



Diocese of Norwich  
St Benet's  
Multi Academy Trust

**[Academy Name]**

## **Data Retention Policy**

<b>Policy Type:</b>	<b>Trust Policy</b>
<b>Date Issued by MAT:</b>	<b>05/09/2022</b>
<b>Approved By:</b>	<b>Trust Board (Finance, Audit and Resources Committee)</b>
<b>Approval Date:</b>	<b>06 July 2022</b>
<b>Review Date:</b>	<b>July 2025</b>
<b>Person Responsible:</b>	<b>Trust Data Protection Officer</b>

## Summary of Changes

The model policy has been revised to reflect these changes to the statutory guidance as outlined below.

<b>Page Ref.</b>	<b>Section</b>	<b>Amendment</b>	<b>Date of Change</b>
	1	Insert name of academy hereafter known as The Academy and updated section to refer to UK GDPR	Nov 2021
	1.4	Updated contact details for Trust DPO	Nov 2021
	Appendix 1	Documents relating to Appointment Process – no requirement to retain DBS certificates  Clarified retention of data on Single Central Record  Added section on Safeguarding	Nov 2021
	1.4	Updated details for Trust DPO	Sept 2023

## 1. Introduction

This policy applies to all employees, workers and contractors.

- 1.1. The Trustees/Governing Body of [insert name of academy] hereafter known as The Academy are committed to retaining personal data (which may be held on paper, electronically, or otherwise) about our employees for no longer than necessary for the purpose or purposes for which they were collected. All steps will be reasonably taken to securely destroy or erase from systems, all data which is no longer required.
- 1.2. The Trustees/Governing Body recognise the need to process data in an appropriate and lawful manner, in accordance with the UK General Data Protection Regulation (GDPR). The purpose of this policy is to set out the principles by which we will retain your personal data.
- 1.3. Data users are obliged to comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary action, including dismissal.
- 1.4. Hannah Monk the Trust Data Protection Officer is responsible for ensuring compliance with the GDPR and this policy at Trust Level. [insert name of headteacher/principal] is responsible for ensuring compliance with the GDPR and this policy at The Academy. Any questions about the operation of this policy or concerns that there has been a breach of this policy should be referred in the first instance to Hannah Monk on 01603 550150 or [governance@donesc.org](mailto:governance@donesc.org).

## 2. Responsibilities

The Trustees/Governing Body understand their legal responsibility to comply with the law, including the UK General Data Protection Regulation. The individual with overall responsibility for this policy is the Data Protection Officer.

## 3. Retention of Data

- 3.1. The Trustees/Governing Body will state the purposes for which it holds personal information, and the Trust will register with the Data Protection Commissioner all the purposes for which it processes personal data.
- 3.2. Personal data will be retained for employment purposes, to assist in the running of the business and/or to enable individuals to be paid. In such cases we will apply the 'recommended' retention period. Some personal data is retained for statutory purposes, in which case we will apply the 'statutory' retention period.

3.3. The Trustees/Governing Body commit to retaining the minimum amount of personal data that is necessary for the purpose for which it is held and access to the personal data will be restricted so that it is used only for the specific purpose.

3.4. Personal data will be held as indicated in Appendix 1 and for no longer than the period specified below. All personal data will be destroyed securely at the end of the retention period.

### **Appendix 1: Retention of Personal Data**

This schedule lists the principal documents held on an employee’s file. The list is not exhaustive, and other documents relating to employment may be also held. Personnel files will be held for the length of employment + 6 years at which time they will be securely shredded. Documents relating to child protection or accidents at work may be held for a period of up to 25 years, in accordance with the DFE “Data protection: a toolkit for schools” and the employee will be advised of this.

