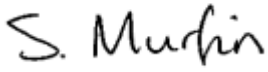
# POLICY DOCUMENT

## Records Management Policy

Approved by WOT Executive Team:
3rd July 2023

Date for review:
July 2026

| Document Control | |
|---|---|
| Title | Record Management Policy |
| Date | 3rd July 2023 |
| Purpose | To provide clarity on the 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. |
| Supersedes | Previous version |
| Amendments | Update MIS provider from SIMS to Arbor |
| Related Policies/Guidance | GDPR Policy, Freedom of Information Policy, Acceptable Use of ICT |
| Author | Kerry Walton |
| Approved Level | Wise Owl Trust Executive Team |
| Date adopted | 3rd July 2023 |
| Expires | July 2026 |
| Signature of CEO |  |

**Wise Owl Trust**
is a Multi Academy Trust
Registered in England and Wales number 8053288
Registered Office: Trust House, c/o Seymour Road Academy, Seymour Road South, Clayton, Manchester, M11 4PR

The Wise Owl trust has a number of Trust-wide policies which are adopted by all the academies in the Trust to ensure an equitable and consistent delivery of provision. The Trust Board has responsibility for the operation of all academies and the outcomes of all students; however, responsibility is delegated to the Local Governing Body of each school via the Scheme of Delegation.

Within our policies reference to:

- Governing Body/Governors relate to the members of the Local School Committees representing the Trust Board.
- School/Academy will be used throughout the policies in reference to Academies within the Trust.
- Headteacher/Principal will be used interchangeably throughout policies and will relate to the Principal of the Academy.

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# 1. Statement of Intent

Wise Owl Trust is committed to maintaining the confidentiality of its information and ensuring that all records within the Academies are only accessible to the appropriate individuals. In line with the requirements of the GDPR, the Trust and associated Academies also have 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 Academies statutory requirements and this policy should be read in conjunction with the Records Retention Schedule.

This document, alongside the Records Retention Schedule, complies with the requirements set out in the GDPR and Data Protection Act 2018.

# 2. Legal Framework

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

- General Data Protection Regulation (GDPR)
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- Data Protection Act 2018 1.2 This policy also has due regard to the following guidance:
- Information Records Management Society (IRMS) (2019) 'Information Management Toolkit for Schools'
- DfE (2018) 'Data protection: a toolkit for schools'
- DfE (2018) 'Careers guidance and access for education and training providers'.

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

- GDPR Policy
- Privacy Notices
- Acceptable Use of ICT Policy
- Information Asset Register
- Records Retention Schedule
- On-line Safety and Social Media Policy
- Any other legislation or regulations (including audit, equal opportunities and ethics) affecting the Wise Owl Trust.

# 3. Responsibilities

- All areas/staff within the Trust and Academies have a responsibility for maintaining its records and record-keeping systems in line with statutory requirement.
- The Principal holds the overall responsibility for this policy and for ensuring it is implemented correctly.
- The DPO is responsible for the management of records at each Academy
- The DPO is responsible for promoting compliance with this policy and reviewing the policy on a three yearly basis, unless it is necessary to adopt or change the policy in line with updated IRMS publications.
- The DPO is responsible for ensuring that all records are stored securely and are disposed of safely and correctly, in accordance with the retention periods outlined in the Records Retention Schedule, which should be read in conjunction with this policy.

- 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.

## 4. 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 includes all personal information relating to them, eg date of birth, home address, as well as their progress and achievements

The following information, if relevant to an individual is stored within each Academy's secure Schools Information Management System (Arbor):

- Forename, surname, date of birth
- Unique pupil number
- Note of the date the file was opened
- Any preferred names
- Name of doctor and any allergies or medical conditions that are important to be aware of
- Names of people with parental responsibility, including their home address and telephone contact numbers
- Details of other agencies involved, ie speech and language therapist
- Reference to any other linked files
- Details of SEND
- Data collection information and SATs information/results
- Notes relating to major incidents and accidents involving the child
- Information re EHC plan and associated support
- Medical information relevant to the pupil's on-going education and behaviour
- Information relating to exclusions
- Correspondence with parents or external agencies
- Notes indicating records of complaints made by parent/carer or pupil
- Attendance and absence information
- Parental consent forms for education visits, photographs, videos etc
- Consent to administer medication records
- Copies of birth certificates, passports etc 3.3 Hard copies of disclosures and reports relating to child protection are stored securely in a locked filing cabinet – see DP within organisation

Safeguarding, wellbeing and pastoral information/issue is stored within CPOMS, a secure software system.
Actual copies of accident and incident information are stored separately in a locked cupboard and are held within the retention periods outlined in the Records Retention Schedule.

