



## **Data Retention Policy for ACT and the following Academies:**

Our Lady of Lourdes Catholic Primary School  
Sacred Heart Catholic Primary School  
St Helen's Catholic Primary School  
Holy Family Catholic Primary School  
St Teresa's Catholic Primary School  
St Joseph's Catholic Primary School  
St George's Catholic Primary School  
Our Lady of Ransom Catholic Primary School  
St Thomas More High School

**This Data Retention Policy has been approved and adopted by the Assisi Catholic Trust in February 2019 and reviewed in September 2020. This policy will be reviewed every three years.**

**Committee Responsible: Audit and Risk Committee**

Assisi Catholic Trust Mission Statement

*Our mission is to inspire the children in our care and that our schools place Christ and the teaching of the Catholic Church at the centre of all we do. We believe that every child has a right to educational excellence and we are committed in partnership to ensure this happens.*

Motto

*'Start doing what is necessary, then do what's possible and suddenly you are doing the impossible'*

## Data Retention Policy

### Introduction

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

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 Schools maintain 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 maintained by: Database Managers, HR Teams and/or Administrative teams. 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.

### **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 Managers, Trust Chief Financial Officer, Data Managers and Network Managers have joint overview in the primary and day-to-day responsibility for implementing this Policy. The Data Protection Officer for the Trust, in conjunction with the Schools Data Protection Officers, are responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The Trust data protection officer will consider the suitability and adequacy of this policy and report improvements directly to Trustees.

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 Period File Description

### *Employment Records*

Job applications and interview records of unsuccessful candidates

Job applications and interview records of successful candidates

Written particulars of employment, contracts of employment and changes to terms and conditions

Right to work documentation including identification documents

Immigration checks

DBS checks and disclosures of criminal records forms

Change of personal details notifications

Emergency contact details

Personnel and training records

Annual leave records

Consents for the processing of personal and sensitive data

Working Time Regulations:

- Opt out forms
- Records of compliance with WTR

Disciplinary and training records

Allegations of a child protection nature against a member of staff including where the allegation is founded

## Retention Period

Six 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

6 years after employment ceases

6 years after employment ceases

2 years after employment ceases

Two years after the termination of employment

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.

No longer than 6 months after receiving this notification

Destroyed on termination

While employment continues and up to six years after employment ceases

Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year

For as long as the data is being processed and up to 6 years afterwards

- Two years from the date on which they were entered into
- Two years after the relevant period

6 years after employment ceases

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.