

# **JOHN TAYLOR MULTI ACADEMY TRUST**



## **GDPR Records Management Policy**

Implementation date: March 2018

Reviewed on: June 2024

Next review due: June 2025

Policy owner: Mark Crompton (Strategic Network Manager)

## Version Control

| Version | Author      | Date       | Changes   |
|---------|-------------|------------|---|
| 1.0     | M. Crompton | 07/01/2018 | First Draft   |
| 1.1     | M. Crompton | 16/03/2018 | Changes to the responsibilities section to reflect the GDPR implementation plan                               |
| 1.2     | M. Crompton | 19/03/2018 | Organisation chart added under the responsibilities header  |
| 1.3     | M. Crompton | 21/02/2019 | Recruitment, proof of identity documents retention periods on pHRp recommendation (not submitted for review). |
| 2.0     | M. Crompton | 13/08/2019 | Policy re-written based on the newly issued IRMS Toolkit for schools.   |

## **Context**

John Taylor Multi Academy Trust (JTMAT) is committed to maintaining the confidentiality of its information and ensuring that all records within the Trust are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulation (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 originally intended.

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

The retention periods outlined in this policy are good practice guidelines only, and individual academies should ensure that they consider requirements specific to their academy when implementing these timeframes in consultation with the Trust. The tables for retention periods are based on information provided by the Information Records Management Society (IRMS) and are not an exhaustive list of records that may be kept by academies. Where the IRMS has not provided guidance for disposal methods or retention periods, good practice recommendations have been provided in **orange and bold**.

## **Legal framework**

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

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

This policy also has due regard to the following guidance:

- Information Records Management Society 'Information Management Toolkit for Schools 2019'

## **Scope of the policy**

This policy applies to all records created, received or maintained by permanent or temporary staff of the trust in the course of carrying out its functions. Also, by agents, contractors, consultants or third parties action on behalf of the trust.

Records are defined as all those documents which facilitate the business carried out by the trust and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard or electronic format e.g. paper documents, emails, skype conversations, notes of telephone calls, text messages, word documents, presentations etc.

## **Responsibilities**

The Trust has a statutory responsibility to maintain the trusts records and record keeping systems in accordance with the regulatory environment specific to it and its academies.

Each academy has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements and this policy.

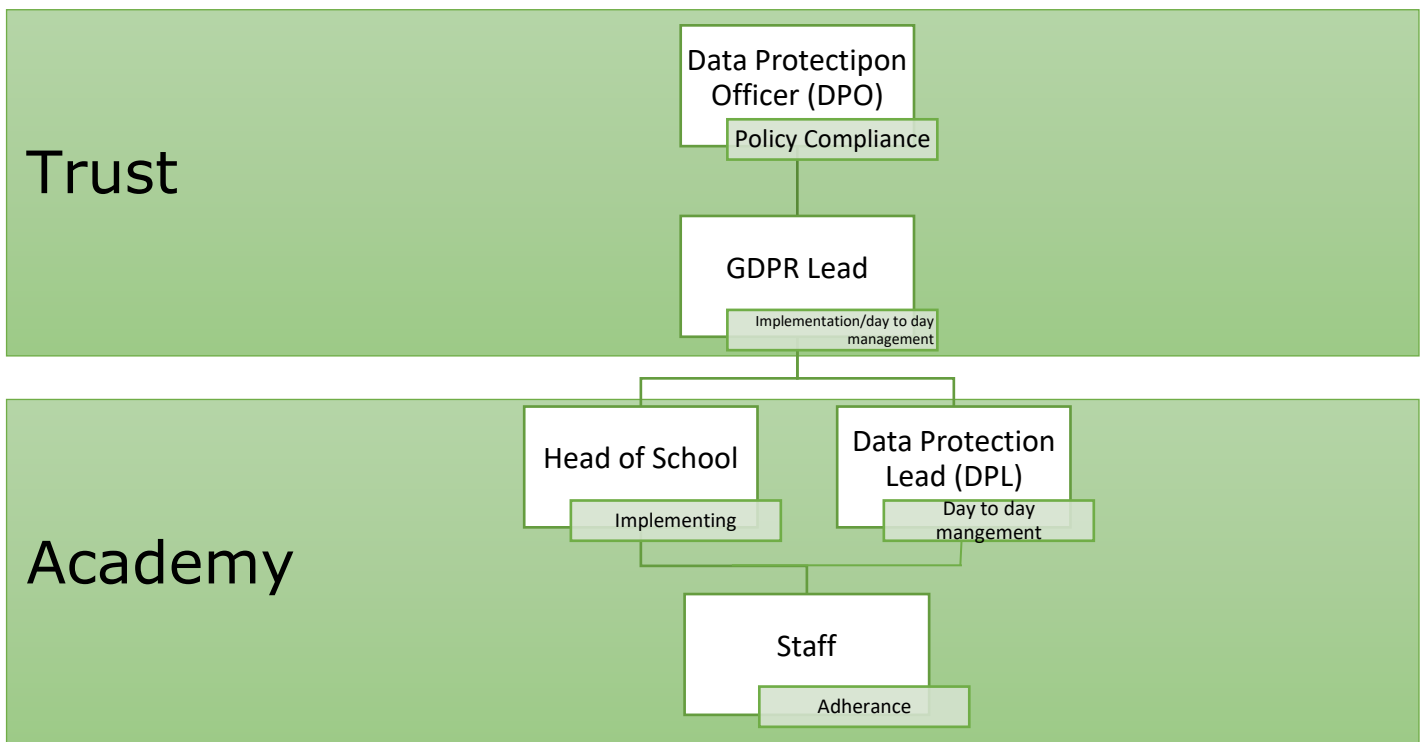
The Head of School is responsible for ensuring this policy is implemented correctly at their own academy.

The GDPR Lead will be responsible for the day to day management of records at the trust.

The Data Protection Officer is responsible for promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the GDPR Lead and Audit and Compliance committee.

The Data Protection Lead at each academy is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of correctly.