The Academy 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 to the above is if any records placed on the pupils 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 pupil's next school via a secure common transfer file within the academy's SIMS system.

The Academy 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 academy. The responsibility for these records will then transfer to the next school the pupil attends.

The Academy 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 Academy.
Electronic copies of any information and files will be destroyed in line with the retention periods detailed in the Records Retention Schedule.

Alongside Arbor, pupil's information is stored within various secure software packages as follows:

- CPOMS – safeguarding, wellbeing and pastoral information are stored within CPOMS
- Report Assist – used for producing pupil termly reports
- O'Track – a pupil tracking system, which allows the Academy to monitor progress and attainment through EYFS, KS1 and KS2
- Tapestry (EYFS) – used as a secure, online learning journal to record photos, observations and comments in line with the Early Years Foundation Stage curriculum
- FFT aspire – tool used to analyse pupil results and pupil progress to provide leaders with insightful data to support school improvement and self-evaluation

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

**Indicates 'updated' items in line with current requirements*
***Indicates 'new' items in line with current requirements*

| 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 pupil remains at school, whichever is less + 1 month | Securely disposed of |
| Images used in displays | | Whilst the pupil is still 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 pupil remains at the school, whichever is less + 1 month | Securely disposed of |
| Postcodes, names and characteristics | | Whilst the pupil is at school + 5 years | Securely disposed of |
| House number and road | | For the duration of the event/activity + 1 month | Securely disposed of |
| **Admissions** | | | |
| Register of admissions | * | Every entry in the admission register will be preserved for a period of 3 years after the date on which the entry was made | Information is reviewed and the register may be kept permanently |

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| Admissions (where the admission is successful) | ** | Date of admission + 1 year | Securely disposed of |
| Admissions (where the admission is unsuccessful) | * | Resolution of the case + 1 year | Securely disposed of |
| Proof of address (supplied as part of the admissions process) | * | Current academic year + 1 year | Securely disposed of |
| Supplementary information submitted, including religious and medical information etc (where the admission was successful) | * | Information added to the pupils file | Securely disposed of |
| Supplementary information submitted, including religious and medical information etc (where the admission was unsuccessful) | * | Information added to the pupils file | Securely disposed of |
| All records relating to the creation and implementation of the Admissions Policy | ** | All records relating to the creation and implementation of the Admissions Policy | ** |
| **Pupils Educational Records** | | | |
| Pupils educational records | | Whilst the pupil remains at the school | Transferred to next destination |
| Pupils educational records | | 25 years after pupils date of birth | Reviewed and securely disposed of if no longer required |
| Public examination results | * | Added to pupils record and transferred to next school | All uncollected certificates returned to examination board |
| Internal examination results | * | Added to pupils record and transferred to next school | Transferred to next school |
| Behaviour records | | Added to pupils record and transferred to the next destination. Copies are held whist the pupil is at school + 1 year | Securely disposed of |
| Exclusion records | | Added to pupils record and transferred to the next destination. Copies are held whist the pupil is at school + 1 year | Securely disposed of |
| Child protection information held on a pupils record | * | Stored in a sealed envelope – same length of time as pupils records. Records also subject to instruction given by the IICSA | Securely disposed of (shredded if possible) |

