



KING JAMES'S SCHOOL
KNARESBOROUGH

Document Retention – GDPR

Policy updated May 2018

To be ratified by the Board of Governors July 2018

Please note that any reference to GDPR may be subject to change as the Data Protection Bill progresses and related policies will be updated to GDPR)

Approved by the Governing Body:

Signed:

Date:

Review Date: June 2019

May 2021

This policy is to ensure that King James's School complies with the requirements of the General Data Protection Regulation, Environmental Information Regulations 2004 (EIR) and Freedom of Information Act 2000 (FOIA), associated guidance and Codes of Practice issued under the legislation. In line with the requirements of the General Data Protection Regulation (GDPR), King James's School also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended. This policy also has due regard to the following guidance, Information Records Management Society 'Information Management Toolkit for Schools' 2016 version 5. This policy will be implemented in accordance with the following school policies and procedures:

- Information Policy
- Information Security Policy
- CCTV Policy
- IT Policy
- Privacy Policy for Staff
- Privacy Policy for Students and Parents

Data Protection Responsibilities

Personal data will be processed in accordance with the requirements of GDPR and in compliance with the data protection principles specified in the legislation.

The school has notified the Information Commissioner's Office that it is a Data Controller and has appointed a Data Protection Officer (DPO). Details of the DPO can be found here:

Information Governance
Veritau Ltd
County Hall
Racecourse Lane
Northallerton
DL7 8AL

schoolsDPO@veritau.co.uk
01609 53 2526

Information Asset Owners

An Information Asset Owner (IAO) is the individual responsible for an information asset, understands the value of that information and the potential risks associated with it. The school will ensure that IAO's are appointed based on sufficient seniority and level of responsibility. King James's School has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements. It is the responsibility of the Headteacher and Director of Business Services to ensure the policy is implemented correctly and in line with the policy. Employees of King James's School have a responsibility for the accuracy, safe handling, storage and disposal of records.

1. Management of Trainee Teacher Records

- 1.1. Trainee Teacher records are specific documents that are prior to, during and after a trainee decides to apply and train with King James's School.
- 1.2. The information below is stored in a trainee file, and will be easily accessible:
 - Attendance Information
 - Additional support trainees may receive
 - DBS
 - Interview Records
 - Major incidents notes
 - Notes of complaints
 - Trainee Progress Reports/Reviews/Grading
 - UCAS Application Form
- 1.3. The following information is subject to shorter retention periods. These will be kept by the Teaching School Administrator in a separate file:
 - Sick notes
 - Correspondence with trainees, schools and HEIs about minor issues
- 1.4. Hard copies of disclosures relating to criminal records or serious incidents are retained by HR and are stored in the HR office.
- 1.5. If a trainee enrolls on the course, King James's School will keep the trainee's records for 6 years.

2. Retention of trainee records and other trainee-related information

- 2.1. The table below illustrates King James's School retention periods for individual trainee records and the action that will be taken after the retention period.
- 2.2. All forms of information will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Admissions		
UCAS application form	3 years after the date the entry was made	Information is reviewed and the register may be kept permanently
Interview Documentation	The current academic year, plus 1 year	Secure disposal
Identification Documents	Added to the pupil's record	Secure disposal
Qualifications Documents	Added to the pupil's record	Secure disposal
DBS Information	Until the appeals process has been completed	Secure disposal
Pupil's educational records		
Trainee Progress Data	Deleted on completion of course	Secure disposal

Schools Placement Lists	Deleted on completion of course	Secure disposal
Trainee Review Documents	Deleted on completion of course	Secure disposal
Cause for Concern Documents	Deleted on completion of course	Secure disposal
Supplementary Information on Trainees	Deleted on completion of course	Secure disposal
Attendance		
Attendance registers	Deleted on completion of course	Secure disposal
Sick Notes/Leave of Absence Documents	Deleted on completion of course	Secure disposal
SEND		
Disability Documents	Deleted on completion of course	Secure disposal, unless it is subject to a legal hold

3. Educational Visits Outside the Classroom

- 3.1. The table below illustrates King James's School retention periods for Educational Visit outside the Classroom and the action that will be taken after the retention period.
- 3.2. All forms of information will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Educational Visits outside the Classroom		
Records created to obtain approval to run Educational Visits outside the Classroom	Date of visit, plus 10 years	Secure disposal
Parental consent form from parent on trip with no major incident	Conclusion of trip	Secure disposal
Parental consent form from parent on trip with major incident	DOB of pupil plus 25 years	Secure disposal