All Trust staff are responsible for ensuring that any records for which they are responsible are accurate, maintained, secure and disposed of correctly, in line with the provisions of this policy.



### Creation and Management of School Archives

The John Taylor Multi Academy Trust archive is maintained as a resource to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging and shared heritage; to prompt memories of school-life among many generations of students and staff; and to serve as a research resource for all interested in the history of John Taylor Multi Academy Trust, its academies and the communities they serve.

## **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 or academy that a pupil attends and includes all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.

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

- Forename, surname, gender and date of birth

- Unique pupil number
- Note of the date when the file was opened
- Note of the date when the file was closed, if appropriate

The following lists common and potential record types that form part of the Pupil Record:

- Admissions form
- Details of any SEND
- If the pupil has attended an early years setting, the record of transfer
- Fair processing notice – only the most recent notice will be included
- Annual written reports to parents
- National curriculum and agreed syllabus record sheets
- Notes relating to major incidents and accidents involving the pupil
- Any information about an education and healthcare (EHC) plan and support offered in relation to the EHC plan
- Any notes indicating child protection disclosures and reports are held
- Any information relating to exclusions
- Any correspondence with parents or external agencies relating to major issues, e.g. mental health
- Notes indicating that records of complaints made by parents or the pupil are held
- Examination results – pupil copy
- SATS Results

The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the pupil in an **appropriate secure location**: they should not be forwarded to the pupils' next school

- Attendance Registers and Information
- Absence notes and correspondence
- Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
- Accident forms (a copy can be placed on the pupil record if it is a major incident)
- Medicine consent and administering records
- Copies of birth certificates, passports, etc.
- Correspondence with parents about minor issues, e.g. behaviour
- Pupil work and drawings
- Previous data collection forms which have been superseded

Hard copies of disclosures and reports relating to child protection are stored in a securely locked filing cabinet in a securely locked room – a note indicating this is marked on the pupil's file.

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

Actual copies of accident and incident information are stored separately on the individual academies' 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.

Each 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 pupil's file have a shorter retention period and may need to be removed. In such cases, a named individual will be responsible for disposing records and will remove these records.

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

**Secondary academies including sixth forms.** If any pupil attends the school until statutory school leaving age, the school will keep the pupil's records until the pupil reaches the age of 25 years.

Each 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 school.

### **1 Governing Body & Trust Board**

This section contains retention periods connected to the work and responsibilities of the governing body and trust board. For the purposes of this section these two groups are interchangeable.

| <b>1.1 Management of Governing Body / Trust Board</b> |   |                             |   |   |                             |
|---|---|-----------------------------|---|---|-----------------------------|
|   | <b>Basic file description</b>   | <b>Statutory Provisions</b> | <b>Retention Period [Operational]</b>   | <b>Action at end of the administrative life of the record</b> | <b>Personal Information</b> |
| 1.1.1   | Instruments of government   |                             | For the life of the school  | Consult local archives before disposal                        |                             |
| 1.1.2   | Trusts and endowments   |                             | For the life of the school  | Consult local archives before disposal                        |                             |
| 1.1.3   | Records relating to the election of parent and staff governors not appointed by the governors |                             | Date of election + 6 months   | SECURE DISPOSAL   | Yes                         |
| 1.1.4   | Records relating to the appointment of co-opted governors                                     |                             | Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children). In this case retain for 25 years | SECURE DISPOSAL   | Yes                         |

|        |   |  |  |   |           |
|--------|---|--|--|---|-----------|
| 1.1.5  | Records relating to the election of chair and vice chair                    |  | Once the decision has been recorded in the minutes, the records relating to the election can be destroyed  | SECURE DISPOSAL                                       | Yes       |
| 1.1.6  | Scheme of delegation and terms of reference for committees                  |  | Until superseded or whilst relevant [Schools may wish to retain these records for reference purposes in case decisions need to be justified]                     | These could be offered to the archives if appropriate |           |
| 1.1.7  | Meetings schedule   |  | Current year   | STANDARD DISPOSAL                                     |           |
| 1.1.8  | Agendas - principal copy  |  | Where possible the agenda should be stored with the principal set of the minutes   | Consult local archives before disposal                | Potential |
| 1.1.9  | Minutes - principal set (signed)  |  | Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting | Consult local archives before disposal                | Potential |
| 1.1.10 | Reports made to the governors' meeting which are referred to in the minutes |  | Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting | Consult local archives before disposal                | Potential |
| 1.1.11 | Register of attendance at Full governing board meetings                     |  | Date of last meeting in the book + 6 years   | SECURE DISPOSAL                                       | Yes       |

|        |   |  |   |  |           |
|--------|---|--|---|--|-----------|
| 1.1.12 | Papers relating to the management of the annual parents' meeting                              |  | Date of meeting + 6 years   | SECURE DISPOSAL                        | Yes       |
| 1.1.13 | Agendas - additional copies   |  | Date of meeting   | STANDARD DISPOSAL                      |           |
| 1.1.14 | Records relating to Governor Monitoring Visits  |  | Date of the visit + 3 years   | SECURE DISPOSAL                        | Yes       |
| 1.1.15 | Annual Reports required by the DoE  |  | Date of report + 10 years   | SECURE DISPOSAL                        |           |
| 1.1.16 | All records relating to the conversion of schools to Academy status                           |  | For the life of the organisation  | Consult local archives before disposal |           |
| 1.1.17 | Records relating to complaints made to and investigated by the governing body or head teacher |  | Major complaints:<br>current year + 6 years. If negligence involved then:<br>current year + 15 years<br>If child protection or safeguarding issues are involved then: current year + 40 years | SECURE DISPOSAL                        | Yes       |
| 1.1.18 | Correspondence sent and received by the governing body or head teacher                        |  | General correspondence should be retained for current year + 3 years  | SECURE DISPOSAL                        | Potential |
| 1.1.19 | Action plans created and administered by the governing body                                   |  | Until superseded or whilst relevant   | SECURE DISPOSAL                        |           |

|        |   |  |   |  |  |
|--------|---|--|---|--|--|
| 1.1.20 | Policy documents created and administered by the governing body |  | Until superseded [The school/trust should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the IICSA has issued its recommendations.] |  |  |
|--------|---|--|---|--|--|

