



# Truro School Records Retention Statement and Schedule

*A copy of this notice is published in the following area:  
The school's website*

Date reviewed: November 2020  
Date for review: December 2021  
Approved by: Kieran Topping, Business Director

## A. Introduction

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Truro School is part of the Methodist Independent Schools Trust (MIST) - an educational charity operating in England and Wales. Truro School is based at Trennick Lane, Truro, TR1 1TH and can be contacted on 01872 272763 and [enquiries@truroschool.com](mailto:enquiries@truroschool.com).

MIST Head Office is based at 25 Marylebone Road, London, NW1 5JR. MIST can be contacted on 020 7935 3723 and [admin@methodistschools.org.uk](mailto:admin@methodistschools.org.uk). MIST's charity registration number is 1142794 and company number is 07649422.

## B. Retention Statement

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Underlying an efficient records management system is a thorough document retention policy for both digital and physical data. A retention policy offers guidance and provides a framework for employees to manage information across its lifecycle enabling the organisation to adhere with the various laws and regulations pertaining to data management. The General Data Protection Regulation (GDPR) takes effect on 25 May 2018. This new data protection law has led Truro School to review its technical and organisational data governance measures. According to its published privacy notices, Truro School will retain information for as long as it has a purpose and a lawful basis for doing so. Truro School's Privacy Notices are publicly available and can be accessed via on the website at <https://www.truroschool.com/truro-senior-school/senior-school-policies/>.

## C. Retention Policy

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Truro School has referred to the Information and Records Management Societies Records Management Toolkit for Schools. Records provide evidence for protecting the legal rights and interests of the office and provides evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited. It covers:

- Scope
- Responsibilities
- Relationships with existing policies
- Data Subject Access Requests (DSARs)

## **D. Scope**

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This policy applies to all records created, received or maintained by employees at Truro School while carrying out its functions. Records are defined as all those documents which facilitate the business carried out by Truro 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.

## **E. Responsibilities**

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Responsibility for data governance lies with the Compliance Committee and is implemented by all members of staff at Truro School. Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the School's records management guidelines.

## **F. Relationships with existing policies/privacy notices**

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- Data Protection Policy
- Privacy Notice
- Staff/Volunteer Privacy Notice
- Data Subject Access Requests (DSAR)

## **G. Data Subject Access Requests (DSAR)**

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All data subjects past and present (staff, volunteers, pupils, parents, governors etc.) have the right to contact Truro School and make a DSAR. The DSAR must be answered within 1 calendar month. The DSAR Policy and form can be accessed via <https://www.truroschoo.com/truro-senior-school/senior-school-policies/>.

## **H. Queries and complaints**

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Any comments or queries on this statement and schedule should be directed to the Head ([head@truroschoo.com](mailto:head@truroschoo.com) 01872 272763). If an individual believes that Truro School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School's complaints procedure and should also notify the Headmaster. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the data controller before involving the regulator.

## RETENTION SCHEDULE

'Secure Destruction' of physical documentation is shredding with a cross shredder at Truro School. When destruction is done externally then a certificate is acquired from the shredding company.

<u>RECORD TYPE</u>	<u>DATA PROTECTION CONCERN?</u>	<u>RETENTION PERIOD</u>	<u>DELETION/DESTRUCTION</u>
<b>GOVERNANCE &amp; SCHOOL BUSINESS</b>			
Instrument of Government, Articles of Association	No	Permanent (or until dissolution of company – review for archive)	n/a
School Deeds	No	Permanent (or until dissolution of company – review for archive)	n/a
Certificates of Incorporation	No	Permanent (or until dissolution of company – review for archive)	n/a
Employers' liability certificate	No	Permanent (or until dissolution of company – review for archive)	n/a
Records for all full Governors meetings, committee, sub-committee and working party meetings, including: 1. agendas 2. signed minutes 3. reports noted in minutes	Yes – may contain personal data depending on meeting and subject	Permanent 1 master meeting record should be retained – spare copies from the meeting should undergo secure destruction. Working copies may be retained for 7 years, should be stored securely and undergo secure destruction when no longer required.	Duplicate  (digital/physical) copies to be securely destroyed.
Action Plans created by the School	No	Project Lifespan + 6 years	Kept digitally – deletion for server. Securely destroy hard copies.

