

## DATA RETENTION POLICY

Date	Review Date	Endorsed by	Approved by	Link Governor
Dec 2018	Dec 2021	Resources Committee	Governing Body	TBC

### INTRODUCTION

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 periods specified in the retention schedule recommended in the IRMS Information Management Toolkit for Schools (Appendix A). When managing records, the School will adhere to the standard retention periods 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.

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/box reference (or other unique identifier);
- File/box title/description/contents;
- 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 School Business Manager. The appropriate staff member, when archiving documents should record in this list the following information: -

- Archive box reference and/or title;
- Description of ;
- 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 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.

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**This policy has been reviewed and endorsed by the Full Governing Body of The Devonshire Hill Nursery and Primary School on Wednesday 5<sup>th</sup> December 2018.**