4. Pupil's Educational Record

- 4.1. The table below illustrates King James's School retention periods for Pupil's Educational Record and the action that will be taken after the retention period.
- 4.2. All forms of information will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Pupil's Educational Record		
Pupil's Educational Record required by the Education (Pupil Information) (England) Regulations 2005	DOB, plus 25 years	Secure disposal
Child protection information held on pupil file	Kept in sealed envelope and retained for the same period as pupil file	Secure disposal (shredded)
Child protection information held in separate files	DOB, plus 25 years	Secure disposal (shredded)
Attendance		
Attendance records	3 years from date the entry was made	Secure disposal
Authorised absence correspondence	Current year plus 2 years	Secure disposal
Special Educational Needs		
Special Educational Needs files, reviews and education plans	DOB plus 25 years	Secure disposal. This is a minimum retention period. SEN files can be retained for longer to respond to any claims against 'failure to provide sufficient education'. Any decision made to keep records beyond the minimum retention period must be documented.
Information and advice provided to parents regarding educational needs	DOB plus 25 years	Secure disposal
Accessibility strategy	DOB plus 25 years	Secure disposal

5. School Meal Management

5.1. The table below illustrates King James's School retention periods for School meal management and the action that will be taken after the retention period.

5.2. All forms of information will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
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School Meal Management		
Free School Meal register	Current year, plus 6 years	Secure disposal
School meal register	Current year, plus 3 years	Secure disposal
School meals summary sheets	Current year, plus 3 years	Secure disposal

6. Retention of staff records

6.1. The table below illustrates King James's School retention periods for staff records and the action that will be taken after the retention period.

6.2. All forms of information will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Operational		
Staff personal file	Termination of employment, plus 6 years	Secure disposal
Timesheets	Current year, plus 6 years	Secure disposal
Annual appraisal and assessment records	Current academic year, plus 5 years	Secure disposal
Sickness Records	Current year, plus 6 years	Secure disposal
Annual leave	Current year, plus 2 years	Secure disposal
Unpaid leave / special leave records	Current year, plus 3 years	Secure disposal
Recruitment		
Records relating to new Headteacher appointment	Date of appointment, plus 6 years	Secure disposal
Records relating to new members of staff (unsuccessful candidates) appointment	Date of appointment of successful candidate, plus 6 months	Secure disposal
Records relating to new members of staff (successful candidates) appointment	Relevant information added to the member of staff's personal file. All other information retained for 6 months	Secure disposal
DBS checks	Up to 6 months	Secure disposal
Proof of identify as part of the enhanced DBS check	After identity has been proven	Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy this will be placed on the

		staff member's personal file, if not, secure disposal
Evidence of right to work in the UK	Added to staff personal file or, if kept separately, termination of employment, plus no longer than 2 years	Secure disposal
Disciplinary and grievance procedures		
Child protection allegations against a member of staff, including where the allegation is unproven	Until the individual's normal retirement age, or 10 years from the date of the allegation whichever is longer. Then review Malicious allegations are removed from personal files	Secure disposal
Oral warnings	6 months from date of warning	Secure disposal – if placed on staff personal file, removed from file
Written warning – level 1	6 months from date of warning	Secure disposal – if placed on staff personal file, removed from file
Written warning – level 2	12 months from date of warning	Secure disposal – if placed on staff personal file, removed from file
Final warning	18 months from date of warning	Secure disposal – if placed on staff personal file, removed from file
Records relating to no case to be answered	Dispose of at conclusion of the case, unless the incident is child protection related and is disposed of as above	Secure disposal

7. Retention of Teaching School Strategic Board Records

- 7.1. The table below illustrates King James's School retention periods for senior Leadership and Management records and the action that will be taken after the retention period.
- 7.2. All forms of information will be destroyed in line with the retention periods below.

File Description	Retention period	Actions taken at end of retention period
Governing Body		
Agendas for Governing Body board meetings	One copy is to be retained alongside the original set of minutes – all others to be disposed of	Secure disposal
Principal set of minutes, original and signed	Permanent	
Reports presented to the Governors	Minimum 6 years, if an individual is referred to these reports are kept permanently	Securely disposed of or, if they refer to individual reports, retained with the signed copy of minutes
Meeting papers relating to annual parents meeting held under section 33 Education Act 2002	Minimum of 6 years from date of meeting	Secure disposal
Instruments of Government, including Articles of Association	Permanent	Retention within school and offered to County Archives Service when school closes
Action plans created and administered by the Governing Body	Duration of the action plan, plus 3 years	Secure disposal
Policy documents created and administered by the Governing Body	Duration of the policy, plus 3 years	Secure disposal
Records that relate to complaints dealt with by the strategic board	Minimum 6 years from date of resolution of the complaint	Secure disposal
Annual Reports created under the requirements of the Education (Governors Annual Reports)(England)(Amendments) Regulations 2002	3 years from date approved/declined	Secure disposal
Proposals concerning changing the teaching school status	3 years from date approved/declined	Secure disposal
Teaching School Minutes and Documentation		
Minutes of teaching staff meetings and meetings of other internal administrative bodies	Date meeting, plus 3 years	Reviewed and secure disposal

Reports created by teaching staff	Date of report, plus minimum of 3 years	Reviewed and secure disposal
Records created by the Headteacher, Deputy Head or administrative team	Current academic year, plus 6 years	Reviewed and secure disposal
Correspondence created by the Headteacher, Deputy Head or administrative team	Date of correspondence, plus 3 years	Reviewed and secure disposal
School Development Plan	Duration of the plan, plus 3 years	Secure disposal

8. Retention of Health and Safety Records

8.1. The table below illustrates King James's School retention periods for health and safety records and the action that will be taken after the retention period.

