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Records Management Policy

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Statement of intent

The Talentum Learning Trust is committed to maintaining the confidentiality of its information and ensuring that all records within the Trust are only accessible to the appropriate individuals. In line with the requirements of the UK GDPR, the Trust also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The Trust has created this policy to outline how records are stored, accessed, monitored, retained and disposed of to meet the Trust's statutory requirements.

This document complies with the requirements set out in the UK GDPR and Data Protection Act 2018.

Schools should understand that there is not a sector wide data retention policy that prescribes how long data should be retained for. The retention periods outlined in this policy are good practice guidelines only, and schools should ensure that they consider requirements specific to their school when implementing these timeframes. The tables for retention periods are based on information provided by the Information Records Management Society (IRMS) and the DfE and are not an exhaustive list of records that may be kept by schools.

IRMS retention periods should only be used as a guide. Please note, some of the records in this policy are no longer listed in the IRMS toolkit; however, to ensure that you have good practice recommendations for as many types of information as possible, we have chosen to include these records alongside their retention periods.

Any retention periods should be in line with your school's local arrangements and your school's justification for processing the data.

1. Legal framework

This policy has due regard to legislation including, but not limited to, the following:

- UK General Data Protection Regulation (GDPR)
- EU GDPR
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- Data Protection Act 2018

This policy also has due regard to the following guidance:

- DfE (2018) 'Data protection: a toolkit for schools'
- DfE (2023) 'Careers guidance and access for education and training providers'
- ESFA (2022) 'Record keeping and retention information for academies and academy trusts'
- Information Records Management Society (IRMS) (2019) 'Information Management Toolkit for Schools'
- IRMS (2019) 'Academies Toolkit'

This policy will be implemented in accordance with the following Trust policies and procedures:

- Data Protection Policy
- Freedom of Information Policy
- Data and Cyber-security Breach Prevention and Management Plan
- Disposal of Records Log
- Data Asset Register
- Archived Files Log
- ICT Acceptable Use Policy

2. Roles and responsibilities

The Trust and its academies have a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.

The CEO and / or headteacher of each academy holds the overall responsibility for this policy and for ensuring it is implemented correctly.

The DPO is responsible for:

- The management of records at the Trust.
- Promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the CEO.
- Ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of safely and correctly.
- Liaising with Headteachers and Data Controllers at each school to ensure this policy is implemented.

All staff members are responsible for ensuring that any records they are responsible for (including emails) are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

3. Management of pupil records

Pupil records are specific documents that are used throughout a pupil's time in the education system – they are passed to each school that a pupil attends and include all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievements.

The following information is stored on the front of a pupil record, and will be easily accessible:

- Forename, surname, and date of birth
- Unique pupil number
- Note of the date when the file was opened

The following information is stored inside the front cover of a pupil record, and will be easily accessible:

- Any preferred names
- Emergency contact details and the name of the pupil's doctor
- Any allergies or other medical conditions that are important to be aware of
- Names of people with parental responsibility, including their home address(es) and telephone number(s)
- Any other agency involvement, e.g. speech and language therapist
- Reference to any other linked files
- The following information is stored in a pupil record, and will be easily accessible:
- Admissions form
- Details of any SEND
- If the pupil has attended an early years setting, the record of transfer
- Data collection or data checking form
- Annual written reports to parents
- National curriculum and agreed syllabus record sheets
- Notes relating to major incidents and accidents involving the pupil
- Any information about an EHC plan and support offered in relation to the EHC plan
- Medical information relevant to the pupil's on-going education and behaviour
- Any notes indicating child protection disclosures and reports
- Any information relating to exclusions
- Any correspondence with parents or external agencies relating to major issues, e.g. mental health
- Notes indicating that records of complaints made by parents or the pupil
- Examination results – pupil copy
- SATs results

The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the pupil in the school office or other secure areas:

- Attendance registers and information

- Absence notes and correspondence
- Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
- Accident forms – forms about major accidents will be recorded on the pupil record
- Consent to administer medication and administration records
- Copies of pupil birth certificates, passports etc.
- Correspondence with parents about minor issues, e.g. behaviour
- Pupil work
- Previous data collection forms that have been superseded

Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in a securely locked filing cabinet in the school office or other secure area – a note indicating this is marked on the pupil's file.

Hard copies of complaints made by parents or pupils are stored in a file in the headteacher's office – a note indicating this is marked on the pupil's file.

Actual copies of accident and incident information are stored separately on the school's management information system and held in line with the retention periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.

The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend. The only exception is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, the Data Controller will remove these records, with guidance from the DPO.

Electronic records relating to a pupil's record will also be transferred to the pupils' next school.

[Primary schools] The school will not keep any copies of information stored within a pupil's record unless there is ongoing legal action at the time during which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.

[Secondary schools and sixth-form colleges] If any pupil attends the school until statutory school leaving age, the school will keep the pupil's records until the pupil reaches the age of 25 years.

The school will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the school.

