



Truro School Records Retention Statement and Schedule

A copy of this notice is published in the following area:

The school's website

Date reviewed: February 2024

Date for next review: February 2025.

Approved by: Chief Operating Officer

A. Introduction

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.

Truro School is part of the Methodist Independent Schools Trust. Registered Office: 66 Lincoln's Inn Fields, London EC2A 3LH. Charity No. 1142794. Company No. 7649422. MIST can be contacted on 020 7935 3723 and admin@methodistschools.org.uk. MIST's charity registration number is 1142794 and company number is 07649422.

B. Retention Statement

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

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

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

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

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

G. Data Subject Access Requests (DSAR)

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.truroschoold.com/truro-senior-school/senior-school-policies/>.

H. Queries and complaints

Any comments or queries on this statement and schedule should be directed to the Head (head@truroschoold.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 Head. 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 or a suitable shredding contractor.

| <u>RECORD TYPE</u> | <u>DATA PROTECTION CONCERN?</u> | <u>RETENTION PERIOD</u> | <u>DELETION/DESTRUCTION</u> |
|---|--|--|--|
| GOVERNANCE & SCHOOL BUSINESS | | | |
| 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 unless there is a lawful basis for continued retention – see privacy notice. | 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 unless there is a lawful basis for continued retention – see privacy notice. | Kept digitally – deletion for server. Securely destroy hard copies. |

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| Governor Visit Reports | Yes | 7 years unless there is a lawful basis for continued retention – see privacy notice. | 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 unless there is a lawful basis for continued retention – see privacy notice. | Kept digitally – deletion for server. Securely destroy hard copies. |

| FINANCE, INSURANCE AND CONTRACTS/AGREEMENTS | | | |
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| <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. |

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| 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. |
| <u>RECORD TYPE</u> | <u>DATA PROTECTION CONCERN?</u> | <u>RETENTION PERIOD</u> | <u>DELETION/DESTRUCTION</u> |
| 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, | No | 7 years from completion of contractual obligation concerned or term of agreement | Kept digitally – deletion for server. Securely destroy hard copies. |

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| storage, development, coexistence agreements, consents) | | | |
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| <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. |
| HR ADMINISTRATION | | | |
| 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 unless there is a lawful basis for continued retention – see privacy notice. | Kept digitally – deletion for server. Securely destroy hard copies. |
| Employee appraisals or reviews | Yes | Duration of employment + 7 years unless there is a lawful basis for continued retention – see privacy notice. | Kept digitally – deletion for server. Securely destroy hard copies. |
| Staff personnel file | Yes | Duration of employment + 7 years unless there is a lawful basis for continued retention – see privacy notice. | Kept digitally – deletion for server. Securely destroy hard copies. |

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| 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 unless successful has given explicit and noted consent for longer retention. | Kept digitally – deletion for server. Securely destroy hard copies. |
| Disciplinary records | Yes | Written warning (1 st) – 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. |

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| Health records relation to employees | Yes | 7 years from end of contract of employment unless there is a lawful basis for continued retention – see privacy notice. | 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. |
| <u>RECORD TYPE</u> | <u>DATA PROTECTION CONCERN?</u> | <u>RETENTION PERIOD</u> | <u>DELETION/DESTRUCTION</u> |
| 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. |
| DATA PROTECTION | | | |
| 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. |
| SAFEGUARDING | | | |
| 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. See Privacy Notice. | n/a |