8.2. All forms of information will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Health and Safety		
Health and safety risk assessments	3 years plus duration of risk assessment	Secure disposal
Health and safety Policy	3 years plus life of policy	Secure disposal
Records relating to accidents and injuries at work	12 years from date of incident. 15 years is applied in the case of serious accidents	Secure disposal
Adults – accident reporting	6 years from date of the incident	Secure disposal
Pupils – accident reporting	Pupil's date of birth plus 25 years	Secure disposal
Control of Substances Hazardous to Health (COSHH)	Current year, plus 40 years	Secure disposal
Documentation relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action, plus 40 years	Secure disposal
Documentation relating to areas where employees and persons are likely to come into contact with radiation	Date of last action, plus 50 years	Secure disposal
Fire precautions log books	Current year, plus 6 years	Secure disposal

9. Retention of Financial Records

9.1. The table below illustrates King James's School retention periods for financial records and the action that will be taken after the retention period.

9.2. All forms of information will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Payroll Pensions		
Maternity pay records	Current year, plus 3 years	Secure disposal
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current year, plus 6 years	Secure disposal
Risk management and insurance	Current academic year, plus 6 years	Secure disposal
Employer's liability insurance certificate	Closure of school plus 40 years	Secure disposal
Asset Management		
Burglary, theft and vandalism report forms	Current year, plus 6 years	Secure disposal
Inventory of furniture and equipment	Current year, plus 6 years	Secure disposal
Accounts and Statements including Budget Management		
Annual accounts	Current academic year, plus 6 years	Secure disposal
Loans and grants managed by the school	Date of last payment on the loan + 12 years then review	Secure disposal
All records relating to the creation and management of budgets	Current year, plus 6 years	Secure disposal
Student grant applications (Bursary/Foundation)	Current year, plus 6 years	Secure disposal
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus 6 years	Secure disposal
Records relating to the collection and banking of monies	Current financial year, plus 6 years	Secure disposal
Records relating to the identification and collection of debt	Current financial year, plus 6 years	Secure disposal

Contract Management		
All records relating to the management of contracts under seal	Last payment of contract, plus 12 years	Secure disposal
All records relating to the management of contracts under signature	Current academic year, plus 6 years	Secure disposal
All records relating to the monitoring of contracts	Current academic year, plus 6 years	Secure disposal
School Fund		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus 6 years	Secure disposal

10. Retention of other school records

10.1. The table below illustrates King James's School retention periods for any other records and the action that will be taken after the retention period.

10.2. All forms of information will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Property Management		
Title deeds of properties belonging to the school	Permanent – follow the property unless the property has been registered with the Land Registry	Transferred to new owners if the building is leased or sold
Plans of property belonging to the school	Held for the period the building belongs to the school	Transferred to new owners if the building is leased or sold
Leases of property leased by or to the school	Expiry of lease, plus 6 years	Secure disposal
Records relating to the letting of school premises	Current financial year, plus 6 years	Secure disposal
Maintenance		
All maintenance records relating to the school carried out by contractors	Current year, plus 6 years	Secure disposal
All maintenance records relating to the school carried out by school employees	Current year, plus 6 years	Secure disposal

Operational Administration		
Creation and publication of the school brochure and/or prospectus record	Current academic year, plus 3 years	Disposed of against common standards
Creation and distribution of circulars to staff, parents or pupils record	Current academic year, plus 3 years	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year plus 1 year	Disposed of against common standards
Visitors' books and signing-in sheets	Current academic year	Reviewed then Secure disposal
Creation and management of Parent Teacher Associations and/or old pupil associations record	Current academic year, plus 6 years	Reviewed then Secure disposal

11. Statistics and Management Information

11.1. The table below illustrates King James's School retention periods for Statistics and Management Information and the action that will be taken after the retention period.