4. Retention of pupil records and other pupil-related information

The table below outlines the school's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|--|---|--|
| Personal identifiers, contacts and personal characteristics | | |
| Images used for identification purposes | For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month | Securely disposed of |
| Images used in displays | Whilst the pupil is at school | Securely disposed of |
| Images used for marketing purposes | In line with the consent period | Securely disposed of |
| Biometric data | For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month | Securely disposed of |
| Postcodes, names and characteristics | Whilst the pupil is at school, plus five years | Securely disposed of |
| House number and road | For the duration of the event/activity, plus one month | Securely disposed of |
| Admissions | | |
| Register of admissions | Every entry in the admissions register will be preserved for a period of three years after the date on which the entry was made | Information is reviewed and the register may be kept permanently |
| Admissions (where the admission is successful) | Date of admission, plus one year | Securely disposed of |
| Admissions appeals (where the appeal is unsuccessful) | Resolution of the case, plus one year | Securely disposed of |
| [Secondary schools] In-year secondary school admissions | Whilst the pupil remains at the school, plus one year | Securely disposed of |
| Proof of address (supplied as part of the admissions process) | Current academic year, plus one year | Securely disposed of |

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| Supplementary information submitted, including religious and medical information etc. (where the admission was successful) | Information added to the pupil file | Securely disposed of |
| Supplementary information submitted, including religious and medical information etc. (where the admission was not successful) | Retained until the appeals process is complete | Securely disposed of |
| All records relating to the creation and implementation of the Admissions Policy | Life of the policy, plus three years and then review | Securely disposed of |
| Pupils' educational records | | |
| [Primary schools] Pupils' educational records | Whilst the pupil remains at the school | Transferred to the next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period. The IRMS advises to retain the information for a short period to allow for any queries or reports to be completed or where linked records in the school information management system have not yet reached the end of their retention period and deleting would cause problems. |
| [Secondary schools and sixth forms] Pupils' educational records | 25 years after the pupil's date of birth | Reviewed and securely disposed of if no longer needed |
| Public examination results | Added to the pupil's record and transferred to next school | All uncollected certificates returned to the examination board |
| Internal examination results | Added to the pupil's record and transferred to next school | Reviewed and securely disposed of if no longer needed |
| Behaviour records | Added to the pupil's record and transferred to the next school | Securely disposed of |

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| | Copies are held whilst the pupil is at school, plus one year | |
| Exclusion records | Added to the pupil's record and transferred to the next school Copies are held whilst the pupil is at school, plus one year | Securely disposed of |
| Child protection information held on a pupil's record | Stored in a sealed envelope for the same length of time as the pupil's record Records also subject to any instruction given by the Independent Inquiry into Child Sex Abuse (IICSA) | Securely disposed of – shredded |
| Child protection records held in a separate file | 25 years after the pupil's date of birth Records also subject to any instruction given by the IICSA | Securely disposed of – shredded |
| Curriculum returns | Current academic year, plus three years | Review and allocate a further retention period or securely dispose of |
| Schemes of work | Current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |
| Timetable | Current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |
| Class record books | Current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |
| Mark books | Current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |
| Record of homework set | Current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |

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| Pupils' work | Returned to pupil at the end of current academic year If this is not possible, hold for the current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |
| Careers advice and subsequent agreed decisions | Whilst the pupil is at the school, plus three years | Securely disposed of |
| Education, training or employment destinations data | Whilst the pupil is at the school, plus three years or from the end of KS4, whichever is earliest | Securely disposed of |
| Attendance | | |
| Attendance registers | Every entry is retained for a period of three years after the date on which the entry was made | Securely disposed of |
| Correspondence relating to any absence (authorised or unauthorised) | Current academic year, plus two years | Securely disposed of |
| Medical information and administration | | |
| Permission slips | For the duration of the period that medication is given, plus one month | Securely disposed of |
| Medical conditions – ongoing management | Added to the pupil's record and transferred to the next school Copies held whilst the pupil is at school, plus one year | Securely disposed of |
| Medical incidents that have a behavioural or safeguarding influence | Added to the pupil's record and transferred to the next school Copies held whilst the pupil is at school, plus 25 years | Securely disposed of |
| SEND | | |

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| SEND files, reviews and EHC plans, including advice and information provided to parents regarding educational needs and accessibility strategy | The pupil's date of birth, plus 31 years | Securely disposed of |
| Curriculum management | | |
| SATs results | 25 years after the pupil's date of birth (as stated on the pupil's record) A composite of the whole year's results may be held for the current year plus six years, for comparative purposes | Securely disposed of |
| Examination papers | Until the appeals/validation process has been completed | Securely disposed of |
| Published Admission Number (PAN) reports | Current academic year, plus six years | Securely disposed of |
| Valued added and contextual data | Current academic year, plus six years | Securely disposed of |
| Self-evaluation forms (internal moderation) | Current academic year, plus one year | Securely disposed of |
| Self-evaluation forms (external moderation) | Retained until superseded | Securely disposed of |
| Pupils' work | Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year | Securely disposed of |
| Extra-curricular activities | | |
| Field file – information taken on school trips | Until the conclusion of the trip, plus one month Where a minor incident occurs, field files are | Securely disposed of |

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| | added to the core system as appropriate | |
| Trip packs – information taken on school trips | Until the end of the visit Where a minor incident occurs, files are added to the core system as appropriate | Shredded upon return to school |
| Financial information relating to school trips | Whilst the pupil remains at school, plus one year | Securely disposed of |
| Parental consent forms for school trips where no major incident occurred | Until the conclusion of the trip, unless a school risk assessment decides the forms are likely to be required for any reason, in which case they should be retained for 22 years after the pupil's date of birth | Securely disposed of – shredded |
| Parental consent forms for school trips where a major incident occurred | 25 years after the pupil's date of birth on the pupil's record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils) | Securely disposed of – shredded |
| Educational visitors in school – sharing of personal information | Until the conclusion of the visit, plus one month | Securely disposed of |
| Walking bus registers | Date of the register being taken plus six years | Securely disposed of If held electronically, all copies should be destroyed at the same time |
| Family liaison officers and home-school liaison assistants | | |
| Day books | Current academic year, plus two years | Reviewed and securely destroyed if no longer required |
| Reports for outside agencies | Duration of the pupil's time at school | Securely disposed of |
| Referral forms | Whilst the referral is current | Securely disposed of |

