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Data Retention Policy

**Adopted By: Board of Trustees**

**Date: May 2023**

**Review Date: May 2024**

**Records Management Policy**

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| Date of Issue: |  | May 2023 |
|  |  |  |
| Policy applies to: |  | **All staff employed by the Wessex Multi-Academy Trust.** |
|  |  |  |
| Policy Version Number: |  | 1 |
|  |  |  |
| Purpose of the document: |  | To outline how records are stored, retained and disposed of to meet statutory requirements |
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| Summary of the main points: |  | The document provides:  1. Guidance on the retention of school records  2. Guidance on the disposal of data |
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| Approved by: |  | This policy has been approved by the WMAT Board of Trustees |
|  |  |  |
| Reviewer: |  | Sophia Radford – Data Protection Officer |
|  |  |  |
| Summary of amendments: |  |  |
|  |  |  |
| Next review due: |  | May 2024 |

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**Statement of intent**

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

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

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

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

IRMS retention periods should only be used as a guide.

# Legal framework

* 1. 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

1. **Roles and responsibilities**
   1. The whole Trust has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements. Each headteacher holds the overall responsibility for this policy within their academy and for ensuring it is implemented correctly.
   2. The Data Protection Lead (DPL) within each academy is responsible for:
      * The management of records at the academy.
      * Promoting compliance with this policy.
      * Ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy and are disposed of safely and correctly.
   3. 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.
2. **Management of pupil records**
   1. Pupil records are specific documents that are used throughout a pupil’s time in the education system – they are passed to each academy 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.
   2. Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in a securely locked filing cabinet in …………………… [academy to insert] – a note indicating this is marked on the pupil’s file.
   3. Hard copies of complaints made by parents or pupils are stored in a file in ……………………………. [academy to insert] – a note indicating this is marked on the pupil’s file.
   4. Actual copies of accident and incident information are stored separately on the academy’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.
   5. The academy will ensure that no pupil records are altered or amended before transferring them to the next academy 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 DPL will remove these records. Electronic records relating to a pupil’s record will also be transferred to the pupils’ next academy.   
        
      **[Primary academies]** 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 academy that the pupil attends.  
        
      **[Secondary academies and sixth-form colleges]** If any pupil attends the academy until statutory academy leaving age, the academy will keep the pupil’s records until the pupil reaches the age of 25 years.
   6. 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 academy 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.
3. **Retention of pupil records and other pupil-related information**
   1. The table below outlines the Trust’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 academy, whichever is less, plus one month | Securely disposed of |
| Images used in displays | Whilst the pupil is at academy | 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 academy, whichever is less, plus one month | Securely disposed of |
| Postcodes, names and characteristics | Whilst the pupil is at academy, plus five years | Securely disposed of |
| House number and road | For the duration of the event/activity, plus one month | Securely disposed of |
| **Admissions** | | |
| Register of admissions | Every entry in the admissions register will be preserved for a period of three years after the date on which the entry was made | Information is reviewed and the register may be kept permanently |
| Admissions (where the admission is successful) | Date of admission, plus one year | Securely disposed of |
| Admissions appeals (where the appeal is unsuccessful) | Resolution of the case, plus one year | Securely disposed of |
| **[Secondary academies]** In-year secondary academy admissions | Whilst the pupil remains at the academy, plus one year | Securely disposed of |
| Proof of address (supplied as part of the admissions process) | Current academic year, plus one year | Securely disposed of |
| 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 academies]** Pupils’ educational records | Whilst the pupil remains at the academy | Transferred to the next destination – if this is an independent school, home-school or outside of the UK, the file will be kept by the LA and retained for the statutory period |
| **[Secondary academies and sixth forms]** Pupils’ educational records | 25 years after the pupil’s date of birth | Reviewed and securely disposed of if no longer needed |
| Public examination results | Added to the pupil’s record and transferred to next school | All uncollected certificates returned to the examination board |
| Internal examination results | Added to the pupil’s record and transferred to next school; | Transferred to the next school |
| Behaviour records | Added to the pupil’s record and transferred to the next school  Copies are held whilst the pupil is at academy, 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 the 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 | Securely disposed of |
| Schemes of work | Current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |
| Timetable | Current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |
| Class record books | Current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |
| Mark books | Current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |
| Record of homework set | Current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |
| Pupils’ work | Returned to pupils at the end of the academic year, or retained 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 |
| Education, training or employment destinations data | Whilst the pupil is at the academy, plus three years or from the end of KS4, whichever is earliest | Securely disposed of |
| **Attendance** | | |
| Attendance registers | Every entry is retained for a period of three years after the date on which the entry was made | Securely disposed of |
| Correspondence relating to any absence (authorised or unauthorised) | Current academic year, plus two years | Securely disposed of |
| **Medical information and administration** | | |
| Permission slips | For the duration of the period that medication is given, plus one month | Securely disposed of |
| Medical records | Added to the pupil’s record and transferred to the next school  Copies held whilst the pupil is at academy, plus 25 years | 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 academy, 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) | Securely disposed of |
| Examination papers | Until the appeals/validation process has been completed | Securely disposed of |
| Published Admission Number (PAN) reports | Current academic year, plus six years | Securely disposed of |
| Valued added and contextual data | Current academic year, plus six years | Securely disposed of |
| Self-evaluation forms (external and internal moderation) | Current academic year, plus 6 years | Securely disposed of |
| **Extra-curricular activities** | | |
| Field file – information taken on academy 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 |
| Financial information relating to academy trips | Whilst the pupil remains at academy, plus one year | Securely disposed of |
| Parental consent forms for academy trips where no major incident occurred | Until the conclusion of the trip | Securely disposed of – shredded |
| Parental consent forms for academy 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 academy – sharing of personal information | Until the conclusion of the visit, plus one month | Securely disposed of |
| **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 academy | 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 academy, plus one year | Securely disposed of |
| Meal eligibility | Whilst the pupil is at academy, plus five years | Securely disposed of |

