

Records Retention Schedule

St Columba's College

Retention of Records

As a data controller, St Columba's College must be clear about the length of time for which personal data will be kept and the reasons why the information is being retained. In determining appropriate retention periods, regard must be had for any statutory obligations imposed on a data controller. If the purpose for which the information was obtained has ceased and the personal information is no longer required, the data must be deleted or disposed of in a secure manner. It may also be anonymised to remove any personal data. Anonymisation must be irrevocable; removing names and addresses may not necessarily be sufficient.

In order to comply with this legal requirement, St Columba's College has assigned specific responsibility and introduced procedures for ensuring that files are purged regularly and securely and that personal data is not retained any longer than is necessary. All records will be periodically reviewed in light of experience and any legal or other relevant indications.

IMPORTANT: In all cases, schools should be aware that where proceedings have been initiated, are in progress, or are reasonably foreseeable (although have not yet been taken against the school/board of management/an officer or employee of the school (which may include a volunteer), all records relating to the individuals and incidents concerned should be preserved and should under no circumstances be deleted, destroyed or purged. The records may be of great assistance to the school in defending claims made in later years.

WARNING: In general, the limitation period does not begin to run until the person concerned acquires knowledge of the facts giving rise to the claim and the Statute of Limitations may be different in every case. In all cases where reference is made to "18 years" being the date upon which the relevant period set out in the Statute of Limitations commences for the purposes of litigation, the school must be aware that in some situations (such as the case of a pupil with special educational needs, or where the claim relates to child sexual abuse, or where the pupil has not become aware of the damage which they have suffered, and in some other circumstances), the Statute of Limitations **may not begin to run when the pupil reaches 18 years of age and specific legal advice should be sought by schools on a case-by-case basis.** In all cases where retention periods have been recommended with reference to the relevant statutory period in which an individual can make a claim, these time-frames may not apply where there has been misrepresentation, deception or fraud on the part of the respondent/defendant. In such a circumstance, the school should be aware that the claim could arise many years after the incident complained of and the courts/tribunals/employment fora may not consider the complainant to be "out of time" to make their claim.

| Pupil Records | Retention period | Final disposition | Comments |
|-----------------------------|-------------------------|--------------------------|---|
| Registers/Roll books | Indefinitely | N/A | Indefinitely. Archive when class leaves + 2 years |
| State exam results | N/A | N/A | SEC responsibility to retain, not a requirement for school to retain. |

| Records relating to pupils | Retention period | Confidential shredding | Comments |
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| 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 | Student reaching 18 years + 7 years | N/A | 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) |
| Garda vetting form & outcome – PUPILS | 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. |

| Sensitive Personal Data Students | Retention period | Final disposition | Comments |
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| Psychological assessments | Indefinitely | Never destroy | Never destroy |
| Special Education Needs' files, reviews, correspondence and Individual Education Plans | Indefinitely | Never destroy | 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) |

| CCTV Images | Retention period | Final disposition | Comments |
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| Images from CCTV cameras protecting the school site | 28 days | Over written on CCTV server | |

| Staff Records | Retention period | Final disposition | Comments |
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| <p>Recruitment process</p> <p>Note: these retention periods apply to unsuccessful candidates only. They do NOT apply to successful candidates, or candidates who are/were also employees already within the school applying for another post/position. For successful candidates, or candidates who are/were also employees already within the school applying for another post/position, see retention periods set out below.</p> | See comments | Confidential shredding | 18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken. |
| Applications & CVs of candidates called for interview | See comments | Confidential shredding | 18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken. |
| Database of applications | See comments | Confidential shredding | 18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken. |
| Selection criteria | See comments | Confidential shredding | 18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken. |
| Applications of candidates not shortlisted | See comments | Confidential shredding | 18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken. |
| Unsolicited applications for jobs | See comments | Confidential shredding | 18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken. |

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| Candidates shortlisted but unsuccessful at interview | See comments | Confidential shredding | 18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken. |
| Candidates shortlisted and are successful but do not accept offer | See comments | Confidential shredding | 18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken. |
| Interview board marking scheme & board notes | See comments | Confidential shredding | 18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken. |
| Panel recommendation by interview board | See comments | Confidential shredding | 18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken. |

| Staff personnel files (whilst in employment) | Retention period | Final Disposition | Comments |
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| e.g. applications, qualifications, references, recruitment, job specification, contract, Teaching Council registration, records of staff training etc. | See comments | 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) |
| Application &/CV | See comments | 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) |
| Qualifications | See comments | 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) |
| References | See comments | 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 section which relates to the employee only) | See comments | 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) |
| Selection criteria | See comments | 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) |

