



***DATA MANAGEMENT & DATA RETENTION***

***SCHEDULE POLICY***



**Focus 1st Academy is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment!**

Working in Partnership with North London Schools & Local Authorities since 2000

Accredited Independent School Status 2014 (DFE REG NO. 308/6003)

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Focus Inception

*Focus 1st Academy was set up in the year 2000 using European Social Fund to provide education and training and to-date has defied all the odds and was awarded the Independent School status in August 2014. This enables us to work in partnership with schools and local authorities to provide an alternative method of education for 14 to 16 year olds. Our student referrals are some of the most vulnerable young people and it is our duty to ensure that they are equipped with the appropriate skills and qualifications to ensure full participation within the modern workplace. Our team of professionals consisting of tutors, tutor assistance, pastoral support staff and mentors to nurture the students ensuring our work-based-learning approach alongside a variety of techniques are utilised and compatible to ensure the prevention of social and economic exclusion prior to adulthood which is underpinned through the subjects delivered whilst in classroom environment as well as on an individual basis.*

Focus Ethos

*Our programme fulfils the need of students who are disengaged from academic studies and may be exhibiting behavioural problems as a result. Our hands-on approach to learning creates an inspirational motivation for students wishing to pursue a career via the vocational route. The students are taught methods on how to improve their social skills in preparation for work/apprenticeship schemes and/or further education by learning in real-life situations and participating in sports, art and drama to express emotions. We believe that all individuals have a certain quality, which is sometimes concealed due to lack of confidence, mixed sentiments or disabilities. As such, recognising and coming to terms with barriers is a small part of the conflict, we are certain that all individuals are aware of their own weaknesses; the most vital part is engaging with professionals and adhere to individual training plans set which in turn prepares our students for economic and social integration into adulthood.*

DATA MANAGEMENT & DATA RETENTION SCHEDULE POLICY

1. Introduction

Focus 1st Academy recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to its effective overall management. Records provide evidence for protecting the legal rights and interests of the school and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

1. Scope of the Policy

2.1 This policy applies to all records that are created, received or maintained by staff of the school in the course of carrying out its functions.

2.2 Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created or received and then stored in hard copy or electronically.

2.3 A small percentage of our records may be selected for permanent preservation as part of the school’s archives and for historical research.

1. Responsibilities

3.1 We have a corporate responsibility to maintain records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher – Marina Savva.

3.2 Marina Savva is responsible for records management in the school will give guidance about good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. Marina will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

3.3 Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the school’s records management guidelines.

1. Recording Systems

Information created by the Focus 1st Academy must be managed against the same standards regardless of the media in which it is stored.

4.1 Maintenance of Record Keeping Systems

A. It is important that filing information is properly resourced and is carried out on a regular basis. It is equally important that the files are weeded of extraneous information where appropriate on a regular basis. Removing information from a file once a freedom of information request has been made will be a criminal offence (unless it is part of normal processing).

B. Applying retention periods is straightforward provided files are closed on a regular basis.

C. Once a file has been closed, it should be moved out of the current filing system and stored either in a locked office in either (Marina, Chris or Androulla’) until it has reached the end of the retention period.

D. Information security is very important especially when dealing with personal information or sensitive policy information. There are a number of basic rules: ·

* All personal information is kept in lockable filing cabinets which are kept locked when the office is unattended.
* Personal information held on computer systems is not easily obtainable.
* Information should never be left up on a screen if the computer is unattended.
* Files containing personal or sensitive information should not be left out on desks overnight.
* Where possible sensitive personal information should not be sent by e-mail.
* If files need to be taken off the premises they should be secured in the boot of a car or in lockable containers.
* Teachers have been advised not to use data on memory sticks or other removable data carriers in order to access their files both at home and at school; instead, they should use the remote access.
* All computer information is automatically backed up on a daily basis.
* Information contained in emails should be filed into the appropriate electronic or manual filing system once it has been dealt with.
1. The Safe Disposal of Information Using the Data Retention Schedule

5.1 Files should be disposed of in line with the Data Retention Schedule. This is a process which should be undertaken on an annual basis.

5.2 Paper records containing personal information should be shredded using a cross-cutting shredder. Other files can be disposed of in the paper recycling bins. Loose papers should not be put in skips unless the skip has a lid. CD s/DVD s/Floppy disks should be cut into pieces. Audio/Video tapes and fax rolls should be dismantled and shredded.

5.3 Electronic data should be archived on electronic media and deleted appropriately at the end of the retention period.

DATA RETENTION SCHEDULE

1. The purpose of the retention schedule

2. Benefits of a retention schedule

3. Maintaining and amending the retention schedule

4. What to do with records once they have reached the end of their administrative life

4a Disposal of records

5. Retention Schedule

1. The purpose of the retention schedule

Under the Freedom of Information Act 2000, Focus 1st Academy is required to maintain a retention schedule listing the records which the school creates in the course of its business. The retention schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use.

Members of staff are expected to manage their current record keeping systems using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems.

If there is an administrative need to keep a certain record for longer than that shown in the retention schedule then the school may do so (documenting the reason for such further retention).

The retention schedule refers to all information, regardless of the method in which they are stored.