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| Child protection records held in a separate file | * | 25 years after pupils date of birth Records also subject to instruction given by the IICSA | Reviewed and securely disposed of if no longer required (shredded if possible) |
| Curriculum returns | ** | Current academic year + 3 years | Securely dispose of |
| Schemes of work | ** | Current academic year + 1year | Review at end of each year – allocate a further retention period or securely dispose of |
| Timetable | ** | Current academic year + 1year | Review at end of each year – allocate a further retention period or securely dispose of |
| Class record books | ** | Current academic year + 1year | Review at end of each year – allocate a further retention period or securely dispose of |
| Mark books | ** | Current academic year + 1year | Review at end of each year – allocate a further retention period or securely dispose of |
| Record of homework set | ** | Current academic year + 1year | Review at end of each year – allocate a further retention period or securely dispose of |
| Pupil's work | ** | Current academic year + 1year | Review at end of each year – allocate a further retention period or securely dispose of |
| Education, training or employment destinations data | | Whilst the pupil is at school + 3 years | Securely dispose of |
| **Attendance** | | | |
| Attendance registers | * | Every entry is retained for a period of 3 years after the date on which the entry was made | Securely dispose of |
| Correspondence relating to any absence (authorised or unauthorised) | * | Current academic year + 2 years | Securely dispose of |
| **Medical information and administration** | | | |
| Ongoing management of medical conditions | | Added to the pupil's record and transferred to next destination. Copies held whilst the pupil is at school + 1 year | Securely disposed of |
| Medical incidents that have a behavioural or | | Added to the pupil's record and transferred to next destination. | Securely disposed of |

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| safeguarding influence | | Copies held whilst the pupil is at school + 25 years | |
| **Special Educational Needs (SEND)** | | | |
| SEND files, reviews, statements and EHC plans, including advice and information provided to parents regarding educational needs and accessibility strategy | * | The pupil's date of birth + 31 years | Securely disposed of |
| **Curriculum management** | | | |
| SATs results | | 25 years after pupils date of birth | Securely disposed of |
| Examination papers | | Until the appeals/validation process has been completed | Securely disposed of |
| Published Admission Number (PAN) | | Current academic year + 6 years | Securely disposed of |
| Value added and contextual data | | Current academic year + 6 years | Securely disposed of |
| Self-evaluation forms (internal moderation) | * | Current academic year + 1 year | Securely disposed of |
| Self-evaluation forms (external moderation) | * | Retained until superseded | Securely disposed of |
| Pupil's work | | Returned to pupils at the end of the academic year, or retained for the current academic year + 1 year | Securely disposed of |
| **Extra-curricular activities** | | | |
| Information taken on school trips | | Until the conclusion of the trip + 1 month<br>Where a minor incident occurs, information is added to the pupils records on SIMS | Securely disposed of |
| Financial information relating to school trips | | Whilst the pupil remains at school, + 1 year | Securely disposed of |
| Parental consent forms for school trips where no major incident occurred | | Until the conclusion of the trip | Securely disposed of (shredded if possible) |
| Parent consent forms for school trips where a major incident occurred | | 25 years after the pupils date of birth (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 if possible) |
| Educational visitors in school – sharing of personal information | | Until the conclusion of the visit + 1 month | Securely disposed of |
| **Family liaison workers and home-school liaison assistants** | | | |
| Day books | | Current academic year + 2 years | Reviewed and securely destroyed if no longer required |

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| Reports for outside agencies | | Duration of the pupils 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 required |
| Contact database entries | | Current academic year | Reviewed and securely destroyed if no longer required |
| Group registers | | Current academic year + 2 years | Securely disposed of |
| Meal administration | | Whilst the pupil is at school + 1 year | Securely disposed of |
| Meal eligibility | | Whilst the pupil is at school + 5 years | Securely disposed of |

## 6. Retention of staff records

The table below outlines the Trust'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.

