

# DE LA SALLE COLLEGE



## REVIEW, RETENTION & DIPOSAL OF SENSITIVE INFORMATION POLICY

***“REJOICE IN THE LORD ALWAYS; AGAIN I WILL SAY, REJOICE.”***

**PHILIPPIANS 4:4**

Compiled by: The Head of College	Last Reviewed: June 2023
Policy Holder: Mr D. Washington	Revision date: June 2024
Oversight Governor: Nicholas Le Cornu	Verification date: Spring 2024

# Review, Retention & Disposal of Sensitive Information

## **1. Introduction**

- 1.1 The Jersey Vetting Bureau is a registered body of the Disclosure and Barring Service (DBS). De La Salle College is a Registered Service User of the Jersey Vetting Bureau through which we use the Disclosure and Barring Service as part of our recruitment process to assess an applicant's suitability for employment in posts of trust.
- 1.2 All organisations using the Disclosure and Barring Service to help assess the suitability of applicants for positions of trust must comply fully with the DBS Code of Practice.
- 1.3 The Code places an obligation on such organisations to have a written policy on the correct handling and safekeeping of disclosure information.
- 1.4 This Policy applies to sensitive information pertaining to all staff at De La Salle College.

## **2. Responsibility**

- 2.1 De La Salle College undertakes to comply fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of sensitive information.
- 2.2 De La Salle College undertakes to comply fully with its obligations under the Data Protection Law (Jersey) Law 2005 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of disclosure information.

## **3. Access and Storage of information**

- 3.1 Upon the applicant providing access to their DBS certificate, the approved disclosure recipient at De La Salle College will ensure that it is viewed only by those who are designated by him as entitled to see it as part of their duties.
  - 3.1.1 De La Salle College undertakes to ensure that information provided on the applicant's DBS Certificate is never kept on the applicant's personal file.

## **4. Handling**

- 4.1 De La Salle College undertakes to maintain a record of all those to whom disclosures certificates or disclosure information has been revealed and recognises that it is a criminal offence to pass the information to anyone who is not entitled to receive it.

## **5. Usage**

- 5.1.1 De La College undertakes to ensure that disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

## **6. Retention**

- 6.1 De La Salle College will not keep any disclosure information for any longer than is absolutely necessary once a recruitment decision has been made.

**6.2** De La Salle College will not keep any photocopy or other image of the disclosure certificate, or any copy of the contents of a certificate.

**RETENTION SCHEDULES FOR COLLEGE RECORDS**  
Move from data handling policy

<b>Records in Series</b>	<b>Retention in school</b>		<b>Notes</b>
<b>1. MANAGEMENT</b>			
1.1	School development plans	Permanent retention	
1.2	Headteacher's personal filing	Current + 6 years	
<b>2. GOVERNING BODY</b>			
2.1	Instruments and Articles of Government	Permanent retention	
2.2	Governor's Minutes, agendas and papers	Permanent retention	
2.4	Proceedings of the PTA AGM	Permanent retention	
2.5	Correspondence files	Current + 6 years	
<b>3. SCHOOL ORGANISATION</b>			
3.1	School prospectus	Permanent retention	
3.2	Headteacher's official diary	Current + 1 year	
3.3	Staff meetings Minutes	Current + 6 years	
3.4	Administration and general files	Current + 10 years	
3.6	Circulars to staff and pupils	Current + 2 years	
3.7	Newsletters to parents	Permanent retention	
3.8	Staff Handbook	Permanent retention	
3.9	Visitors Book (VIP visitors)	Permanent retention	
<b>4. HEALTH &amp; SAFETY</b>			
4.1	Health and Safety Policy statement	Current + 1 year	
4.2	Staff Accident Records	Current + 6 years	
4.3	Pupil Accident Records	DOB + 25	
4.4	Safety incident report book	Current + 20 years	
4.5	Maintenance log book	Current + 10 years	
4.6	Training records	Current + 10 years	
4.7	Health and Safety Reports	Permanent retention	