## 1.2 Governor Management

|       | Basic file description  | Statutory Provisions | Retention Period [Operational]  | Action at end of the administrative life of the record | Personal Information |
|-------|---|----------------------|---|--|----------------------|
| 1.2.1 | Records relating to the appointment of a clerk to the governing body                            |                      | Date on which clerk appointment ceases + 6 years  | SECURE DISPOSAL  | Yes                  |
| 1.2.2 | Records relating to the terms of office of serving governors, including evidence of appointment |                      | Date appointment ceases + 6 years   |  | Yes                  |
| 1.2.3 | Records relating to governor declaration against disqualification criteria                      |                      | Date appointment ceases + 6 years   | SECURE DISPOSAL  | Yes                  |
| 1.2.4 | Register of business interests  |                      | Date appointment ceases + 6 years   | SECURE DISPOSAL  | Yes                  |
| 1.2.5 | Governors Code of Conduct   |                      | This is expected to be a dynamic document; one copy of each version should be kept for the life of the organisation |  |                      |

|       |   |  |                                    |                 |     |
|-------|---|--|------------------------------------|-----------------|-----|
| 1.2.6 | Records relating to the training required and received by Governors                   |  | Date Governor steps down + 6 years | SECURE DISPOSAL | Yes |
| 1.2.7 | Records relating to the induction programme for new governors                         |  | Date appointment ceases + 6 years  | SECURE DISPOSAL | Yes |
| 1.2.8 | Records relating to DBS checks carried out on clerk and members of the governing body |  | Date of DBS check + 6 months       | SECURE DISPOSAL | Yes |
| 1.2.9 | Governor personnel files  |  | Date appointment ceases + 6 years  | SECURE DISPOSAL | Yes |

## **2 Management of the School**

This section contains retention periods connected to the processes involved in managing the school, including Human Resources, Financial Management, Payroll and Property Management.

### **2.1 Head Teacher and Senior Management Team**

|       | <b>Basic file description</b>   | <b>Statutory Provisions</b> | <b>Retention Period [Operational]</b>   | <b>Action at end of the administrative life of the record</b>  | <b>Personal Information</b> |
|-------|---|-----------------------------|---|--|-----------------------------|
| 2.1.1 | Log books of activity in the school maintained by the Head Teacher                                  |                             | Date of last entry in the book + minimum of 6 years, then review                    | These could be of permanent historical value and should be offered to the County Archives Service if appropriate | Potential                   |
| 2.1.2 | Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies |                             | Date of the meeting + 3 years then review annually, or as required if not destroyed | SECURE DISPOSAL  | Potential                   |

|       |  |  |                           |
|-------|--|--|---------------------------|
| 2.1.3 | Reports created by the Head Teacher or the Management Team   | Date of the report + a minimum of 3 years then review annually or as required if not destroyed             | SECURE DISPOSAL Potential |
| 2.1.4 | Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities which do not fall under any other category | Current academic year + 6 years then review annually, or as required if not destroyed                      | SECURE DISPOSAL Potential |
| 2.1.5 | Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities                                     | Current year + 3 years   | SECURE DISPOSAL Potential |
| 2.1.6 | Professional development plans   | These should be held on the individual's personnel record. If not then termination of employment + 6 years | SECURE DISPOSAL Potential |
| 2.1.7 | School development plans   | Life of the plan + 3 years   | SECURE DISPOSAL           |

| <b>2.2 Operational Administration</b> |   |                             |  |  |                             |
|---------------------------------------|---|-----------------------------|--|--|-----------------------------|
|                                       | <b>Basic file description</b>   | <b>Statutory Provisions</b> | <b>Retention Period [Operational]</b>  | <b>Action at end of the administrative life of the record</b>                  | <b>Personal Information</b> |
| 2.2.1                                 | General file series which do not fit under any other category                                   |                             | Current year + 5 years, then review  | SECURE DISPOSAL  | Potential                   |
| 2.2.2                                 | Records relating to the creation and publication of the school brochure or prospectus           |                             | Current academic year + 3 years  | The school could preserve a copy for their archive otherwise STANDARD DISPOSAL |                             |
| 2.2.3                                 | Records relating to the creation and distribution of circulars to staff, parents or pupils      |                             | Current academic year + 1 year   | STANDARD DISPOSAL  |                             |
| 2.2.4                                 | School Privacy Notice which is sent to parents as part of GDPR compliance                       |                             | Until superseded + 6 years   |  |                             |
| 2.2.5                                 | Consents relating to school activities as part of GDPR compliance                               |                             | Consent will last whilst the pupil attends the school, it can therefore be destroyed when the pupil leaves | SECURE DISPOSAL  | Yes                         |
| 2.2.6                                 | Newsletters and other items with a short operational use  |                             | Current academic year + 1 year [Schools may archive one copy]  | STANDARD DISPOSAL  |                             |
| 2.2.7                                 | Visitor management systems (including electronic systems, visitors books and signing-in sheets) |                             | Last entry in the visitors book + 6 years (in case of claims by parents or pupils about various actions).  | SECURE DISPOSAL  | Yes                         |
| 2.2.8                                 | Walking bus registers   |                             | Date of register + 6 years   | SECURE DISPOSAL  | Yes                         |

