Data Retention Policy

Introduction

This guidance applies to the retention of all records within schools. Some of the guidance below relates to records within schools that will contain 'personal data'. Personal data is defined under the General Data Protection Regulation (GDPR) as:

> Any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (GDPR article 4).

1. This policy is based upon the policy recommended by the Records Management Society for maintained schools in England.

2. The Lincolnshire Education Trust recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the organisation. This document provides the policy framework through which this effective management can be achieved and audited.

3. This policy should be read in conjunction with the following documents, all of which can be found on the Data Protection page of the school website

- Data Protection Policy
- Privacy Notices for:
    - Parents
    - Students
    - Staff
    - Job Applicants

Scope
4. This policy applies to all records created, received or maintained by staff of the School in the course of carrying out its functions. Records are defined as all those documents which facilitate the business carried out by the School and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

5. A small percentage of the school's records will be selected for permanent preservation as part of the School's archives and for historical research.

6. This policy also applies to all accounting records required by the Companies Act 2006, as well as those records required by HMRC and others to be retained.

Overview of Records Management

7. The school keeps records under a wide variety of headings, including (but not restricted to):

Management of the School
- Academy Trust – agendas, minutes, resolutions, reports, contact information for Members
- Governing Board – agendas, minutes, reports, policies, complaints, contact information for Governors
- Headteacher and Senior Leadership Team – School Development Plan, SLT minutes,
- Admissions – supplementary information forms, offers, acceptances, appeals, proof of address,
- Operational Administration – newsletters, visitor log books,

Human Resources
- Recruitment – application forms, interview notes, references
- Operational Staff Management - personal files, appraisals, personal identity information necessary for employment
- Management of Disciplinary and Grievance Process – allegations of abuse, disciplinary documents
- Health and Safety – risk assessments, accident reporting, COSHH, asbestos, fire precautions
- Payroll and pensions – maternity/paternity pay records, retirement benefits schemes

Financial Management
- Risk Management and Insurance – employer's liability insurance certificate
- Asset Management – inventories, burglary reports,
- Accounts and Statements – annual accounts, budgets, purchase orders, invoices, receipts, banking, payroll
- Contract Management
- School Meals Management – free school meals register, ParentPay

Property Management
- Property Management – title deeds, school plans
- Maintenance – contractors, log books

Students
- Personal identity information necessary for enrolment, parent contact information
- Student Educational Record – exam results (public/internal), child protection information,
- Attendance – attendance registers, authorised absence correspondence
- SEND – Individual Education Plans, reviews, advice to parents, accessibility strategy
- Pupil Premium / Sixth Form Bursary – evidence of eligibility
- Medical – Individual Health Plans, first aid records

Curriculum Management

- Statistics and Management Information – exam papers, results, value added data,
- Implementation of Curriculum – schemes of work, timetable, class record books, mark books, homework set

Extra-Curricular Activities

- Educational Visits outside the Classroom – trips records, parent consent forms
- Family Liaison Officers – referral forms, contact data sheets, reports for external agencies

Central Government and Local Authority

- Local Authority – census returns, attendance returns,
- Central Government – returns made to DfE/ESFA

8. The school has a corporate responsibility to maintain these records and record keeping systems in accordance with the regulatory environment.

9. The person with overall responsibility for this policy is the Data Protection Officer who will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely fashion.

10. The storage and retention of digital information will be handled on a day-to-day basis by the IT team under the guidance of the Principal, ensuring that records are held securely, backed-up on suitable systems, archived when necessary and checked regularly for ease of retrieval when required.

11. Individual staff must ensure that records for which they are responsible are accurate, kept securely, and are maintained and disposed of in accordance with the school's records management guidelines.

12. The Finance Manager is responsible for the secure retention of all financial documents for the period required by the Companies Act. These documents may be requested by authorised external agencies at any time, for example the academy's auditors. The Finance Manager makes arrangements with the IT team for the secure retention of electronic accounting records.

13. The guidelines for records management follow those set out in the Records Management Toolkit for schools version 5 (updated in February 2016) http://irms.org.uk/page/SchoolsToolkit

Archives

14. Some records (including accounting and personnel) may be archived until being disposed of. Archived records will:
    - Be treated as being as confidential as current records.
    - Not necessarily be as accessible as current records, but will still be retrievable.
    - Have adequate storage made available or may be kept electronically or on microfilm.

15. Before deciding on whether records will be stored electronically or on microfilm the School will consider:
    - Whether the records may need to be kept in the original format (for legal reasons).
    - Whether the medium chosen to archive the records has an acceptable lifespan for records that will have to be retained for a very long time.
    - Where records are archived electronically or on microfilm, whether there will have an adequate means for accessing and printing the record.

16. A record of all documents that have been archived electronically or on microfilm will be kept.

Disposal of records

17. When the period of retention has expired, and there is no other reason to keep them, the records may be disposed of safely and securely. The records will be completely destroyed by shredding paper, cutting up CDs and similar items and dismantling and destroying hard drives. Non-sensitive papers will be bundled and disposed of to a waste paper recycling merchant.

Monitoring and evaluation

18. This policy has been drawn up within the context of the Freedom of Information Publication Scheme, the Data Protection Policy and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the School and will be monitored to ensure that the retention guidelines updated by the Records Management Society periodically are adhered to.

19. In addition, The Lincolnshire Education Trust recognises the specific requirements for the retention of accounting records and other corporate records by, HMRC and under the Companies Act 2006 and will therefore monitor the guidelines.

Reviewing

20. The Governing Board is responsible for the maintenance of this policy and will review it annually in the light of recommendations and any changes made by the Information and Records Management Society