4.8	Fire precautions log book	Current + 6 years	
<b>5. CHILD PROTECTION</b>			
5.1	Child protection files	25 years post incident	Unless student transfers to new school. Then file should relocate with them and a note made of whom and when it was transferred to.
5.2	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Until the person's normal retirement age or 25 years from the date of the allegation, whichever is longer	
<b>6. PUPILS</b>			
6.1	Admission Registers (CMIS system)	Permanent retention	Admission registers are current while entries are being made and active until the pupil has left the school
6.2	Failure to gain place	30 days from the commencement of the academic year.	
6.3	Attendance Registers	Current + 3 years	
6.4	Pupil's educational record/ file (CMIS)	Permanent retention	Remainder shredded at discretion of Department Manager
6.5	Punishment books	Permanent retention	Transfer to Archive
6.6	Absence books	Current + 6 years	
6.7	Absence letters	Current + 2 years	
<b>7. STAFF</b>			
7.1	Staff personal files	Termination of employment + 3 years	

7.2	Child Protection Files- any personnel files with allegations	100 years from end date of file	
7.3	Contractors, peripatetic teachers employed directly by college	Termination of employment + 3 years	
<b>8. TEACHING</b>			
8.1	Curriculum development Minutes and files; Professional Development plan	Current + 6 years	
8.2	School syllabus	Current	
8.3	Timetables	Current + 6 YEARS	
8.4	Record of homework set	Current	
8.5	Teaching Aids (commercial and home-made)	Current	
8.6	Examination results – held at DfESC	Permanent retention	
8.7	Pupils' work	Current	
<b>9. FINANCE</b>			
9.1	Annual Budget	Permanent retention	
9.2	Budget files	Current + 6 years	
9.3	Headteacher's budget reports and budget monitoring tabulations	Current + 3 year	
9.4	Annual statement of accounts	Permanent retention	
9.5	Supplier Invoices	Current + 5 years	
9.6	Delivery documentation	Current + 6 years	
9.7	Invoices, bank account records, cashbooks, cash till rolls, debtor's records	Current + 5 years	
9.8	Monthly Payroll	Current + 5 years	
<b>10. PROPERTY</b>			
10.1	Legal agreements, leases, maintenance contracts	Current + 6 years	
10.2	Contracts/Title Deed	Permanent retention	
10.3	Register of tenders and quotations, orders for repairs, maintenance and supplies, records of letting school premises,	Current + 10 years	

	maintenance log books, burglary, theft and vandalism report forms, contractors' reports		
10.4	Records of insurance (policies and schedules)	Current	
10.5	Plans	Permanent retention	
<b>11. EXTRA-CURRICULAR</b>			
11.1	School magazines	Permanent retention	
11.2	Photographs	Permanent retention	
11.4	Programmes – concerts, plays, sports day, lists of school prize winners etc	Permanent retention	
11.5	School History	Permanent retention	One copy also to Jersey Library Ref. Section
11.6	Audio-tape, video-tape recordings	Permanent retention	
11.7	Record of school societies	Permanent retention	Minutes/ newsletters should be identified and preserved as far as possible

**Appendix - CEYS retention schedule**



**Children, Young People, Education and Skills**

**RETENTION SCHEDULE FOR CHILDCARE AND EARLY YEARS SERVICE**

**(whatever their format – paper or electronic)**

Under the Public Records (Jersey) Law 2002 the Archivist appointed by Jersey Heritage is required to work with public authorities to produce retention schedules. The schedules list the public records produced by authorities, the length of time these records need to be retained for and the eventual disposal of the information – either to the Jersey Archive for permanent preservation or to be confidentially destroyed.

This schedule applies to all records, whether paper or electronic that are produced by the Childcare and Early Years Service (CEYS).

**The guidance below reflects best practice but does not constitute legal advice. The Archivist will endeavour to work with public authorities to ensure that the guidance reflects legislation but responsibility for checking on any legislative requirements rests with the public authority. Responsibility for checking more recent enactments rests with the reader.**

This schedule will be reviewed after 5 years. Date of next review: 2024

<b>File Title</b>	<b>Retention at CEYS</b>	<b>Action by CEYS</b>	<b>Action by Jersey Archive</b>	<b>Closed / open</b>
<b>Early Years and Childhood settings</b>				
<ul style="list-style-type: none"> <li>• Registered Setting Data files</li> <li>• Registration</li> <li>• Certificates</li> <li>• Plans</li> <li>• Reports</li> <li>• Questionnaires</li> <li>• Consultation</li> <li>• Complaints</li> <li>• Correspondence</li> </ul>	Current plus 5 years after closure of centre	Transfer to Jersey Archive	Archive	Closed
<b>Registered childminder - Each file contains some or all of the following documents:</b>				
<ul style="list-style-type: none"> <li>• Registered Setting Data files</li> <li>• Registration</li> <li>• Annual re-registration</li> <li>• Certificates</li> <li>• Plans</li> <li>• Reports</li> <li>• Questionnaires</li> <li>• Consultation</li> <li>• Complaints</li> <li>• Correspondence</li> <li>• Architectural plans</li> <li>• DBS status</li> </ul>	Current plus 25 years after de-registration	Transfer to Jersey Archive	Archive	Closed