**Indicates 'updated' items in line with current requirements*
***Indicates 'new' items in line with current requirements*

| TYPE OF FILE | | RETENTION PERIOD | ACTION TAKEN AFTER RETENTION PERIOD ENDS |
|---|---|---|---|
| **Operational** (please note absence info recorded under section 8) | | | |
| Staff members' personnel file | * | Termination of employment + 6 years, unless member of staff is part of a case which falls under the terms of reference of IICSA. In this case the file will be retained until the IICSA enquiries are complete | Securely disposed of |
| Annual appraisal and assessment records | * | Current academic year + 6 years | Securely disposed of |
| Sickness absence monitoring (where sickness pay is not paid) | ** | Current academic year + 3 years | Securely disposed of |
| Sickness absence monitoring (where sickness pay is paid) | ** | Current academic year + 6 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 dealing | ** | Retained securely in 'Every' | Securely disposed of |

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| with pupils ie first aid or H&S) | | | |
| Staff training (where the training relates to pupils ie safeguarding or other pupil-related training) | ** | Date of training retained securely in 'Every' + 40 years | Securely disposed of |
| **Recruitment** | | | |
| Records relating to un-successful appointment of a new Principal, Executive Principal or CEO | * | Date of interview + 6 months | Securely disposed of |
| Records relating to the successful appointment of a new Principal, Executive Principal or CEO | * | Added to personnel file, retained until end of appointment + 6 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 unsuccessful appointment of new members of staff or governors | * | Date of interview + 6 months | Securely disposed of |
| Records relating to the successful appointment of new members of staff or governors | * | Added to personnel file, retained until end of appointment + 6 years, except in cases of negligence or claims of child abuse, then records are retained for at least 15 years | Securely disposed of |
| Pre-employment vetting information for successful candidates | * | For the duration of the employee's employment + 6 years | Securely disposed of |
| DBS certification | | For the duration of the employee's employment + 6 month | Securely disposed of |
| Proof of identity as part of the enhanced DBS check | * | Proof of identity kept securely on 'Every'. | Securely disposed of |
| Evidence of right to work in the UK | | At termination of employment + 2 years | Securely disposed of |
| **Disciplinary and grievance procedures** | | | |
| Child protection allegations, including where the allegation is unproven<br><br>If allegations are found | * | Add to personnel file until normal retirement age, or 10 years from the date of allegation – whichever is longer.<br>If allegations are malicious, remove from personnel file.<br>Keep on personnel file and a copy is provided to the person concerned unless the staff member is part of any case which falls under the terms of ref of the IICSA. If this is the case, the file is | Securely dispose of<br><br>Securely dispose of |

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| | | retained until IICSA enquires are complete. | |
| Verbal warnings | | Date of warning + 6 months | Securely disposed of |
| 1st written warning | | Date of warning + 6 months | Securely disposed of |
| 2nd written warning | | Date of warning + 12 months | Securely disposed of |
| Final warning | | Date of warning + 18 months | Securely disposed of |

## 7. Retention of senior leadership and management records

The table below outlines the Trust's retention period 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.

**Indicates 'updated' items in line with current requirements*
***Indicates 'new' items in line with current requirements*

| TYPE OF FILE | | RETENTION PERIOD | ACTION TAKEN AFTER RETENTION PERIOD ENDS |
|---|---|---|---|
| **Trustees and Governing Bodies** | | | |
| Agendas for Trustee and Governing Body meetings | * | One copy alongside the original set of minutes – all others disposed of without retention | WOT archives consulted before secure disposal |
| Original signed copies of the minutes of above meetings | * | Permanent – all other copies disposed of without retention | Securely disposed of (shredded if possible if contain sensitive or personal information |
| Reports presented which are referred to in the minutes | * | Permanent – all others disposed of without retention | WOT archives consulted before secure disposal |
| Instruments of government, including articles of association | * | Permanent | WOT archives consulted before secure disposal |
| Trusts and endowments managed by the Trust or Governing Bodies | * | Permanent | WOT archives consulted before secure disposal |
| Action plans created and administered by Trust or GB | * | Until superseded or whilst relevant | Securely disposed of |
| Policies and documents created | * | Until superseded or whilst relevant | Securely disposed of |

