



UNICORN SCHOOL

RECORDS RETENTION POLICY

This policy applies to all present & past pupils, parents, staff, Governors and volunteers. It also applies to the children and parents of prospective pupils.

This policy is on the public section of the website.

The School has appointed the Bursar as Data Protection Controller to oversee its role as Data Controller.

This Policy links to the Privacy Notice.

RESPONSIBILITY

Staff Member:	Bursar
Governors' Committee:	Risk & Compliance

Last Reviewed:	June 2024
Approved (Committee):	June 2024
Approved (Governors):	June 2024

Unicorn School needs to collect and store personal information in order to provide education services to pupils, contractual obligations to Staff and to fulfil other legal obligations. All data is held in accordance with the relevant legislation (“Data Protection Law”). The relevant legislation includes the General Data Protection Regulation (EU 2016/679) and the UK Data Protection Act 2018, as well as other potentially supporting legislation. Please see the Privacy Notice for further details.

This policy details the procedures for storing and destroying the personal information held within the School.

Basic Details

These are basic details of pupils, staff & governors which are held indefinitely. The purpose of holding this data is to answer queries from third parties where appropriate (such as potential employers seeking confirmation of previous employment). The details held are:

- first name & last name
- dates at Unicorn School
- position held (former staff/governors)
- class joined and left (former pupils)

Personal Details

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason:

- ordinary Pupil records are kept whilst they remain in statutory education, which is 7 years after they would have left Year 6
- ordinary Staff personnel records are kept for 6 years following departure
- personal details on records for Governors and volunteers are retained for one year after the appointment/activity ceases

Incident reports and safeguarding files need to be kept much longer, in accordance with specific legal requirements. There is no time limit for keeping records concerning such issues. These records are held on a separate system from the main pupil, staff and governor records.

DBS Records

These are held by a third party service provider. Basic information on all the applications which they have processed is retained indefinitely.

Pupil Records

<u>Data</u>	<u>Why Held</u>	<u>Where Held</u>	<u>When Destroyed</u>
Basic Details	Legal/Administration	Electronic & Paper	No set period
Personal Details	Legal/Administration	Electronic & Paper	7 years after pupil would have left Year 6
Contact details & address	Legal/Administration	Electronic & Paper	7 years after pupil would have left Year 6
Attendance Records	Legal/Administration	Electronic & Paper	7 years after pupil would have left Year 6
Disciplinary Records	Legal/Administration	Electronic & Paper	7 years after pupil would have left Year 6
Medical Information	Duty of Care	Electronic & Paper	7 years after pupil would have left Year 6
Educational Records	Legal	Electronic & Paper	7 years after pupil would have left Year 6
Safeguarding Records	Legal/Safeguarding	Electronic & Paper	No set period
Photographs	Administration	Electronic & Paper	Individual identifying photographs destroyed within 2 years of pupil's departure*

* non identifying photographs (such as whole school photographs) are not destroyed

Parent Records

<u>Data</u>	<u>Why Held</u>	<u>Where Held</u>	<u>When Destroyed</u>
Personal Details	Legal/Administration	Electronic & Paper	7 years after pupil would have left Year 6
Contact details & address	Legal/Administration	Electronic & Paper	7 years after pupil would have left Year 6
DBS Records (if volunteer)	Legal	Electronic	No set period
Financial Information**	Legal/Administration	Electronic & Paper	6 months after the pupil (with a bursary) leaves

** Bursary holders only. Personal financial data of unsuccessful bursary applicants is destroyed within 6 months of notification of no award

Prospective Pupils & their Parents Records

<u>Data</u>	<u>Why Held</u>	<u>Where Held</u>	<u>When Destroyed</u>
Personal Details	Legal/Administration	Electronic & Paper	The year when the pupil would have left Year 6
Contact details & address	Legal/Administration	Electronic & Paper	The year when the pupil would have left Year 6
Financial Information**	Legal/Administration	Electronic & Paper	Within 6 months if no Bursary awarded, or 6 months after the pupil (with a bursary) leaves

** Bursary applications only

Old Unicorn Records

Except in exceptional circumstances, all pupils leave the School before the age of 13 years (the age below which the law assumes that parents may give “data” consent on their child’s behalf). When a pupil leaves, their parents are asked to subscribe to the Old Unicorn newsletter on their behalf and to nominate an e-mail address to which Old Unicorn communications are to be sent (the default is the primary parent email held by the School).

<u>Data</u>	<u>Why Held</u>	<u>Where Held</u>	<u>When Destroyed</u>
Personal Details	Administration	Electronic & Paper	When destruction requested by Old Unicorn or parent if below the age of 13 years
Contact details & address	Administration	Electronic & Paper	When destruction requested by Old Unicorn or parent if below the age of 13 years
What Happened Next [^]	Administration	Electronic & Paper	When destruction requested by Old Unicorn or parent if below the age of 13 years

[^] Information about an Old Unicorn received in good faith may be reported in the Old Unicorn newsletter and stored on their Old Unicorn record

We also hold personal details & contact information on former Unicorn Staff members who have requested to stay in contact and to receive the Old Unicorn newsletter. These are subject to the same rules of data retention as for alumni.

Staff Records

<u>Data</u>	<u>Why Held</u>	<u>Where Held</u>	<u>When Destroyed</u>
Basic Details	Legal/Administration	Electronic & Paper	No set period
Personal Details	Legal/Administration	Electronic & Paper	6 years after employment ceased
Contact details & address	Legal/Administration	Electronic & Paper	6 years after employment ceased
DBS Records	Legal	Electronic	No set period
Attendance Records	Legal/Administration	Electronic & Paper	6 years after employment ceased
Disciplinary Records	Legal/Administration	Electronic & Paper	6 years after employment ceased
Safeguarding Records	Legal/Safeguarding	Electronic & Paper	No set period

Governors Records

<u>Data</u>	<u>Why Held</u>	<u>Where Held</u>	<u>When Destroyed</u>
Basic Details	Legal/Administration	Electronic & Paper	No set period
Personal Details	Legal/Administration	Electronic & Paper	1 year after appointment ceased
Contact details & address	Legal/Administration	Electronic & Paper	1 year after appointment ceased
DBS Records	Legal	Electronic	No set period
Attendance Records	Legal/Administration	Electronic & Paper	No set period
Safeguarding Records	Legal/Safeguarding	Electronic & Paper	Never

Volunteer Records

<u>Data</u>	<u>Why Held</u>	<u>Where Held</u>	<u>When Destroyed</u>
Personal Details	Legal/Administration	Electronic & Paper	1 year after volunteer activity ceased
DBS Records	Legal	Electronic	No set period

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