



Data Retention policy (GDPR compliant)

1. Aim and scope of policy

This policy applies to the personal data of students, parents, carers, guardians, job applicants, existing and former employees, apprentices, volunteers, placement students, workers and self-employed contractors. It applies to personal data in manual and electronic form.

The policy stipulates the length and time a record needs to be retained, the basis on which the information is retained and the action which should be taken when it is no longer required

Where third parties process data on behalf of the School, the School will ensure that the third party takes such measures to retain securely such data and return or destroy data that no longer required in line with this policy.

2. Types of data held

The retention schedule in appendix 1 refers to all personal data, regardless of the media in which they are stored

Employees/workers/volunteers of the school are expected to manage their current personal data storage systems using the retention schedule (appendix 1). In addition, they are expected to incorporate the different kinds of retention periods and storage considerations into account when creating new personal data recording systems.

3. Data security

The School adopts procedures designed to maintain the security of personal data when it is stored. More information can be found in the Data Protection Policy on our website at www.droitwichspahigh.worcs.sch.uk

Failure to follow the School's rules on data security may be dealt with via the School's disciplinary procedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

4. Data Protection Officer

The School's appointed Data Protection Officer is Head of Governance in respect of its data protection activities who can be contacted at Droitwich Spa High School and Sixth Form Centre, Briar Mill, Droitwich, WR9 0AA or by email at privacy@droitwichspahigh.worcs.sch.uk.

5. Chief Privacy Officer

The HR and Administration Manager is the School's appointed chief privacy officer in respect of its data protection activities who can be contacted at Droitwich Spa High School and Sixth Form Centre, Briar Mill, Droitwich, WR9 0AA or by email at privacy@droitwichspahigh.worcs.sch.uk

The schools policies, privacy notices and forms are available on our web site at

<https://website.droitwichspahigh.worcs.sch.uk/index.php/communications/information-management-and-data-protection/>



DROITWICH SPA HIGH SCHOOL AND SIXTH FORM CENTRE

APPENDIX 1

DROITWICH SPA HIGH SCHOOL AND SIXTH FORM CENTRE RETENTION SCHEDULE TO BE USED IN CONJUNCTION WITH SCHOOL DATA PROTECTION AND DATA RETENTION POLICIES

Type of Document/File	Retention Period	Justification for Retention	Action Taken at end of Retention Period
ADMISSIONS			
Register of Admissions	Twenty five years after the students date of birth	<p>Statutory Provisions include the School Admissions Code and Departmental advice for maintained schools, academies, independent schools and local authorities October 2014.</p> <p>We often receive enquiries from past pupils to confirm the dates they attended school.</p> <p>Admissions data is used extensively from the period of the school receiving it up until the point where children enrol.</p>	Information held will be reviewed and may be retained for twenty five years after the students date of birth otherwise it will be disposed of using an appropriate secure method
Supplementary information submitted with application/appeal documentation, including religious and medical information etc. (where the admission was successful)	Twenty five years after the students date of birth	<p>It is then used for some validation and cross checking of enrolment details. Once enrolled, the child's records in the Management Information System become the core record.</p>	Appropriate secure disposal methods

Supplementary information submitted with application/appeal documentation, including religious and medical information etc. (where the admission was NOT successful)	Until the appeals process has been completed	Data about children who enrolled but didn't get in is useful, but any intelligence gathered from it (for example, the SEN make up) is aggregated within the first year to a level that is non-personal, after that, the detailed data within the admission file will be deleted.	Appropriate secure disposal methods
		<p>It is important to retain detailed data for a year, any appeals for which richer data about other successful/unsuccessful appeals may be relevant typically happen in the first year.</p> <p>Information about admissions appeals</p> <p>When dealing with appeals, having a reasonable history of any other appeals in some detail can be needed to deal with the particular appeal. The information is needed alongside the admissions policies of the time.</p>	
STUDENT/EDUCATIONAL RECORDS			
Public Examination results (Schools Copy)	Current year plus 6 years	Uncollected certificates will be returned to the examination board	Appropriate secure disposal methods
Internal examination results	Twenty five years after the students date of birth		Appropriate secure disposal methods
Students' marked examination scripts	Until the appeals / validation process has been completed	To meet the requirements of examination board validation and or appeals processes	Appropriate secure disposal methods



Photographs and videos used for examination/course assessment purposes	Until the appeals / validation process has been completed	To meet the requirements of examination board validation and or appeals processes	
Student-level value-added / contextual data	Current academic year, plus six years		Appropriate secure disposal methods
Safeguarding and Child Protection Information (held in a separate file from the student file)	Twenty five years after the students date of birth	Statutory Instruments include Keeping children safe in education guidance and Working together to safeguard children. All data on safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name and address) that are needed to identify children with certainty are needed to be retained along with those records	Appropriate secure disposal methods
Attendance data	One year after leaving date of student	Attendance is related to individual attainment and so being able to relate attendance to attainment whilst in our care is important. Keeping it in detailed, individual form for one year	Appropriate secure disposal methods
		after the pupil leaves school support conversations about detailed attendance that may be needed to best support that child. After that period, non-identifiable summary statistics are all that is required to support longer term trend analysis of attendance patterns.	

