

The Eveline Day School Data Retention Policy

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Reviewed by: Eveline Drut February 2020

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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 and the School Manager.
- Electronic records will be regularly monitored by the School Business Manager and the School 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.

Macintosh

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Destruction of Records

Where records have been identified for destruction they will be disposed of in an appropriate way. All information will be reviewed before destruction by the appropriate department or individual responsible 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 will be shredded before disposal where possible. All other paper records will be disposed of by an appropriate confidential waste paper merchant.

All electronic information will be deleted and overseen by the School Business Manager and the School Manager.

The School maintains a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member will record in this list at least: -

File reference (or any 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 School Business Manager and the School Manager. The appropriate staff member, when archiving documents will record in this list the following information: -

- File reference (or any other unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising officer
- Number of the Archive Box and its location (Grand Drive Branch)

Transferring Information to Other Media

Where lengthy retention periods have been allocated to hard copy records, in due course, the storage methodology will be reviewed by the Group Directors.

Responsibility and Monitoring

The Head Teacher has primary and day-to-day responsibility for implementing this Policy. The Data Protection Officer, the Head Teacher, 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.

| EDS | FILE DESCRIPTION | RETENTION PERIOD |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EDS | Employment Records <i>(Italics denotes record is kept for less than 7 years (or more where applicable) from the identifying point in time)</i> | |
| EDS | Job applications and interview records of unsuccessful candidates | Six months after notifying unsuccessful candidates. |
| EDS | Job applications and interview records of successful candidates | 7 years after employment ceases |
| EDS | Written particulars of employment, contracts of employment and changes to terms and conditions | 7 years after employment ceases |
| EDS | Immigration checks | 7 years after the termination of employment |
| EDS | 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. |
| EDS | Change of personal details notifications | No longer than 6 months after receiving this notification |
| EDS | Emergency contact details | Destroyed on termination |
| EDS | Personnel and training records | While employment continues and up to 7 years after employment ceases |
| EDS | Annual leave records | 7 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year |
| EDS | Consents for the processing of personal and sensitive data | For as long as the data is being processed and up to 7 years afterwards |
| EDS | Disciplinary and training records | 7 years after employment ceases |
| EDS | 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. |
| EDS | School Development Plans | 3 years from the life of the plan |
| EDS | Professional Development Plans | 7 years from the life of the plan kept in HR files. |

| | | |
|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EDS | Visitors Book and Staff Signing-In Sheets | 7 years |
| Newsletters and Circulars | | |
| EDS | FILE DESCRIPTION | RETENTION PERIOD |
| EDS | Newsletters and circulars to staff, parents and pupils | 3 years from the end of the relevant academic year. |
| Health and Safety Records | | |
| EDS | Health and Safety consultations | Permanently |
| EDS | Health and Safety Risk Assessments | 3 years from the life of the risk assessment |
| EDS | Any reportable accident, death or injury in connection with work | For at least twelve years from the date the report was made |
| EDS | Accident reporting | Adults – 6 years from the date of the incident Children – when the child’s DOB + 25 years |
| EDS | Fire precaution log books | 6 years |
| EDS | Medical records and details of: - <ul style="list-style-type: none"> • 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 |
| EDS | 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 | | |
| EDS hrs worked (HO hrs & pmts) | Records relating to hours worked and payments made to workers | 7 years |
| Notes | Pupil Records | |
| EDS | Admissions records | 1 year from the date of admission |
| EDS | Admissions register | Entries to be preserved for 3 years from date of entry |
| EDS | School Meals Records of allergy childrens’ meals | Until the end of the current academic year. |
| EDS | Pupil Record – last year’s reports (see penultimate section for state schools) | Records transferred 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. |
| EDS | Attendance Registers | 3 years from the date of the end of the academic year covered in the register |
| EDS | 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. |