# 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:

|  |  |  |
| --- | --- | --- |
| **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 the training relates to dealing with pupils, e.g. first aid or health and safety) | Retained in the personnel file | Securely disposed of |
| Staff training (where the training relates to pupils, e.g. safeguarding or other pupil-related training) | Date of the training, plus 40 years | Securely disposed of |
| **Recruitment** | | |
| Records relating to the appointment of new members of staff (unsuccessful attempts) | Date of appointment, plus six months. | Securely disposed of |
| Records relating to the appointment of new members of staff (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 |
| 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 |
| **Disciplinary and grievance procedures** | | |
| Child protection allegations, including where the allegation is unproven | 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  If allegations are malicious, they are removed from personal files  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 | 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](#A) | Securely disposed of |

# Retention of governance records

# The table below outlines the Trust’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  If child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years | Reviewed for further retention in case of contentious disputes, then securely disposed of |
| Annual reports required by the DfE | Date of report, plus 10 years | Securely disposed of |
| Proposals concerning changing the status of the academy | Date proposal accepted or declined, plus three years | Securely disposed of |
| Records relating to the appointment of 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 |
| 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 |
| 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** | | |
| Articles of association | Life of the Trust | Securely disposed of |
| Memorandum of understanding | Life of the Trust | Securely disposed of |
| Constitution | Life of the Trust | Securely disposed of |
| Special resolutions to amend the constitution | Life of the Trust | Securely disposed of |
| Written scheme of delegation | Life of the scheme of delegation, plus 10 years | Securely disposed of |
| Trustees – appointment | Life of appointment, plus six years | Securely disposed of |
| Trustees – disqualification | Data of disqualification, plus 15 years | Securely disposed of |
| Trustees – 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 |
| 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 Members, Trustees and governors | Life of the Trust/academy, plus six years | Securely disposed of |
| Register of Members, Trustees and governors’ business interests | Life of Trust/academy, plus six years | Securely disposed of |
| Register of members, Trustees and governors’ residential addresses | Life of Trust/academy, plus six years | Securely disposed of |
| Register of gift, hospitality and entertainments | Life of academy, plus six years | Securely disposed of |
| Declaration of interests | Life of academy, plus six years | Securely disposed of |

# Retention of senior leadership and management records

# The table below outlines the Trust’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** | | |
| Logbooks of activity in the academy 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 |

# Retention of health and safety records

# The table below outlines the Trust’s retention periods for health and safety records, and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will also be destroyed in line with the retention periods below:

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

# Retention of financial records

# The table below outlines the Trust’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 and flexitime records | Current academic year, plus three years | Securely disposed of |
| Absence record | Current academic year, plus three years | Securely disposed of |
| Insurance | Current academic year, plus six years | Securely disposed of |
| Payroll awards | Current academic year, plus six years | Securely disposed of |
| Payroll (gross/net weekly or monthly) | Current academic year, plus six years | Securely disposed of |
| Payroll reports | Current academic year, plus six years | Securely disposed of |
| Pension payroll | Current academic year, plus six years | Securely disposed of |
| Staff returns | Current academic year, plus three years | Securely disposed of |
| **Risk management and insurance** | | |
| Employer’s liability insurance certificate | Closure of the Trust, plus 40 years | Securely disposed of  Passed to the LA if the Trust closes |
| **Asset management** | | |
| Inventories of furniture and equipment | Current academic year, plus six years | Securely disposed of |
| Burglary, theft and vandalism report forms | Current academic year, plus six years | Securely disposed of |
| **Accounts and statements including budget management** | | |
| Annual accounts | Current academic year, plus six years | Disposed of against common standards |
| Loans and grants managed by the academy | 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 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 academy, plus six years | Securely disposed of |
| **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 |
| Budget plan | Current financial year, plus six years | Securely disposed of |
| Charging and remissions policy | Date policy superseded, plus three years | Securely disposed of |
| Audit and risk committee and appointment of responsible officers | Life of the Trust | 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 |

