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INTERNATIONAL SCHOOL BANGKOK

Record Keeping Policy

Approval:	Executive Board	**Level:**	Public
Writer:	Bursar	**Review Frequency:**	3-yearly
Next Review:	February 2027	**Approval Dated:**	February 2024
Linked Policies:	Child Protection & Safeguarding Policy; Data Protection Policy; eSafety / Acceptable Use Policy; Taking, Storing & Using Images of Children Policy		

1. Context

1.1 As an integral part of compliance with the new Personal Data Protection Act ('PDPA'), which came into force in Thailand on 31 May 2021, Wellington College International School Bangkok ('WCIB') has developed this Policy for managing the retention, storage, and destruction of records.

1.2 This Policy on the management of student and employee records should be read in conjunction with the WCIB Data Protection Policy.

2. Principles

2.1 This Policy establishes the principles for the length of document retention. These will be based on questions of relevance, purpose, and data security.

2.2 The School will ensure that all Personal Data it holds will be:

- Justifiable and transparent, by reference to its purpose through the appropriate Privacy Notice.
- Clearly, simply, and accurately explained to individuals as to why their Personal Data is obtained and held.
- Stored securely and only handled by those with the authority to access it.
- Retained only for the period of time stipulated in the appropriate Privacy Notice; and thereafter destroyed and/or erased securely and effectively.

3. Safeguarding

3.1 Data Protection issues should never put a child's safety at risk, nor take precedence over the general prevention and processing of safeguarding matters. The School will not, therefore, delete any historical employee or student records where there may be a safeguarding or child protection issue, or any material potentially relevant for future cases, even if this Personal Data has already been held for a long time.

4. Definition of a 'record'

4.1 In this Policy, a 'record' means any document or item of data which contains evidence or information relating to the School, its employees, or students. Some of this material, but not all, will contain the Personal Data of individuals. An obvious example of Personal Data would be the Single Central Register ('SCR'). However, a 'record' of Personal Data could arise simply by holding an email on the School's IT network.

4.2 **Digital records:** Many new and recent records will be created, received, and stored electronically. Digital records can be lost or misappropriated in huge quantities very quickly. Access to sensitive data should as a minimum be password-protected and held on a limited number of devices only, with passwords provided on a need-to-know basis and changed at least annually. Where 'cloud storage' is used for Personal Data which is sensitive or in large quantities, digital encryption will be used.

4.3 **Paper records:** Paper records are often damaged by damp or poor storage conditions; but as well as applying common sense in their storage, security is also vital particularly if materials include legally or financially sensitive data, as well as Personal Data.

5. Data retention

5.1 The length in respect of which documents and data should be retained is detailed in **Appendix A** below.

6. Archiving and the destruction of records

6.1 All employees should receive basic training in data management; including issues such as Data Protection, security, recognising and handling sensitive Personal Data, and safeguarding.

6.2 Employees given specific responsibility for the management of records must have specific training and ensure the following:

- Records, whether electronic or hard copy, are stored securely including, if necessary, with encryption so that access is only available to authorised personnel.
- Important records, and large or sensitive personal databases, are not taken off site or carried on portable devices such as USB sticks or mobile devices.
- Back-up and migration of data is managed in line with School procedures through the Head of IT.
- Arrangements with external storage providers, whether physical or electronic including the 'cloud', are supported by robust contractual arrangements providing for security.
- Reviews are held on a regular basis to ensure that all Personal Data being kept is still relevant and necessary for the stated purposes it is held.
- All destruction or permanent erasure of records, either by the School or a contracted third party, is carried out securely with no risk of re-use, disclosure, or re-construction.

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APPENDIX A

Type of record	WCIB retention period
<u>School specific records</u> • Registration documents of the School • Minutes and resolutions of the Board of Governors • Annual reports	 • Permanent • Minimum – 10 years • Minimum – 6 years
<u>Individual student records</u> • Admissions: including application forms, assessments, and records of decisions • Examination results (external or internal) • Student file (iSAMS): including reports, medical records • Special educational needs records	• Until the School ceases to operate as an education provider (as per OPEC guidelines)
<u>Safeguarding</u> • Policies and procedures • DBS disclosure certificates, ICPC and police checks • Accident / incident reporting • Child Protection files • Counselling records	 • Permanent record of historic policies • No longer than 6 months from the decision on recruitment • Keep on record for as long as any living victim may bring a claim • Until the School ceases to operate as an education provider • Until the School ceases to operate as an education provider
<u>Individual parent records</u> • Contact details for parents / guardians	• Duration of student's time at WCIB
<u>Individual alumni / past parent records</u> • Contact data and communication, such as marketing and prospect research	• Lifetime of alumni / past parent (subject to consent from the collection of data)
<u>Accounting records and contracts</u> • Accounting records • Annual audit • VAT registration documents & returns • Budget and internal financial reports • Fixed assets (buildings) • Contractual agreements	 • Minimum 6 years • Minimum 6 years • Minimum 6 years • Minimum 3 years • 15-30 years (depending on useful life) • Minimum 6 years

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Type of record	WCIB retention period
<u>Employee records</u>	
• Single Central Register ('SCR')	• Permanent record of all mandatory checks (but not DBS certificate itself)
• DBS disclosure records, ICPC and police checks	• As above
• Contracts of employment	• 7 years from end of contract
• Appraisals or disciplinary reviews	• 7 years from end of contract
• Employee personnel file	• 7 years (but do not delete any information relating to safeguarding)
• Salary & benefits	• Minimum 6 years
• Job application records (unsuccessful candidates)	• Minimum 3 months but no more than 1 year
• Health records	• 7 years from end of contract
<u>Health & Safety records</u>	
• Maintenance logs	• 10 years from date of entry
• Accidents to students	• 25 years from date of birth
• Accidents to employees	• Minimum 4 years from date of accident
• Employee use of hazardous substances	• Minimum 7 years from end of use
• Risk assessments	• 7 years from completion of project
<u>Data Protection records</u>	
• Records, breaches	• No limit
<u>CCTV</u>	
• Video footage	• 90 days
<u>Emails</u>	
• Emails	• 2 years