**Lansdowne Turney**

**Federation**

**Lansdowne Turney Federation**

**DATA RETENTION POLICY**

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

Paper records will be regularly monitored by Federation Business Manager – Nicola Smith.

Electronic records will be regularly monitored by Federation Business Manager – Nicola Smith.

The schedule is a relatively lengthy document listing the many types of records used by the Federation 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 Federation 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 maintained by the Office Manager / Finance & Admin Officer 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**

Federation Business Manager – Nicola Smith has primary and day-to-day responsibility for implementing this Policy. The Data Protection Officer, in conjunction with the Federation 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** | **RETENTION PERIOD** |
|  |  |
| **Employment Records** |  |
|  |  |
| Job applications and interview records of | Six months after notifying unsuccessful |
| unsuccessful candidates | candidates, unless the Federation 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 | 6 years after employment ceases |
| successful candidates |  |
| Written particulars of employment, | 6 years after employment ceases |
| contracts of employment and changes to |  |
| terms and conditions |  |
| Right to work documentation including | 2 years after employment ceases |
| identification documents |  |
|  |  |
| Immigration checks | Two years after the termination of |
|  | employment |
|  |  |
| DBS checks and disclosures of criminal | As soon as practicable after the check has |
| records forms | 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 | For as long as the data is being processed |
| and sensitive data | 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 | 10 years from the date of the allegation |
| against a member of staff including where | or the person’s normal retirement age |
| the allegation is founded | (whichever is longer). This should be kept |
|  | under review. |

|  |  |
| --- | --- |
|  | Malicious allegations should be removed. |
|  |  |
| **Financial and Payroll Records** |  |
|  |  |
| Pension records | 12 years |
|  |  |
| Retirement benefits schemes – notifiable | 6 years from the end of the scheme year |
| events (for example, relating to | in which the event took place |
| incapacity) |  |
| Payroll and wage records | 6 years after end of tax year they relate |
|  | to |
| Maternity/Adoption/Paternity Leave | 3 years after end of tax year they relate |
| records | to |
| Statutory Sick Pay | 3 years after the end of the tax year they |
|  | relate to |
| Current bank details | No longer than necessary |
|  |  |
| **Agreements and Administration Paperwork** |
|  |  |
| Collective workforce agreements and past | Permanently |
| agreements that could affect present |  |
| employees |  |
| Trade union agreements | 10 years after ceasing to be effective |
|  |  |
| Federation Development Plans | 3 years from the life of the plan |
|  |  |
| Professional Development Plans | 6 years from the life of the plan |
|  |  |
| Visitors Book and Signing In Sheets | 6 years |
|  |  |
| Newsletters and circulars to staff, parents | 1 year |
| and pupils |  |
| **Health and Safety Records** |  |
|  |  |
| 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 | For at least twelve years from the date |
| connection with work | 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: - | 40 years from the date of the last entry |
|  | made in the record |
| · control of lead at work |  |
| · employees exposed to asbestos |  |
| dust |  |

|  |  |
| --- | --- |
| · records specified by the Control of |  |
| Substances Hazardous to Health |  |
| Regulations (COSHH) |  |
|  |  |
| Records of tests and examinations of | 5 years from the date on which the record |
| control systems and protection equipment | was made |
| under COSHH |  |
| **Temporary and Casual Workers** |  |
|  |  |
| Records relating to hours worked and | 3 years |
| payments made to workers |  |
| **Pupil Records** |  |
|  |  |
| Admissions records | 1 year from the date of admission |
|  |  |
| Admissions register | Entries to be preserved for three years |
|  | from date of entry |
| Federation Meals Registers | 3 years |
|  |  |
| Free Federation Meals Registers | 6 years |
|  |  |
| Pupil Record | Until the pupil turns 25 |
|  |  |
| Attendance Registers | 3 years from the date of entry |
|  |  |
| Special Educational Needs files, reviews | Until the child turns 25. |
| and individual education plans (this |  |
| includes any statement and all advice and |  |
| information shared regarding educational |  |
| needs) |  |
| Emails | Keeping files for no longer than 5 years |
|  |  |

**Other Records**

**Reviewed by the Governing Body July 2020**

**To be reviewed by the Governing Body July 2021**