1. Benefits of a retention schedule

There are a number of benefits which arise from the use of a complete retention schedule:

* Managing records against the retention schedule is deemed to be “normal processing” under the Data Protection Act 1998 / GDPR and the Freedom of Information Act 2000. Provided members of staff are managing record series using the retention schedule they cannot be found guilty of unauthorised tampering with files once a freedom of information request or a data subject access request has been made.
* Members of staff can be confident about destroying information at the appropriate time.
* Information which is subject to Freedom of Information and Data Protection Legislation will be available when required.
* We will not maintain and store information unnecessarily.
1. Maintaining and amending the retention schedule

Where appropriate the retention schedule should be reviewed and amended to include any new record series created and remove any obsolete record series.

1. What to do with records once they have reached the end of their administrative life

1. Disposal of records

Where records have been identified for disposal, they should be disposed of in an appropriate way. All records containing personal information, or sensitive policy information, should be shredded or placed in the confidential waste system.

The Freedom of Information Act 2000 requires us to maintain a list of records which have been destroyed and who authorised their destruction. Members of staff should record at least:

* File reference
* File title
* Number of files
* The name of the authorising personnel
* This is kept in an Excel spreadsheet or other database format

5.1 Management

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| **Basic file description** |
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| **Retention Period [operational]**  |

 | **Action at the end of the administrative life of the record**  |
| Staff Meetings | 6 years  | Destroy  |
| Staff Observations  | 6 years | Destroy |
| Ofsted Reports  | Permanent  | Permanent  |
| Central Record Register | Permanent  | Permanent  |
| School Insurance | 6 years | Destroy |
| Building safety regulations  | 6 years  | Destroy |

5.2 Students

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| --- | --- | --- |
| **Basic File description**  | **Retention period**  | **Action at the end of the administrative life of the record**  |
| Admission records  | 7 years  | Destroy |
| Attendance register | 7 years | Destroy |
| Student folders  | 7 years  | Destroy |
| Children SEN Files (to include original Individual Education Plans, Reviews, All Statements (proposed, amended or maintained under The Education Act 1996 – Section 324)  | Closure + 35 years  | Destroy by shredding unless legal action is pending  |
| Advice and information to parents regarding educational needs Special Educational Needs and Disability Act 2001 Section 2  | Closure + 12 years  | Destroy unless legal action is pending  |
| Exam results & papers | 7 years | Destroy |
| End of year progression sheets  | 7 years | Destroy |

5.3 Curriculum

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| **Basic File description** | **Retention period**  | **Action at the end of the administrative life of the record**  |
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| --- |
| Syllabus  |

 | 7 years  | Destroy |
| Schemes of Work | 7 years | Destroy |
| Timetable | Current year | Destroy  |
| Progress records | Current year | Destroy |
| Students work | Current year | Destroy |
| Exam results | 7 years | Destroy |

5.4 Personnel

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| **Basic File description** | **Retention period**  | **Action at the end of the administrative life of the record** |
| Timesheets  | 6 years | Destroy |
| Staff Personal files  | 7 years  | Destroy |
| Recruitment records  | 7 years | Destroy |
| DBS | 7 years | Destroy |
| Disciplinary  | 7 years | Destroy |
| Records relating to accident/injury at work  | 7 years  | Destroy |
| Annual appraisal/assessment records  | 7 years  | Destroy |
| Maternity pay records  | 7 years  | Destroy |

5.5 Health & Safety

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| **Basic File description** | **Retention period**  | **Action at the end of the administrative life of the record**  |
| Accessibility Plan | 6 years  | Destroy |
| Accident Report Book | 25 years | Destroy |
| COSHH | 10 years | Destroy |
| Risk Assessment  | 7 years | Destroy |
| Fire Precautions logbooks  | 7 years | Destroy |
| PAT Testing  | 7 years | Destroy |

5.6 Administrative

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| --- | --- | --- |
| **Basic File description** | **Retention period**  | **Action at the end of the administrative life of the record**  |
| Employer's Liability certificate  | Permanent  | Destroy when school is closed  |
| Circulars (staff/parents/pupils)  | 7 years  | Destroy |
| Visitors’ book  | 7 years | Destroy |

5.7 Finance

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| **Basic File description** | **Retention period**  | **Action at the end of the administrative life of the record**  |
| Annual Accounts  | 6 years | Destroy |
| Invoice, receipts and other records covered by the Financial Regulations  | 6 years  | Destroy |
| Paying in books & Cheque books  | 6 years  | Destroy |
| Free school meals registers  | 6 years  | Destroy |
| School Fund – Bank statements  | 6 years  | Destroy |
| Uniform | 7 years | Destroy |

5.8 Property

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| **Basic File description** | **Retention period**  | **Action at the end of the administrative life of the record**  |
| Lease  | Permanent  | Destroy when school closes |
| Maintenance and contractors  | 6 years  | Destroy |

5.9 LEA

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| **Basic File description** | **Retention period**  | **Action at the end of the administrative life of the record**  |
| Referral forms | 7 years  | Destroy |
| Attendance returns  | 7 years  | Destroy |
| Correspondence via email  | 2 years  | Destroy |

5.10 DFE

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| **Basic File description** | **Retention period**  | **Action at the end of the administrative life of the record**  |
| OFSTED reports and papers  | Permanent  | Destroy when school closes |
| Circulars from DfES  | Permanent  | Destroy when school closes |

File Destroy Log

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| --- | --- | --- | --- |
| **Date of destroy** | **File name**  | **Name of authorising staff member** | **Signature of authorising staff member**  |
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