| <b>2.3 Human Resources</b> |  |  |  |   |                             |
|----------------------------|--|--|--|---|-----------------------------|
|                            | <b>Basic file description</b>  | <b>Statutory Provisions</b>  | <b>Retention Period [Operational]</b>  | <b>Action at end of the administrative life of the record</b> | <b>Personal Information</b> |
| <b>Recruitment</b>         |  |  |  |   |                             |
| 2.3.1                      | All records leading up to the appointment of a headteacher   |  | Unsuccessful attempts. Date of appointment plus 6 months. Add to personnel file and retain until end of appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years | SECURE DISPOSAL   | Yes                         |
| 2.3.2                      | All records leading up to the appointment of a member of staff/governor – unsuccessful candidates          |  | Date of appointment of successful candidate + 6 months   | SECURE DISPOSAL   | Yes                         |
| 2.3.3                      | Pre-employment vetting information – DBS Checks – successful candidates                                    | DBS Update Service Employer Guide June 2014; Keeping Children Safe in Education 2018 | Application forms, references and other documents – for the duration of the employee’s employment + 6 years  | SECURE DISPOSAL   | Yes                         |
| 2.3.4                      | Forms of proof of identity collected as part of the process of checking “portable” enhanced DBS disclosure |  | Where possible this process should be carried out using the on-line system. If it is necessary to take a copy of documentation then it should be retained on the staff personal file.                        | SECURE DISPOSAL   | Yes                         |

|       |   |   |   |                     |
|-------|---|---|---|---------------------|
| 2.3.5 | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom – successful candidates | An Employer’s Guide to Right to Work Checks [Home Office, May 2015] | Where possible these documents should be added to the staff personnel file [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of employment + not less than 2 years | SECURE DISPOSAL Yes |
|-------|---|---|---|---------------------|

### Operational Staff Management

|       |                                     |                                 |  |                     |
|-------|-------------------------------------|---------------------------------|--|---------------------|
| 2.3.6 | Staff personnel file                | Limitation Act 1980 (Section 2) | Termination of Employment + 6 years, unless the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA concludes. | SECURE DISPOSAL Yes |
| 2.3.7 | Annual appraisal/assessment records |                                 | Current year + 6 years   | SECURE DISPOSAL Yes |

## Operational Staff Management

|        |  |   |                     |
|--------|--|---|---------------------|
| 2.3.8  | Sickness absence monitoring  | <p>Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records.</p> <p>Where sickness pay is not paid then current year + 3 years is acceptable, whilst if sickness pay is made then it becomes a financial record and current year + 6 years applies.</p> | SECURE DISPOSAL Yes |
| 2.3.9  | Staff training – where the training leads to continuing professional development         | Length of time required by the professional body  | SECURE DISPOSAL Yes |
| 2.3.10 | Staff training – except where dealing with children, e.g. first aid or health and safety | This should be retained on the personnel file [see 2.3.1 above]   | SECURE DISPOSAL Yes |

## Operational Staff Management

|        |   |   |                 |     |
|--------|---|---|-----------------|-----|
| 2.3.11 | Staff training – where the training relates to children (e.g. safeguarding or other child related training) | Date of the training + 40 years<br>[This retention period reflects that the IICSA may wish to see training records as part of an investigation] | SECURE DISPOSAL | Yes |
|--------|---|---|-----------------|-----|

## Disciplinary and Grievance Processes

Where schools are in any doubt as to which categories disciplinary records fall under, then HR or legal advice should be sought from the HR provider.

|        |   |  |   |   |     |
|--------|---|--|---|---|-----|
| 2.3.12 | Records relating to any allegation of a child protection nature against a member of staff | "Keeping children safe in education Statutory guidance for schools and colleges September 2018"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018" | Until the person's normal retirement age or 10 years from the date of the allegation (whichever is the longer) then REVIEW. Note: allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned UNLESS the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete | SECURE DISPOSAL<br>These records must be shredded | Yes |
|--------|---|--|---|---|-----|

|        |                          |  |  |  |     |
|--------|--------------------------|--|--|--|-----|
| 2.3.13 | Disciplinary proceedings |  |  |  | Yes |
|--------|--------------------------|--|--|--|-----|

|  | Basic file description | Statutory Provisions [Operational] | Retention Period | Action at end of the Personal administrative life Information of the record |
|--|------------------------|------------------------------------|------------------|---|
|--|------------------------|------------------------------------|------------------|---|

### Disciplinary and Grievance Processes

**Note:**

The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.

Any disciplinary proceedings data will be a record of an important event in the course of the employer’s relationship with the employee. Should the same employee be accused of similar misconduct five years down the line, and them defend him- or herself by saying “I would never do something like that”, reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had “fifteen years of unblemished service”, the record of the disciplinary proceedings would be effective evidence to counter this claim.

Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be “removed from the file”. This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.

|  |                           |  |   |                 |  |
|--|---------------------------|--|---|-----------------|--|
|  | Oral warning              |  | Date of warning + 6 months  | SECURE DISPOSAL |  |
|  | Written warning – level 1 |  | Date of warning + 6 months  |                 |  |
|  | Written warning – level 2 |  | Date of warning + 12 months   |                 |  |
|  | Final warning             |  | Date of warning + 18 months   |                 |  |
|  | Case not found            |  | If the incident is related to child protection then see above, otherwise dispose of at the conclusion of the case | SECURE DISPOSAL |  |

### Payroll and Pensions

|        |                      |  |                              |                 |     |
|--------|----------------------|--|------------------------------|-----------------|-----|
| 2.3.14 | Absence record       |  | Current year + 3 years       | SECURE DISPOSAL | Yes |
| 2.3.15 | Batches              | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years       | SECURE DISPOSAL | Yes |
| 2.3.16 | Bonus sheets         | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 3 years       | SECURE DISPOSAL | Yes |
| 2.3.17 | Car allowance claims | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 3 years       | SECURE DISPOSAL | Yes |
| 2.3.18 | Car loans            | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Completion of loan + 6 years | SECURE DISPOSAL | Yes |
| 2.3.19 | Car mileage output   | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years       | SECURE DISPOSAL | Yes |
| 2.3.20 | Elements             |  | Current year + 2 years       | SECURE DISPOSAL | Yes |
| 2.3.21 | Income tax form P60  |  | Current year + 6 years       | SECURE DISPOSAL | Yes |

|        |   |  |                        |                 |     |
|--------|---|--|------------------------|-----------------|-----|
| 2.3.22 | Insurance                                 | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.23 | Maternity payment                         |  | Current year + 3 years | SECURE DISPOSAL | Yes |
| 2.3.24 | Members allowance register                | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.25 | National Insurance – schedule of payments | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.26 | Overtime                                  | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 3 years | SECURE DISPOSAL | Yes |
| 2.3.27 | Part time fee claims                      | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.28 | Pay packet receipt by employee            |  | Current year + 2 years | SECURE DISPOSAL | Yes |
| 2.3.29 | Payroll awards                            |  | Current year + 6 years | SECURE DISPOSAL | Yes |