	<ul style="list-style-type: none"> <li>• Audit notebook and reports</li> <li>• Declaration of Good Health</li> <li>• Childminder folder</li> </ul>				
<b>Alleged illegal Childminder database and register:</b>					
	Reports containing names and addresses	Retain for 5 Years	Destroy	N/A	N/A

<b>Retention information for Registered Providers including Childminders</b>					
	Liability insurance certificate	Current plus 25 years	Archive at CYPES Please discuss the process for historical claims with your insurance provider	N/A	N/A
	Business Information	Current	To be retained with CYPES until the documentation is 25 years old – can be retained electronically on a password protected device	N/A	N/A
	Records of accidents/incidents and medication	Current plus 25 years	Transfer to Archive (notifiable records only i.e. death, A & E visit for child or adult, serious injury. To be retained with CYPES until the child's 25 <sup>th</sup> birthday)	N/A	N/A
	Attendance register	Current	To be retained with CYPES until the documentation is 25 years old – can be retained electronically on a password protected device	Archive	Closed
	Information regarding children To include: <ul style="list-style-type: none"> <li>• Contact details</li> <li>• Emergency contacts</li> <li>• List of people that may currently or have previously been authorised to collect the child</li> <li>• Learning journey diary/file if applicable (supply to parent on leaving)</li> <li>• Written observations if applicable (supply to parent on leaving)</li> <li>• Photos (supply to parent on</li> </ul>	Monitor and keep up to date at all times. Note any change in circumstances, contact details, developed allergies etc.	To be retained with CYPES until the documentation is 25 years old, can be retained electronically on a password-protected device.  Registered Childminders who cease work must follow the separate retention guidance.	Destroy	N/A


<ul style="list-style-type: none"> <li>leaving)</li> <li>Records of concerns</li> <li>Copies of any MASH referrals made during time with you</li> <li>Copies of any reports on observations for support agencies</li> <li>Arrangements in case of an emergency</li> <li>Written permission to administer medicine</li> <li>Permission to take children out on outings</li> <li>Permission for children to be photographed and videoed and how these images are used</li> <li>Permission for social media</li> </ul>				
<b>FINANCIAL</b>				
All financial paperwork including staff wages, maternity/paternity/adoption pay records, sick pay records, redundancy records etc.	Current	All financial paperwork, tax returns, accounts, statements and invoices should be kept for 10 years (JFSC Business Records 3.4.6.2 <a href="https://www.ierseyfs.c.org/media/1655/m-sb-code-21-march-2018.pdf">https://www.ierseyfs.c.org/media/1655/m-sb-code-21-march-2018.pdf</a> )	N/A	N/A
<b>Staff records including mandatory training</b>				
CV's application forms and interview notes (unsuccessful candidates)	Current	To be kept for no more than 1 year following the decision to not employ	Destroy	
CV's Application forms and interview notes (successful candidates)		Keep for 6 years following the cessation of employment	Destroy	
DBS Check/Disclosure information Name, DOB, reference number, date of issue, update service reference number, and anything	By Law the only details that can be kept for longer than 6 months are the	Remember to destroy any detailed information within 6 months, retaining only the name,	Destroy	

recorded on the certificate	date of the check it's reference number and the result i.e. clear or not clear	DOB, reference number, date of issue, update service reference number		
Personnel files and training records must contain all information for the staff employed, including application form, work history, references, supervision records, appraisals, qualifications, disciplinary records, training records and time sheets (if used). Original qualification certificates to be photocopied and then returned to the employee.		6 years after employment ceases, can be retained electronically on a password protected device	Destroy	
Maternity, paternity, adoption records Sick pay records Redundancy records		6 years after employment ceases, can be retained electronically on a password protected device	Destroy	

**APPROVED AND SIGNED BY CYPES:**

Name	Signature	Position	Date
Keith Posner		Director, Policy & Planning	

**APPROVED AND SIGNED BY JERSEY ARCHIVE:**

Name	Signature	Position	Date
Linda Romeril		Archives and Collections Director, Jersey Heritage	20/8/19