



## PLYMOUTH HIGH SCHOOL FOR GIRLS

### POLICY: DATA RETENTION POLICY AND SAFE DESTRUCTION

**SLT LINK MEMBER:** Shaun Willis

**GOVERNORS SUB COMMITTEE:** P & R

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## **1.0 Introduction**

This policy is intended to support adherence to the Data Protection Act 2018 and General Data Protection Regulations (GDPR). In particular it relates to Article 5 of the GDPR – Principles relating to processing of personal data 1. (e), which relates to Storage Limitation.

Please be aware that this guidance applies to all types of record, whether they are in paper or digital format.

## **2.0 Compliance**

This policy, combined with our retention schedule and destruction records will ensure that we:

- Are not keeping data for longer than we need it;
- That we know and record how long we keep information and our reasons for this;

As part of our policy compliance we will:

- Periodically review the retention schedule;
- Periodically review the data we hold and erase or anonymise any data when we no longer need it;
- Have appropriate processes in place to comply with individuals' requests for erasure under 'the right to be forgotten'.
- Clearly identify any personal data that we need to keep for public interest archiving, scientific or historical research, or statistical purposes.

## **3.0 Responsibilities**

This policy applies to all staff. Everyone is responsible for ensuring that:

- They do not retain information longer than the retention schedule;
- If they process personal information not specified on the asset register/retention schedule they notify the school business manager or data protection officer;
- The Business Manager/Data Protection Officer will be responsible for ensuring that data is reviewed and managed in line with the data retention schedule;
- The Headteacher holds overall responsibility for the data management in line with this policy and schedule.

## **4.0 Retention Schedule**

The school has a data retention schedule, which forms part of our overall data asset register. This document contains a list of all of the information that the school produces, including those records that contain personal and sensitive (special category) information. It is located <insert link>. The school has set a data retention date on the schedule which includes advice for what should happen to the record when it reaches the retention date.

## **5.0 Disposal of records**

The school will ensure that records are reviewed periodically to identify those that are no longer required for school purposes and can be appropriately destroyed. A review will be conducted as a minimum on an annual basis, however we will review records at any other given opportunity.

As soon as a record is identified as reaching the retention date the record will be reviewed under the criteria set out so that only the appropriate records are destroyed. The school review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained by the school for research or litigation purposes.

All actions taken as a result of this review will be done so in accordance with the Retention Schedule.

Whatever decisions are made will be documented. Please see Appendix A for a template of the 'List of School Records and Data Safely Destroyed', which will be maintained for all data managed in line with the data retention policy and schedule.

### **5.1 Safe destruction of records**

All records containing personal information, or sensitive personal information will be made either unreadable or unable to be reconstructed.

- Paper records will be shredded using a cross-cutting shredder
- CDs / DVDs / Floppy Disks should be cut into pieces
- Audio / Video Tapes and Fax Rolls should be dismantled and shredded
- Hard Disks should be dismantled and sanded

The school uses Viridor for all personal paper records that it needs to destroy. There are confidential waste bins located in admin offices. Normal waste bins should not be used for any paper that contains personal information. This includes scrap notes, written telephone messages etc. as well as more structured documents or files. The ad-hoc notes are not included in the retention schedule, however must follow the process for safe destruction where they contain personal information. The confidential waste bins will be used for all personal information. The school has an appropriate contract in place with the shredding company and has sufficient guarantees that staff are appropriately trained in data protection and that their processing of personal information complies with the Data Protection Act. We receive a Certificate of Destruction to confirm that all information has been safely destroyed.

Records that have been identified as due for destruction but not yet destroyed are still subject to disclosure under the data subject's right request. Therefore, to ensure that records are not retained beyond their retention date we will arrange collection of our confidential waste on a regular basis.

### **5.2 Disposal Transfer of records to the Archives**

Where records have been identified as requiring permanent preservation, arrangements should be made to transfer the records to the Plymouth and West Devon Records Service. The school should contact the local record office if there is a requirement to permanently archive the records, and the records will continue to be managed via the DPA 2018 and the FoIA 2000.

### **5.3 Transfer of information to other media**

Where lengthy retention periods have been allocated to records, the school may consider converting paper records to other media such as microform or digital media. The lifespan of the media and the ability to migrate data where necessary will always be considered. We will always consider the legal admissibility of records that have been converted from paper to electronic media and will not undertake conversion unless we have robust procedures in place to convert in a standard way. This means that we can prove that the electronic version is a genuine original and could not have been tampered with in any way. We will make reference to 'British Standard 10008:2008 Evidential weight and legal admissibility of electronic information' when preparing such procedures.