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| and administered by Trust or GB | | | |
| Records relating to complaints dealt with by the Trust, Governing Bodies, CEO, Executive Principal or Principals | * | Current academic year + 6 years. If negligence is involved, records are retained for the current academic year + 15 years. If CP/safeguarding issues involved, records are retained for the current academic year + 40 years | Reviews for further retention in case of contentious disputes, then securely disposed of |
| Annual reports required by the DfE | | Date of report + 10 years | Securely disposed of |
| Proposals concerning changing the status of an Academy | | Date proposal accepted or declined +3 years | Securely disposed of |
| Records relating to the appointment of co-opted governors | ** | Date of election + 6 months | Securely disposed of |
| Records relating to the election of the chair or vice chair of Trustees or Governors | ** | Destroyed after the decision has been recorded in the minutes | Securely disposed of |
| Schemes of delegation and terms of reference for committees | ** | Until superseded or whilst relevant | Reviewed before securely disposing of |
| Meeting schedules | ** | Current academic year | Standard disposal |
| Register of attendance at Trust or full Governing Body meetings | ** | Date of last meeting + 6 years | Securely disposed of |
| Records relating to Trustee or Governor monitoring visits | ** | Date of visit + 3 years | Securely disposed of |
| Correspondence sent and received by the Trust or Governing Bodies, CEO, Executive Principal or Principals. | ** | Date of correspondence + 3 years | Securely disposed of |
| Records relating to the appointment of a clerk to the Trust or Governing Bodies | ** | Date on which clerk's appointment ends + 6 years | Securely disposed of |
| Records relating to the terms of office of serving Governors, including evidence of appointment | ** | Date on which Governor's appointment ends + 6 years | Securely disposed of |
| Records relating to Governor declaration | ** | Date on which Governor's appointment ends + 6 years | Securely disposed of |

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| against disqualification criteria | | | |
| Register of pecuniary/business interests | ** | Date on which Governor's appointment ends + 6 years | Securely disposed of |
| Governor code of conduct | ** | Dynamic document – keep permanently | Securely disposed of when updated |
| Records relating to training, required and delivered to Trustees or Governors | ** | Date on which Governor's appointment ends + 6 years | Securely disposed of |
| Records relating to induction of new Trustees or Governors | ** | Date on which Governor's appointment ends + 6 years | Securely disposed of |
| Records relating to DBS checks for clerk, Trustees or Governors | ** | Date of DBS check + 6 months | Securely disposed of |
| Trustee or Governor personnel files | ** | Date on which Governor's appointment ends + 6 years | Securely disposed of |
| **CEO, Executive Principal, Principals and Senior Leadership Team** | | | |
| Log books of activity in school maintained by any of above staff | | Date of last entry + 6 years | Reviewed before securely disposing of |
| Minutes of SLT meetings and other internal administrative bodies | * | Date of meeting + 3 years | Review annually and securely dispose of if not needed |
| Reports created by any of above staff | * | Date of report + minimum of 3 years | Review annually and securely dispose of if not needed |
| Records created by any of above staff, or other staff with administrative responsibilities | * | Current academic year + 6 years | Review annually and securely dispose of if not needed |
| Correspondence created by any of above staff, or other staff with administrative responsibilities | * | Current academic year + 3 years | Securely dispose of |
| Professional development plan | * | Held on personnel record | Securely dispose of |
| SDP | | Duration of plan + 3 years | Securely dispose of |

## 8. Retention of health and safety records

The table below outlines the Trust's retention period 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.

**Indicates 'updated' items in line with current requirements*
***Indicates 'new' items in line with current requirements*

| TYPE OF FILE | | RETENTION PERIOD | ACTION TAKEN AFTER RETENTION PERIOD ENDS |
|---|---|---|---|
| Health & Safety policy statements | | Duration of policy + 3 years | Securely disposed of |
| Health & Safety risk assessments | * | Duration of RA + 3 years<br>Copies of RA should be stored with any accident reports | Securely disposed of |
| Records relating to any reportable death, injury, disease or dangerous occurrence under RIDDOR | * | Date of incident + 3 years.<br>All records relating to incidents are kept in secure file/folder | Securely disposed of |
| Accident reporting - adults | * | 3 years from date of incident | Securely disposed of |
| Accident reporting - pupils | * | 3 years from date of incident | Securely disposed of |
| Records kept under COSHH | | Date of incident + 40 years | Securely disposed of |
| Information relating to areas where employees/others are likely to come into contact with asbestos | | Date of last action + 40 years | Securely disposed of |
| Information relating to areas where employees/others are likely to come into contact with radiation (maintenance records/controls, safety features and PPE) | * | 2 years from date on which examination took place | Securely disposed of |
| Information relating to areas where employees/others are likely to come into contact with radiation (dose assessment and recording) | ** | Until person would have reached 75 years old, but in any event for at least 30 years from when record was made | Securely disposed of |