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| Interview board marking scheme & board notes | See comments | 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 | See comments | 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 | See comments | 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 | See comments | 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 | See comments | 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 | See comments | 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) | See comments | 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 | See comments | 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 share | See comments | 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) |
| Career Break | See comments | 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) |
| Maternity leave | See comments | 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) |
| Paternity leave | See comments | Confidential shredding | Retain for 2 years following retirement/resignation or the 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) (whichever is the greater). |
| Parental leave | See comments | Confidential shredding | Must be kept for 8 years - Parental Leave Act 1998 . Retain for 8 years or the 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) (whichever is the greater). There is a statutory requirement to retain for 8 years. |

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| Force Majeure leave | See comments | Confidential shredding | Retain for 8 years or the 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) (whichever is the greater). There is a statutory requirement to retain for 8 years. |
| Carers leave | See comments | Confidential shredding | Must be kept for 8 years - Carer's Leave Act 2001. Retain for 8 years or the 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) (whichever is the greater). There is a statutory requirement to retain for 8 years |
| Working Time Act (attendance hours, holidays, breaks) | See comments | 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). There is a statutory requirement to retain for 3 years |
| Allegations/complaints | See comments | Confidential shredding | Retain in accordance with the Grievance and Disciplinary procedure |
| Grievance and Disciplinary records | See comments | Confidential shredding | Retain in accordance with the Grievance and Disciplinary procedure |

| Promotion process | Retention period | Final Disposition | Comments |
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| Posts of Responsibility | See comments | N/A | Retain indefinitely on master file as it relates to pay/pension etc. (See DES guidelines) |
| Calculation of service | See comments | N/A | Retain indefinitely on master file |
| Promotions/POR Board master files | See comments | N/A | Retain indefinitely on master file |
| Promotions/POR Boards assessment report files | See comments | N/A | Retain original on personnel file in line with retention periods in "Staff Records" retention guidelines above |
| POR appeal documents | See comments | 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 | See comments | 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. |

| Occupational Health Records | Retention period | Confidential Shredding | Comments |
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| Sickness absence records/certificates | See comments | Confidential shredding Or do not destroy. | 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 | See comments | Confidential shredding Or do not destroy. | 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. |
| Occupational health referral | See comments | Confidential shredding Or do not destroy. | 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. |
| Correspondence re retirement on ill-health grounds | See comments | Confidential shredding Or do not destroy. | 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. |
| Accident/injury at work reports | See comments | Confidential shredding | 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). |
| Medical assessments or referrals | See comments | Confidential shredding Or do not destroy. | 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 Medmark assessment 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) | See comments | 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) |

| Superannuation /Pension /Retirement records | Retention period | Final Disposition | Comments |
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| Records of previous service (incl. correspondence with previous employers) | See comments | N/A | DES advise that these should be kept indefinitely. |
| Pension calculation | See comments | 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) |
| Pension increases | See comments | 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 | See comments | 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 | Retention period | Final disposition | Comments |
| Any returns which identify individual staff/pupils, | See comments | 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. |

| Fellows', and Sub-Committee and Board of Management Records | Retention period | Final disposition | Comments |
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| Board and sub-committee agenda and minutes | See comments | N/A | Indefinitely. These should be stored securely on school property |
| School closure | See comments | | 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 | Retention period | Final disposition | Comments |
| CCTV recordings | See comments | 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 | See comments | 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". |
| Financial Records | Retention period | Final disposition | Comments |
| Audited Accounts | See comments | n/a | Indefinitely |
| Payroll and taxation | See comments | | Revenue Commissioners require that records be kept for at least six years after the end of the tax year. Records must be made available for inspection by authorised officers of the Revenue Commissioners or of the Dept. of Social Protection. Note: The DES requires of schools that "pay, taxation and related school personnel service records should be retained indefinitely within the school. These records can be kept either on a manual or computer system. |
| Invoices/back-up records/receipts | See comments | Confidential shredding | Retain for 7 years |

| Golf Licensee Records | Retention period | Final disposition | Comments |
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| Each licence holder has details held of their contact details and licence history | See comments | Confidential shredding | Records kept for the duration of their time as a licence holder and then as for a further six years after the end of the tax year in case of inspection by authorised officers of the authorities for VAT purposes |