



Data Retention Policy

Crofty Multi Academy Trust

Date of Drafting: April 2018

Adopted Date:

Review Date: April 2020

This policy should be read in conjunction with the following documents:

- Data protection policy.
- Freedom of information.

Introduction

The Data Protection Act 1998 and General Data Protection Regulations 2018 makes it clear that records should be kept for no longer than necessary. This means that school managers need to be aware of how long each type of record needs to be retained in law, where it might be judicious to retain records for a longer period, and how to destroy records that are no longer needed.

Under the Freedom of Information Act 2000, schools are required to maintain a retention schedule listing the record series, which the school creates in the course of its business. The retention schedule lays down the length of time for which the record needs to be maintained and the action which is taken when it is of no further administrative use (what is destroyed, when it was destroyed and by whom).

This policy is based upon the policy recommended by the Records Management Society for maintained schools in England. Crofty MAT recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations. This document provides the policy framework through which this effective management can be achieved.

Objectives and targets

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.

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.

Action plan

The school keeps records under a wide variety of headings:

- Child protection.
- Governors.
- Management.
- Pupils.
- Curriculum.
- Personnel records of staff.
- Health and safety.
- Administration.
- Finance.
- Property.
- School meals.
- DFE, local authority (LA), work experience and careers, family liaison.

The school has a corporate responsibility to maintain these records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the school's Head Teacher. The person responsible for records management in the school 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.

Members of staff are expected to manage their current record keeping using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems. The guidelines follow those set out in the Records Management Toolkit for schools version 5 (updated in 2016), and can be found on the Information and Records Management Society's website or by following the below link to the pdf on our school website:

[add link to website to pdf]

There are a number of benefits from the use of a complete retention schedule:

- Managing records against the retention schedule is deemed to be 'normal processing' under the Data Protection Act 1998 and the Freedom of Information Act 2000. Provided members of staff are managing record series using the retention schedule they cannot be found guilty of unauthorised tampering with files once a freedom of information request or data subject access request has been made.
- Members of staff can be confident about shredding information at the appropriate time.
- Information which is subject to freedom of information and data protection legislation will be available when required.
- The school is not maintaining and storing information unnecessarily.

Archives

Old accounting and personnel records, and some other records, will 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.

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, whether there will have an adequate means for accessing and printing the record.

Disposal of records

When the period of retention has expired, and there is no other reason to keep them, the records may be disposed of. The records will be destroyed by shredding paper, cutting up CDs and similar items, dismantling, and destroying hard drives. Non-sensitive papers will be bundled and disposed of to a waste paper recycling merchant. A list is kept of records, which have been destroyed. This list includes:

- The file reference.
- The file title or a brief description.
- The number of files and date range.
- The name of the authorising officer.
- The date the file was destroyed.

Reviewing

The governing body is responsible for the maintenance of this policy and will review it bi-annually in the light of recommendations and any changes made by the Information and Records Management Society.