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| Fire log information | ** | Current academic year + 3 years | Securely disposed of |
| H&S file showing building, alterations (wiring, plumbing, building works etc) to be passed on in the case of change of ownership | ** | Keep indefinitely | To be transferred to new owner on sale or transfer of building |
| Health & Safety policy statements | | Duration of policy + 3 years | Securely disposed of |
| Health & Safety risk assessments | * | Duration of RA + 3 years<br>Copies of RA should be stored with any accident reports | Securely disposed of |

## 9. Retention of financial records

The table below outlines the Trust's retention period 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.

**Indicates 'updated' items in line with current requirements*
***Indicates 'new' items in line with current requirements*

| TYPE OF FILE | RETENTION PERIOD | ACTION TAKEN AFTER RETENTION PERIOD ENDS |
|---|---|---|
| **Payroll and pension information** | | |
| Maternity pay records | Current academic year + 3 years | Securely disposed of |
| Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Current academic year + 6 years | Securely disposed of |
| Timesheets, clock cards and records relating to successful Flexible Working Hour applications | * | Current academic year + 3 years | Securely disposed of |
| Absence records | ** | Current academic year + 3 years | Securely disposed of |
| Additional hours/bonus sheets | ** | Current academic year + 3 years | Securely disposed of |
| Car allowance claims/car loan info | ** | Current academic year + 3 years | Securely disposed of |
| Car mileage outputs | ** | Current academic year + 6 years | Securely disposed of |
| Income Tax form P60 | ** | Current academic year + 6 years | Securely disposed of |

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| Insurance information | ** | Current academic year + 6 years | Securely disposed of |
| Members allowance register | ** | Current academic year + 6 years | Securely disposed of |
| National insurance – schedule of payments | ** | Current academic year + 6 years | Securely disposed of |
| Part time fee claims | ** | Current academic year + 6 years | Securely disposed of |
| Payroll awards | ** | Current academic year + 6 years | Securely disposed of |
| Payroll (gross/net weekly/ monthly) and payroll reports | ** | Current academic year + 6 years | Securely disposed of |
| Payslips (copies) | ** | Current academic year + 6 years | Securely disposed of |
| Pension payroll | ** | Current academic year + 6 years | Securely disposed of |
| Personal bank details | ** | Until superseded + 3 years | Securely disposed of |
| Sickness records | ** | Current academic year + 3 years | Securely disposed of |
| **Risk Management and Insurance** | | | |
| Liability Insurance Certificate | * | Until closure of Academy + 40 yrs | Securely disposed of |
| **Asset Management** | | | |
| Inventories of furniture/equipment | | Current academic year + 6 years | Securely disposed of |
| Burglary, theft and vandalism report forms | | Current academic year + 6 years | Securely disposed of |
| **Accounts and statements including budget management** | | | |
| Annual accounts | | Current academic year + 6 years | Securely disposed of |
| Loans and grant information and records | | Date of last payment + 12 years | Information is reviewed then securely disposed of |
| All records relating to the creation and management of budgets | | Duration of the budget + 3 years | Securely disposed of |
| Invoices, receipts, order 'books', requisitions an delivery notices | | Current financial year + 6 years | Securely disposed of |
| Records relating to the collection and banking of monies | | Current financial year + 6 years | Securely disposed of |
| Records relating to the identification and collection of debt | * | Final payment + 6 years | Securely disposed of |
| **Retention of financial records, continued Contract Management** | | | |