## Payroll and Pensions

|        |                                       |  |                            |                 |     |
|--------|---------------------------------------|--|----------------------------|-----------------|-----|
| 2.3.30 | Payroll – gross/net weekly or monthly | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years     | SECURE DISPOSAL | Yes |
| 2.3.31 | Payroll reports                       | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years     | SECURE DISPOSAL | Yes |
| 2.3.32 | Payslips – copies                     | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years     | SECURE DISPOSAL | Yes |
| 2.3.33 | Pension payroll                       | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years     | SECURE DISPOSAL | Yes |
| 2.3.34 | Personal bank details                 | If employment ceases then end of employment + 6 years          | Until superseded + 3 years | SECURE DISPOSAL | Yes |
| 2.3.35 | Sickness records                      |  | Current year + 3 years     | SECURE DISPOSAL | Yes |
| 2.3.36 | Staff returns                         |  | Current year + 3 years     | SECURE DISPOSAL | Yes |
| 2.3.37 | Superannuation adjustments            | Taxes Management Act 1970<br>Income and Corporation Taxes 1988 | Current year + 6 years     | SECURE DISPOSAL | Yes |

|        |                                       |  |                        |                 |     |
|--------|---------------------------------------|--|------------------------|-----------------|-----|
|        | Superannuation reports                | Taxes Management Act 1970<br>Income and Corporation Taxes 1988   | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.38 | Tax forms P6/P11/P11D/P35/P45/P46/P48 | The minimum requirement - as stated in Inland Revenue Booklet 490 - is for at least 3 years after the end of the tax year to which they apply. Originals must be retained in paper/ electronic format. It is a corporate decision to retain for current year + 6 years. Employees should retain records for 22 months after current tax year | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.3.39 | Time sheets/clock cards/flexitime     |  | Current year + 3 years | SECURE DISPOSAL | Yes |

## 2.4 Health and Safety

|       |   |   |   |                 |     |
|-------|---|---|---|-----------------|-----|
| 2.4.1 | Health and safety policy statements   |   | Life of policy + 3 years  | SECURE DISPOSAL |     |
| 2.4.2 | Health and safety risk assessments  |   | Life of risk assessment + 3 years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred  | SECURE DISPOSAL |     |
| 2.4.3 | Accident reporting records relating to individuals who are over 18 years of age at the time of the incident | <p>Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</p> <p>Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628</p> <p>Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628</p> <p>Social Security Administration Act 1992 Section 8.</p> <p>Social Security (Claims and Payments) Amendment (No 30) Regulations 1993 SI 1993 No 2113</p> <p>Allows the information to be kept electronically</p> | <p>The Accident Book – BI 510 - 3 years after last entry in the book</p> <p>This includes the new format to be used from 1/1/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR</p> | SECURE DISPOSAL | Yes |

## 2.4 Health and Safety

|       |  |  |   |                 |     |
|-------|--|--|---|-----------------|-----|
| 2.4.4 | Accident reporting records relating to individuals who are under 18 years of age at the time of the incident   | <p>Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</p> <p>Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628</p> <p>Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628</p> <p>Social Security Administration Act 1992 Section 8.</p> <p>Social Security (Claims and Payments) Amendment (No 30 Regulations 1993 SI 1993 No 2113</p> <p>Allows the information to be kept electronically</p> | <p>The Accident Book – BI 510 - 3 years after last entry in the book</p> <p>This includes the new format to be used from 1/1/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR</p> | SECURE DISPOSAL | Yes |
| 2.4.5 | Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see <a href="http://www.hse.gov.uk/RIDDOR/">http://www.hse.gov.uk/RIDDOR/</a> | Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2)  | Date of incident + 3 years provided that all records relating to the incident are held on personnel file [see 2.4.2 above]  | SECURE DISPOSAL | Yes |

|       |   |  |  |                 |  |
|-------|---|--|--|-----------------|--|
| 2.4.6 | Control of Substances Hazardous to Health (COSHH)   | Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2) | Date of incident + 40 years  | SECURE DISPOSAL |  |
| 2.4.7 | Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos   | Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19  | Last action + 40 years   | SECURE DISPOSAL |  |
| 2.4.8 | Process of monitoring of areas where employees and persons are likely to have come into contact with radiation. Maintenance records or controls, safety features and PPE<br>-----<br>-----<br>Dose assessment and recording | The Ionising Radiation Regulations 2017. SI 2017 No 1075 Regulation 11<br><br>As amended by SI 2018 No 390 Personal Protective Equipment (Enforcement) Regulations 2018  | 2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination.<br>-----<br>-----<br>To keep the records made and maintained (or a copy of these records) until the person to whom the record relates has or would have attained the age of 75 years, but in any event for at least 30 years from when the record was made | SECURE DISPOSAL |  |
| 2.4.9 | Fire Precautions log books  |  | Current year + 3 years   | SECURE DISPOSAL |  |

|        |  |  |   |  |  |
|--------|--|--|---|--|--|
| 2.4.10 | Health and safety file to show current state of building, including all alterations (wiring, plumbing, building works, etc.), to be passed on in the case of change of ownership |  | Pass to new owner on sale or transfer of building |  |  |
|--------|--|--|---|--|--|

## 2.5 Financial Management

### Risk Management and Insurance

|       |  |  |   |  |  |
|-------|--|--|---|--|--|
| 2.5.1 | Employer's Liability Insurance Certificate |  | Closure of the school + 40 years [May be kept electronically] | SECURE DISPOSAL To be passed to the Local Authority if the school closes |  |
|-------|--|--|---|--|--|

### Asset Management

|       |  |  |                        |                 |  |
|-------|--|--|------------------------|-----------------|--|
| 2.5.2 | Inventories of furniture and equipment     |  | Current year + 6 years | SECURE DISPOSAL |  |
| 2.5.3 | Burglary, theft and vandalism report forms |  | Current year + 6 years | SECURE DISPOSAL |  |

