

## **Policy update 22/01/2024**

This policy has been updated to reference up to date legislation.

Section 2 Roles and responsibilities has added information on role of staff when pupils use personal information in projects

Section 3 has added information on retention of pupil records in certain circumstances

Section 15 has been added to include details of how each school and the trust records its processing activities



Policy for

Records Management

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Prepared by:	Adopted by Board of Directors
LT	<b>Spring 2024</b>

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## Statement of intent

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

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

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

The Aspire Educational Trust comprises of a central team and individual academies. The CEO is the data controller for the trust. For the purpose of implementing data protection policies each academy and the central team are data controllers in the own right and jointly with the Trust, depending on the data asset. In each academy, the principal is the data controller for school level data assets. In the trust central team, the CEO is the data controller for trust level data assets.

The Trust understands 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 have been developed using good practice guidelines based on information provided by the Information Records Management Society (IRMS) and the DfE.

This is not an exhaustive list of records that are being kept by schools across our trust. Where a record is not listed, schools will consult with the DPO to determine the specific justification for processing the data and determining a retention period in order to adhere to, and comply with the UK GDPR 'storage limitation' principle

## 1. Legal framework

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

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

This policy also has due regard to the following guidance:

- **[New]** DfE (2023) 'Data protection in schools'
- DfE (2018) 'Data protection: a toolkit for schools'
- **[Updated]** DfE (2023) 'Careers guidance and access for education and training providers'
- ESFA (2022) 'Record keeping and retention information for academies and academy trusts'
- Information Records Management Society (IRMS) (2019) 'Information Management Toolkit for Schools'
- IRMS (2019) 'Academies Toolkit'
- **[New]** ICO (2023) 'How do we document our processing activities?'
- **[New]** ICO (2023) 'Controllers checklist'

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

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

## 2. Roles and responsibilities

The retention guidelines in this document are intended for use by all academies within the Aspire Educational Trust.

Information can become a liability if it is not properly managed. We should know what information we hold, why we hold it, how sensitive it is, and how it should be managed. Information should be kept for as long as you need it and disposed of when we no longer have a reason to keep it. We can dispose of information by destroying it, transferring it to another body or by transferring it to an archive.

Under the Freedom of Information Act 2000, the trust is required to maintain a retention schedule, listing the record series which the trust and its schools create in the course of their business. The retention schedule lays down the length of time over which the record

needs to be retained, and the action which should be taken when it is of no further administrative use. The retention schedule lays down the basis for normal processing under the UK General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000.

Members of staff are expected to manage their current record keeping systems using the retention schedule and to take account of differing retention periods when creating new recordkeeping systems.

The retention schedule refers to record series, regardless of the media in which they are stored.

There are numerous benefits which arise from the use of the retention schedule:

- Managing records against the retention schedule is deemed to be “normal processing” under the UK General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000. Members of staff should be aware that once a Freedom of Information request is received or a legal hold imposed, then records disposal must be stopped.
- Members of staff can be confident that information has been disposed of safely and at the appropriate time.
- Information which is subject to the UK General Data Protection Regulation, Data Protection Act 2018 and the Freedom of Information Act 2000 legislation will be available when required.
- The trust and its schools are not maintaining and storing information unnecessarily.

Managing record series using these retention guidelines will be deemed to be “normal processing” under the legislation mentioned above. If record series are to be kept for longer or shorter periods than those laid out in this document, the reasons for this need to be discussed with the DPO and documented.

The whole trust has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.

The CEO, supported by the DPO, holds the overall responsibility for this policy and for ensuring it is implemented correctly.

The DPO is responsible for monitoring compliance with this policy and reviewing it regularly in accordance with the trust’s policy schedule.

Principals are responsible for:

- The management of records in each 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.

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.

**[New]** Staff will be responsible for ensuring that when pupils use personal data for projects or coursework, they do so appropriately. This includes being compliant when storing personal data.

