

Records Management Policy

Key Document Details:			
Author:	Data Protection Officer	Department:	Central Services
Reviewer:	Head of Primary Education	Version No:	2.0
Last Review:	October 2023	Next Review:	October 2024
Approver:	Executive Team	Date Ratified:	October 2023

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Document Change History

Date:	Version:	Description of Changes:
08/22	1.2	Updated 'Legal framework'
09/23	2.0	Updated to include 'Records Retention Schedule' (previously separate document).

Mission Statement

“To nurture and develop all people in our Trust so that they reach their full potential academically, vocationally, and personally, including being positive role models for future generations in the community. We will achieve this by providing high quality values-based education that cultivates employability and life skills making our schools the first choice for young people, parents, carers, staff and employers.”

Values

The values of Respect, Excellence, Collaboration, Independence, Perseverance, Enjoyment, Leadership, Integrity and Care are central to everything we do at the Skills for Life Trust.

Statement of Equality

We have carefully considered and analysed the impact of this policy on equality and the possible implications for pupils with protected characteristics, as part of our commitment to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.

Purpose

The Skills for Life 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 school 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 school’s statutory requirements.

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

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 school policies and procedures:

- Data Protection Policy
- Freedom of Information Policy
- Cyber-security Policy
- ICT Acceptable Use Policy

2. Roles and responsibilities

The trust and all trust schools have a responsibility for maintaining records and record-keeping systems in line with statutory requirements.

The CEO and the Headteacher at each school hold the overall responsibility for this policy and for ensuring it is implemented correctly.

The DPO is responsible for:

- Promoting compliance with this policy and reviewing the policy on an annual basis.
- Ensuring that staff are aware of their responsibilities regarding the secure storage of records in accordance with the retention periods outlined in this policy, and that records are disposed of safely and correctly.

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:

- 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

Disclosures and reports relating to safeguarding and child protection are recorded on a dedicated safeguarding management information system.

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 DPO will remove these records.

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

Trust primary schools 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.

If any pupil attends a trust secondary 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
In-year secondary school admissions	Whilst the pupil remains at the school, plus one year	Securely disposed of

Type of file	Retention period	Action taken after retention period ends
Proof of address (supplied as part of the admissions process)	Current academic year, plus one year	Securely disposed of
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 school pupils' educational records	Whilst the pupil remains at the school	<p>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</p> <p>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</p>
Secondary school and sixth form pupils' educational records	25 years after the pupil's date of birth	Reviewed and securely disposed of if no longer needed

Type of file	Retention period	Action taken after retention period ends
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 Copies are held whilst the pupil is at school, plus one year	Securely disposed of
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

Type of file	Retention period	Action taken after retention period ends
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
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 at least 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

Type of file	Retention period	Action taken after retention period ends
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		
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

Type of file	Retention period	Action taken after retention period ends
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 added to the core system as appropriate	Securely disposed of
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	Securely disposed of – shredded

Type of file	Retention period	Action taken after retention period ends
	be required for any reason, in which case they should be retained for 22 years after the pupil's date of birth	
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
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

Type of file	Retention period	Action taken after retention period ends
Meal eligibility	Whilst the pupil is at school, plus five years	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

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
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 training relates to pupils, e.g. first aid or health and safety)	Retained in the personnel file	Securely disposed of

Type of file	Retention period	Action taken after retention period ends
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
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

Type of file	Retention period	Action taken after retention period ends
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	Date of resolution of complaint, plus six years If negligence is involved, records are retained for the current academic year, plus 15 years	Reviewed for further retention in case of contentious disputes, then securely disposed of

Type of file	Retention period	Action taken after retention period ends
	If child protection or safeguarding issues are 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
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

Type of file	Retention period	Action taken after retention period ends
Records relating to governor declaration against disqualification criteria	Date on which the governor's appointment ends, plus six years	Securely disposed of
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		
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	Date of disqualification, plus 15 years	Securely disposed of

Type of file	Retention period	Action taken after retention period ends
Directors – termination of office	Date of appointment, plus six years	Securely disposed of
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

Type of file	Retention period	Action taken after retention period ends
Health and safety risk assessments	Duration of risk assessment, plus three years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred	Securely disposed of
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

Type of file	Retention period	Action taken after retention period ends
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

Type of file	Retention period	Action taken after retention period ends
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

Type of file	Retention period	Action taken after retention period ends
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

Type of file	Retention period	Action taken after retention period ends
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

Type of file	Retention period	Action taken after retention period ends
Trust finance records		
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
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	Securely disposed of

Type of file	Retention period	Action taken after retention period ends
	loan, plus 12 years if the loan is over £10,000	

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

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 school's Online Safety Policy.

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.

Personal emails, i.e. emails that do not relate to work matters or are from family members, will be deleted as soon as they are no longer needed. Staff members will review and delete any emails they no longer require on an annual basis.

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. 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 school 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 school's Data Protection Policy when responding to requests seeking access to personal information.

14. 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 data records containing personal or sensitive information will be made either unreadable or unable to be reconstructed.

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.

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

15. Monitoring and review

This policy will be reviewed on an annual basis by the DPO.

Any changes made to this policy will be communicated to all members of staff and the governing board.

Equality Impact Assessment

Who is the policy or process intended for?	Pupils	Employees	Govs/ Trustees	Volunteers	Visitors
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Status of the policy or process:	New policy or process			Existing policy or process	
	<input type="checkbox"/>			<input checked="" type="checkbox"/>	
Analysis					
Protected Characteristic	Impact analysis			Explanation of impact analysis	
	Positive	Neutral	Negative		
Age:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Disability:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Sex:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Gender reassignment:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Race:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Religion or belief:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Sexual orientation:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Marriage or civil partnership:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Pregnancy and maternity:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Pupil groups (PP/SEN/CLA):	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Evaluation and decision making					
Summary of action taken:					
Final decision:					