Data Retention Policy

Date Agreed:	March 2019
Review Date:	March 2021

Approved by Diocese of Chichester Academy Trust

Revision No.	Date Issued	Prepared By	Approved	Comments
1	24th May 2018	DC/SJP		GDPR Judicium
2	February 2019	MMI		Adapted for STCC

Academy	St Catherine's College
LGB ratified date	March 2019

Type of Policy	Tick ✓
DCAT Statutory Policy	
DCAT Non-statutory Policy	✓
DCAT Model Optional Policy	
Academy Policy	✓
Local Authority Policy	

DATA RETENTION POLICY

The Academy has a responsibility to maintain its records and record keeping systems. When doing this, the Academy 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 Academy's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the Academy 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 Academy 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 Academy. The Academy'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 Academy will adhere to the standard retention times listed within that schedule.

Paper records will be regularly monitored by specific staff for each overarching area:

- Personnel Records - S Windsor
- Business/Whole College Records - M Maynard
- Pupil and Contact Records – M Milligan

Electronic records will be overseen by M Mulhern and M Milligan but regularly monitored by specific staff for each overarching area

- Student and Staff Network files – M Mulhern
- Personnel Records - S Windsor
- Business/Whole College Records - M Maynard
- Pupil and Contact Records – M Milligan
- Data held on software used by specific departments – the relevant HOD

The schedule is a relatively lengthy document listing the many types of records used by the Academy 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 Academy 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 overseen by the Head of Data and Information but maintained by specific staff for each overarching area:

- Personnel Records - S Windsor
- Business/Whole College Records - M Maynard
- Pupil and Contact Records – M Milligan
- Safeguarding Records – K Guppy

The appropriate staff members, 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

Mr S Berhane and Mr N Jewell have primary and day-to-day responsibility for implementing this Policy. The Data Protection Officer, in conjunction with the Academy 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 (Staff responsibility)	RETENTION PERIOD
Employment Records (SWN)	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates, unless the Academy 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
Personnel and training records	While employment continues and up to six 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: • Opt out forms • Records of compliance with WTR	 • Two years from the date on which they were entered into • Two years after the relevant period

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.
Single Central Record of Recruitment Checks	2 Years from start of each Academic Year
Volunteer Records	Same retention periods as staff records
Governor Records (**MMA/Clerk to Governors**)	Retain all Governors papers due to exceptional circumstances.
Trainee Teacher Records	Same retention periods as staff records

Financial and Payroll Records – (MMA/ SWN)

General Accounts and Business Records (**MMA**)	6 years
Pension records – (**DCAT)**	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
Statutory Sick Pay	3 years after the end of the tax year they relate to
Current bank details	Within 6 months of termination.

Agreements and Administration Paperwork

Collective workforce agreements and past agreements that could affect present employees (**SWN**)	Permanently
Trade union agreements (**SLT**)	10 years after ceasing to be effective
Academy Development Plans (**SLT**)	3 years from the life of the plan
Professional Development Plans (**SLT**)	6 years from the life of the plan
Visitors Book and Signing-In Sheets (**MMA**)	6 years
Newsletters and circulars to staff, parents and pupils (**MMA**)	1 year

Health and Safety Records –(HCA)

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: - • 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
Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made
Health Care Plans	Adults: 6 years after employment ceases Children: Until the child turns 25 – Physical file to be separate from main file but banded together
PEEPs – Personal Emergency Evacuation Plans	For the duration of the injury/illness or whilst in employment
Temporary and Casual Workers (SWN)	
Records relating to hours worked and payments made to workers	3 years
Pupil Records	
Admissions records - (**MMA**)	1 year from the date of admission
Admissions register - (**MMA**)	Non-SIMS Entries to be preserved for three years from date of entry Sims Data available on SIMS until child turns 25
Academy Meals Registers - (**MMA**)	3 years
Free Academy Meals Registers – (**MMI**)	6 years *(No physical list kept, report available on SIMS)*
Pupil Record- (**MMI**)	Until the child turns 25
Attendance Registers- (**MMI**)	4 years from the date of entry
Special Educational Needs files, reviews and individual education plans (this includes any statement and all	Until the child turns 25

advice and information shared regarding educational needs) - (**SENCO**)	
Safeguarding Records (**KGU**)	Until the child turns 25. Data held on 'My Concern' is automatically deleted on students' 25th birthday
Exam Results Records (**MMI**)	Until the child turns 25 on SIMS.
Emails – (MMU)	
Outlook email records	Automatic deletion after 2 years
Communication provider records	Records backed up to SIMS will remain until child turns 25. Records stored on external system deleted after 1 year.
Other Records	
CCTV Images (**MMU**)	Generally we will keep footage up to 15days footage. In ongoing situations footage will be backed up and kept until the situation has been resolved.
External Learning Software used by departments.	Data to be deleted annually or within 1 year of child leaving the College, depending upon the nature of the software. Deletion will be carried out by the staff member initiating/monitoring the use of the software.
Current Third Party Software/Providers *Note: The list below will be amended continuously as software use changes, links to their online privacy notices/compliance are supplied where possible.*	