### Accounts and Statements (including budget management)

|       |  |  |   |                   |  |
|-------|--|--|---|-------------------|--|
| 2.5.4 | Annual accounts                        |  | Current year + 6 years                                  | STANDARD DISPOSAL |  |
| 2.5.5 | Loans and grants managed by the school |  | Date of last payment on the loan + 12 years then review | SECURE DISPOSAL   |  |

### Accounts and Statements (including budget management)

|       |   |  |                                  |                 |  |
|-------|---|--|----------------------------------|-----------------|--|
| 2.5.6 | All records relating to the creation and management of budgets, including the annual budget statement and background papers |  | Life of the budget + 3 years     | SECURE DISPOSAL |  |
| 2.5.7 | Invoices, receipts, order books and requisitions, delivery notices  |  | Current financial year + 6 years | SECURE DISPOSAL |  |
| 2.5.8 | Records relating to the collection and banking of monies  |  | Current financial year + 6 years | SECURE DISPOSAL |  |
| 2.5.9 | Records relating to the identification and collection of debt   |  | Final payment of debt + 6 years  | SECURE DISPOSAL |  |

### Pupil Finance

|        |                            |  |   |                 |     |
|--------|----------------------------|--|---|-----------------|-----|
| 2.5.10 | Student Grant applications |  | Current year + 3 years                    | SECURE DISPOSAL | Yes |
| 2.5.11 | Pupil Premium Fund records |  | Date pupil leaves the provision + 6 years | SECURE DISPOSAL | Yes |

### Contract Management

|        |   |                     |   |                 |  |
|--------|---|---------------------|---|-----------------|--|
| 2.5.12 | All records relating to the management of contracts under seal      | Limitation Act 1980 | Last payment on the contract + 12 years | SECURE DISPOSAL |  |
| 2.5.13 | All records relating to the management of contracts under signature | Limitation Act 1980 | Last payment on the contract + 6 years  | SECURE DISPOSAL |  |

|        |   |  |                                  |                 |  |
|--------|---|--|----------------------------------|-----------------|--|
| 2.5.14 | Records relating to the monitoring of contracts |  | Life of contract + 6 or 12 years | SECURE DISPOSAL |  |
|--------|---|--|----------------------------------|-----------------|--|

## 2.5 Financial Management

### School Fund

|        |                               |  |                        |                 |  |
|--------|-------------------------------|--|------------------------|-----------------|--|
| 2.5.15 | School Fund - Cheque books    |  | Current year + 6 years | SECURE DISPOSAL |  |
| 2.5.16 | School Fund - Paying in books |  | Current year + 6 years | SECURE DISPOSAL |  |
| 2.5.17 | School Fund - Ledger          |  | Current year + 6 years | SECURE DISPOSAL |  |
| 2.5.18 | School Fund - Invoices        |  | Current year + 6 years | SECURE DISPOSAL |  |
| 2.5.19 | School Fund - Receipts        |  | Current year + 6 years | SECURE DISPOSAL |  |
| 2.5.20 | School Fund - Bank statements |  | Current year + 6 years | SECURE DISPOSAL |  |
| 2.5.21 | School Fund - Journey Books   |  | Current year + 6 years | SECURE DISPOSAL |  |

### School Meals Management

|        |   |  |                        |                 |     |
|--------|---|--|------------------------|-----------------|-----|
| 2.5.22 | Free school meals registers (where the register is used as a basis for funding) |  | Current year + 6 years | SECURE DISPOSAL | Yes |
| 2.5.23 | School meals registers  |  | Current year + 3 years | SECURE DISPOSAL | Yes |
| 2.5.24 | School meals summary sheets   |  | Current year + 3 years | SECURE DISPOSAL | Yes |

## 2.6 Property Management

## Property Management

|       |  |  |  |                 |  |
|-------|--|--|--|-----------------|--|
| 2.6.1 | Title deeds of properties belonging to the school  |  | These should follow the property unless the property has been registered with the Land Registry  |                 |  |
| 2.6.2 | Plans of property belonging to the school          |  | These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10 |                 |  |
| 2.6.3 | Leases of property leased by or to the school      |  | Expiry of lease + 6 years  | SECURE DISPOSAL |  |
| 2.6.4 | Records relating to the letting of school premises |  | Current financial year + 6 years   | SECURE DISPOSAL |  |

## Maintenance

|       |  |  |  |                 |  |
|-------|--|--|--|-----------------|--|
| 2.6.5 | All records relating to the maintenance of the school carried out by contractors |  | These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10 | SECURE DISPOSAL |  |
|-------|--|--|--|-----------------|--|

|       |  |  |  |                 |  |
|-------|--|--|--|-----------------|--|
| 2.6.6 | All records relating to the maintenance of the school carried out by school employees, including maintenance log books |  | These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10 | SECURE DISPOSAL |  |
|-------|--|--|--|-----------------|--|

### 3 Pupil Management

This section contains retention periods connected to the processes involved in managing a pupil's journey through school, including the admissions process.

#### 3.1 Admissions Process

|       |   |   |  |                 |     |
|-------|---|---|--|-----------------|-----|
| 3.1.1 | All records relating to the creation and implementation of the School Admissions Policy | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Life of the policy + 3 years then review | SECURE DISPOSAL |     |
| 3.1.2 | Admissions – if the admission is successful   | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Date of admission + 1 year               | SECURE DISPOSAL | Yes |
| 3.1.3 | Admissions – if the appeal is unsuccessful  | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Resolution of case + 1 year              | SECURE DISPOSAL | Yes |

|         |   |   |  |  |     |
|---------|---|---|--|--|-----|
| 3.1.4   | Register of Admissions  | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made | REVIEW<br>Schools may wish to consider keeping the admission register permanently as an archive record as often schools receive enquiries from past pupils to confirm the dates they attended the school or to transfer these records to the appropriate County Archives Service |     |
| 3.1.5   | Admissions – Secondary Schools – Casual   |   | Current year + 1 year  | SECURE DISPOSAL  | Yes |
| 3.1.6   | Proofs of address supplied by parents as part of the admissions process                                   | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Current year + 1 year  | SECURE DISPOSAL  | Yes |
| 3.1.7   | Supplementary information form including additional information such as religion, medical conditions etc. |   |  |  | Yes |
| 3.1.7.1 | For successful admissions   |   | This information should be added to the pupil file   | SECURE DISPOSAL  |     |
| 3.1.7.2 | For unsuccessful admissions   |   | Until appeals process completed (GDPR)   | SECURE DISPOSAL  |     |

