



We are a Christian school that serves a diverse community and works in partnership with parents to develop the whole child.

St. Luke's CEVA UK GDPR Data Retention Policy

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Version	Date	Amendment Details	Author
0.1	Autumn 2022	First Draft	Matt Hipperson

Signoff :

Role	Name	Date
Chair of Governors		
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1.0 Overview

The UK General Data Protection Regulation (UK GDPR) states that personal data should be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

Section 46 of the Freedom of Information Act 2000 requires schools, as public authorities, to follow a Code of Practice on managing their records. Under section 7 of the Code of Practice on the Management of Records, it states that “Authorities should have in place a records management policy”.

The School recognises and understands that the efficient management of its data and records is necessary to support its core school functions, to comply with its legal, statutory and regulatory obligations, to ensure the protection of personal information and to enable the effective management of the School.

This policy and related documents meet the standards and expectations set out by contractual and legal requirements and have been developed to meet the best practices of school records management, with the direct aim of ensuring a robust and structured approach to document control and systems.

2.0 Scope and Applicability

The School uses numerous systems and computers as well as paper based records, all of which are within the scope of this procedure. Records are defined as all those documents that are carried out by the school and which are thereafter retained for a certain period to provide evidence of transactions and activities. Records may be created, received or maintained in hard copy or electronic format e.g paper documents, scanned documents, e-mails, spreadsheets, Word documents, presentations etc.

This policy applies to all records created, received or maintained by all School employees including permanent, temporary staff, contractors, consultants or third parties acting on behalf of the School.

3.0 General Policy

3.1 Retention schedule

The required retention periods are detailed by category in the Data Retention Schedule under the following headings:

Record title

Data Protection Issues

Statutory Provisions

Retention period

Action

3.2 Information Asset Register

The School holds and maintains an Information Asset Register(IAR). This records:

- The information retained
- The legal basis for holding the data
- The type of information ie personal information, special category data
- Where the information is held
- The “owners” of the data
- Who the data is shared with
- The retention period

The IAR allows the school to manage the information that is held which includes information created, held, received and in use. This document enables the School to identify the personal information it creates and stores to facilitate correct management under the Data Protection Act (DPA)2018, the UK General Data Protection Regulation(UK GDPR) and the Freedom of Information Act 2000.

3.3 Guidelines and Procedures

The School manages records efficiently and systematically, in a manner consistent with the UK GDPR requirements. Records will be created, maintained and retained in order to provide information about, and evidence of the School's transactions, customers, employment and activities. The retention schedule will govern the period that records will be retained.

It is our intention to ensure that all records and the information contained therein is:

- **Accurate** - records are always reviewed to ensure that they are a full and accurate representation of the transactions, activities or practices that they document
- **Accessible** - records are always made available and accessible when required (with additional security permissions for select staff where applicable to the document content)
- **Complete** - records have the content, context and structure required to allow the reconstruction of the activities, practices and transactions that they document
- **Compliant** - records always comply with any record keeping legal and regulatory requirements
- **Monitored** – staff, School and system compliance with this Data Retention Procedure is regularly monitored to ensure that the objectives and principles are being complied with at all times and that all legal and regulatory requirements are being adhered to.

3.4 Destruction and Disposal of Records and Data

All information of a confidential or sensitive nature on paper, card, microfiche or electronic media must be securely destroyed when it is no longer required. This ensures compliance with Data Protection laws and the duty of confidentiality owed to data subjects.

The School is committed to the secure and safe disposal of any confidential waste and information assets in accordance with our contractual and legal obligations and that is done so in an ethical and compliant manner. We confirm that our approach and procedures comply with the laws and provisions made in the UK GDPR and that staff are trained and advised accordingly on the procedures and controls in place.

3.5 Right to Erasure

In specific circumstances, data subjects have the right to request that their personal data is erased, however the School recognises that this is not an absolute 'right to be forgotten'. Data subjects only have a right to have personal data erased and to prevent processing if one of the below conditions applies: -

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- When the individual withdraws consent
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed

- The personal data must be erased in order to comply with a legal obligation
- The personal data is processed in relation to the offer of information society services to a child

Where one of the above conditions applies and the School received a request to erase data, there must be a check to ensure that no other legal obligation or legitimate interest applies. If the data subject has the right to have their data erased, this is carried out by the School's nominated person in conjunction with the person responsible for IT to ensure that all data relating to that individual has been erased.

These measures enable the School to comply with a data subjects' right to erasure, whereby an individual can request the deletion or removal of personal data where there is no compelling reason for its continued processing. Whilst standard procedures remove data that is no longer necessary, the School follows a dedicated process for erasure requests to ensure that all rights are complied with and that no data has been retained for longer than is needed.

3.6 School Archives

The School archive is maintained as a resource to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging and shared heritage to prompt memories of school-life among many generations and to serve as a research resource for all interested in the School and the community it serves.

4.0 Roles and Responsibilities

The governing body has the statutory responsibility to maintain the School records and record keeping systems although the head takes day to day responsibility.

The Schools UK GDPR lead person will give guidance on good records management practice and will refer to the Schools Data Protection Officer (DPO) when required.

5.0 Compliance

Compliance is mandatory and will be enforced for all employees, vendors and contractors.

Non compliance with this and other School policies may be subject to disciplinary action, up to and including dismissal.

6.0 Risk Management

Risk management for the School is set out in the Risk Register.

7.0 References - None

8.0 Definitions

SAR - Subject Access Request

UK GDPR - The UK General Data Protection regulation

ICO - Information Commissioner's Office

DPA - Data Protection Act

IAR - Information Asset Register

9.0 Review

This policy will be reviewed and updated on a regular basis, not to exceed 24 months.