### 3. Management of pupil records

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

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

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

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

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

The following information is subject to shorter retention periods and, therefore, will be stored separately from the main pupil record:

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

Records of disclosures and reports relating to child protection and safeguarding are stored securely on a cloud based system. Any hard copies of disclosures and reports relating to child protection are stored securely in a locked filing cabinet in the school/DSL office – a note indicating this is marked on the pupil record.

Copies of complaints made by parents or pupils are stored in a file in the principal's office or in an electronic file – a note indicating this is marked on the pupil's file.

Actual copies of accident and incident information are stored separately on the school's management information system or chosen cloud based accident management 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 should be placed in the pupil's file in the event of a major accident or incident.

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

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

Pupils' educational records will follow them when they leave the school; however the school may keep hold of information about pupils for a short period to allow for any queries or reports to be completed or where linked records in the school information management system have not yet reached the end of their retention period and deleting the records would cause problems.

**[New]** Certain elements of pupils' records may be retained for longer, e.g. if litigation is pending, or for transfer to the Local Record Office, in accordance with the retention schedule.

**[New]** In circumstances where an Independent Inquiry into Child Sexual Abuse (IICSA) is ongoing, any records relating to the IICSA will be subject to a separate indication of the appropriate retention periods. The school will never destroy any records relating to an IICSA whilst the inquiry is ongoing and will abide by the appropriate retention periods.



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

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

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

If a type of file is not listed here, the data controller should consult the DPO. The IRMS (2019) Information Toolkit of School (Academies) guidance will be consulted. If this fails to provide guidance on a suitable retention period then the DfE Data Protection – a toolkit for schools Step 5 guidance on questions to consider will be used to determine a suitable retention period.

You may see references to paper records which are no longer created in your school (e.g. log books). If so, you can ignore these retention periods except when reviewing any backlog of paper records.

Many records separately listed below are in practice maintained as part of an integrated pupil record in the school's management information system (MIS). Where the stated retention period is under 7 years, this is generally not because of an overriding legal obligation to destroy the record at a particular point, but for administrative convenience or alignment with common practice. If there is no reasonably practical way to disaggregate the pupil record (e.g. destroying attendance data after 3 years but destroying exam results after 5 years), it is acceptable to destroy all such data after 6 years plus the current academic year. The Limitation Act 1980 provides a reasonable justification for this practice, as the trust and its schools may need to rely on any component part of a record in defending itself from civil claims. Where the retention period is 7 years or more, this should be applied in your electronic system just as it would be with paper records.

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

Physical and 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
<b>Personal identifiers, contacts and personal characteristics</b>		
Images used for identification purposes	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month	Securely disposed of
Images used in displays	Whilst the pupil is at school	Securely disposed of

Images used for marketing purposes	In line with the consent period	Securely disposed of
Biometric data	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month	Securely disposed of
Postcodes, names and characteristics	Whilst the pupil is at school, plus five years	Securely disposed of
House number and road	For the duration of the event/activity, or whilst the pupil remains at the school, plus one month	Securely disposed of
<b>Admissions</b>		
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 as a record of pupils who attend the school
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
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 – see retention period of file below	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
<b>Pupils' educational records</b>		

(Primary School) Pupils' educational records	Whilst the pupil remains at the school	<p>Transferred to the next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period.</p> <p>The IRMS advises to retain the information for a short period to allow for any queries or reports to be completed or where linked records in the school information management system have not yet reached the end of their retention period and deleting would cause problems</p>
Statutory assessment results	Added to the pupil's record and transferred to next school	Transferred to the next school
Internal examination results	Added to the pupil's record and transferred to next school	Reviewed and securely disposed of if no longer needed
Behaviour records	<p>Added to the pupil's record and transferred to the next school</p> <p>Copies are held whilst the pupil is at school, plus one year</p>	Securely disposed of
Exclusion records	<p>Added to the pupil's record and transferred to the next school</p> <p>Copies are held whilst the pupil is at school, plus one year</p>	Securely disposed of
Child protection records held in a separate file	Stored electronically on cloud based system, hard copies in a sealed envelope in a locked filing cabinet for the	Transferred to the next destination as part of pupil's record (see above)