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| Contact data sheets | Current academic year | Reviewed and securely destroyed if no longer active |
| Contact database entries | Current academic year | Reviewed and securely destroyed if no longer required |
| Group registers | Current academic year, plus two years | Securely disposed of |
| Catering and free school meal management | | |
| Meal administration | Whilst the pupil is at school, plus one year | Securely disposed of |
| School meal registers | Current year plus three years | Securely disposed of |
| Free school meal registers (where used as a basis for funding) | Current year plus six years | Securely disposed of |
| School meals summary sheets | Current year plus three years | Securely disposed of |
| Meal eligibility | Whilst the pupil is at school, plus five years | Securely disposed of |

5. Retention of staff records

The table below outlines the school's retention period for staff records and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|---|--|--|
| Operational | | |
| Staff members' personnel file | Termination of employment, plus six years, unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file will be retained until the IICSA enquiries are complete | Securely disposed of |
| Annual appraisal and assessment records | Current academic year, plus six years | Securely disposed of |

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| Sickness absence monitoring (where sickness pay is not paid) | Current academic year, plus three years | Securely disposed of |
| Sickness absence monitoring (where sickness pay is paid) | Current academic year, plus six years | Securely disposed of |
| Staff training (where training leads to CPD) | Length of time required by the CPD professional body | Securely disposed of |
| Staff training (except where the training relates to dealing with pupils, e.g. first aid or health and safety) | Retained in the personnel file | Securely disposed of |
| Staff training (where the training relates to pupils, e.g. safeguarding or other pupil-related training) | Date of the training, plus 40 years | Securely disposed of |
| Recruitment | | |
| Records relating to the appointment of a new headteacher (unsuccessful attempts) | Date of appointment, plus six months. | Securely disposed of |
| Records relating to the appointment of a new headteacher (successful appointments) | Added to personnel file and retained until the end of appointment, plus six years, except in cases of negligence or claims of child abuse, then records are retained for at least 15 years | Securely disposed of |
| Records relating to the appointment of new members of staff or governors (unsuccessful candidates) | Date of appointment of successful candidate, plus six months | Securely disposed of |
| Pre-employment vetting information (successful candidates) | For the duration of the employee's employment, plus six years | Securely disposed of |
| DBS certificates | Up to six months | Securely disposed of |
| Proof of identify as part of the enhanced DBS check | If it is necessary to keep a copy, it will be placed in the staff member's personnel file | Securely disposed of |

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| Evidence of right to work in the UK | Added to staff personnel file or, if kept separately, termination of employment, plus no longer than two years | Securely disposed of |
| Disciplinary and grievance procedures | | |
| Child protection allegations, including where the allegation is unproven | <p>Added to staff personnel file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer</p> <p>If allegations are malicious, they are removed from personal files</p> <p>If allegations are found, they are kept on the personnel file and a copy is provided to the person concerned unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file is retained until IICSA enquiries are complete</p> | Reviewed and securely disposed of – shredded |
| Oral warnings | Date of warning, plus six months | Securely disposed of – if placed on staff personnel file, removed from file |
| Written warning – level 1 | Date of warning, plus six months | Securely disposed of – if placed on staff personnel file, removed from file |
| Written warning – level 2 | Date of warning, plus 12 months | Securely disposed of – if placed on staff personnel file, removed from file |
| Final warning | Date of warning, plus 18 months | Securely disposed of – if placed on staff personnel file, removed from file |
| Records relating to unproven incidents | Conclusion of the case, unless the incident is child protection related, then it is disposed of as above | Securely disposed of |

6. Retention of governance records

The table below outlines the school's retention periods for governance records, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|---|--|--|
| Governance | | |
| Agendas for governing board meetings | One copy alongside the original set of minutes – all others disposed of without retention | Local archives consulted before secure disposal |
| Original, signed copies of the minutes of governing board meetings | Permanent – or at least for 10 years from the date of the meeting | Shredded if they contain any sensitive or personal information, but the local archives will be consulted first |
| Reports presented to the governing board that are referred to in the minutes | Permanent – all others disposed of without retention | Local archives consulted and then securely disposed of |
| Meeting papers relating to the annual parents' meeting | Date of meeting, plus a minimum of six years | Securely disposed of |
| Instruments of government | Permanent | Local archives consulted and then securely disposed of |
| Trusts and endowments managed by the governing board | Permanent | Local archives consulted and then securely disposed of |
| Action plans created and administered by the governing board | Until superseded or whilst relevant | Securely disposed of |
| Policy documents created and administered by the governing board | Until superseded or whilst relevant | Securely disposed of |
| Records relating to complaints dealt with by the governing board or headteacher | <p>Date of resolution of complaint, plus six years</p> <p>If negligence is involved, records are retained for the current academic year, plus 15 years</p> <p>If child protection or safeguarding issues are</p> | Reviewed for further retention in case of contentious disputes, then securely disposed of |

