

Watford Grammar School for Girls



Data Retention Policy

Committee Responsible	Resources
Category	Statutory
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Introduction

Watford Grammar School for Girls collects a lot of data and information about our pupils so that we can run effectively as a school. We manage this data and information in line with our Data Protection Policy and Information Security Policy. This Data Retention Policy outlines how we make decisions about how long we retain information and data for, and the retention periods for key categories of data.

Watford Grammar School for Girls is an Academy Trust school, company number 07348254, registered office at Lady's Close, Watford, WD18 0AE, registered as a company in England and Wales, and an exempt charity. We are well known for our rich academic curriculum, our strong and supportive pastoral care, and the wide range of extended activities that, taken as a whole, educate, encourage and empower our girls. The school motto is *Sperate Parati* - or 'Go forward with preparation' - which encapsulates our aim for every member of the school community.

We are proud of the strong academic traditions and the importance of service to others that have shaped the ethos of our school since its foundation by Elizabeth Fuller in 1704. We value hard work and nurture scholarship, always encouraging our girls to achieve excellence in all fields of study. The girls have the opportunity to excel at music, drama and sport, as well as to play an active role in the wider community by taking part in many charitable activities. Thus they learn to be their best selves: hard working, compassionate and high achieving in all areas of life.

We are a diverse and thriving community, founded on consideration, toleration and trust. Each girl is given opportunities to develop confidence and resilience both in and outside the classroom, and to develop a sense of personal responsibility that is best summarised in the maxim 'I can do it, and I will do it' - words which every member of the school learns and takes to heart.

As part of ensuring the effective running of our school it is essential that we hold and use data and information about parents/carers, pupils, staff, governors, and others with whom we have relationships. It is important to us that we do this professionally and in line with our statutory, moral and contractual obligations, and this policy is part of how we explain how we do this. Legally the school is a Data Controller under the Data Protection Act 2018 / the General Data Protection Regulation, and the responsible officer at the school is Zia Rehman who is Data Protection Officer.

This policy applies to related organisation the Women of Vision Trust (charity no. 1069040) as well as to the school.

1. Overall Aims

Our data retention policy has been produced in line with industry best practice, and in particular the retention schedule is in line with the Information Management Toolkit for Schools produced by the Information and Records Management Society (www.irms.org.uk).

The School balances its general duty under the General Data Protection Regulation / the Data Protection Act 2018 - to make sure it only retains personal data for so long as is necessary for the purpose for which it was collected – with its responsibilities to retain certain records for periods of time, usually fixed periods, for legal and other reasons. In making decisions about data retention and data destruction, the School has regard to both these responsibilities and takes advice and follows best practice guidance for the education sector where appropriate.

2. Retention of Records

Records are any type of information and/or data created, received or transmitted in the course of the School's operation, regardless of physical format. Examples of where various types of information or data might be located include:

- appointment books and calendars
- audio and video recordings
- computer programs
- contracts
- electronic files
- emails
- handwritten notes
- invoices
- letters and other correspondence
- CCTV recordings
- memory in portable devices including phones
- memory sticks
- social media postings
- voicemails

The School may have a business need, or legal duty, to retain records for a number of reasons, including but not limited to the following:

- a legal, accounting, audit or other regulatory or statutory requirement, including reasons in keeping with the principles of the General Data Protection Regulation / the Data Protection Act 2018
- because it supports an ongoing operational necessity for the running of the school, particularly for records relating to current pupils (and their parents/carers) and recent leavers
- because it serves as the ongoing corporate memory of the school

If records are destroyed during periods in which they should be retained by the School, this could result in the following consequences for the School:

- fines and penalties, including from the Information Commissioner's Office

- contempt of court or obstruction of justice claims
- serious detriment to the School's ability to discharge its responsibility towards staff, pupils and parents/carers

For the avoidance of doubt, the inappropriate destruction of any records or other forms of information or data is prohibited.

The School acknowledges that 'disposable information', data which may be discarded or deleted at the discretion of the user once it has served a temporary useful purpose, is not defined as a Record for the purposes of this policy, and may be safely destroyed. 'Disposable information' could include:

- duplicates of original documents, for example as used at a meeting
- preliminary drafts of documents that don't represent a record of significant change or decision-making
- secondary printed or published materials e/g training course papers, books
- spam and junk mail

3. Responsibility

The governing board has overall responsibility for ensuring that the school complies with its obligations under the General Data Protection Regulation / the Data Protection Act 2018.

Day-to-day responsibilities rest with the headteacher, or the Assistant Head, Curriculum and Data, in the headteacher's absence. The headteacher will ensure that all staff are aware of their data protection obligations, including the obligation to follow the Data Retention Policy.

In compliance with the GDPR / Data Protection Act, the School has an appointed Data Protection Officer who is responsible for dealing with any queries related to the storing or processing of personal data, and checking to ensure that the School is adhering to this policy and to its wider legal obligations. The Data Protection Officer is Zia Rehman.

Staff are responsible for ensuring that they manage information and data in accordance with this policy. Should staff members have any doubt or questions they are asked to raise it with their line manager in the first instance, then the Information Officer.

4. Privacy/fair processing notices

The School has an obligation to be clear and specific about the data it controls and processes, the basis for this, and what processing or sharing of data can or does take place. This is set out in the Privacy Notices which vary depending on whose data is being processed. Detailed Privacy Notices for the following categories of data set out what data can be collected or processed, on what basis, and how and why it may be shared:

Pupils / Potential Pupils

Parents / Carers of Pupils, Potential Pupils and Past Pupils

School Employees

Governors / Trustees

The Privacy Notices should be read in conjunction with this policy.

5. Retention periods

Records, data and information should be retained in line with the Retention Schedule in the appendix. This retention schedule is taken from the Information Management Toolkit for Schools, prepared by the Information and Records Management Society www.irms.org.uk

If staff have a category of records, data or information not included in the Retention Schedule this should be raised via line managers in the first instance.

6. Training

Our staff and governors are provided with data protection training as part of their induction process. This includes drawing their attention to this Data Retention Policy.

Data protection will also form part of continuing professional development, where changes to legislation or the school's processes make it necessary. The headteacher is responsible for ensuring that staff are trained, aware of their responsibilities, and carry them out.

7. The General Data Protection Regulation

This policy has been updated in line with the General Data Protection Regulation / the Data Protection Act 2018 and reviewed in January 2021.

8. Monitoring arrangements

The Assistant Head, Curriculum and Data, is responsible for monitoring and reviewing this policy.

The designated governor, who is also the Data Protection Officer, checks that the school complies with this policy by, among other things, reviewing school records. The designated governor may also check compliance through random sampling.

This document will be reviewed at least every two years, if there is a significant change in the law or in official guidance on the implementation of the law, if the best practice guidance on which it is based are changed, and following the implementation of the General Data Protection Regulation.

At every review, the policy will be shared with the governing board.

9. Links with other policies

This Data Retention Policy is linked to:

- the Freedom of Information Publication Scheme
- the Privacy Notices described above
- the Data Protection Policy
- the Information Security Policy
- the CCTV Policy

These documents, which may be updated from time to time by the School, are available on the School's website or upon request to the Data Protection Officer, Zia Rehman.