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| All records relating to the management of contracts under seal | | Last payment on the contract + 12 years | Securely disposed of |
| All records relating to the management of contracts under signature | | Last payment on the contract + 6 years | Securely disposed of |
| All records relating to the monitoring of contracts | * | Life of the contract + 6 or 12 years | Securely disposed of |
| **'School' Fund** | | | |
| Physical cheque books, paying-in books, invoices, receipts, bank statements | | Current academic year + 6 years | Securely disposed of |
| FSM registers (where the register is used as a basis for funding) | | Current academic year + 6 years | Securely disposed of |
| School meals registers | | Current academic year + 3 years | Securely disposed of |
| School meal summary sheets | | Current academic year + 3 years | Securely disposed of |
| **Pupil Finance** (new) | | | |
| Pupil premium funding records | ** | Date the pupil leaves the academy + 6 years | Securely disposed of |

## 10. Retention of other Trust/Academy records

The table below outlines the Trust's retention period for any other records held, 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.

**Indicates 'updated' items in line with current requirements*
***Indicates 'new' items in line with current requirements*

| TYPE OF FILE | | RETENTION PERIOD | ACTION TAKEN AFTER RETENTION PERIOD ENDS |
|---|---|---|---|
| **Property Management** | | | |
| Title deeds of properties belonging to the Trust/Academy | | Retain indefinitely | Transfer to new owners if building leased or sold |
| Plans of property (if they belong) to the Trust/Academy | | For as long as the building belongs to the Trust/Academy | Transferred to new owners if building leased or sold |

| | | | |
|---|---|---|---|
| Leases of property leased by or to the Trust/Academy | | Expiry of lease + 6 years | Securely disposed of |
| Records relating to the letting of premises | | Current financial year + 6 years | Securely disposed of |
| **Maintenance** | | | |
| All records relating to the maintenance of any Academy building carried out by contractors | * | For as long as the building belongs to the Trust/Academy | Transfer to new owners if building leased or sold |
| All records relating to the maintenance of any Academy carried out by employed staff | * | For as long as the building belongs to the Trust/Academy | Transfer to new owners if building leased or sold |
| **Operational Administration** | | | |
| Records relating to the creation and publication of Academy brochures/prospects | * | Current academic year + 3 years | Standard disposal |
| Records relating to the creation and distribution of circulars to staff, parents or pupils | * | Current academic year + 1 year | Standard disposal |
| Newsletters and other items with short operational use | * | Current academic year + 1 year | Keep electronic copy (archive) indefinitely |
| Visitors books and signing-in sheets | * | 6 years | Review then securely disposed of |
| Records relating to the creation and management of parent-teacher associations and/or old pupil associations | | Current academic year + 6 years | Review then securely disposed of |
| Walking bus register | * | Date of register + 6 years | Securely disposed of |
| Privacy notices sent to parents | ** | Until superseded + 6 years | Standard disposal |
| Consents relating to Academy activities | ** | While pupil attends the Academy | Securely disposed of |

## 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.

- Individual email accounts – staff with an email account will be responsible for managing their inbox.
- Emails can act as evidence of the Academy's activities, ie in business and fulfilling statutory duties, so all relevant emails (eg 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 7 of this policy.
- The Academies expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed within the Trusts On-Line Safety and Social Media Policy.
- All emails will be automatically deleted after 12 months unless stated otherwise.
- Correspondence created by the SLT and other staff member with administrative responsibilities will be retained for 3 years before being reviewed and, if necessary securely disposed of.
- No personal emails should be sent or received through a staff members work email address.
- Staff will review and delete any emails no longer required at the end of every term.
- Staff will not, under any circumstances, create their own email archives, ie saving emails onto personal hard drives.
- Staff will be aware that the emails they send could be required to fulfil a subject access request (SAR) or freedom of information (FOI) request. Emails will be drafted carefully, and staff should review content before sending.
- Individuals, including pupils, 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. *Refer to GDPR Policy, section 9.2, Children and SARs, for more information.*
- All SARs and FOIs will be handled in accordance with the Trust's GDPR 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. *Refer to GDPR Policy, section 9.3, Responding to SARs, for more information.*
- Where a request is manifestly unfounded or excessive, the Academy 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. *Refer to GDPR Policy, section 9.3, Responding to SARs, for more information.*
- Staff members will discuss any queries regarding email retention with the DPO.

