



# Data Retention Policy

## Introduction

In its everyday operations Baden Powell School collects and stores records of many types and in a variety of different formats. The relative importance and sensitivity of these records also varies and the school will make decisions on levels of security.

It is important that these records are protected from loss, destruction, falsification, unauthorised access and unauthorised release and a range of controls are used to ensure this, including backups, access control and encryption.

Baden Powell also has a responsibility to ensure that it complies with all relevant legal, regulatory and contractual requirements in the collection, storage, retrieval and destruction of records. Of particular relevance is the UK General Data Protection Regulation (GDPR) and its requirements concerning the storage and processing of personal data.

This control applies to all systems, people and processes that constitute the organisation's information systems, including Governors, employees, external partners and other third parties who have access to Baden Powell systems.

This Policy should be read in conjunction with the Data Retention Schedule.

## Records Retention and Protection Policy

This policy begins by establishing the main principles that must be adopted when considering record retention and protection. It then sets out the types of records held by Baden Powell School and their general requirements before discussing record protection, destruction and management.

## General Principles

There are a number of key general principles that must be adopted when considering record retention and protection policy. These are:

- Records must be held in compliance with all applicable legal, regulatory and contractual requirements
- Records must not be held for any longer than required
- The protection of records in terms of their confidentiality, integrity and availability must be in accordance with their security classification
- Records must remain retrievable in line with organisational requirements at all times
- Where appropriate, records containing personal data must be subject as soon as possible to techniques that prevent the identification of a living individual
- Disposal is as important an issue as retention: premature disposal can mean loss of critical information; while retaining data can expose organisations to risk as well as the financial cost. Retaining hard copies takes up valuable resources.

### **Record Types and Guidelines**

In order to assist with the definition of guidelines for record retention and protection, records held by Baden Powell School are grouped into the categories listed in the retention schedule that follows clear guidance from the Local Educational Authority. For each of these categories, the required or recommended retention period and allowable storage media are also given, together with a reason for the recommendation or requirement.

### **Media Selection**

The choice of long term storage media must take into account the physical characteristics of the medium and the length of time it will be in use.

Where records are legally (or practically) required to be stored on paper, adequate precautions must be taken to ensure that environmental conditions remain suitable for the type of paper used - where possible, backup copies of such records should be taken by methods such as scanning or microfiche. Regular checks must be made to assess the rate of deterioration of the paper and action taken to preserve the records if required.

For records stored on electronic media such as tape, similar precautions must be taken to ensure the longevity of the materials, including correct storage and copying onto more robust media if necessary. The ability to read the contents of the particular tape (or other similar media) format must be maintained by the keeping of a device capable of processing it. If this is impractical an external third party may be employed to convert the media onto an alternative format.

## **Record Retrieval**

There is little point in retaining records if they are not able to be accessed in line with organisational or legal requirements. The choice and maintenance of record storage facilities must ensure that records can be retrieved in a usable format within an acceptable period of time. An appropriate balance should be struck between the cost of storage and the speed of retrieval so that the most likely circumstances are adequately catered for.

## **Record Destruction**

Once records have reached the end of their life according to the defined policy, they must be securely destroyed in a manner that ensures that they can no longer be used. The destruction procedure must allow for the correct recording of the details of disposal which should be retained as evidence.

All personal data must be disposed of securely and via Baden Powells nominated secure collection service. Smaller volumes can be shredded & then placed in a shredding bag and collected by a secure service provider.

When large scale clearance is taking place & it is not practical to shred individual files the information must be stored in a locked area in sealed confidential waste shredding bag ready for collection.

These bags will have to be directly transported to a secure site and shredded by the nominated Baden Powell secure service provider.

Under no circumstances should personal data of any kind be disposed of in general waste.

## **Record Review**

The retention and storage of records must be subject to a regular review process carried out under the guidance of management to ensure that:

- The policy on records retention and protection remains valid
- Records are being retained according to the policy
- Records are being securely disposed of when no longer required
- Legal, regulatory and contractual requirements are being fulfilled
- Processes for record retrieval are meeting business requirements

The results of these reviews must be recorded