	<p>same length of time as the pupil's record</p> <p>Records also subject to any instruction given by the IICSA</p>	Transfer should be made as soon as possible and within 5 days
Curriculum returns	Current academic year, plus three years	Review and allocate a further retention period or securely dispose of
Schemes of work	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Timetable	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Class record books	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Mark books	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Record of homework set	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Pupils' work	<p>Returned to pupil at the end of current academic year</p> <p>If this is not possible, or required as evidence, hold for the current academic year, plus one year</p>	Review at the end of each year and allocate a further retention period or securely dispose of
<b>Attendance</b>		
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
<b>Medical information and administration</b>		

Permission slips	For the duration of the period that medication is given, plus one month if no issues raised	Securely disposed of
Medical conditions – ongoing management	Added to the pupil's record and transferred to the next school  Copies held whilst the pupil is at school, plus one year	Securely disposed of
Medical incidents that have a behavioural or safeguarding influence	Added to the pupil's record and transferred to the next school  Copies held whilst the pupil is at school, plus 25 years	Transferred to the next destination as part of pupil's record (see above)  Securely disposed of
<b>SEND</b>		
SEND files, reviews and EHC plans, including advice and information provided to parents regarding educational needs and accessibility strategy	Whilst the pupil remains at the school	Transferred to the next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period
<b>Curriculum management</b>		
SATs results	Added to the pupil's record and transferred to next school  A composite of the whole year's results may be held for the current year plus six years, for comparative purposes	Transferred to the next school  Securely disposed of
Examination papers	Until the appeals/validation process has been completed	Securely disposed of

Published Admission Number (PAN) reports	Current academic year, plus six years	Securely disposed of
Valued added and contextual data	Current academic year, plus six years	Securely disposed of
Self-evaluation forms (internal moderation)	Current academic year, plus one year	Securely disposed of
Self-evaluation forms (external moderation)	Retained until superseded	Securely disposed of
Pupils' work	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	Securely disposed of
<b>Extra-curricular activities</b>		
Field file – information taken on school trips	Until the conclusion of the trip, plus one month  Where a minor or major incident occurs, field files are added to the core system as appropriate	Securely disposed of
Trip packs – information taken on school trips	Until the end of the visit  Where a minor incident occurs, files are added to the core system as appropriate	Shredded upon return to school
Financial information relating to school trips	Whilst the pupil remains at school, plus one year	Securely disposed of
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip, unless a school risk assessment decides the forms are likely to be required for any reason, in which case they should be retained for 22 years after the pupil's date of birth	Securely disposed of – shredded

Parental consent forms for school trips where a major incident occurred	25 years after the pupil's date of birth on the pupil's record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils)	Securely disposed of – shredded
Educational visitors in school – sharing of personal information	Until the conclusion of the visit, plus one month	Securely disposed of
Walking bus registers	Date of the register being taken plus six years	Securely disposed of If held electronically, all copies should be destroyed at the same time

#### **Family liaison officers and home-school liaison assistants**

Day books	Current academic year, plus two years	Reviewed and securely destroyed if no longer required
Reports for outside agencies	Duration of the pupil's time at school	Securely disposed of
Referral forms	Whilst the referral is current	Securely disposed of
Contact data sheets	Current academic year	Reviewed and securely destroyed if no longer active
Contact database entries	Current academic year	Reviewed and securely destroyed if no longer required
Group registers	Current academic year, plus two years	Securely disposed of

#### **Catering and free school meal management**

Meal administration	Whilst the pupil is at school, plus one year	Securely disposed of
Meal eligibility	Whilst the pupil is at school, plus five years	Securely disposed of
School meal registers	Current year plus three years	Securely disposed of
Free school meal registers (where used as a basis for funding)	Current year plus six years	Securely disposed of
School meals summary sheets	Current year plus three years	Securely disposed of