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| | involved, the records are retained for the current academic year, plus 40 years | |
| Annual reports required by the DfE | Date of report, plus 10 years | Securely disposed of |
| Proposals concerning changing the status of the school | Date proposal accepted or declined, plus three years | Securely disposed of |
| Records relating to the appointment of co-opted governors | Date of election, plus six months | Securely disposed of |
| Records relating to the election of the chair of the governing board and the vice chair | Destroyed after the decision has been recorded in the minutes | Securely disposed of |
| Scheme of delegation and terms of reference for committees | Until superseded or whilst relevant | Reviewed and offered to the local archives if appropriate |
| Meeting schedule | Current academic year | Standard disposal |
| Register of attendance at full governing board meetings | Date of last meeting in the book, plus six years | Securely disposed of |
| Records relating to governor monitoring visits | Date of the visit, plus three years | Securely disposed of |
| [Academies or maintained schools converting to academy status] All records relating to the conversion of the school to academy status | Permanent | Local archives are consulted before disposal |
| Correspondence sent and received by the governing board or headteacher | Current academic year, plus three years | Securely disposed of |
| Records relating to the appointment of the clerk to the governing board | Date on which the clerk's appointment ends, plus six years | Securely disposed of |
| Records relating to the terms of office of serving governors, including evidence of appointment | Date on which the governor's appointment ends, plus six years | Securely disposed of |
| Records relating to governor declaration against disqualification criteria | Date on which the governor's appointment ends, plus six years | Securely disposed of |

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| Register of business interests | Date the governor's appointment ends, plus six years | Securely disposed of |
| Governor code of conduct | Dynamic document – kept permanently | Securely disposed of |
| Records relating to the training required and received by governors | Date the governor steps down, plus six years | Securely disposed of |
| Records relating to the induction programme for new governors | Date on which the governor's appointment ends, plus six years | Securely disposed of |
| Records relating to DBS checks carried out on the clerk and members of the governing board | Date of the DBS check, plus six months | Securely disposed of |
| Governor personnel files | Date on which the governor's appointment ends, plus six years | Securely disposed of |
| Trust governance | | |
| [This section contains recommended retention periods for academy-specific governance information.] | | |
| Governance statement | Life of governance statement, plus six years | Securely disposed of |
| Articles of association | Life of the academy | Securely disposed of |
| Memorandum of understanding | Can be disposed of once the academy has been incorporated | Securely disposed of |
| Memorandum of understanding of shared governance among schools | Life of memorandum of understanding, plus six years | Securely disposed of |
| Constitution | Life of the academy | Securely disposed of |
| Special resolutions to amend the constitution | Life of the academy | Securely disposed of |
| Written scheme of delegation | Life of the scheme of delegation, plus 10 years | Securely disposed of |
| Directors – appointment | Life of appointment, plus six years | Securely disposed of |
| Directors – disqualification | Data of disqualification, plus 15 years | Securely disposed of |
| Directors – termination of office | Date of appointment, plus six years | Securely disposed of |

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| Annual trustee report | Date of report, plus 10 years | Securely disposed of |
| Annual report and accounts | Date of report, plus 10 years | Securely disposed of |
| Annual return | Date of report, plus 10 years | Securely disposed of |
| Appointment of trustees and governors and directors | Life of appointment, plus six years | Securely disposed of |
| Statement of trustees' responsibilities | Life of appointment, plus six years | Securely disposed of |
| Appointment and removal of members | Life of appointment, plus six years | Securely disposed of |
| Strategic review | Date of review, plus six years | Securely disposed of |
| Register of directors | Life of academy, plus six years | Securely disposed of |
| Register of directors' interests | Life of academy, plus six years | Securely disposed of |
| Register of directors' residential addresses | Life of academy, plus six years | Securely disposed of |
| Register of gift, hospitality and entertainments | Life of academy, plus six years | Securely disposed of |
| Register of members | Life of academy, plus six years | Securely disposed of |
| Register of secretaries | Life of academy, plus six years | Securely disposed of |
| Register of trustees' interests | Life of academy, plus six years | Securely disposed of |
| Declaration of interests | Life of academy, plus six years | Securely disposed of |

7. Retention of senior leadership and management records

The table below outlines the school's retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|--|---|---|
| Headteacher and SLT | | |
| Log books of activity in the school maintained by the headteacher | Date of last entry, plus a minimum of six years | Reviewed and offered to the local archives if appropriate |
| Minutes of SLT meetings and the meetings of other internal administrative bodies | Date of the meeting, plus three years | Reviewed annually and securely disposed of if not needed |
| Reports created by the headteacher or SLT | Date of the report, plus a minimum of three years | Reviewed annually and securely disposed of if not needed |
| Records created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities | Current academic year, plus six years | Reviewed annually and securely disposed of if not needed |
| Correspondence created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities | Date of correspondence, plus three years | Securely disposed of |
| Professional development plan | Held on the individual's personnel record. If not, then it is retained for the duration of the plan, plus six years | Securely disposed of |
| SDP | Duration of the plan, plus three years | Securely disposed of |

8. Retention of health and safety records

The table below outlines the school's retention periods for health and safety records, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|-------------------------------------|--|--|
| Health and safety | | |
| Health and safety policy statements | Duration of policy, plus three years | Securely disposed of |
| Health and safety risk assessments | Duration of risk assessment, plus three years provided that a copy of the risk | Securely disposed of |