## 3.2 Pupil's Educational Record

**Please note** that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.

|         |   |  |   |   |     |
|---------|---|--|---|---|-----|
| 3.2.1   | Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 | The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 As amended by SI 2018 No 688 |   |   | Yes |
| 3.2.1.1 | Primary   |  | Retain whilst the child remains at the primary school | The file should follow the pupil when he/she leaves the primary school. This will include: <ul style="list-style-type: none"> <li>• To another primary school</li> <li>• To a secondary school</li> <li>• To a pupil referral unit</li> </ul> |     |
| 3.2.1.2 | Secondary   | Limitation Act 1980 (Section 2)  | Date of birth of the pupil + 25 years                 | REVIEW  |     |
| 3.2.2   | Examination Results – pupil copies  |  |   |   | Yes |
| 3.2.2.1 | Public  |  | This information should be added to the pupil file    | All uncollected certificates should be returned to the examination board after reasonable attempts to contact the pupil have failed   |     |
| 3.2.2.2 | Internal  |  | This information should be added to the pupil file    |   |     |

|       |   |  |  |  |     |
|-------|---|--|--|--|-----|
| 3.2.3 | Child protection information held on pupil file     | "Keeping children safe in education Statutory guidance for schools and colleges 2018"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018" | If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file. Note: These records will be subject to any instruction given by IICSA  | SECURE DISPOSAL These records must be shredded | Yes |
| 3.2.4 | Child protection information held in separate files | "Keeping children safe in education Statutory guidance for schools and colleges 2018"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018" | DOB of the child + 25 years then review<br>This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record<br>Note: These records will be subject to any instruction given by IICSA | SECURE DISPOSAL These records must be shredded | Yes |

### 3.3 Attendance

Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.

|       |   |  |  |                 |           |
|-------|---|--|--|-----------------|-----------|
| 3.3.1 | Attendance Registers  | School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014 | Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made. | SECURE DISPOSAL | Yes       |
| 3.3.2 | Correspondence relating to any absence (authorised or unauthorised) | Education Act 1996 Section 7   | Current academic year + 2 years  | SECURE DISPOSAL | Potential |

### 3.3 Attendance

Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule.

|       |   |  |  |                 |     |
|-------|---|--|--|-----------------|-----|
| 3.4.1 | Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy | Children and Family's Act 2014; Special Educational Needs and Disability Act 2001 Section 14 | Date of birth of the pupil + 31 years [Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act] | SECURE DISPOSAL | Yes |
|-------|---|--|--|-----------------|-----|

## 4 Curriculum and Extra Curricular Activities

This section contains retention periods connected to the processes involved in managing the curriculum and extra-curricular activities.

### 4.1 Statistics and Management Information

|         |                                     |  |                        |                 |     |
|---------|-------------------------------------|--|------------------------|-----------------|-----|
| 4.1.1   | Curriculum returns                  |  | Current year + 3 years | SECURE DISPOSAL | No  |
| 4.1.2   | Examination Results (school's copy) |  | Current year + 6 years | SECURE DISPOSAL | Yes |
| 4.1.2.1 | SATS records                        |  |                        |                 | Yes |

|         |  |  |   |                 |     |
|---------|--|--|---|-----------------|-----|
| 4.1.2.2 | Results                                  |  | The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all of the whole year's SATs results. These could be kept for current year + 6 years to allow suitable comparison | SECURE DISPOSAL |     |
| 4.1.2.3 | Examination Papers                       |  | The examination papers should be kept until any appeals/validation process is complete  | SECURE DISPOSAL |     |
| 4.1.3   | Published Admission Number (PAN) Reports |  | Current year + 6 years  | SECURE DISPOSAL | Yes |

#### 4.1 Statistics and Management Information

|         |                                 |  |                                    |                 |     |
|---------|---------------------------------|--|------------------------------------|-----------------|-----|
| 4.1.4   | Value Added and Contextual Data |  | Current year + 6 years             | SECURE DISPOSAL | Yes |
| 4.1.5   | Self-Evaluation Forms           |  |                                    | SECURE DISPOSAL | Yes |
| 4.1.5.1 | Internal moderation             |  | Academic year plus 1 academic year | SECURE DISPOSAL | Yes |
| 4.1.5.2 | External moderation             |  | Until superseded                   | SECURE DISPOSAL | Yes |

#### 4.2 Implementation of Curriculum

|       | Basic file description | Statutory Provisions | Retention Period [Operational] | Action at end of the administrative life of the record | Personal Information |
|-------|------------------------|----------------------|--------------------------------|--|----------------------|
| 4.2.1 | Schemes of work        |                      | Current year + 1 year          | It may be appropriate to review these                  |                      |
|       |                        |                      |                                |  |                      |

|       |                        |  |   |  |  |
|-------|------------------------|--|---|--|--|
| 4.2.2 | Timetable              |  | Current year + 1 year   | records at the end of each year and allocate a further retention period or SECURE DISPOSAL |  |
| 4.2.3 | Class record books     |  | Current year + 1 year   |  |  |
| 4.2.4 | Mark books             |  | Current year + 1 year   |  |  |
| 4.2.5 | Record of homework set |  | Current year + 1 year   |  |  |
| 4.2.6 | Pupil's work           |  | Where possible, the pupil's work should be returned to the pupil at the end of the academic year. If this is not the school's policy then current year + 1 year | SECURE DISPOSAL  |  |

