



Wilson's Hospital School

Records Retention Policy

Wilson's Hospital School, in its role as a Data Controller, is conscious of its statutory obligations to be fully transparent in relation to the length of time for which personal data will be kept. The School Management Board / Board of Governors has put in place procedures to ensure compliance with all directives in relation to the storing and retention of data sought by the school.

Below are listed guidelines to the length of time various categories of data are stored at the school:

Student Records	Duration	Final disposition	Comments
Registers/Roll books	Indefinitely	N/A	Indefinitely. Archived when class leaves + 2 years
State exam results	N/A	N/A	SEC responsibility to retain, not a requirement for school/ETB to retain.

Enrolment Forms	Student reaching 18 years + 7 years	Confidential shredding	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Student transfer forms (Applies from primary to primary; from one second-level school to another)	Student reaching 18 years + 7 years	Confidential shredding	Student reaching 18 years + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Disciplinary notes	Never destroy	N/A	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	Confidential shredding	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school).
End of term/year reports	Student reaching 18 years + 7 years	Confidential shredding	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Records of school tours/trips, including permission slips, itinerary reports	Never destroy	N/A	Never destroy
Scholarship applications e.g. Gaeltacht, book rental scheme	Student reaching 18 years + 7 years	Confidential shredding	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Garda vetting form & outcome - STUDENTS	Record of outcome retained for 12 months.	Confidential shredding	Record of outcome retained for 12 months. School to retain the reference number and date of disclosure on file, which can be checked with An Garda Síochána in the future.

Student Sensitive Personal Data	Duration	Final disposition	Comments
Psychological assessments	Indefinitely	N/A	Never destroy
Special Education Needs' files, reviews, correspondence and Individual Education Plans	Indefinitely	N/A	Never destroy
Accident reports	Indefinitely	N/A	Never destroy
Child protection records	Indefinitely	N/A	Never destroy
Section 29 appeal records	Student reaching 18 years + 7 years	Confidential shredding	Student reaching 18 years + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Enrolment/transfer forms where child is not enrolled or refused enrolment	Student reaching 18 years + 7 years	Confidential shredding	Student reaching 18 years + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Records of complaints made by parents/guardians	Depends entirely on the nature of the complaint.	Confidential shredding or N/A, depending on the nature of the records.	Depends entirely on the nature of the complaint. If it is child-safeguarding, a complaint relating to teacher-handling, or an accident, then retain indefinitely. Never destroy. If it is a 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, then student reaching 18 years + 7 years (6 years in which to take a claim, and 1 year for proceedings to be served on school)

Unsuccessful Candidates for Interview	Final disposition	Comments
Applications & CVs of candidates called for interview	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Workplace Relation Commission to inform the school that a claim is being taken.
Database of applications	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Workplace Relations Commission to inform the school that a claim is being taken.
Selection criteria	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Workplace Relations Commission to inform the school that a claim is being taken.
Applications of candidates not shortlisted	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Workplace Relations Commission to inform the school that a claim is being taken.
Unsolicited applications for jobs	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Workplace Relations Commission to inform the school that a claim is being taken.
Candidates shortlisted but unsuccessful at interview	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Workplace Relations Commission to inform the school that a claim is being taken.
Candidates shortlisted and are successful but do not accept offer	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Workplace Relations Commission to inform the school that a claim is being taken.
Interview board marking scheme & board notes	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Workplace Relations Commission to inform the school that a claim is being taken.
Panel recommendation by interview board	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Workplace Relations Commission to inform the school that a claim is being taken.

Staff personnel files	Final Disposition	Comments
e.g. applications, qualifications, references, recruitment, job specification, contract, Teaching Council registration, records of staff training etc.	Confidential shredding. Retain an anonymised sample for archival purposes.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Application &/CV	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Interview: database of applications (the	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)

section which relates to the employee only)		
Selection criteria	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Interview board marking scheme & board notes	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Panel recommendation by interview board	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Recruitment medical	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Job specification/ description	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Contract/Conditions of employment	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Probation letters/forms	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
POR applications and correspondence (whether successful or not)	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Leave of absence applications, including jobshare, career break, maternity/paternity leave, parental leave , force majeure and carer's leave	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Allegations/complaints	Confidential shredding	Retain for duration of employment plus 7 years (6 years to take a claim, plus 1 year for proceedings to be served). Note the relevant DES Circular re Disciplinary Procedures in relation to the period of time for which a warning remains "active" on an employee's record.
Grievance and Disciplinary records	Confidential shredding	Retain for duration of employment plus 7 years (6 years to take a claim, plus 1 year for proceedings to be served). Note the relevant DES Circular re Disciplinary Procedures in relation to the period of time for which a warning remains "active" on an employee's record.
Sickness absence records/certificates	Confidential shredding or N/A (see comment)	Re sick leave scheme (1 in 4 rule) ref DES C/L 0060/2010 Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy.
Pre-employment medical assessment. Occupational health referral, correspondence re	Confidential shredding or N/A (see comment)	Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy.