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| | assessment is stored with the accident report if an incident has occurred | |
| Records relating to any reportable death, injury, disease or dangerous occurrence under RIDDOR | Date of incident, plus three years provided that all records relating to the incident are held on the personnel file | Securely disposed of |
| Accident reporting – adults | Three years after the last entry in the accident reporting book | Securely disposed of |
| Accident reporting – pupils | Three years after the last entry in the accident reporting book | Securely disposed of |
| Records kept under the Control of Substances Hazardous to Health Regulations | Date of incident, plus 40 years | Securely disposed of |
| Information relating to areas where employees and persons are likely to come into contact with asbestos | Date of last action, plus 40 years | Securely disposed of |
| Information relating to areas where employees and persons are likely to come into contact with radiation (maintenance records or controls, safety features and PPE) | Two years from the date on which the examination was made | Securely disposed of |
| Information relating to areas where employees and persons are likely to come into contact with radiation (dose assessment and recording) | Until the person to whom the record relates would have reached 75-years-old, but in any event for at least 30 years from when the record was made | Securely disposed of |
| Fire precautions log books | Current academic year, plus three years | Securely disposed of |
| Health and safety file to show current state of buildings, including all alterations (wiring, plumbing, building works etc.) to be passed on in the case of change of ownership | Permanent | Passed to new owner on sale or transfer of building |

9. Retention of financial records

The table below outlines the school's retention periods for financial records and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|--|---|--|
| Payroll and pensions | | |
| Maternity pay records | Current academic year, plus three years | Securely disposed of |
| Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Current academic year, plus six years | Securely disposed of |
| Timesheets, clock cards and flexitime records | Current academic year, plus three years | Securely disposed of |
| Absence record | Current academic year, plus three years | Securely disposed of |
| Batches | Current academic year, plus six years | Securely disposed of |
| Bonus sheets | Current academic year, plus three years | Securely disposed of |
| Car allowance claims | Current academic year, plus three years | Securely disposed of |
| Car loans | Current academic year, plus three years | Securely disposed of |
| Car mileage outputs | Current academic year, plus six years | Securely disposed of |

| | | |
|---|---|----------------------|
| Elements | Current academic year, plus two years | Securely disposed of |
| Income tax form P60 | Current academic year, plus six years | Securely disposed of |
| Insurance | Current academic year, plus six years | Securely disposed of |
| Members allowance register | Current academic year, plus six years | Securely disposed of |
| National insurance – schedule of payments | Current academic year, plus six years | Securely disposed of |
| Overtime | Current academic year, plus three years | Securely disposed of |
| Part-time fee claims | Current academic year, plus six years | Securely disposed of |
| Pay packet receipt by employee | Current academic year, plus two years | Securely disposed of |
| Payroll awards | Current academic year, plus six years | Securely disposed of |
| Payroll (gross/net weekly or monthly) | Current academic year, plus six years | Securely disposed of |

| | | |
|--|---|---|
| Payroll reports | Current academic year, plus six years | Securely disposed of |
| Payslips (copies) | Current academic year, plus six years | Securely disposed of |
| Pension payroll | Current academic year, plus six years | Securely disposed of |
| Personal bank details | Until superseded, plus three years | Securely disposed of |
| Sickness records | Current academic year, plus three years | Securely disposed of |
| Staff returns | Current academic year, plus three years | Securely disposed of |
| Superannuation adjustments | Current academic year, plus six years | Securely disposed of |
| Superannuation reports | Current academic year, plus six years | Securely disposed of |
| Tax forms | Current academic year, plus six years | Securely disposed of |
| Risk management and insurance | | |
| Employer's liability insurance certificate | Closure of the school, plus 40 years | Securely disposed of Passed to the LA if the school closes |
| Asset management | | |

| | | |
|---|--|---|
| Inventories of furniture and equipment | Current academic year, plus six years | Securely disposed of |
| Burglary, theft and vandalism report forms | Current academic year, plus six years | Securely disposed of |
| Accounts and statements including budget management | | |
| Annual accounts | Current academic year, plus six years | Disposed of against common standards |
| Loans and grants managed by the school | Date of last payment, plus 12 years | Information is reviewed then securely disposed of |
| All records relating to the creation and management of budgets | Duration of the budget, plus three years | Securely disposed of |
| Invoices, receipts, order books, requisitions and delivery notices | Current financial year, plus six years | Securely disposed of |
| Records relating to the collection and banking of monies | Current financial year, plus six years | Securely disposed of |
| Records relating to the identification and collection of debt | Final payment, plus six years | Securely disposed of |
| Contract management | | |
| All records relating to the management of contracts under seal | Last payment on the contract, plus 12 years | Securely disposed of |
| All records relating to the management of contracts under signature | Last payment on the contract, plus six years | Securely disposed of |
| All records relating to the monitoring of contracts | Life of the contract, plus six or 12 years | Securely disposed of |
| School fund | | |
| Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books | Current academic year, plus six years | Securely disposed of |
| School meals | | |
| FSM registers (where the register is used as a basis for funding) | Current academic year, plus six years | Securely disposed of |
| School meals registers | Current academic year, plus three years | Securely disposed of |

