



"The child Jesus grew and became strong; he was full of wisdom gaining favour with God and with people." Luke 2:54

Data Retention Policy

The Federation has a responsibility to maintain its records and record keeping systems. When doing this, the Federation 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 Federation's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the Federation 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 Federation 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 2018 (GDPR) and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of the Federation. The Federation'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 Federation will adhere to the standard retention times listed within that schedule.

Paper records will be regularly monitored by the Federation Business Manager. Electronic records will be regularly monitored by the Federation Business Manager. The schedule is a relatively lengthy document listing the many types of records used by the Federation 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 Federation 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. A database of the records sent to the archives is maintained by the Federation Business Manager. 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 Headteacher has primary and day-to-day responsibility for implementing this Policy, The Data Protection Officer, in conjunction with the Federation 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	
Employment Records	
Job applications and interview records of unsuccessful candidates	6 months after notifying unsuccessful candidates
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 ID	2 years after employment ceases
Immigration checks	2 years after the termination of employment
DBS checks and disclosures of criminal records forms	As soon as practicable after the check has been completed and the outcome recorded
Change of personal details records	As soon as records have been updated
Emergency contact details	Destroyed on termination
Personnel and training records	While employment continues and up to 6 years after employment ceases
Consents for the processing of personal and sensitive data	Up to 6 years after it has been processed
Disciplinary and training records	6 years after employment ceases
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
Financial and Payroll Records	
Payroll and wage records	3 years after end of tax year they relate to
Current bank details	No longer necessary
Agreements and Administration Records	
Federation 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 connect with work	For at least 12 years from the date the report was made
Accident reporting	Adults – 6 years from the date of the incident Children – when the child reaches 25 years of age

Fire precaution log books	6 years
Medical records and details of: 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
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	
Admission records	1 year from the date of admission
Admission register	3 years from the date of entry
School meals registers	3 years
Free school meals registers	6 years
Pupil records	Records transfer to new school when pupil leaves. If the child does not move to another educational setting (e.g. home schooled) then the records will be retained until the child turns 25.
Attendance registers	3 years from the date of entry
Special educational needs files, reviews and IEPs including statements and EHC plans	The SEN records will be passed to the new school (separately from the main pupil record) when the child leaves the school. The school will ensure safe transit and obtain confirmation of receipt.
Child Protection records	The child protection records will be passed to the new school (separately from the main pupil record) when the child leaves the school. The school will ensure safe transit and obtain confirmation of receipt.

Adopted: 26 June 2019

Signed:



Chair of Governors

Review Date:

June 2022