Existing School Document Retention and Archiving Periods

| Classroom forms | | | |
|--------------------------------------|--------------------------|-----------------------|-----------------------------|
| Forms | How long to keep? | Where to next? | How long to Archive? |
| Classroom Risk Assessment (Teachers) | 1 year | SECURE DISPOSAL | n/a |
| ISI folders | 3 years | SECURE DISPOSAL | n/a |
| Cleaning Checklist | 6 months | SECURE DISPOSAL | n/a |

| Manager's Office forms | | | |
|--------------------------------------|--------------------------|-----------------------|-----------------------------|
| Forms | How long to keep? | Where to next? | How long to Archive? |
| Manager's Daily Risk assessment | 1 year | SECURE DISPOSAL | n/a |
| Medication Consent forms | 1 year | Archive | 3 years |
| Long Term Medication Consent form | 1 year | Archive | 3 years |
| Riddor form (On Line) | 1 year | Archive | DOB + 25 years |
| Mobile Phone Logs | 3 months | SECURE DISPOSAL | n/a |
| Camera Logs | 3 months | SECURE DISPOSAL | n/a |
| Parents comments | 3 years | SECURE DISPOSAL | n/a |
| Visits and Outings planning (Ofsted) | 3 years | SECURE DISPOSAL | n/a |
| Outing Record (Signing in & out) | 1 year | SECURE DISPOSAL | n/a |

| Garden forms (Lower Reception) | | | |
|-----------------------------------------|--------------------------|-----------------------|-----------------------------|
| Forms | How long to keep? | Where to next? | How long to Archive? |
| Garden registers – Lower Reception only | 3 months | SECURE DISPOSAL | n/a |

| What forms should go in the Pupil's File (Sent to onward School (state only) when pupil leaves EDS) | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|------------------------------------------------|-----------------------------------------------|
| Forms | How long to keep? | Where to next? | If Archive, for how long? |
| Health Care Plan | Until Pupil leaves | Archive at School if not sent to onward School | DOB +25 years after Pupil has left the School |
| Safeguarding Concern form | | | |
| Referral form (From Former School) | | | |
| Disability Assessment form | | | |
| Policy for external observations – Form 1 | | | |
| Policy for external observations – Form 2 | | | |
| Allergy Health Care Plan | | | |
| Leaving/Transition form | | | |
| School Reports | | | |
| Observation file | | | |
| Child Allergy Meal record** (See Health & Safety section) **If a child reacts to any food please keep that form and place it in the child's folder. | | | |
| Baby Sitting Form Must go in to the staff and child's folder | | | |

| Additional Pupil Files (Confidential) | | | |
|----------------------------------------------|--------------------------|-----------------------|----------------------------------|
| Forms | How long to keep? | Where to next? | If Archive, for how long? |
| Senco | Until pupil reaches 25 | | DOB +25 years |
| C/P | Pass to new school | | |

Items to go in the confidential bags:

- Photos of children and staff
- Any confidential forms concerning children or staff
- Anything with names on it

Childrens' files

Lower and Upper Reception only: All scrapbooks from School are to be kept until the child leaves the academic year and given to the family at this point or at an earlier time.

Lower Reception:

- Observation forms in confidential bag are given to parents when the child leaves.
- The Head/Deputy must fill out a transfer/reference form and post it to the school the child is going to or the school provides their own form that the Manager/Deputy/ Room Leader must fill in.

- In the case of a child going on to a State School, where the whole Pupil File is sent to school, photocopy the last reports/tracking. Keep for a year in a folder then send to archive for a further 2 years.

Head Office archiving responsibilities

| Employment Records | |
|---------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FILE DESCRIPTION | RETENTION PERIOD |
| Right to work documentation including identification documents | 7 years after employment ceases |
| Working Time Regulations: <ul style="list-style-type: none"> • Opt out forms • Records of compliance with WTR | <ul style="list-style-type: none"> • 7 years from the date on which they were entered into • 7 years after the relevant period |
| Records relating to hours worked and payments made to workers | 7 years |
| Consents for the processing of personal and sensitive data | <i>For as long as the data is being processed and up to 7 years afterwards</i> |

| Financial and Payroll Records | |
|-----------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| Pension records | 12 years |
| Retirement benefits schemes – notifiable events (for example, relating to incapacity) | 7 years from the end of the scheme year in which the event took place |
| Payroll and wage records | 7 years after end of tax year they relate to |
| Maternity/Adoption/Paternity Leave records | 7 years after end of tax year they relate to |
| Statutory Sick Pay | 7 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 |