Correspondence relating to authorised absence	Current academic year plus 2 years	Education Act 1996 Section 7	Appropriate secure disposal methods
Behaviour related information	One year after leaving date of student	This is relevant for managing children when in school. 1 year allows a period of 'handover' if a child moves to another institution with conversations supported by rich data if relevant. However, if an allegation made by or against a student has been found to be unfounded or is not upheld following investigation, only the investigation summary of findings and conclusions will be retained, any copies of student interviews records made during the investigation will be removed from the student file immediately (or in the event of an appeal on the conclusion of the appeal if the investigation outcome is upheld).	Appropriate secure disposal methods
Permanent Exclusions	n/a	Exclusion data will be 'passed on' to subsequent settings. That school then has responsibility for retaining the full history of the child. If a private setting or the school is unsure where the child has gone, then the school will ensure the LA already has the exclusion data.	n/a
EXTRA CURRICULAR ACTIVITIES			
School Trip field file where no major incident occurs	Until the conclusion of the trip	Financial information related to trips should be retained for 6 years + 1 for audit purposes. This would include enough child identifiers to be able to confirm contributions. A 'field file' is the information that is taken on a trip by a school. This can be destroyed following the trip, once any medicines administered on the trip have been entered onto the core system. If there is a minor medical incident on the trip (for example, a medical incident dealt with by staff in the	Appropriate secure disposal methods
School Trips field file where a major incident occurs	Twenty five years after the students date of birth		Appropriate secure disposal methods
Financial records relating to school trip payment	six years plus one year from the date of the trip		Appropriate secure disposal methods



		<p>way it would be dealt with 'within school'), then adding it into the core system would be done.</p> <p>If there is a major incident (for example, a medical incident that needed outside agency) then retaining the entire file until time that the youngest child becomes 25 would be appropriate.</p> <p>Permission to go on the trip slips will contain personal data, and destroying them after the trip unless any significant incident arises is appropriate, otherwise refer to the policies above.</p> <p>Schools sometimes share personal data with people providing 'educational visits' into school. Policies are in place to ensure that the sharing is proportionate and appropriately deleted afterwards.</p>	
SEND Data			
SEND files, reviews and Individual Education Plans (IEPs)	Twenty five years after the students date of birth (NB this is the minimum retention period but will be reviewed at this time to enable defence in the event of any legal action)	Statutory Provisions include: Limitation Act 1980, Education Act 1996, Special Needs and Disability Act 2001 section 1	Appropriate secure disposal methods



Statement of SEN, maintained under Section 324 of the Education Act 1996 / EHC plan, maintained under Section 37 of the Children and Families Act 2014 (and any amendments to the statement or plan)	Twenty-five years after the student's date of birth		Appropriate secure disposal methods
Information and advice provided to parents regarding SEND	Twenty-five years after the student's date of birth		Appropriate secure disposal methods
PERSONAL IDENTIFIERS			
School Photographs for identification/safeguarding purposes		Images are used for different reasons, and the reason should dictate the retention period. Images used purely for identification can be deleted when the child leaves the setting. Images used in displays etc. can be retained for	Appropriate secure disposal methods



		<p>educational purposes whilst the child is at the school. Other usages of images (for example, marketing) should be retained for and used in line with the active informed consent, captured at the outset of using the photograph.</p> <p>As set out in other sections, names are needed for smooth handover to subsequent schools for up to one year.</p> <p>Schools may well provide references for pupils for up to 3 years after they leave, and so retaining the name in the core pupil record is important (this doesn't mean it needs to be retained in all systems). Keeping names attached to safeguarding files for longer than this may be entirely appropriate – see safeguarding section.</p> <p>Characteristics form an essential part of trend analysis, and so retention is in line with those needs.</p>	
Biometric data used for catering identification	When taken off roll or when consent has been withdrawn	Biometric data (thumbprints used in catering) should be used and retained as set out in the active informed consent gained at the outset, but typically this should not be retained long after the activity that requested its use has finished (for example, the child no longer attends the school to have a meal).	Appropriate secure disposal methods
Photographs/video/social media used for other purposes will be by informed consent only	As outlined in consent	Informed consent will be sought to use such items to 'celebrate' success in school and participation in significant events such as competitions, in addition in school	Appropriate secure disposal methods



