

ST WILLIAM OF PERTH CATHOLIC PRIMARY SCHOOL



DATA RETENTION POLICY

Reviewed: February 2023

Next Review: February 2024

PURPOSE AND SCOPE

The purpose and scope of this procedure is to define the controls required for the establishment, maintenance and control of documents and data that support the activities of St. William of Perth Catholic Primary School.

Additionally, the purpose and scope of this procedure is to define the controls required for the maintenance and control of records and information that support the activities of the organisation, the management system.

DOCUMENTED INFORMATION

The 'management system' is the collective term used to describe the occupational activities (processes) and written information to control and reflect this (policies, manuals, procedures, arrangements, forms, etc.). This Documented Information can exist in hard copy and/or electronic format however any printed or distributed item is always to be considered 'uncontrolled'.

Instructional documents, such as; policy statements, manuals, handbooks, procedures, flow charts arrangements, work orders, method statements, etc., are available to read, providing guidance on the organisation's requirements and the way in which processes should function.

Working documents, would include; forms, spreadsheets, databases, drawings, etc. These maybe project or time specific and information may be added to these during the process, thus creating 'records'. It is essential that the most up to date version of a document be held, understood and in place at the point of use.

CONTROL OF RECORDS

Physical records generated as a result of operational activity shall be stored under suitable conditions and adequately protected in order to ensure that they remain legible, readily identifiable and retrievable.

The information recorded in hard copy may also be available electronically, however, for ease of reference all hard copy records are retained for a minimum period of seven years, in a secure location, at the head office or with an approved archiving company at an offsite location. Once the retention period has expired, a senior manager shall authorise destruction via shredding of any sensitive items, prior to disposal with general company waste paper.

Computer records created are to be held centrally on a server. There are 4 individual daily back-ups carried out Monday to Friday and held on the server, there is also a weekly back up and 1 monthly back up held on the server. An offsite back up carried out fortnightly and is held in a safe at our IT Management Company Head Office. An additional daily backup will be done of the St. William of Perth's management information system records.

DATA PROTECTION

In accordance with the legal requirements of St. William of Perth their clients, suppliers and all other interested parties, in addition to the elevated need for discretion, it is imperative that data protection is a priority for all personnel working with or on behalf of St. William of Perth.

Data Protection, confidentiality and the best practices to adopt will form part of our training for all staff and starts with the confidential nature of documentation and records. It is accepted that all documents are uncontrolled once printed, however it remains imperative that all documentation and records are treated as commercially, operationally and security sensitive.

DOCUMENT RETENTION

All documents will be retained for minimum of six years from the date of production with an optimal retention period of seven years being the target for St. William of Perth. No maximum retention period has been established with the exception of the following records:

- Employment contract, including personnel and training records, written particulars of employment and changes to terms and conditions – maximum six years after employment ceases (Section 5 Limitation Act 1980 and Data Protection Act 1998);
- Data concerning a temporary worker – maximum six years after employment ceases (Section 5 Limitation Act 1980 and Data Protection Act 1998);
- Reports on employee performance review meetings and assessment interviews (e.g. evaluations, employment application forms of successful applicants, copies of academic and other training received, employment contracts and their amendments, correspondence concerning appointment, appraisals, promotions and demotions, agreements concerning activities in relation to the works council, references and sick leave records) – maximum six years after employment ceases (Section 5 Limitation Act 1980 and Data Protection Act 1998);
- Copy of identification documents – maximum six years after employment ceases (Section 5 Limitation Act 1980);
- Expats records and other records relating to foreign employees (e.g. visa, work permit) – maximum six years after employment ceases (Section 5 Limitation Act 1980);
- Necessary data for emergency medical care, individual reintegration plans, individual treatment agreements, degree of incapacity for work, required workplace adaptations – maximum six years after employment ceases (Section 5 Limitation Act 1980 and Data Protection Act 1998);
- Accident reports (ensuing from obligation on an employer to retain records of any reportable accident, reportable diagnosis, death or injury in connection with work) – maximum six years after employment ceases (Regulation 12, Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013/1471).

After these maximum retention periods have lapsed, the documents will be either:

- Securely disposed of; or
- De-identified (i.e. all references to data subjects should be rendered unreadable).

Annual checks of documentation will be undertaken as part of the internal auditing programme and as files or folders are identified by date or as part of a register, any file or folder that is approaching six years since its creation will be reviewed in line with the guidance identified above.