Name	Staff responsible	Webb address for PN/GDPR compliance
4Matrix	MMI	http://www.4matrix.com/terms
ActiveLearn	KRU	https://www.pearson.com/uk/pearson-privacy-and-you/privacy-policy/digital-learning-services-privacy-policy.html
All Things Code	KPA	https://www.allthingscode.co.uk/privacy/
Analyse School Performance	MMI	https://www.analyse-school-performance.service.gov.uk/Terms/Privacy
Arts Pool	EMC	https://www.artspool-e-learning.com/wp-content/uploads/2017/11/ArtsPool-UK-Ltd-PRIVACY-POLICY-june-18-update.pdf
Asset for School	MMI	http://www.analyseschoolperformance.uk/compliance/
Bedrock Learning	SWI	https://www.bedrocklearning.org/privacy-statement/
Cavendish Communications Ltd.	MMA	https://www.cavcoms.com/
CCF (Combined Cadet Forces)	LMI	https://combinedcadetforce.org.uk/legal-information

Cloud Box Design	MMU	https://www.clouddesignbox.co.uk/privacy-policy.php
Cobb PR	MMA/SWN	https://cobbpr.com/privacy-policy/
CRB Cunninghams	MMU	https://www.crbcunninghams.co.uk/
Duke of Edinburgh Awards	NHA	https://www.dofe.org/privacy-statement/
East Sussex County Council	MMA	https://www.eastsussex.gov.uk/privacy/all-privacy-notices/
Educake	MCH	https://www.educake.co.uk/privacypolicy#
Edulink	MMI	https://www.overnetdata.com/privacypolicy
FFT Aspire	MMI	https://fft.org.uk/privacy-policy/
Get Revising	Teachers	https://getrevising.co.uk/pages/privacy
Goldsmiths University	MMA/KRU	https://www.gold.ac.uk/confucius-institute/
Groupcall	MMI	https://www.groupcall.co.uk/Documents/Xod/School-Portal-XoD-Data-Sharing-Agreement.pdf
Heathercroft	KGU	http://www.hts.ac.uk/
Kahoot	KPA/KRU	https://kahoot.com/privacy-policy/
KCS Copiers	MMU	http://www.kcs4ps.co.uk/privacy-notice
Kerboodle	KRU/HPR	https://global.oup.com/privacy?cc=pl
Learning Record Service (Dfe)	MMI	https://www.gov.uk/government/publications/lrs-privacy-notices/lrs-privacy-notice
Lexia	SWI	https://www.lexialearning.com/website-privacy-policy
Literacy Planet	SWI	https://www.literacyplanet.com/uk/about/privacy-policy/
Mandarin Excellence	KRU	https://ci.ioe.ac.uk/
Maths Watch	STI	https://vle.mathswatch.co.uk/downloads/mathswatch_privacy_policy_-_updated.pdf
Memrise	KRU	https://www.memrise.com/privacy/
Method Maths	STN	https://static1.squarespace.com/static/59521eeb72af6579b89b8b10/t/5add980e352f538288156164/1524471823086/Methodmaths+PRIVACY+POLICY.pdf
Music First	DWO	https://www.musicfirst.co.uk/privacy-policy
My Concern	KGU	https://www.myconcern.co.uk/gdpr-compliance/
My Trust - My Career	GOC	https://www.themytrust.org/gdpr
Padlet	KRU	https://padlet.com/about/privacy
Parent Pay	MMA/MMU	https://www.parentpay.com/parentpay-and-gdpr/
Pinpoint	STI	https://www.pinpointlearning.co.uk/privacy.php
Plickers	ATI	https://help.plickers.com/hc/en-us/articles/360009090833-Plickers-Privacy-Policy
Quizzizz	KPI	https://quizizz.com/admin
Quizlet	KRU	https://quizlet.com/privacy
Renaissance Learning UK Ltd	KPA	http://www.renlearn.co.uk/about-us/privacy/ http://www.renlearn.co.uk/about-us/gdpr/
Safety Mark	HCA	https://www.safety-mark.co.uk/index.html - https://bishopbellco.sharepoint.com/Staff/gdpr/Shared%20Documents/3rd%20Party%20Contracts,%20Agreements%20and%20Tand%20Cs/Safety%20Mark%20Privacy%20and%20G

		DPR%20Policy%20-%20plc%20-%20draft%20v%201%2003.18%20(002).pdf
Salamander	MMU	https://www.salamandersoft.co.uk/dataprotection/
Secure Locker	MMA	https://prefectlockers.com/
Seneca	MMI	https://help.senecalearning.com/teacher-faqs/are-you-gdpr-compliant - https://www.senecalearning.com/privacy
Show My Homework (Satchel)	GWA	https://help.showmyhomework.co.uk/ArticleDetail/Teachers/Administrators/Satchel-and-GDPR-compliance
Showbie	DWO	https://www.showbie.com/privacy/
Sims (Capita)	MMI	https://www.capita-sims.co.uk/privacy-notice
Strictly Educational	MMA/SWN	https://www.strictlyeducation.co.uk/privacy-policy - https://www.strictlyeducation.co.uk/gdpr-compliance
Study Mojo	KRU	https://studymojo.com/
Surveymonkey	RLA	https://www.surveymonkey.com/mp/legal/privacy-policy/?ut_source=gdpr_consent_banner