		publications such as the school prospectus and newsletters.	
Medical information	DOB of the child + 25 years	<p>To support any handover work about effective management of medical conditions to a subsequent institution.</p> <p>Permission forms that parents sign should to be retained for the period that medication is given, and for 1 month afterwards if no issue is raised by child/parent. If no issue is</p>	Appropriate secure disposal methods
		<p>raised in that time that feels a reasonable window to assume all was administered satisfactorily.</p> <p>Medical 'incidents' that have a behavioural or safeguarding angle (including the school's duty of care) should refer to the retention periods associated with those policies.</p>	
PARENT TEACHER ASSOCIATION			
Records relating to the creation and management of PTA that may contain personal identifiers	Current year plus 6 and then review		Appropriate secure disposal methods
CURRICULUM MANAGEMENT			
Schemes of work	Current year plus 1 year		Appropriate secure disposal methods
Timetable	Current year plus 1 year		Appropriate secure disposal methods
Class Record Books	Current year plus 1 year		Appropriate secure disposal methods



Mark Books	Current year plus 1 year		Appropriate secure disposal methods
Record of Homework set	Current year plus 1 year		Appropriate secure disposal methods
Pupils Work	Retained for the current academic year, plus one year (where not already returned to students).		Appropriate secure disposal methods
OPERATIONAL ADMINISTRATION			
Visitor Books and Signing in Sheets	Current year plus 6 and then review		Appropriate secure disposal methods
CCTV Footage	2 months (on a rolling basis)	CCTV footage may be used during an investigation in the event of a security breach on the school site It may also be used to inform an investigation of an alleged serious misdemeanour by a student or students It may also be used to ensure the safety of staff and or students.	Appropriate secure disposal methods
		It may also be used by the school in the event of litigation claims made against us.	
HEALTH AND SAFETY			
Records relating to accident/injury at work	Date of incident plus 12 years. In the event of a serious accident a period of further retention may be required	Statutory instruments that may apply include: Social Security (Claims and Payments) Regulations 1979, Regulation 25. Social Security Administration Act 1992	Appropriate secure disposal methods



Accident Reporting:		Section 8, Limitation Act 1980, Control of Substances Hazardous to Health Regulations 2002, Control of Asbestos at Work Regulations 2012, SI1012 Regulation 19.	Appropriate secure disposal methods
<ul style="list-style-type: none"> Adults Children 	Date of incident plus 6 years DOB of child plus 25 years		
COSHH related information/reports that may contain persona identifiers	Current year plus 40 years		Appropriate secure disposal methods
Asbestos related information/reports that may contain personal identifiers	Last Action plus 40 years		Appropriate secure disposal methods
FINANCIAL INFORMATION			
Student Grant applications	Current year plus 3 years		Appropriate secure disposal methods
Free School Meal registers	Current year plus 6 years		Appropriate secure disposal methods
Parent Pay Records	Current year plus 6 years		Appropriate secure disposal methods
LA Related			
Secondary Transfer Sheets (Primary)	Current year + 2 years		
Attendance Returns	Current year + 1 year		
OUTSIDE AGENCIES			
Referral forms	While the referral is current		Appropriate secure disposal methods
Contact Data Sheets/database entries	Current year and then review and destroy if no longer needed		Appropriate secure disposal methods
HUMAN RESOURCES			

All records leading up to the appointment of a new Headteacher	All the relevant information should be added to the Personal file and retained for duration of employment plus 6 years and 50 years for the	Statutory Instruments that may apply include: Keeping Children Safe in Education Guidance. DBS update Service Guide. (Statutory Guidance from Dept. of Education sections 73 and 74). Home Office Employers Guide to Right to Work Checks. Limitation Act 1980 (Section 2).	Appropriate secure disposal methods
	pension service related information. With the exception of those records shown below	Immigration and Asylum and Nationality Act, Working Time Regulations 1998.	
All records leading up to the appointment of a new member of staff – unsuccessful candidates	Date of appointment of successful candidate + 6 months	Information is retained in line with ICO guidance for litigation defence in the event of action being taken against the school.	Appropriate secure disposal methods
All records leading up to the appointment of a new member of staff – successful candidate	All the relevant information should be added to the staff Personal file and retained for duration of employment plus 6 years and 50 years for the pension service related information. With the exception of those records shown below	Service information will need to be retained to meet the requirements of pension providers who may have queries in relation to service dates. It is also the case that employment dates may need to be confirmed for reference and safeguarding purposes throughout the employment of the individual if they remain in an education environment	Appropriate secure disposal methods