<u>RECORD TYPE</u>	<u>DATA PROTECTION CONCERN?</u>	<u>RETENTION PERIOD</u>	<u>DELETION/DESTRUCTION</u>
Policy documents agreed by the School (not including safeguarding related policies)	No	Policy Lifespan + 6 years post review period	Kept digitally – deletion for server. Destroy hard copies.
Annual Reports	No	6 years + review for archiving	Kept digitally – deletion for server. Destroy hard copies.
Risk Assessments	No	7 years from completion of relevant project, incident, event or activity.	Duplicate (digital/physical) copies to be securely destroyed.
Serious Incident Reports	Yes	Permanent	n/a
DBS Documentation	Yes	Verification information only until DBS is successfully completed. But kept no longer than 6 months (including DBS certificate) DBS numbers - duration staff/volunteer is engagement with School business + review at that point.	Kept digitally – deletion for server. Securely destroy hard copies.
Governor Application Forms & Declaration Forms	Yes	Duration volunteer is engagement with School business + 7 years from departure <b>unless there is a lawful basis for continued retention – see privacy notice.</b>	Kept digitally – deletion for server. Securely destroy hard copies.
Governor Register of Interests	Yes	Duration volunteer is engagement with School business + 7 years from departure <b>unless there is a lawful basis for continued retention – see privacy notice.</b>	Kept digitally – deletion for server. Securely destroy hard copies.
Governor Visit Reports	Yes	7 years <b>unless there is a lawful basis for continued retention – see privacy notice.</b>	Kept digitally – deletion for server. Securely destroy hard copies.

<u>RECORD TYPE</u>	<u>DATA PROTECTION CONCERN?</u>	<u>RETENTION PERIOD</u>	<u>DELETION/DESTRUCTION</u>
Records (i.e. register and outcomes) relating to complaints dealt with by the School.	Yes	7 years after the date of pupil leaving the School <b>unless there is a lawful basis for continued retention – see privacy notice.</b>	Kept digitally – deletion for server. Securely destroy hard copies.

<b>FINANCE, INSURANCE AND CONTRACTS/AGREEMENTS</b>			
<u>RECORD TYPE</u>	<u>DATA PROTECTION CONCERN?</u>	<u>RETENTION PERIOD</u>	<u>DELETION/DESTRUCTION</u>
Insurance Policies (private, public, professional indemnity)	No	Duration of policy (or as required by policy) plus a period for any run-off arrangement and coverage for any run-off arrangement and coverage of insured risks (until it is possible that no living person could make a claim)	Kept digitally – deletion for server. Securely destroy hard copies.
Correspondence related to claims/renewals/notification	No	7 years	Kept digitally – deletion for server. Securely destroy hard copies.
Accounting Records	No	6 years from the end of the financial year in which the transaction took place	Kept digitally – deletion for server. Securely destroy hard copies.
Tax Returns	No	6 years from the end of the financial year in which the transaction took place	Kept digitally – deletion for server. Securely destroy hard copies.