### 4.3 School Trips

|       |  |  |  |                 |     |
|-------|--|--|--|-----------------|-----|
| 4.3.1 | Parental consent forms for school trips where there has been no major incident |  | Although the consent forms could be retained for Date of birth + 22 years, the school may wish to complete a risk assessment to assess whether the forms are likely to be required and could make a decision to dispose of the consent forms at the end of the trip (or at the end of the academic year). This is a pragmatic approach and if in doubt the school should | SECURE DISPOSAL | Yes |
|-------|--|--|--|-----------------|-----|

|       |  |                                 |   |                 |     |
|-------|--|---------------------------------|---|-----------------|-----|
|       |  |                                 | seek legal advice   |                 |     |
| 4.3.2 | Parental permission slips for school trips – where there has been a major incident | Limitation Act 1980 (Section 2) | Date of birth of the pupil involved in the incident + 25 years<br>The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils | SECURE DISPOSAL | Yes |

#### 4.4 School Support Organisations

##### Family Liaison Officers and Home School Liaison Assistants

|       |  |  |   |                 |     |
|-------|--|--|---|-----------------|-----|
| 4.4.1 | Day books  |  | Current year + 2 years then review                                    | SECURE DISPOSAL | Yes |
| 4.4.2 | Reports for outside agencies - where the report has been included on the case file created by the outside agency |  | Whilst child is attending school and then destroy                     | SECURE DISPOSAL | Yes |
| 4.4.3 | Referral forms   |  | While the referral is current   | SECURE DISPOSAL | Yes |
| 4.4.4 | Contact data sheets  |  | Current year then review, if contact is no longer active then destroy | SECURE DISPOSAL | Yes |
| 4.4.5 | Contact database entries   |  | Current year then review, if contact is no longer active then destroy | SECURE DISPOSAL | Yes |
| 4.4.6 | Group registers  |  | Current year + 2 years  | SECURE DISPOSAL | Yes |

## Parent Teacher Associations and Old Pupils Associations

|       |   |  |                                    |                 |  |
|-------|---|--|------------------------------------|-----------------|--|
| 4.4.7 | Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations |  | Current year + 6 years then review | SECURE DISPOSAL |  |
|-------|---|--|------------------------------------|-----------------|--|

## 5 Central Government and Local Authority

This section covers records created in the course of interaction between the school and local authority

### 5.1 Local Authority

|       |   |  |                        |                 |     |
|-------|---|--|------------------------|-----------------|-----|
| 5.1.1 | Secondary Transfer Sheets (primary)                           |  | Current year + 2 years | SECURE DISPOSAL | Yes |
| 5.1.2 | Attendance returns  |  | Current year + 1 year  | SECURE DISPOSAL | Yes |
| 5.1.3 | School census returns   |  | Current year + 5 years | SECURE DISPOSAL |     |
| 5.1.4 | Circulars and other information sent from the local authority |  | Operational use        | SECURE DISPOSAL |     |

### 5.2 Central Government

|       |  |  |                                |                 |  |
|-------|--|--|--------------------------------|-----------------|--|
| 5.2.1 | OFSTED reports and papers where a physical copy is held      |  | Life of the report then review | SECURE DISPOSAL |  |
| 5.2.2 | Returns made to central government                           |  | Current year + 6 years         | SECURE DISPOSAL |  |
| 5.2.3 | Circulars and other information sent from central government |  | Operational use                | SECURE DISPOSAL |  |







**Storing and protecting information**

The GDPR Lead will undertake a risk analysis to identify which records are vital to Trust and individual academies' management and these records will be stored in the most secure manner.

Each academy will conduct a back-up of information in line with the current ICT Security – Backup Policy to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.

Where possible, backed-up information will be stored off the school premises, using a central back-up service operated.

Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.

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.

Where data is saved on removable storage or a portable device, the device is kept in a locked filing cabinet, drawer or safe when not in use.

Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.

All electronic devices are password-protected to protect the information on the device in case of theft.

Where possible, the Trust enables electronic devices to allow the remote blocking or deletion of data in case of theft.

Staff and governors do not use their own personal email addresses for school purposes.

All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password in line with the current ICT Security – Password Policy.

Emails containing sensitive or confidential information are password-protected to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate 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 GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.

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.

All staff members will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be 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 each academy containing sensitive information are supervised at all times.

The physical security of the Trust's buildings and storage systems, and access to them, is reviewed termly by the site manager in conjunction with the GDPR Lead. If an increased risk in vandalism, burglary or

theft is identified, this will be reported to the Head of School/headteacher and extra measures to secure data storage will be put in place.

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

The GDPR Lead is responsible for continuity and recovery measures are in place to ensure the security of protected data.

### **Accessing information**

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

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

- Know what information the Trust 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 is doing to comply with its obligations under the GDPR.

All members of staff, parents of registered pupils and other users of the Trust, its academies and its facilities have the right, under the 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 to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

### **Digital continuity statement**

Digital data that is retained for longer than six years will be named as part of a digital continuity statement.

The GDPR Lead will identify any digital data that will need to be named as part of a digital continuity statement.

The data will be archived to dedicated files on the Trust's servers, which are password-protected – this will be backed-up.

Memory sticks will never be used to store digital data, subject to a digital continuity statement.

The Strategic Network Manager 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 purpose and 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

## **Information audit**

The Trust conducts information audits on an annual basis against all information held by each academy to evaluate the information the academy is holding, receiving and using, and to ensure 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

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

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

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

- The Trust's and individual academies' 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 GDPR Lead 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 GDPR Lead will record all details on the Trust's Information Asset Register.

The information displayed on the Information Asset Register will be shared with the Board and each designated academy leader to gain their approval.

## **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.

Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut. The DP Lead will keep a record of all files that have been destroyed.

Where the disposal action is indicated as reviewed before it is disposed, the DP Lead will review the information against its administrative value – if the information should be kept for administrative value, the DP Lead 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 DP Lead 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

### **Monitoring and review**

This policy will be reviewed on an annual basis by the GDPR Lead in conjunction with the Board, CEO & Business Manager – the next scheduled review date for this policy is March 2019.

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