| | | |
|--|--|----------------------|
| School meals summary sheets | Current academic year, plus three years | Securely disposed of |
| Pupil finance | | |
| Student grant applications | Current academic year, plus three years | Securely disposed of |
| Pupil premium fund records | Date the pupil leaves the school, plus six years | Securely disposed of |
| Trust finance records | | |
| [This section contains recommended retention periods for academy-specific finance information.] | | |
| Statement of financial activities for the year | Current financial year, plus six years | Securely disposed of |
| Financial planning | Current financial year, plus six years | Securely disposed of |
| Value for money statement | Current financial year, plus six years | Securely disposed of |
| Records relating to the management of VAT | Current financial year, plus six years | Securely disposed of |
| Whole of government accounts return | Current financial year, plus six years | Securely disposed of |
| Borrowing powers | Current financial year, plus six years | Securely disposed of |
| Budget plan | Current financial year, plus six years | Securely disposed of |
| Charging and remissions policy | Date policy superseded, plus three years | Securely disposed of |
| Audit and risk committee and appointment of responsible officers | Life of the academy | Securely disposed of |
| Independent auditor's report on regularity | Financial year report relates to, plus six years | Securely disposed of |
| Independent auditor's report on financial statements | Financial year report relates to, plus six years | Securely disposed of |
| Funding agreement | Date of last payment of funding, plus six years | Securely disposed of |
| Funding records – capital grant | Date of last payment of funding, plus six years | Securely disposed of |

| | | |
|--|--|----------------------|
| Funding records – general annual grant | Date of last payment of funding, plus six years | Securely disposed of |
| Per-pupil funding records | Date of last payment of funding, plus six years | Securely disposed of |
| Exclusions agreements | Date of last payment of funding, plus six years | Securely disposed of |
| Funding records | Date of last payment of funding, plus six years | Securely disposed of |
| Gift aid and tax relief | Date of last payment of funding, plus six years | Securely disposed of |
| Records relating to loans | Date of last payment of loan, plus six years if the loan is under £10,000 or date of last payment of loan, plus 12 years if the loan is over £10,000 | Securely disposed of |

10. Retention of other school records

The table below outlines the school's retention periods for any other records held by the school, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

| Type of file | Retention period | Action taken after retention period ends |
|--|---|---|
| Property management | | |
| Title deeds of properties belonging to the school | Permanent | Transferred to new owners if the building is leased or sold |
| Plans of property belonging to the school | For as long as the building belongs to the school | Transferred to new owners if the building is leased or sold |
| Leases of property leased by or to the school | Expiry of lease, plus six years | Securely disposed of |
| Records relating to the letting of school premises | Current financial year, plus six years | Securely disposed of |
| Maintenance | | |
| All records relating to the maintenance of the school carried out by contractors | For as long as the school owns the building and then passed onto any new owners if the building is leased or sold | Securely disposed of |

| | | |
|--|---|---|
| All records relating to the maintenance of the school carried out by school employees | For as long as the school owns the building and then passed onto any new owners if the building is leased or sold | Securely disposed of |
| Operational administration | | |
| General file series | Current academic year, plus five years | Reviewed and securely disposed of |
| Records relating to the creation and publication of the school brochure and/or prospectus | Current academic year, plus three years | If a copy is not preserved by the school, standard disposal |
| Records relating to the creation and distribution of circulars to staff, parents or pupils | Current academic year, plus one year | Disposed of against common standards |
| Newsletters and other items with short operational use | Current academic year, plus one year | One copy archived, other copies standard disposal |
| Visitors' books and signing-in sheets | Last entry in the logbook, plus six years | Reviewed then securely disposed of |
| Records relating to the creation and management of parent-teacher associations and/or old pupil associations | Current academic year, plus six years | Reviewed then securely disposed of |
| Walking bus registers | Date of register, plus six years | Securely disposed of |
| School privacy notice which is sent to parents | Until superseded, plus six years | Standard disposal |
| Consents relating to school activities | While pupil attends the school | Secure disposal |

Further details on retention of records not covered in the table can be sourced through the IRMS Records Management Schedule, or by contacting the DPO. In this context, SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross-cut shredder.

11. Retention of emails

Group email addresses will have an assigned member of staff who takes responsibility for managing the account and ensuring the correct disposal of all sent and received emails. All staff members with an email account will be responsible for managing their inbox.

Emails can act as evidence of the school's activities, i.e. in business and fulfilling statutory duties, so all relevant emails, e.g. invoices, will be retained for at least 12 months. Invoices received and sent in emails will be printed off and retained in accordance with Section 8 of this policy.

The school's expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in the TTLT Staff Code of Conduct, individual school's Online Safety Policy and the TTLT Data and Cyber Security Breach Prevention and Management Plan. All staff are responsible for deleting emails that are past their retention period, unless they fall under the above categories.

Correspondence created by the SLT and other members of staff with administrative responsibilities will be retained for three years before being reviewed and, if necessary, securely disposed of.

Staff members will review and delete any emails they no longer require at the end of every term.

Staff members will not, under any circumstances, create their own email archives, e.g. saving emails on to personal hard drives. Staff members will be aware that the emails they send could be required to fulfil a SAR or freedom of information (FOI) request. Emails will be drafted carefully, and staff members will review the content before sending.

Individuals, including children, have the right to submit an SAR to gain access to their personal data to verify the lawfulness of the processing – this includes accessing emails.

All SARs will be handled in accordance with the school's Data Protection Policy. FOI requests will be handled in accordance with the school's Freedom of Information Policy.