Document	Period of Retention
<b>Application Process</b>	
Application forms and interview notes (for unsuccessful candidates)	Six months. <i>Recommended.</i>
Original job application form for successful candidate	Termination + 6 years <i>Recommended</i>
<b>Documents Relating to Appointment Process</b>	
Confirmation of pre-employment medical check clearance	Termination + 6 years <i>Recommended</i>
DBS certificates/copies	No requirement to retain <i>Recommended</i>  If, in very exceptional circumstances, it is considered necessary to retain a copy of the original certificate for longer than six months, consent should be sought

	from the applicant and retained on file.
Confirmation of DBS outcome and any associated docs (e.g. risk assessment or certificate of good conduct/DBS number) on the Single Central Record	Termination + 1 year
Barred list clearance on the Single Central Record	Termination + 1 year
Prohibition check on the Single Central Record	Termination + 1 year
Copies of documents used for identity authentication for DBS and Asylum and Immigration Act purposes	Termination + 2 years <i>Recommended</i> within Home Office 'An Employers Guide to Right to Work Checks', August 2017
UK Border Agency Documentation (Work permit)	Termination + 2 years <i>Recommended</i> within Home Office 'An Employers Guide to Right to Work Checks', August 2017
Records relating to employees from outside of the UK e.g. visa, work permits, etc.	Termination + 2 years <i>Recommended</i> within Home Office 'An Employers Guide to Right to Work Checks', August 2017
Copies of qualifications certificates relevant to employment	Termination + 6 years <i>Recommended</i>
NQT – Satisfactory completion of skills tests.	Termination + 6 years <i>Recommended</i>
Two original references	Termination + 6 years

	<i>Recommended</i>
Original contract acceptance	Termination + 6 years <i>Recommended</i>
Copy of Contract of employment and any variation letters or side letters	Termination + 6 years <i>Recommended</i>

<b>Disciplinary Records</b>	
Formal disciplinary warnings – child protection related	Termination + 25 years <i>Recommended</i> within the DFE guidance, 'Data Protection: a toolkit for schools', April 2018
Formal disciplinary warnings – not child protection related	Termination + 6 years <i>Recommended.</i>
<b>Accidents at Work</b>	
Accident books, accident records, accident reports	Three years from the date of the last entry  (or, if the accident involves a child/ young adult, then until that person reaches age 21)  <i>Statutory</i>
Records relating to accident/injury at work	Termination + 12 years <i>Recommended</i>  In the case of serious accidents, a further retention period may need to be considered
<b>Financial Information</b>	

Inland Revenue/HMRC correspondence	Termination + 6 years <i>Statutory</i>
National minimum wage records	Three years after the end of the pay reference period following the one that the records cover. <i>Statutory</i>
Wage/salary records (also overtime, bonuses, expenses)	Termination + 6 years <i>Statutory</i>
Time sheets	Current year + 6 years <i>Recommended</i>
<b>Sickness and Maternity Information</b>	
Medical certificates/ Occupational Health reports and sickness absence record	Current year + 6 years <i>Recommended</i>
SMP, SAP, SSPP records, calculations, certificates (Mat B1s) or other medical evidence, notifications, declarations and notices	Three years after the end of the tax year in which the leave period ends <i>Statutory</i>
Statutory Sick Pay records, calculations, certificates, self-certificates	Six years after the employment ceases <i>Recommended</i>
Parental leave records	Eighteen from birth/adoption of the child or if the child receives a disability living allowance <i>Recommended</i>

Other special leave of absence including parental leave, maternity leave	Current year + 6 years <i>Recommended</i>
<b>Leavers Information</b>	
Letter of resignation and acceptance of resignation or other documentation relating to the termination of employment.	Termination + 7 years <i>Recommended</i>
Exit interview notes	Termination + 7 years <i>Recommended</i>
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	Six years from the date of redundancy <i>Recommended</i>
Retirement Benefits Schemes – records of notifiable events, for example, relating to incapacity	Six years from the end of the scheme year in which the event took place <i>Statutory</i>
<b>Additional Employee Information</b>	
Salary assessment forms – teachers	Current year + 6 years <i>Recommended</i>
Appraisal information	Current year + 6 years <i>Recommended</i>
Staff induction including NQTs Induction	Completion + 6 years <i>Recommended</i> within DFE statutory guidance ‘Induction for newly qualified teachers (England)’, April 2018
Working time records	Two years from date on which they were made



	<i>Statutory</i>
<b>Safeguarding</b>	
All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained along with those records	Termination + 25 years Recommended within the DFE guidance, 'Data Protection: a toolkit for schools', April 2018