



THE LATYMER SCHOOL
Founded 1624

Data Retention Policy

Document Control

Document Name	Data Retention Policy
The implementation of this document will be monitored by	Senior Leadership Team
Monitoring will take place at regular intervals	Yearly
Approved by the Governing Body	
Frequency of review	Yearly
Date for Next Review	July 2021

Date	Version Number	Description of modification	Author
10/09/2019	1	Draft Policy	EVET / PLR
29/06/2020	2	1st Version for Governing Board, amended by DPO	EVET/DPO

Contents

Policy Scope	2
Data Protection.....	2
Safe Destruction of Data.....	2
Disposal of records that have reached the end of the minimum retention period allocated.....	2
Retention Schedule.....	3
Safe Destruction of Records.....	3
Archiving	4
General and Miscellaneous records.....	4
Transferring Information to Other Media.....	5
Responsibility and Monitoring.....	5
Retention Checklists.....	6

Policy Scope

The Latymer School has a responsibility to maintain its records and record keeping systems. Our approach provides a checklist and attempt to identify processes which our records support, rather than identifying individual records. This is for the following reasons:

- To make the retention period apply to all records independent of any format i.e. same rules apply to paper, email or another electronic document
- To allow flexibility in developing the schedule to cover new process and amend existing ones over time.
- To enable School Business Manager, Clerks, IT Staff, SENCO and other School Staff to carry out an efficient annual review and safe destruction of school records and information.

This policy has been produced in accordance with the guidance produced by the DFE in April 2018 in the “GDPR Toolkit for Schools”. The retention checklists have been produced based on the “Information Management Toolkit for Schools 2019” (IMTIS) which is published by the Information Record Management Society (“IRMS”).

The schedules are intended to cover the lifecycle of records and information from creation through to destruction, or permanent preservation.

The aims of this policy are to:

- Prevent the premature destruction of records that need to be retained for a specified period to satisfy legal, financial and other requirements of public administration
- Provide consistency for the destruction of those records not required permanently after specified periods in order to reduce the costs of unnecessary storage
- Give the public confidence that when information is destroyed it is done so according to well-considered rules.
- Assist in identifying records that may be worth preserving permanently as part of historical archives
- Ensure that records are stored in an efficient and effective way, considering the confidential nature of some records, privacy and disclosure, their accessibility and their security.

Data Protection

The School’s Data Protection Policy outlines its duties and obligations under the GDPR, the Data Protection Act 2018 and other legislation/regulation relating to management and security of personal data.

Safe Destruction of Data

[Disposal of records that have reached the end of the minimum retention period allocated](#)

This policy and associated schedules set 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 Data Protection rules and the Freedom of Information Act 2000 legislation.

The fifth data protection principle as per the data protection rules (updated for GDPR) states that:

“Data kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject”

The school will:

- ensure that records that are no longer required for business use are reviewed as soon as possible under the criteria set out so that only the appropriate records are destroyed.
- The school review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained by the school for research or litigation purposes.
- Document decisions as part of the records management policy within the school

Retention Schedule

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedules. 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

Electronic records will be regularly monitored by: The Data Manager / Network Manager

The retention schedules listed at the end of this document are each 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.

Safe Destruction of Records

Where records have been identified for destruction they should be disposed of in an appropriate way; All records containing personal information, or sensitive policy information should be made either unreadable or unreconstructedly.

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. Do not put records in with the regular waste or a skip unless there is no other alternative All electronic information will be deleted.

All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed:

- Whenever there is the possibility of litigation, the records and information that are likely to be affected should not be amended or disposed of until the threat of litigation has been removed.
- Records that are currently (or known to be in the future) the subject of a Freedom of Information, Data Protection, Environmental Information Regulations etc.; official request or appeal, must not be destroyed until that request or appeal has been completed.

To knowingly destroy a record when it is subject to a request/ complaint is an offence.

The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction

When destroying documents, the appropriate staff member should record at least:

- File reference (or other unique identifier);
- File title (or brief description);
- Number of files and date range
- The name of the authorising officer
- Date action taken

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 Administrative team. The appropriate staff member, 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.

Data Protection law provides an exemption for information about identifiable living individuals that is held for research, statistical or historical purposes to be held indefinitely; provided specific requirements are met. It is the responsibility of the Archivist to ensure that further processing of personal data is lawful.

General and Miscellaneous records

There are some records that do not need to be kept at all that staff may routinely destroy in the normal course of business. The retention schedule will still contain reference and instructions referring to them.

This usually applies to information that is duplicated, unimportant or only of short-term value.

Unimportant records or information include:

- 'With compliments' slips
- Catalogues and trade journals
- Telephone message slips
- Non-acceptance of invitations
- Trivial email messages or notes that are not related to our business
- Requests for stock information such as maps, plans or advertising material
- Out-of-date distribution lists
- Working papers which lead to a final report

Duplicated and superseded material such as manuals, drafts, forms, address books and reference copies of annual reports may be destroyed under this rule. Electronic copies of documents where a

hard copy has been printed and filed, and paper faxes after making and filing a photocopy, are also covered

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, Data Manger and Network Manger have joint overview in the 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.

Retention Checklists

1	Pupil Management
	<ul style="list-style-type: none"> - Admissions - Parent Details - Curriculum - School Office Use - SEN - Safeguarding - Schools Trips and extra-curricular - Medical
2	Examinations and Results Management
	<ul style="list-style-type: none"> - Internal Examinations Arrangements - External Examinations Arrangements - Entrance Test Arrangements - External Examination Results Processing
3	School Workforce / Human Resources
	<ul style="list-style-type: none"> - Payroll - Absences - Personnel Information
4	Financial Management of the School and associated Organisations
	<ul style="list-style-type: none"> - Financial Data Retention - Lettings Management
5	Property and Maintenance Management
	<ul style="list-style-type: none"> - Plans of building - Insurance - Site Maintenance Records
6	Governing Body
	<ul style="list-style-type: none"> - Meeting Agendas - Meeting Minutes - Reports
7	IT Systems
8	Management of the School
	<ul style="list-style-type: none"> - Senior Leadership Team - Curriculum Management - Central Government and Local Authority
9	Health and safety
10	List of School Records and Data safely destroyed