

# BRYN COCH SCHOOL

## Retention of Data Policy



Bryn Coch 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 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 and electronic records will be regularly monitored by the SMT and Office staff. 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.

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.

## **Responsibility And Monitoring**

The Headteacher has primary and day-to-day responsibility for implementing this Policy. 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.

FILE DESCRIPTION	RETENTION PERIOD
<b>Employment Records</b>	
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
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	2 years after employment ceases
Immigration checks	Two 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 (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.
Change of personal details notifications	No longer than 6 months after receiving this notification
Emergency contact details	Destroyed on termination
Annual appraisal records	Current year +5 years
Personnel and training records	While employment continues and up to 5 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
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>• Two years from the date on which they were entered into</li> <li>• Two years after the relevant period</li> </ul>
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. Malicious allegations should be removed.

Accident and injury at work	Date of incident +12 years
<b>Financial and Payroll Records</b>	
Pension records	12 years
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
Payroll and wage records	6 years after end of tax year they relate to
Maternity/Adoption/Paternity Leave records	3 years after end of tax year they relate to
Timesheets and Sick Pay	Current year +6 years
Current bank details	No longer than necessary
Budget reports	Current year +2 years
Invoice and receipts	Current year +6 years
Annual Budget	Current year +6 years
Order books	Current year +6 years
School Fund paperwork	Current year +6 years
Petty Cash books	Current year +6 years
Lettings	Current year +3 years
<b>Agreements and Administration Paperwork. Management.</b>	
Collective workforce agreements and past agreements that could affect present employees	Permanently
Trade union agreements	10 years after ceasing to be effective
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	Current year +2 years
Newsletters and circulars to staff, parents and pupils	Current year +1 year
<b>Health and Safety Records</b>	
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: - <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
COSHH	10 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
Minutes of SMT meetings	Retain in school for 5 years from date of meeting

Reports made by the HT or SMT	Retain in school for 3 years from date of meeting
Correspondence created by SMT, HoY, Staff and admin.	Retain in school for 3 years from date
Accessibility Plans	Current year +6 years
Inventories of equipment and furniture	Current year +6 years
School prospectus	Current year +3 years
<b>Pupil Records</b>	
Admissions records	1 year from the date of admission
Admissions register	Entries to be preserved for 6 years from date of entry
School Meals Registers	3 years
Free School Meals Registers	6 years
Pupil Record	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.
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.
Statement maintained under Education Act 1996	DOB +30years
Proposed statement or amended statement	DOB +30years
Advice and information to parents regarding educational needs	Closure +12years
Accessibility Strategy	Closure +12years
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. The school will retain a copy of the Child Protection records until such a time that the new school acknowledges receipt of the original file. The copy will then be shredded.
Parental permission slip	Conclusion of trip
Parental permission slip where there has been a major incident	DOB of the pupil involved in the incident +25 years.
Records created by schools to obtain approval to run a visits outside the classroom	Date of visit +14 years
<ul style="list-style-type: none"> <li>• Schemes of work</li> <li>• Timetables</li> <li>• Class record books</li> <li>• Mark books</li> <li>• Homework set</li> </ul>	Current year +1 year

Value Added and Contextual Data	Current year +6 years
Self evaluation forms	Current year +6 years
<b>School Governors</b>	
Minutes <ul style="list-style-type: none"> <li>Principal set (signed)</li> </ul>	Retain in school for 6 years from date of meeting
<ul style="list-style-type: none"> <li>Inspection copies</li> </ul>	Secure disposal – Date of meeting + 3years
Agendas	Date of meeting
Reports	Retain in school for 6 years from date of meeting
Annual Parents' meeting papers	Retain in school for 6 years from date of meeting
Instruments of Government	Retain in school whilst school is open
Action Plans	Retain in school for 3 years from date of plan. Secure disposal
Policy documents	Retain in school whilst policy is operational.
Complaints Files	Retain in school for first 6 years then review for further retention in the case of contentious disputes.