.0 Extra-curricular Activities**



11.1	Records created by schools to obtain approval to run an Educational Visit outside the classroom	Date of visit + 10 years
11.2	Parental consent forms for school trips where there has been no major incident	Conclusion of the trip
11.3	Parental consent forms for school trips where there has been a major incident	Date of birth of the pupil involved in the incident + 25 years. The permission slips for all the pupil on the trip need to be retained to show that the rules had been followed for all pupils
<b>12.0</b>	<b>Pastoral records</b>	
12.1	Day books	Current year + 2 years then review
12.2	Reports for outside agencies where the report has been included on the case file created by the outside agency	Whilst child is attending school and then destroy
12.3	Referral forms	While the referral is current
12.4	Contact sheets	Current year then review, if contact is no longer active then destroy
12.5	Contact database entries	Current year then review, if contact is no longer active then destroy
12.6	Group registers	Current year + 2 years