



DATA RETENTION POLICY

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1. ABOUT THIS POLICY

- 1.1 The information of Appledore School, including data subject data is vital to how it conducts its business and manages employees.
- 1.2 Certain laws require us to retain certain records, usually for a specific amount of time. The accidental or intentional destruction of these records during their specified retention periods could result in the following consequences:
 - Fines and penalties.
 - Loss of rights.
 - Obstruction of justice charges.
 - Contempt of court charges.
 - Serious disadvantages in litigation.
- 1.3 We must retain certain records because they contain information that:
 - Has business value (for example, it provides a record of a business transaction, evidences our rights or obligations, protects our legal interests or ensures operational continuity).
 - Must be kept to satisfy legal, accounting, or other regulatory requirements.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 1.5 This policy applies to all employees, officers, pupils, pupils' family, consultants, contractors, volunteers, interns, casual workers, and agency workers of Appledore School.
- 1.6 This policy explains the differences among records and disposable information.

2. RECORDS

- 2.1 A record is any type of information created, received, or transmitted in the transaction of business, regardless of physical format. Examples of where the various types of information are located include:
 - Appointment books and calendars.
 - Audio and video recordings.
 - Computer programs.
 - Contracts.
 - Electronic files.
 - Emails.
 - Handwritten notes.
 - Invoices.
 - Letters and other correspondence.
 - Memory in mobile phones and other mobile devices.

- Online postings, such as on Facebook, Twitter, Instagram, and other social media platforms and websites.
- Performance reviews.
- Voicemails.

2.2 Any records that hold Personal Data (any information which can be used to identify a living individual, e.g. name, address, telephone number, email) are to be considered part of the relevant category listed in the Records Retention Schedule contained in the Appendix to this policy and must be retained for the amount of time indicated in the Records Retention Schedule.

2.3 All records are to be considered and treated as confidential information and should not be disclosed to any third party (including police, courts or other investigatory bodies) without the permission of a Director and/or Privacy Officer.

2.4 A record should not be retained beyond the period indicated in the Record Retention Schedule, unless a valid business reason (or other situations, e.g. litigation) requires that it is retained beyond the set period. If you are unsure whether to retain a certain record, contact the Privacy Officer.

3. **DISPOSABLE INFORMATION**

3.1 Disposable information consists of data that may be discarded or deleted at the discretion of the user once it has served its temporary useful purpose and/or data that may be safely destroyed because it is not a record as defined by this policy. Examples include:

- Duplicates of originals (that have not been annotated).
- Preliminary drafts of letters, memoranda, reports, worksheets, and informal notes that do not represent significant steps or decisions in the preparation of an official record.
- Books, periodicals, manuals, training binders, and other printed materials obtained from sources outside of the company and retained primarily for reference purposes.
- Spam and junk mail.

4. **GUIDELINES FOR DESTRUCTION**

4.1 Each member of staff is responsible for the continuing process of identifying the records that have met their required retention period and supervising their destruction. The destruction of confidential, financial, and personnel-related records must be conducted by shredding if possible or may be outsourced to a reputable third party who provides record destruction services. Non-confidential records may be destroyed by recycling. The destruction of electronic records must be coordinated with the Privacy Officer.

4.2 The destruction of records must stop immediately upon notification from the Privacy Officer, a Director or on notice that the company may be involved in a lawsuit or an official investigation.

5. **BREACH OF THIS POLICY**

5.1 Breach of this policy may result in disciplinary action up to and including dismissal. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.

5.2 You may be required to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

APPENDIX

Record Retention Schedule

Employees should give special consideration to the categories of documents listed in the record retention schedule below. Avoid retaining a record if there is no business reason for doing so, and consult with the Privacy Officer if unsure.

RECORD	RETENTION PERIOD
Personnel Records	
Benefits descriptions per employee	7 years
Employee applications, resumes and other selection process documents for unsuccessful candidates.	1 year
Unsolicited and speculative application and resumes	1 year unless asked to be retained on file for future use by the applicant
Employee offer letters (and other documentation regarding hiring, promotion, demotion, transfer, lay-off, termination or selection for training)	7 years from the date of termination
Records relating to background checks on employees	5 years from when the background check is conducted
Allegations/complaints	7 years from the date of termination
Grievance and Disciplinary records	7 years from the date of termination
Employment contracts; employment and termination agreements	7 years from the date of termination
Employee records with information on expenses and non-salaried pay	5 years
Hazardous material exposures	Indefinitely
Supplemental record for each occupational injury or illness	Indefinitely
Job descriptions, performance goals and reviews; garnishment records	7 years from the date of termination
Employee tax records	7 years from the date tax is due or paid
Medical referrals, exams/checks and sickness records	7 years from the date of termination
Pension plan and retirement records	Indefinitely
Payroll Records	
Payroll registers (gross and net)	Indefinitely
Corporate Records	
Articles of Incorporation, Bylaws, Corporate Seal	Indefinitely
Annual corporate filings and reports to secretary of state and attorney general	Indefinitely
Board policies, resolutions, meeting minutes, and committee meeting minutes	Indefinitely
Contracts	14 years from the date of termination
Construction documents	Indefinitely
Emails (business related)	14 years
Fixed Asset Records	Indefinitely
Sales and purchase records	Indefinitely
Resolutions	Indefinitely
Accounting and Finance	
Accounts Payable and Receivables ledgers and schedules	7 years
Annual audit reports and financial statements	Permanent

Annual plans and budgets	2 years
Bank statements, cancelled checks, deposit slips	7 years
Business expense records	7 years
Electronic fund transfer documents	7 years
Employee expense reports	7 years
General ledgers	Indefinitely
Journal entries	7 years
Invoices	7 years
Petty cash vouchers	3 years
Legal and Insurance Records	
Appraisals	Indefinitely
Environmental studies	Indefinitely
Insurance claims/ applications	Indefinitely
Insurance contracts and policies	Indefinitely
Leases	7 years after termination
Patents, patent applications, supporting documents	Indefinitely
Real estate documents (including loan and mortgage contracts, deeds)	Indefinitely
Stock and bond records	Indefinitely
Trade mark registrations, evidence of use documents	Indefinitely
Warranties	Duration of warranty + 7 years
Pupil Records	
Registers/Roll books	Indefinitely
State exam results	Student reaching 18 years + 7 years
Enrolment Forms	Student reaching 18 years + 7 years
Student transfer information	Student reaching 18 years + 7 years
Disciplinary notes	Never destroy
Results of in-school tests/exams (i.e. end of term, end of year exams, assessment results)	Student reaching 18 years + 7 years
End of term/year reports	Student reaching 18 years + 7 years
Records of school tours/trips, including permission slips, itinerary reports	Never destroy
Special Education Needs' files, reviews, correspondence and Individual Education Plans	Indefinitely
Accident reports	Indefinitely
Child protection records	Indefinitely
Enrolment/transfer forms where child is not enrolled or refused enrolment	Student reaching 18 years + 7 years
Safeguarding complaints made by parents/ guardians	Indefinitely.
Complaint of a more mundane nature (e.g. misspelling of child's name, parent not being contacted to be informed of parent-teacher meeting) or other minor matter	Student reaching 18 years + 7 years (6 years in which to take a claim, and 1 year for proceedings to be served on school)
Parent / guardians personal information (eg contact details and other relevant personal information)	Student reaching 18 years + 7 years