When handling a request for information, the DPO will speak to the requestor to clarify the scope of the request and whether emails will be required to fulfil the SAR or FOI request. Where an SAR has been made electronically, the information will be provided in a commonly used electronic format. All requests will be responded to without delay and at the latest, within one month of receipt.

If a request is manifestly unfounded, excessive or repetitive, a fee will be charged. All fees will be based on the administrative cost of providing the information.

Where a request is manifestly unfounded or excessive, the school holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

Staff members will discuss any queries regarding email retention with the DPO.

12. Identifying information

Under the UK GDPR, all individuals have the right to data minimisation and data protection by design and default – as the data controller, the school ensures appropriate measures are in place for individuals to exercise this right.

Wherever possible, the school uses pseudonymisation, also known as the ‘blurring technique’, to reduce the risk of identification.

Once an individual has left the school, if identifiers such as names and dates of birth are no longer required, these are removed or less specific personal data is used, e.g. the month of birth rather than specific date – the data is blurred slightly.

Where data is required to be retained over time, e.g. attendance data, the school removes any personal data not required and keeps only the data needed – in this example, the statistics of attendance rather than personal information.

13. Storing and protecting information

The Data Controller, with support from the DPO will undertake a business impact assessment to identify which records are vital to school management and these records will be stored in the most secure manner. The Data Controller will conduct a back-up of information on a regular basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.

Where possible, backed-up information will be stored off the school premises, using a central back-up cloud service, details of individual school arrangements can be found in the TTLT Data and Cyber Security Breach Prevention and Management Plan. The ICT Technicians and Data Controllers, with the support of the DPO will ensure that the location of the cloud storage and the security offered is appropriate for the information and records stored on it.

Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access. Any room or area where personal or sensitive data is stored will be locked when unattended. Confidential paper records are not left unattended or in clear view when held in a location with general access.

Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site. Where data is saved on removable storage or a portable device, the device is kept in a locked and fireproof filing cabinet, drawer or safe when not in use. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.

All electronic devices are password-protected to protect the information on the device in case of theft. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft. Where possible, staff and governors do not use their personal laptops or computers for school purposes. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

Emails containing sensitive or confidential information are password-protected or sent via a secure encrypted or data transfer system to ensure that only the recipient is able to access

the information. The password will be shared with the recipient in a separate email. Personal information is never put in the subject line of an email. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

When sending confidential information by fax, members of staff always check that the recipient is correct before sending.

Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the UK GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.

If documents that have been taken off the school premises will be left unattended, the staff member will leave the documents in the locked boot of a car or keep them on their person. A record will be kept of any document that is taken off the school premises that logs the location of the document and when it is returned to the school site, this includes records that are digitally remotely accessed.

Before sharing data, staff always ensure that:

- They have consent from data subjects to share it.
- Adequate security is in place to protect it.
- The data recipient has been outlined in a privacy notice.

The Trust has a Data Sharing Policy detailing how data is shared and processed with all data processors and third parties. These agreements are developed by the DPO and cover information about issues such as access controls and permissions.

A record is kept of what level of access each staff member has to data. This record details information including:

- What level of access each staff member has.
- Limits on how staff members access data.
- What actions staff members can perform.
- What level of access is changed or retained when a staff member changes role within the school.
- Who is able to authorise requests to change permissions and access.

All staff members implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information is stored in a securely locked filing cabinet, drawer or safe with restricted access.

Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.

Where possible, staff are required to use their school login details to use photocopiers and printers.

The physical security of the school's buildings and storage systems, and access to them, is reviewed regularly by the site manager in conjunction with the Data Controller and DPO. If an

increased risk in vandalism, burglary or theft is identified, this will be reported to the headteacher and extra measures to secure data storage will be put in place.

All systems that allow staff and pupils to remotely access information from the school's network whilst they are not physically at the school have strong security controls in place which are reviewed termly by the ICT Technician, Data Controller and DPO.

The DPO decides what restrictions are necessary to prevent information or records being downloaded, transferred or printed while the user is not on the school site.

The Trust takes its duties under the UK GDPR seriously and any unauthorised disclosures may result in disciplinary action.

The DPO is responsible for ensuring continuity and recovery measures are in place to ensure the security of protected data. Any damage to or theft of data will be managed in accordance with the school's Data and Cyber-security Breach Prevention and Management Plan.

As a result of the UK's exit of the EU data controllers and processors follow the UK GDPR, and the Data Protection Act 2018, where:

- As UK data controllers, they collect, store or process the personal data of individuals residing in the UK.
- As non-UK data controllers, they offer goods or services to, or monitor the behaviour of, UK residents.

Data controllers and processors follow the EU GDPR where:

- They collect, store or process the personal data of individuals residing in the EU.
- As non-EU data controllers, they offer goods or services to, or monitor the behaviour of, EU residents.

14. Accessing information

We are transparent with data subjects, the information we hold and how it can be accessed.

All members of staff, parents of registered pupils and other users of the school, e.g. visitors and third-party clubs, are entitled to:

- Know what information the Trust and its schools holds and processes about them or their child and why.
- Understand how to gain access to it.
- Understand how to provide and withdraw consent to information being held.
- Understand what the school is doing to comply with its obligations under the UK GDPR.

All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the UK GDPR, to access certain personal data being held about them or their child.

Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents. Pupils who are considered by the school to be at an appropriate age to

make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

The school will adhere to the provisions outlined in the Trust's Data Protection Policy when responding to requests seeking access to personal information.

15. Digital continuity statement

Digital data that is retained for longer than six years will be identified by the DPO and named as part of a Digital Continuity Statement. The data will be archived to dedicated files on the school's server, which are password-protected – this will be backed-up in accordance with Section 12 of this policy.

Memory sticks are never used to store digital data, subject to a Digital Continuity Statement.

The ICT technician will review new and existing storage methods annually and, where appropriate, add them to the digital continuity statement.

The following information will be included within the Digital Continuity Statement:

- A statement of the business purposes and statutory requirements for keeping the records
- The names of the individuals responsible for long term data preservation
- A description of the information assets to be covered by the digital preservation statement
- A description of when the record needs to be captured into the approved file formats
- A description of the appropriate supported file formats for long-term preservation
- A description of the retention of all software specification information and licence information
- A description of how access to the information asset register is to be managed in accordance with the UK GDPR

16. Information audit

The Trust and its schools conduct information audits on an annual basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the UK GDPR. This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Microfilm or microfiche
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information
- Knowledge
- Apps and portals

The information audit may be completed in a number of ways, including, but not limited to:

- Interviews with staff members with key responsibilities – to identify information and information flows, etc.
- Questionnaires to key staff members to identify information and information flows, etc.
- A mixture of the above.

The DPO is responsible for completing the information audit. The information audit will include the following:

- The school's data needs
- The information needed to meet those needs
- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

The DPO will consult with the Data Controllers and staff members involved in the information audit process to ensure that the information is accurate.

Once it has been confirmed that the information is accurate, the Data Controller will record all details on the school's Data Asset Register.

An information asset owner is assigned to each asset or group of assets. They will be responsible for managing the asset appropriately, ensuring it meets the school's requirements, and for monitoring risks and opportunities.

The information displayed on the Data Asset Register will be shared with the headteacher to gain their approval.

17. Disposal of data

Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.

All records containing personal or sensitive information will be made either unreadable or unreconstructable.

Where disposal of information is outlined as secure disposal, this will be shredded or pulped. Electronic information will be scrubbed clean and, where possible, cut, archived or digitalised. The Data Controller should keep a record of all files that have been destroyed.

Where the disposal action is indicated as reviewed before it is disposed, the DPO will review the information against its administrative value – if the information should be kept for administrative value, the DPO will keep a record of this.

If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

Where information has been kept for administrative purposes, the DPO will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.

Where information must be kept permanently, this information is exempt from the normal review procedures.

Records and information that might be of relevant to the Independent Inquiry into Child Sexual Abuse (IICSA) will not be disposed of or destroyed.

18. School closures and record keeping

Academy conversion

If a maintained school closes and subsequently becomes an academy, all records relating to pupils who are transferring to the academy will be transferred.

If the school will retain the existing building when it converts to an academy, all records relating to the management of the buildings will be transferred.

All other records created and managed when the school was part of the LA will become the responsibility of the LA.

Academy closure

If the academy is closing, the trust will follow the DfE's guidance on what should happen to records retained by the trust, which can be found in the DfE's ['Record keeping and retention information for academies and academy trusts'](#) guidance.

Sale or re-use of the site

If the school site is being sold or re-allocated to another use, the LA will take responsibility for the records from the date the school closes.

Merger of schools

If the school merges with another school to create one school, the new school will be responsible for retaining all current records originating from the former schools.

The DPO will determine the outcome of each group of records; these outcomes are as follows:

- Securely destroy all records that are expired and due for disposal, in accordance with the retention periods outlined in this policy.
- Transfer to the successor school or academy all records that are current and that will be required by the new school or academy.
- Transfer to the LA all records that are dormant but still need to be retained to comply with legal and business retention requirements.
- Transfer to the local record office any records with historical value.

Managing records

The DPO will identify which records need to be destroyed or transferred to the relevant body – they will allocate personnel as necessary to sort through records.

The DPO will notify the other organisations as soon as possible so that necessary disposal, storage and transfer arrangements can be made. The school's ICT provider will also be

notified so that arrangements can be made to ensure the safe transfer or deletion of electronic records, including all back-up copies.

When sorting records, the DPO and their team will:

- Review all records held within the school as soon as notification of closure is received, including paper and electronic records.
- Use the retention periods outlined in this policy to categorise the records into those to be destroyed and those that need to be transferred.
- Contact the relevant body to make arrangements for the safe and secure transfer of records.
- Sort, list and box the records in preparation for the transfer, ensuring records are stored in a safe environment whilst awaiting collection.
- Plan how the disposal of records will be undertaken.
- Sort expired records in readiness for confidential disposal, ensuring they are stored securely whilst awaiting disposal.

All forms of storage will be completely emptied before the building is vacated or before disposal. Records awaiting transfer will be held in a secure area. The identity of any third parties collecting or disposing of records will be checked and a collection receipt will be obtained.

Records will be disposed of in line with the '[Disposal of data](#)' section of this policy. Electronic records will be either transferred to the new body or deleted. All ICT equipment will be decommissioned in accordance with the school's ICT Acceptable Use Policy.

No records will be left behind once the school building is vacated.

19. Monitoring and review

This policy will be reviewed on an annual basis by the DPO in conjunction with the CEO.

Any changes made to this policy will be communicated to all members of staff, Trustees and Governors.