Pre-employment vetting information – DBS Checks No DBS Update Service Employer	The school does not keep copies of DBS certificates. The certificate number and issue date is retained on the schools single central record and within their personnel file SCR data is deleted after date of leaving plus one year when it will be reviewed with a view to further retention if required.		Appropriate secure disposal methods
Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ⁴	Until termination of employment plus 6 years		Appropriate secure disposal methods
Staff Personal File (Paper)	Until termination of employment plus 6 years and 50 years for pension information		Appropriate secure disposal methods
Staff Personnel File (computerised)	Until termination of employment plus 6 years		Appropriate secure disposal methods
Annual appraisal/assessment records	6 years after leaving date		Appropriate secure disposal methods



Allegation of a child protection nature against a member of staff including where the allegation is unfounded ⁵	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from Personnel files. If found they are to be kept on the file and a copy provided to the person concerned		Appropriate secure disposal methods
Disciplinary/ Capability Proceedings	As set out in Disciplinary and Capability Procedures available in Staff handbook and from HR on request		Appropriate secure disposal methods
PAYROLL			
Timesheets	Current year plus 6 years	Statutory instruments that may be applicable include: Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567) Retirement Benefits Schemes (Information Powers) Regulations 1995 Financial Regulations	Appropriate secure disposal methods
Maternity pay records	Current year + 3 years		Appropriate secure disposal methods
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current year plus 6 years		Appropriate secure disposal methods
School salary budget Reports	Current year plus 6 years	In addition, to meet school audit and accounting requirements	Appropriate secure disposal methods



GOVERNANCE			
Agendas for Governor Meetings (where personal identifiers may be used)	One master copy retained with master set of minutes		n/a
Minutes of Governors meetings (where personal identifiers may be used)	permanently and all other copies destroyed		n/a
Reports presented to Governing Bodies (where they contain personal identifiers)	Minimum of 6 years however if minutes refer directly to report then this should also be retained permanently with the minutes		Appropriate secure disposal methods
Records of complaints dealt with by Governing Body	Date of resolution of the complaint and a minimum of 6 years thereafter then a review for further retention in the case of contentious disputes		Appropriate secure disposal methods
HEADTEACHER/SLT RELATED			
Minutes of meetings if they contain personal identifiers	Date of meeting plus 3 years then review for further retention period if required		Appropriate secure disposal methods
Reports created by Head or SLT if they contain personal identifiers	Date of report plus 3 years then review for further retention period if required		Appropriate secure disposal methods
Sundry correspondence created by Head/SLT if they contain personal identifiers	Date of correspondence plus 3 years then review for		Appropriate secure disposal methods

	further retention period if required		
Professional Development Plans	Life of plan plus 6 years		Appropriate secure disposal methods

This Document is to read in conjunction with the following notes:

1. The D of E Schools Toolkit and IRMS Toolkit were used in the development of this retention schedule which conforms to the requirements of the Data Protection Act 2018 and the GDPR Regulations 2018
2. This retention schedule only relates to information that would have data protection issues (ie would contain personal identifiers)
3. For operational reasons disposal of data will take place in the School's summer closure period of the academic year the data becomes due for disposal.
4. All personal data is stored in an appropriate and secure locations until destruction:
 - paper based data is stored in locked cabinets and offices and classrooms remain locked when the school is closed
 - computer based information is retained on secure servers (NB general email correspondence that does not fall into the retention categories outlined above are automatically deleted from the secure servers 30 days from the issue/received date)
5. The date of birth used will be that as shown on the student or staff record
6. Secure disposal methods used by the school include:
 - Destruction of paper documents using an approved contractor who specialised in the secure disposal of paper based data
 - Permanent deletion of computer based records

Data Protection Officer

The School's Data Protection Officer is the *Head of Governance and Compliance* who can be contacted at Droitwich Spa High School and Sixth Form Centre, Briar Mill, Droitwich, WR9 0AA or by email at privacy@droitwichspahigh.worcs.sch.uk.

Chief Privacy Officer

The HR and Administration Manager is the School's appointed chief privacy officer in respect of its data protection activities who can be contacted at Droitwich

Spa High School and Sixth Form Centre, Briar Mill, Droitwich, WR9 0AA or by email at privacy@droitwichspahigh.worcs.sch.uk

[The schools policies, privacy notices and forms are available on our web site at www.droitwichspahigh.worcs.sch.uk](http://www.droitwichspahigh.worcs.sch.uk)

