



# Kenmore Park Infant & Nursery School

## DOCUMENT AND ELECTRONIC DATA RETENTION POLICY

### Contents

1	Introduction	2
2	Scope	2
3	Legal obligation	3
4	Retention Procedure	3
5	Retention of Encrypted Data	4
6	Retention of Digital Data	4
7	Archiving and Retention of Documentation	4
8	Archiving Process	5
9	Disposal of Records	5
10	Disposal of Electrical Hardware	5
11	Document Owner	6

# 1 Introduction

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This Retention “Policy” and the supplementary Retention Guidelines Document which details the retention schedule applies to Kenmore Park Infant & Nursery School.

This Policy along with the Retention Guidelines Document covers all records and documentation, whether analogue or digital that are subject to the retention requirements of this Policy and its supplementary guidance.

For the purpose of this Policy, the terms ‘document’ and ‘records’ include information in both hard copy and electronic form and have the same meaning hereby referred to as Documents or Documentation.

In certain circumstances it will be necessary to retain specific records in order to fulfil statutory or regulatory requirements and to meet operational needs. Any retention of specific records should be retained under the retention period specified in the Retention Guidelines Document.

Data Protection Legislation means the Data Protection Act 2018 which incorporates the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the General Data Protection Regulation which is the governing legislation that regulates data protection across the EEA. This includes any replacement legislation coming into effect from time to time.

Throughout this document we refer to the General Data Protection Regulation (GDPR) as the governing legislation that regulates data protection regulation across the EEA.

## 2 Scope

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Kenmore Park Infant & Nursery School is bound by various obligations with regard to the Documentation and electronic data it retains. These obligations include the period of retention for Documentation and when and how this Documentation is disposed (refer to Retention Guidelines Document).

Article 5 of GDPR states “personal data must 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”. The purpose of this Policy supported by the Retention Guidelines Document is to ensure that necessary records, documents and

electronic data of Kenmore Park Infant & Nursery School are adequately protected, archived and disposed of at the correct retention period, and to provide all staff with clear instructions regarding the appropriate retention and disposal of Documentation.

This Policy will also aid paper records and electronic data storage issues identified throughout the business and to eliminate the need to retain paper and electronic records unnecessarily.

Kenmore Park Infant & Nursery School will ensure that information is not kept longer than is necessary and will retain the minimum amount of information that it is required to hold to meet its statutory functions and the provision of its services.

### 3 Legal obligation

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General Data Protection Regulation (GDPR)

Data Protection Act 2018 (DPA)

Freedom of Information Act 2000 (FOI)

Limitation Act 1980

Companies Act 2006

The Waste Electric and Electronic Equipment Regulations 2013

IRMS Toolkit for Schools

### 4 Retention Procedure

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All decisions relating to the retention and disposal of Documents should be taken in accordance with this Policy in particular:

Retention Guidelines Document

In circumstances where a retention period of a specific document has expired, a review should always be carried out prior to a decision being made to dispose of the record.

## 5 Retention of Encrypted Data

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Any information retained under this Policy that is in an encrypted format, consideration must be taken for the secure storage of any encryption keys. Encryption keys must be retained as long as the data that the keys decrypt is retained.

## 6 Retention of Digital Data

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Any digital data including media and e mail files are retained on the schools intranet and secure LGfL Staffmail. Media is retained on our local server until such time it is deleted in accordance with the Retention Guidelines Document. The backup of electronic data is icloud back up managed by our IT providers Beebug.

The process for accessing stored electronic data in terms of Office documents, SIMs, FMS or any other software used by the school is via our server. This includes our parent payment applications. Prevention from loss on the server, data will be in terms of the enterprise backup software that we run to local repositories.

All portable / removeable storage media such as USB pens are controlled, always encrypted and handed in when a member of staff leaves and all data deleted. Staff are regularly reminded to delete data stored on a pen drive when no longer required such as class data. Once the children transition all data is to be removed from the USB pen.

All cryptographic keys, which are required for identify record types are retained in a locked storage space on site.

## 7 Archiving and Retention of Documentation

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Archiving is defined as the process by which inactive data, in any format is securely stored for long periods of time in accordance with a retention schedule.

Kenmore Park Infant & Nursery School archives paper records onsite in line with our Retention Guidelines Document.

All documentation should be retained in accordance with the retention schedule, on site in a secure location, at the end of the retention period all documentation will be

disposed of in a confidential waste bin to be incinerated. Collected by the London Borough of Harrow refuse & recycling department.

There may be exceptions where documentation will need to be retained for longer periods at site, in these instances the School leadership will be responsible for ensuring that the documentation is held in a safe and secure location.

## 8 Archiving Process

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The method of archiving selected for a particular Document will vary between departments and services. Any questions regarding archiving should be raised in the first instance with the department manager.

In all cases identify the documents that need to be retained in accordance with the Retention of records Schedule contained within the Retention Guidelines Document. Remove all duplicates and any unnecessary papers. Obtain the agreed Standard Archiving Box, clearly label the box and ensure it is correctly sealed.

## 9 Disposal of Records

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Any record containing confidential information must either be disposed of in a confidential waste bin or shredded using a cross-cut shredder.

Disposal of documents that do not contain confidential information may be disposed of in the normal way or recycled.

Records of disposal should be maintained by each admin department and should detail as a minimum the document disposed of, the date of disposal and the disposal authority.

## 10 Disposal of Electrical Hardware

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- IT equipment and devices that have the ability and capability to store personal data include:
- PC's
- Laptops

- Mobile Phones
- Multi-Functional Devices – printers / scanners
- Servers
- USB Memory Sticks and external hard drives.

IT equipment disposal must be managed by the schools IT Technician in collaboration with our IT support. The schools Finance officer will always be consulted as part of this process in line with the disposal procedure and the school asset management plan/ inventory.

All computer equipment, recycling or refurbishing must be disposed of in accordance with the Waste Electric and Electronic Equipment Regulations 2013.

## 11 Document Owner

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The Governing Body of Kenmore Park Infant & Nursery School is the owner of this document and is responsible for ensuring that this Policy is reviewed in line with the review requirements of GDPR.

Please also refer to the Retention Guidelines Document which sits alongside this policy.

**This policy was adopted by the Governing body September 2019.**