<b><u>RECORD TYPE</u></b>	<b><u>DATA PROTECTION CONCERN?</u></b>	<b><u>RETENTION PERIOD</u></b>	<b><u>DELETION/DESTRUCTION</u></b>
VAT Returns	No	6 years from the end of the financial year in which the transaction took place	Kept digitally – deletion for server. Securely destroy hard copies.
Budget and internal financial reports	No	6 years from the end of the financial year in which the transactions took place	Kept digitally – deletion for server. Securely destroy hard copies.
Signed or final/concluded agreements (including any signed or final/concluded variations or amendments)	No	7 years from completion of contractual obligations or term of agreement, whichever is the later	Kept digitally – deletion for server. Securely destroy hard copies.
Deeds (or contracts under seal)	No	13 years from completion of contractual obligation or term of agreement	Kept digitally – deletion for server. Securely destroy hard copies.
Formal documents of title (trademarks, registered design certificates, patents, utility model certificates)	No	Permanent (if permanently extended (e.g. trademark) Otherwise – expiry of right + 7 years	Kept digitally – deletion for server. Securely destroy hard copies.
IP / IT agreements (including software licences and ancillary agreements e.g. maintenance, storage, development, coexistence agreements, consents)	No	7 years from completion of contractual obligation concerned or term of agreement	Kept digitally – deletion for server. Securely destroy hard copies.

<u>RECORD TYPE</u>	<u>DATA PROTECTION CONCERN?</u>	<u>RETENTION PERIOD</u>	<u>DELETION/DESTRUCTION</u>
Bursary Application Forms and supporting evidence	Yes	Verified at time of application, then supporting evidence is returned to the parents within the year after the application or all copies of the documents are destroyed.	Kept digitally – deletion for server. Securely destroy hard copies.
<b>HR ADMINISTRATION</b>			
Single central record of staff/volunteers	Yes	Permanent record of all mandatory checks undertaken	n/a
Contracts of employment	Yes	7 years from the effective date of end of contract <b>unless there is a lawful basis for continued retention – see privacy notice.</b>	Kept digitally – deletion for server. Securely destroy hard copies.
Employee appraisals or reviews	Yes	Duration of employment + 7 years <b>unless there is a lawful basis for continued retention – see privacy notice.</b>	Kept digitally – deletion for server. Securely destroy hard copies.
Staff personnel file	Yes	Duration of employment + 7 years <b>unless there is a lawful basis for continued retention – see privacy notice.</b>	Kept digitally – deletion for server. Securely destroy hard copies.
Payroll, salary, maternity pay records	Yes	6 years	Kept digitally – deletion for server. Securely destroy hard copies.
Pension or other benefit schedule records	Yes	Permanent (depending on the nature of the scheme)	n/a

<u>RECORD TYPE</u>	<u>DATA PROTECTION CONCERN?</u>	<u>RETENTION PERIOD</u>	<u>DELETION/DESTRUCTION</u>
Job application, interview/rejection records (unsuccessful applicants)	Yes	6 months <b>unless successful has given explicit and noted consent for longer retention.</b>	Kept digitally – deletion for server. Securely destroy hard copies.
Disciplinary records	Yes	Written warning (1 <sup>st</sup> ) – 9 months Final warning – 12 months Retention may be longer if gross misconduct. + 3 years from expiration.	Kept digitally – deletion for server. Securely destroy hard copies.
Absence records	Yes	4 years	Kept digitally – deletion for server. Securely destroy hard copies.
Annual Leave records	No	4 years	Kept digitally – deletion for server. Securely destroy hard copies.
Immigration records	Yes	4 years	Kept digitally – deletion for server. Securely destroy hard copies.
Health records relation to employees	Yes	7 years from end of contract of employment <b>unless there is a lawful basis for continued retention – see privacy notice.</b>	Kept digitally – deletion for server. Securely destroy hard copies.
Accident at work records	No	4 years from date of accident – review case-by-case	Kept digitally – deletion for server. Securely destroy hard copies.



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Staff use of hazardous substances	No	7 years from end of date of use – review case-by-case	Kept digitally – deletion for server. Securely destroy hard copies.
<b>DATA PROTECTION</b>			
Records documentation (including processing activity, data breaches, DPIA assessments)	No	Permanent – as long as up to date and relevant	Kept digitally – deletion for server. Securely destroy hard copies.
<b>SAFEGUARDING</b>			
Policies and Procedures	No	Permanent	n/a
Accident / Incident reporting	Yes	Periodic review by suitable person. Keep on record for as long as any living person may bring a claim. <b>See Privacy Notice.</b>	n/a