## 5. Retention of staff records

The table below outlines the 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
<b>Operational</b>		
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
<b>Recruitment</b>		
Records relating to the appointment of a new headteacher (unsuccessful attempts)	Date of appointment, plus six months.	Securely disposed of



Records relating to the appointment of a new headteacher (successful appointments)	Added to personnel file and retained until the end of appointment, plus six years, except in cases of negligence or claims of child abuse, then records are retained for at least 15 years	Securely disposed of
Records relating to the appointment of new members of staff or governors (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of
Pre-employment vetting information (successful candidates)	For the duration of the employee's employment, plus six years	Securely disposed of
DBS certificates	Up to six months, and only if there is a valid reason to retain a copy.	Securely disposed of
Proof of identify as part of the enhanced DBS check	Copies of documents used to verify identity should be placed in the staff member's personnel file. Retained as detailed above for all information within staff personnel files.	Securely disposed of
Proof of required qualifications	Copies of proof of qualification documents should 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
Single Central Record (SCR) – Leavers Employees, LAC Governors, Trustees and Members	Remove from SCR - transfer name and dates only to separate leavers retention sheet for end of academic year in which they leave + 6 years.  Delete all other personal information including address, date of birth, teacher reference number, qualifications and DBS number.	Securely disposed of

<p>Single Central Record – Leavers Contractors, Volunteers, Supply Staff from agency and ITT fee-funded</p>	<p>Remove record from SCR as soon as their involvement/contract with the school ends.</p> <p>Retain for 12 months reassurances of relevant checks made provided by the employer, contractor, or training provider and volunteer risk assessment</p>	<p>Securely disposed of</p>
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**Disciplinary and grievance procedures**

<p>Child protection allegations, including where the allegation is unproven</p>	<p>Added to staff personnel file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer</p> <p>If allegations are malicious, they are removed from personal files</p> <p>If allegations are found, they are kept on the personnel file and a copy is provided to the person concerned unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file is retained until IICSA enquiries are complete</p>	<p>Reviewed and securely disposed of – shredded</p>
<p>Oral warnings</p>	<p>Date of warning, plus six months</p>	<p>Securely disposed of – if placed on staff personnel file, removed from file</p>
<p>Written warning – level 1</p>	<p>Date of warning, plus six months</p>	<p>Securely disposed of – if placed on staff personnel file, removed from file</p>
<p>Written warning – level 2</p>	<p>Date of warning, plus 12 months</p>	<p>Securely disposed of – if placed on staff personnel file, removed from file</p>
<p>Final warning</p>	<p>Date of warning, plus 18 months</p>	<p>Securely disposed of – if placed on staff personnel file, removed from file</p>

Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related, then it is disposed of as <a href="#">above</a>	Securely disposed of
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## 6. Retention of governance records

The table below outlines the trust's retention periods for all governance records, and the action that will be taken after the retention period, in line with any requirements. Term governing board refers to files of Board of Directors, Members and Local Academy Committee