## 12. Identifying information

- Under the GDPR, all individuals have the right to data minimization and data protection by design and default – as the data controller, the Academy ensures appropriate measures are in place for individuals to exercise this right.
- Wherever possible, the Academy uses pseudonymisation, also known as the 'blurring technique' to reduce the risk of identification.
- Once and individual has left the Academy, if identifiers such as names and dates of birth are no longer required, these are removed or less specific personal data is used, eg the month of birth rather than specific date – the data is blurred slightly.
- Where data is required to be retained over time, eg attendance data the Academy will remove 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

**Indicates 'updated' items in line with current requirements*
***Indicates 'new' items in line with current requirements*

- The DPO will undertake a business impact assessment to identify which records are vital to Academy management and these records will be stored in the most secure manner.
- The ICT team will a back-up of information on a daily basis to ensure that all data can still be accessed In the event of a security breach, eg a virus and prevent any loss or theft of data.
- * Where possible, backed-up information will be stored off the school premises, using an encrypted offsite back-up service. This will ensure that the location of the remote 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 protection, both on a local hard drive and on a network drive that is regularly backed-up off-site.
    - Data should never be stored on memory sticks, removable or portable storage devices.
- All electronic devices are password protected to protect the information on the device in case of theft.
- Where possible, the Academy enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- Staff and governors **do not use** their personal laptops or computers for work purposes.
- All members of staff are provided with their own secure login and password and are requested to regularly (at least annually) change their password for added security.
- * 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, if sent to parents, are sent blind copy (bcc), so email addresses are not disclosed to other recipients.
- 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 GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security, eg 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 Academy premises will be left unattended, staff 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 Academy 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 Academy has data sharing arrangements with all data processors and third parties with whom data is shared. 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
- who is able to authorize requests to change permissions and access
- All staff implement a 'clear desk policy' to avoid unauthorized 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.
- ** Staff are required to use their login details to use photocopiers and printers.
- The physical security of the Academy's buildings and storage systems, and access to them is reviewed weekly by the caretaker or site manager in conjunction with the DPO. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the Principal and extra measures to secure data storage will be put into place.
- ** All systems that allow staff and pupils to remotely access information from the Academy's network whilst they are not physically at the Academy have strong security controls in place which are reviewed termly by the 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 Academy site.
- The Academy takes its duties under GDPR seriously and any unauthorized 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 Academy's Business Continuity Plan.

## 14. Accessing information

Please refer to the Trust's GDPR Policy.

## 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 Academy's server, which are password protected – this will be backed-up in accordance with this policy.
- Memory sticks are never used to store digital data and are not permitted to be used at the WOT.
- The IT team 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 GDPR

## 16. Information audit

**Indicates 'updated' items in line with current requirements*
***Indicates 'new' items in line with current requirements*

- * The Academy conducts information audits on an annual basis against all information held to evaluate the information they hold, receive and share ensuring that this is correctly managed in accordance with the 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 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 Academy'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 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 DPO will record all details on the Academy'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 Academy's requirements and for monitoring risks and opportunities.
- The information displayed on the data asset register will be shared with the Principal for 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, eg paper recycling, electronic recycling.
- * Where disposal of information is outlined as secure disposal, this will be disposed of in line with the Academy's secure disposal arrangements and electronic information will be scrubbed clean and, where possible, cut, archived or digitalized. The DPO will 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 is exempt from normal review procedures.
- ** Records and information that might be of relevant to the IICSA will not be disposed of or destroyed.

## 18. Academy closures and record keeping

- ** If the Academy merges with another school/academy the new school/academy 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/academy all records that are current and that will be required and all records that are dormant but still need to be retained to comply with legal and business retention requirements.
- The school/academy's IT team will be notified so that arrangements can be made to ensure the safe transfer or deletion of electronic records, including all back-up copies.
- All records awaiting transfer will be held in a secure area.
- The identity of third parties collecting or disposing of physical records will be checked and a collection receipt obtained