

Data Protection Governance Framework Compliance with GDPR



WORKFORCE AND VOLUNTEER DATA RETENTION SCHEDULE							
Data item group	Short term need (event +1 month)	Medium term need (workforce in school +1 year)	Long term need (staff member has left school +3 years)	Very long term need (+10 years or longer)	Justification		
Staff member basic details (incl. Personal identifiers) and emergency contacts	√ (images used in identity systems) √ (biometrics) √ (house number and road, Phone contact details)	√ (images used in displays in school)	√ (postcodes) √ (names) √ (characteristics)	Staff member basic details (incl Personal identifiers) and characteristics	Images are used for different reasons, and the reason should dictate the retention period. Images used purely for identification (website, entrance hall) can be deleted when the staff member leaves the setting. Images used in displays etc. can be retained for educational purposes whilst the staff member is at the school. Other usages of images (for example, marketing) should be retained for and used in line with the active informed consent captured at the outset of using the photograph. Biometric data (typically facial recognition, fingerprint recognition) is not currently used in school. This should be used and retained as set out in the active informed consent gained at the outset, but typically this should not be retained long after the activity that requested its use has finished. (e.g staff member has left school) Names, addresses and characteristics are needed for the purpose of contacting the person, and for creating a contract of employment. Medical information is required to ensure health and safety in the workplace. Data is retained in school for a period of 3 years after the person has left, after which it is regarded that a request for a reference cannot reasonably be given as the person has not worked in the building for some time. Data concerning medical or legal incidents is retained indefinitely Staff may wish to be included on a birthday list. Details are removed when the staff member leaves.		

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Data Retention Schedule v0.1 April 21018



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Staff member basic details (incl. Personal identifiers) and emergency contacts	Emergency contact (name, phone number) Relationship to staff member				Emergency contact details (name and phone number of named contact) are updated yearly and securely destroyed each year. Contact details may reveal the relationship to the staff member, although this is not required.
Bank details Payroll information			√		Information is needed to pay individuals. Staff bank details are retained by Beds Borough (payroll provider) whilst the staff member is employed and for the retention period of their auditors. Records of payroll payments are kept for budgeting and auditing for 6+ years then securely destroyed. Records of invoices and payment details are kept in our financial records for 6+ years for auditing purposes and then securely destroyed.

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DBS check (name, address, any accompanying notes)	V	V			All workforce are required to have an enhanced DBS specific to the school. After the DBS has been verified, a record of the DBS number is kept on the Single Central Record, together with any accompanying notes in relation to the DBS. This record is removed when the workforce member leaves.
Safeguarding	V	V	V	V	All data on the safeguarding file (CPOMS) potentially forms part of an important story that may be needed retrospectively for many years. Staff names (reporting incidents; involved in supporting the child) form part of these records and are needed to be retained along with those records.
Contract details, absence information, appraisal records	V	V	V	(√)	Staff contracts, absence and appraisal information form part of their employment contract. This information may form part of a subsequent reference and is retained after the staff member has left. After 3 years it is deemed no longer relevant for the purposes of providing a reference or verifying employment, and is securely destroyed, the only exception being in the case of a medical or legal incident, in which case it is retained.

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