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
<b>Board of Directors, Members Meetings and Local Academy Committee</b>		
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 principal	<p>Date of resolution of complaint, plus six years</p> <p>If negligence is involved, records are retained for the current academic year, plus 15 years</p> <p>If child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years</p>	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 school	Date proposal accepted or declined, plus three years	Securely disposed of
Records relating to the appointment of co-opted governors	Date of election, plus six months	Securely disposed of
Records relating to the election of the chair of the governing board and the vice chair	Destroyed after the decision has been recorded in the minutes	Securely disposed of
Scheme of delegation and terms of reference for committees	Until superseded or whilst relevant	Reviewed and offered to the local archives if appropriate
Meeting schedule	Current academic year	Standard disposal
Register of attendance at full governing board meetings	Date of last meeting in the book, plus six years	Securely disposed of
Records relating to governor/monitoring visits	Date of the visit, plus three years	Securely disposed of
All records relating to the conversion of the school to academy status	Permanent	Local archives are consulted before disposal
Correspondence sent and received by the governing board or principal	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	Recorded on MAT SCR Date of the DBS check, plus six years	Securely disposed of
Governor personnel files	Date on which the governor's appointment ends, plus six years	Securely disposed of
<b>Governance of the Academy Trust</b>		
Governance statement	Life of governance statement, plus six years	Securely disposed of
Articles of association	Life of the academy	Securely disposed of
Memorandum of understanding	Can be disposed of once the academy has been incorporated	Securely disposed of
Memorandum of understanding of shared governance among schools	Life of memorandum of understanding, plus six years	Securely disposed of
Constitution	Life of the academy	Securely disposed of
Special resolutions to amend the constitution	Life of the academy	Securely disposed of
Written scheme of delegation	Life of the scheme of delegation, plus 10 years	Securely disposed of

Directors – appointment	Life of appointment, plus six years	Securely disposed of
Directors – disqualification	Data of disqualification, plus 15 years	Securely disposed of
Directors – termination of office	Date of appointment, plus six years	Securely disposed of
Annual trustee report	Date of report, plus 10 years	Securely disposed of
Annual report and accounts	Date of report, plus 10 years	Securely disposed of
Annual return	Date of report, plus 10 years	Securely disposed of
Appointment of trustees and governors and directors	Life of appointment, plus six years	Securely disposed of
Statement of trustees' responsibilities	Life of appointment, plus six years	Securely disposed of
Appointment and removal of members	Life of appointment, plus six years	Securely disposed of
Strategic review	Date of review, plus six years	Securely disposed of
Register of directors	Life of academy, plus six years	Securely disposed of
Register of directors' interests	Life of academy, plus six years	Securely disposed of
Register of directors' residential addresses	Life of academy, plus six years	Securely disposed of
Register of gift, hospitality and entertainments	Life of academy, plus six years	Securely disposed of
Register of members	Life of academy, plus six years	Securely disposed of
Register of secretaries	Life of academy, plus six years	Securely disposed of
Register of trustees' interests	Life of academy, plus six years	Securely disposed of
Declaration of interests	Life of academy, plus six years	Securely disposed of

## 7. Retention of senior leadership and management records

The table below outlines the 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
<b>Headteacher and SLT</b>		
Log books of activity in the school maintained by the principal	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 principal 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 principal, deputy principal, 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 principal, deputy principal, 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
Academy Development Plan	Duration of the plan, plus three years	Securely disposed of

## 8. 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
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**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
Incident reports	Current year + 20 years	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.  The incident reporting form Date of incident + 6 years	Securely disposed of
Records relating to accident/injury at work	Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	Securely disposed of
Accident reporting – pupils	Three years after the last entry in the accident reporting book  The incident reporting form Date of birth of the child + 25 years	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 six years	Securely disposed of
Fire risk assessments	Life of risk assessment, plus six 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
<b>Fleet Management</b>		
The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	Disposal of the vehicle + 6 years	Securely disposed of
The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, maintenance	Disposal of the vehicle + 6 years	Securely disposed of
Service logs and vehicle logs	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	Securely disposed of
GPS tracking data relating to the vehicles	Date of journey + 6 years	Securely disposed of

## 9. 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
<b>Payroll and pensions</b>		
Maternity pay records	Current academic year, plus three years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year, plus six years	Securely disposed of
Timesheets, clock cards and flexitime records	Current academic year, plus three years	Securely disposed of
Absence record	Current academic year, plus three years	Securely disposed of
Batches	Current academic year, plus six years	Securely disposed of
Bonus sheets	Current academic year, plus three years	Securely disposed of
Car allowance claims	Current academic year, plus three years	Securely disposed of
Car loans	Current academic year, plus three years	Securely disposed of
Car mileage outputs	Current academic year, plus six years	Securely disposed of
Elements	Current academic year, plus two years	Securely disposed of