# 

# Retention of other Trust records

# The table below outlines the Trust’s retention periods for any other records held by its academies, 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 Trust | Permanent | Transferred to new owners if the building is leased or sold |
| Plans of property belonging to the Trust | For as long as the building belongs to the academy | Transferred to new owners if the building is leased or sold |
| Leases of property leased by or to the Trust | Expiry of lease, plus six years | Securely disposed of |
| Records relating to the letting of Trust/academy premises | Current financial year, plus six years | Securely disposed of |
| **Maintenance** | | |
| All records relating to the maintenance of the Trust/academies carried out by contractors or Trust employees | For as long as the academy owns the building and then passed onto any new owners if the building is leased or sold | Securely disposed of |
| **Operational administration** | | |
| General files | Current academic year, plus five years | Reviewed and securely disposed of |
| Records relating to the creation and publication of the academy brochure and/or prospectus | Current academic year, plus three years | If a copy is not preserved by the academy, 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 |
| MAT privacy notice which is sent to parents | Until superseded, plus six years | Standard disposal |
| Consents relating to academy activities | While pupil attends the academy | Secure disposal |

# 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 Trust/academy’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 Trust expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in theData Protection Policies and training. All emails will be automatically deleted after 12 months, unless stated otherwise.

# 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 at the end of every term.

# Staff members will not, under any circumstances, create their own email archives, e.g. saving emails on to personal hard drives. Staff members will be aware that the emails they send could be required to fulfil a SAR or freedom of information (FOI) request. Emails will be drafted carefully, and staff members will review the content before sending. Individuals, including children, have the right to submit a 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 Trust’s Data Protection Policy. FOI requests will be handled in accordance with the Trust’s Freedom of Information Policy.

# When handling a request for information, the DPL will speak to the requestor to clarify the cope of the request and whether emails will be required to fulfil the SAR or FOI request.

# Where a 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 Trust/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. Staff members will discuss any queries regarding email retention with the DPL.

# Storing and protecting information

# The DPL 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 DPL will conduct a back-up of information on a termly basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.

# Where possible, backed-up information will be stored off the academy premises, using a central back-up cloud service. The DPL will ensure that the location of the cloud storage and the security offered is appropriate for the information and records stored on it.

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

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

# All electronic devices are password-protected to protect the information on the device in case of theft. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

# Emails containing sensitive or confidential information are password-protected or sent via a secure encrypted or data transfer system to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email. Personal information is never put in the subject line of an email. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

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

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

# The Trust/academy has data sharing agreements with all data processors and third parties with whom data is shared. These agreements are developed by the DPL 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.

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

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

# The physical security of the Trust/academy’s buildings and storage systems, and access to them, is reviewed termly by the site manager in conjunction with the DPL. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the headteacher and extra measures to secure data storage will be put in place.

# Accessing information

# We are transparent with data subjects about the information we hold and how it can be accessed. All members of staff, parents of registered pupils and other users of the Trust and its academies, e.g. visitors and third-party clubs, are entitled to:

# Know what information the Trust/academy 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 Trust/academy is doing to comply with its obligations under the UK GDPR.

# All members of staff, parents of registered pupils and other users of the Trust and its academies 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 academy 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 Trust/academy will adhere to the provisions outlined in the Trust’s Data Protection Policy when responding to requests seeking access to personal information.

# Information audit

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

# Paper documents and records

# Electronic documents and records

# Databases

# Microfilm or microfiche

# Sound recordings

# Video and photographic records

# Hybrid files, containing both paper and electronic information

# Knowledge

# Apps and portals

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

# Interviews with staff members with key responsibilities – to identify information and information flows, etc.

# Questionnaires to key staff members to identify information and information flows, etc.

# A mixture of the above.

# Disposal of data

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

# All records containing personal or sensitive information will be made either unreadable or unreconstructable. Where disposal of information is outlined as secure disposal, this will be shredded or pulped. Electronic information will be scrubbed clean and, where possible, cut, archived or digitalised. The DPL will keep a record of all files that have been destroyed.

# Where the disposal action is indicated as reviewed before it is disposed, the DPL will review the information against its administrative value – if the information should be kept for administrative value, the DPL 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 DPL will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years. Where information must be kept permanently, this information is exempt from the normal review procedures.

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

# Monitoring and review

# This policy will be reviewed on an annual basis by the DPO – the next scheduled review date for this policy is May 2024. Any changes made to this policy will be communicated to all members of staff and the governing board.