retirement on ill-health grounds, medical assessments or referrals		
Accident/injury at work reports	Confidential shredding or N/A (see comment)	Retain for 10 years, or the duration of the employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), whichever is the greater (unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy).
Sick leave records (sick benefit forms)	Confidential shredding	In case of audit/refunds, Current year plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)

Records of previous service (incl. correspondence with previous employers)	N/A	DES advise that these should be kept indefinitely.
Pension calculation, pension increases	Confidential shredding	Duration of employment + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) or for the life of employee/former employee plus + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the longer)
Salary claim forms	Confidential shredding	Duration of employment + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) or for the life of employee/former employee plus + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the longer)

Government returns	Final disposition	Comments
Any government returns which identify individual staff/pupils,	N/A	Depends upon the nature of the return. If it relates to pay/pension/benefits of staff, keep indefinitely as per DES guidelines. If it relates to information on students, e.g. October Returns, Annual Census etc., keep in line with "Student Records" guidelines above.

School Management Board / Board of Governors Records	Final disposition	Comments
Board agenda and minutes	N/A	Indefinitely. These should be stored securely on school property
School closure		On school closure, records should be transferred as per Records Retention in the event of school closure/amalgamation . A decommissioning exercise should take place with respect to archiving and recording data.
Other school based reports/minutes	Final disposition	Comments
CCTV recordings	Safe/secure deletion.	28 days in the normal course, but longer on a case-by-case basis e.g. where recordings/images are requested by An Garda Síochána as part of an investigation or where the records /images capture issues such as damage/vandalism to school property and where the images/recordings are retained to investigate those issues.
Principal's monthly report including staff absences	N/A	Indefinitely. Administrative log and does not relate to any one employee in particular: the monthly reports are not structured, either by reference to individuals or by reference to criteria relating to individuals, in such a way that specific information relating to a particular individual is readily accessible. Not a "relevant filing system".

Promotion process	Final Disposition	Comments
Posts of Responsibility	N/A	Retain indefinitely on master file as it relates to pay/pension etc. (See DES guidelines)
Calculation of service	N/A	Retain indefinitely on master file
Promotions/POR Board master files	N/A	Retain indefinitely on master file
Promotions/POR Boards assessment report files	N/A	Retain original on personnel file in line with retention periods in "Staff Records" retention guidelines above
POR appeal documents	N/A	Retain original on personnel file, and copy of master & appeal file. Retain for duration of employment + 7 years (6 years in which to take a claim, plus 1 year to serve proceedings on school). Copy on master and appeal file.
Correspondence from candidates re feedback	N/A	Depends upon nature of feedback. If feedback is from unsuccessful candidate who is not an employee within the school, keep in line with retention periods in "Staff Records" above. If feedback is from successful candidate or from unsuccessful candidate who is already an employee within the school, keep in line with "Staff personnel while in employment" above.

Appendix 3

Exceptions to the Right of Access

A Data Subject about whom Wilson's Hospital School holds personal information does not have a right to see such information where any of the following circumstances apply.

1. If the information is kept for the purpose of preventing, detecting or investigating offences, apprehending or prosecuting offenders, or assessing / collecting any taxes or duties: but only in cases where allowing the right of access would be likely to impede any such activities
2. If the information is kept for certain anti-fraud functions: but only in cases where allowing the right of access would be likely to impede any such functions
3. If granting the right of access would be likely to harm the international relations of the State
4. If the information concerns an estimate of damages or compensation in respect of a claim against the School where granting the right of access would be likely to harm the interests of the School
5. If the information would be subject to legal professional privilege in court
6. If the information is kept only for the purpose of statistics or carrying out research, but only where the information is not disclosed to anyone else, and where the results of the statistical work or research are not made available in a form that identifies any of the individuals involved
7. If the information is back-up data.