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

Payslips (copies)	Current academic year, plus six years	Securely disposed of
Pension payroll	Current academic year, plus six years	Securely disposed of
Personal bank details	Until superseded, plus three years	Securely disposed of
Sickness records	Current academic year, plus three years	Securely disposed of
Staff returns	Current academic year, plus three years	Securely disposed of
Superannuation adjustments	Current academic year, plus six years	Securely disposed of
Superannuation reports	Current academic year, plus six years	Securely disposed of
Tax forms	Current academic year, plus six years	Securely disposed of
<b>Risk management and insurance</b>		
Employer's liability insurance certificate	Closure of the school, plus 40 years	Securely disposed of Passed to the LA if the school closes
Insurance policies	Date the policy expires + 6 years	Securely disposed of
Records relating to the settlement of insurance claims	Date claim settled + 6 years	Securely disposed of
<b>Asset management</b>		

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
<b>Accounts and statements including budget management</b>		
Annual accounts	Current academic year, plus six years	Disposed of against common standards
Loans and grants managed by the school	Date of last payment, plus 12 years	Information is reviewed then securely disposed of
All records relating to the creation and management of budgets	Duration of the budget, plus three years	Securely disposed of
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus six years	Securely disposed of
Records relating to the collection and banking of monies	Current financial year, plus six years	Securely disposed of
Records relating to the identification and collection of debt	Final payment, plus six years	Securely disposed of
<b>Contract management</b>		
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
<b>School fund</b>		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
<b>School meals</b>		
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
<b>Pupil finance</b>		
Student grant applications	Current academic year, plus three years	Securely disposed of
Pupil premium fund records	Date the pupil leaves the school, plus six years	Securely disposed of
<b>Trust finance records</b>		
<b>[This section contains recommended retention periods for academy-specific finance information.]</b>		
Statement of financial activities for the year	Current financial year, plus six years	Securely disposed of
Financial planning	Current financial year, plus six years	Securely disposed of
Value for money statement	Current financial year, plus six years	Securely disposed of
Records relating to the management of VAT	Current financial year, plus six years	Securely disposed of
Whole of government accounts return	Current financial year, plus six years	Securely disposed of
Borrowing powers	Current financial year, plus six years	Securely disposed of
Budget plan	Current financial year, plus six years	Securely disposed of
Charging and remissions policy	Date policy superseded, plus three years	Securely disposed of
Audit and risk committee and appointment of responsible officers	Life of the academy	Securely disposed of
Independent auditor's report on regularity	Financial year report relates to, plus six years	Securely disposed of
Independent auditor's report on financial statements	Financial year report relates to, plus six years	Securely disposed of
Funding agreement	Date of last payment of funding, plus six years	Securely disposed of
Funding records – capital grant	Date of last payment of funding, plus six years	Securely disposed of

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

## 10. Retention of other school records

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

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

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

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

## 11. Retention of emails

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

Emails can act as evidence of the school's activities, i.e. in business and fulfilling statutory duties, so all relevant emails, e.g. invoices, will be retained for at least 12 months. Invoices



received and sent in emails will be printed off and retained in accordance with Section 10 of this policy.

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

Personal emails, i.e. emails that do not relate to work matters or are from family members, will be deleted as soon as they are no longer needed. Staff members will review and delete any emails they no longer require at the end of every term.

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

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

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

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

## **12. Identifying information**

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

Wherever possible, the trust and its schools use pseudonymisation, also known as the 'blurring technique', to reduce the risk of identification.

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

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

## **13. Storing and protecting information**

The principal will undertake a business impact assessment to identify which records are vital to school management and these records will be stored in the most secure manner.

Information is backed-up in accordance with guidance in the Trust's Data and Cyber-security Breach Prevention and Management Plan.

Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access. Any room or area where personal or sensitive data is stored will be locked when

unattended. Confidential paper records are not left unattended or in clear view when held in a location with general access.

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

All electronic devices are password-protected to protect the information on the device in case of theft. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft. Staff and governors do not use their personal laptops or computers for school purposes unless authorised to do so. All members of staff are provided with their own secure login and password. Passwords should follow the guidance set out in the trust's password policy.

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.

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

Documents that have been taken off the school premises should not be left unattended when transporting to a destination. Once at the intended destination they must be stored securely. A record will be kept of any document that is taken off the school premises that logs the location of the document and when it is returned to the school site, this includes records that are digitally remotely accessed.

Before sharing data, staff always ensure that:

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

The trust and its schools should obtain written data sharing agreements with all data processors and third parties with whom data is shared. These agreements can be developed with support from the DPO to cover information about issues such as access controls and permissions.

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

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

Staff are required to use their school login details to use photocopiers and printers.

The physical security of the school's buildings and storage systems, and access to them, is reviewed termly by the site manager. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the principal and extra measures to secure data storage will be put in place.

All systems that allow staff and pupils to remotely access information from the school's network whilst they are not physically at the school have strong security controls in place which are reviewed regularly by the principal.

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

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

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

## **14. Accessing information**

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

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

- Know what information the trust and its schools hold and process 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 UK GDPR.

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

Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents. Pupils who are considered by the school to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

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

## **15. [New] Record of processing activities**

Each school will maintain a record of processing activities, to capture all the important information about data processing activities. This will be known as the school's 'Data Map'

A trust's record of processing activities across all schools will be known as the trust's 'Data Asset Register'. The data asset register will contain the following mandatory information as a minimum:

- Name and contact details of the school
- Name and contact details of the school's data protection officer
- Name and contact details of any joint controllers
- Purposes of carrying out personal data processing
- Categories of personal data which the school processes
- Categories of individuals whose personal data the school process
- Categories of organisations with which the school shares personal data
- Schedule for retaining each category of personal data
- General description of the school's technical and organisational security

More details about further information that the record of processing activities will be included via the following prompts:

- Source of personal data
- Category of personal data
- Whether the school is a data controller, data processor, a joint controller, or has a controller-processor contract in place
- Access and use
- Data retention and destruction
- Comments, rights, and subject access requests
- Security and personal data breaches
- Automated decision-making

The information documented on school data maps and trust data asset register must reflect the current situation. These documents are considered to be living documents and must be updated as and when necessary.

## **16. Digital continuity statement**

Digital data that is retained for longer than six years will be identified by the principal and named as part of a Digital Continuity Statement. The data will be archived to dedicated files on the school's server or cloud based storage system, which are password-protected – this data will be backed-up.

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

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

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

- A statement of the business purposes and statutory requirements for keeping the records

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

## **17. Information audit**

Each school conducts information audits on at least an annual basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the UK GDPR. This includes the following information:

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

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

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

The principal is responsible for completing the information audit and updating the school's data map. The DPO will then record details on the trust's Data Asset Register.

## **18. 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 school will keep a record of all files that have been destroyed.

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

## **19. School closures and record keeping**

**[This section contains provisions for ensuring records are managed effectively when a school closes. There are a number of reasons why a school may close, which may affect where records need to be stored and managed.]**

### **[Maintained schools] Academy conversion**

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

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

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

### **Academy closure**

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

### **Sale or re-use of the site**

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

### **Merger of schools**

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

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

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

### **Managing records**

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

The DPO will notify the other organisations as soon as possible so that necessary disposal, storage and transfer arrangements can be made. The school's ICT provider will also be notified so that arrangements can be made to ensure the safe transfer or deletion of electronic records, including all back-up copies.

When sorting records, the DPO and their team will:

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

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

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

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

## **20. Monitoring and review**

This policy will be reviewed by the DPO in accordance with the Aspire Educational Trusts' policy review schedule.

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