11.2. All forms of information will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Statistics and Management Information		
Curriculum returns	Current year, plus 3 years	Secure disposal
Examination results	Current year, plus 6 years	Secure disposal
SATS results	Kept on student file until age 25 years. School may keep a composite record of all results for comparison purposes, current year plus 6 years.	Secure disposal
Examination papers	Kept until all appeals/validation processes are complete	Secure disposal
Published Admissions Number (PAN) Reports	Current year, plus 6 years	Secure disposal
Value Added and Contextual Data	Current year, plus 6 years	Secure disposal
Self-Evaluation Forms	Current year, plus 6 years	Secure disposal

12. Implementation of Curriculum

12.1. The table below illustrates King James's School retention periods for Implementation of Curriculum and the action that will be taken after the retention period.

12.2. All forms of information will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Implementation of Curriculum		
Schemes of Work	Current year, plus 1 year	Review at end of each year and allocate further retention or secure disposal.
Timetable	Current year, plus 1 year	Review at end of each year and allocate further retention or secure disposal.
Class Records books	Current year, plus 1 year	Review at end of each year and allocate further retention or secure disposal.
Mark books	Current year, plus 1 year	Review at end of each year and allocate further retention or secure disposal.
Record of homework set	Current year, plus 1 year	Review at end of each year and allocate further retention or secure disposal.
Pupil's work	Return to pupil if possible, if not current year plus 1 year	Secure disposal

13. Local Authority

13.1. The table below illustrates King James's School retention pertaining to the Local Authority and the action that will be taken after the retention period.

13.2. All forms of information will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Local Authority		
Secondary transfer sheets	Current year, plus 2 years	Secure disposal
Attendance returns	Current year, plus 1 year	Secure disposal

School Census returns	Current year, plus 5 years	Secure disposal
Circulars and other information sent from the Local Authority	Operational use	Secure disposal

14. Central Government

14.1. The table below illustrates King James’s School retention pertaining to the Central Government and the action that will be taken after the retention period.

14.2. All forms of information will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Local Authority		
OFSTED reports and papers	Life of report, then review	Secure disposal
Returns made to central government	Current year, plus 6 years	Secure disposal
Circulars and other information sent from Central Government	Operational use	Secure disposal

15. Storing and Protecting Information

15.1. The Director of Business Services will undertake a risk analysis to identify which records are vital to school management and these records will be stored in the most secure manner. Back ups are completed nightly and key data is secured in the cloud. Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access. Confidential paper records are not left unattended or in clear view when held in a location with general access. All staff members will implement a ‘clear desk policy’ to avoid unauthorised access to physical records containing sensitive or personal information. Any confidential information will be stored in a securely locked filing cabinet, drawer or safe with restricted access. Visitors to areas of the school containing sensitive information are supervised at all times.

15.2 Staff are not permitted to use storage devices eg USB sticks to hold student data. Devices used by staff will be encrypted with a password. All electronic devices are password-protected to protect the information on the device in case of theft. All staff iPads are set up for remote detection, blocking or deletion of data in case of theft. Staff are provided with their own secure login and password.

15.3 Emails containing sensitive or confidential information are password-protected if there are unsecure servers between the sender and the recipient. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients. Any person taking the information from the school premises accepts full responsibility for the security of the data.

- 15.4 Before sharing data, staff always ensure that:
- They have consent from data subjects to share it.
 - Adequate security is in place to protect it.
 - The data recipient has been outlined in a privacy notice.
- 15.5. The physical security of the school's buildings and storage systems, and access to them, is reviewed termly by the Site Manager in conjunction with the Director of Business Services.
- 15.6. Any loss, damage or theft of data will be managed in accordance with the school's Information Security Policy. The school takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.

16. Information Audit

- 16.1. The school conducts information audits to complete the Information Asset Register on an annual basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the GDPR. This includes the following information:
- Paper documents and records
 - Electronic documents and records
 - Databases
 - Sound recordings
 - Video and photographic records
 - Hybrid files, containing both paper and electronic information
- 16.2. The information audit may be completed in a number of ways, including, but not limited to:
- Interviews with staff members with key responsibilities – to identify information and information flows, etc.
 - Questionnaires to key staff members to identify information and information flows, etc.
 - A mixture of the above
- 16.3. The DPO is responsible for checking the Information Asset Register and will consult with staff members involved in the information audit process to ensure that the information is accurate.

17. Disposal of data

- 17.1 Where disposal of information is outlined as standard disposal, this will be recycled appropriately to the form of the information, e.g. paper recycling, electronic recycling.

- 17.2. Where disposal of information is outlined as secure disposal, this will be disposed off by an approved Third Party securely and documented and electronic information will be scrubbed clean and, where possible, cut. The Information Asset Owner will keep a record of all files that have been destroyed. If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

18. Monitoring and Review

- 18.1. This policy will be reviewed on an annual basis by the DPO in conjunction with the Director of Business Services and the Headteacher – the next scheduled review date for this policy is June 2019. Any changes made to this policy will be communicated to all members of staff and the Governing Body.