DATA RETENTION POLICY

Adopted: Autumn 26
Review: Autumn 29

Policy Review and Monitoring

This policy is due to be reviewed at the time stated, unless circumstances determine that this policy needs to be reviewed at an earlier time.

Signed:	**Chair of Governors**	**Headteacher**
	Mr J. Orchard	Mr K. Stroud

DATA RETENTION POLICY

Introduction

Maes yr Haul Primary School has a responsibility to maintain its records and record keeping systems. When doing this, we 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
- Accessibility of records and record keeping systems.

This policy may be amended from time to time as necessary to reflect any alterations to our procedures as may become necessary. Our retention schedule document is separate to this policy.

Data Protection

This policy sets out how long employment-related and pupil data will normally be held by the school and when that information will be confidentially destroyed in compliance with the terms of the UK General Data Protection Regulation (UK GDPR) and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of the school. The School's Data Protection Policy outlines its duties and obligations under the UK 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 school will adhere to the standard retention times listed within that schedule. The retention schedule refers to all records regardless of the media (e.g., paper, electronic, microfilm, photographic etc) in/on which they are stored. These are monitored regularly the senior leaders.

Destruction of Records
The schedule is a relatively lengthy document listing the many types of records used by the school and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

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 wastepaper merchant. All electronic information will be deleted.

Retention of Safeguarding Records
Any allegations made that are found to be malicious must not be part of the personnel records.

For any other allegations made, the school must keep a comprehensive summary of the allegation made, details of how the investigation was looked into and resolved and any decisions reached. This should be kept on the personnel files of the accused.

Any allegations made of sexual abuse should be preserved by the school for the term of an inquiry by the Independent Inquiry into Child Sexual Abuse. All other records (for example, the personnel file of the accused) should be retained until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. In 2022 the Independent Inquiry into Child Sexual Abuse (IICSA) concluded and published their final report, leaving a recommendation that all records relating to child sexual abuse should be retained for a period of 75 years.

The ICO has not currently produced guidance or frameworks regarding retention as recommended by the inquiry. Until this has been produced, records will still be retained for a prolonged period as recommended initially by IISCA in order to fulfil potential legal duties that a school may have in relation to the inquiry or any further guidance.

Emails
Emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost.

Staff should aim to maintain a retention of no more than three years for emails, except for any specific, exceptional cases. Where the content requires an extended period of retention, staff should save this email as an electronic document outside of the email system, so that a ‘standard’ level of email retention can be upheld.

Transferring Information
Where paper records have lengthy retention periods, staff will aim to scan these and save as secure digital files as part of school records on Hwb.

We retain the pupil's educational record whilst the child remains at the school. Once a pupil leaves the school, any paper and electronic files will be sent to their next school. The responsibility for retention then shifts onto the next school. We may retain the file for a year following transfer in case any issues arise as a result of the transfer. We may delay destruction for a further period where there are special factors such as potential litigation.

Responsibility and Monitoring
The headteacher has primary and day-to-day responsibility for implementing this policy. The Data Protection Officer, in conjunction with the school 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. The headteacher will seek to undertake periodic audits to provide assurance that school staff are effective in creating, maintaining and removing records.

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