

Records Management and Retention Procedures

| Summary | |
|-------------------------|-----------------------|
| Policy Reference Number | 020 |
| Category | Risk Management |
| Authorised by | Full Trust Board |
| Responsibility of | Business Manager |
| Status | Updated December 2024 |
| Next Review Date | December 2025 |

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Introduction

The UK GDPR regulation requires that we keep personal information for no longer than it is necessary for the purpose that it was processed. This procedure has been implemented to ensure we meet this requirement.

Where a trust holds personal information, it will always do so for a purpose that is necessary for it to function effectively. Where it is determined that particular data is 'no longer necessary', it will be destroyed with the guidelines below ensuring the recordkeeping requirements set out in the Data Protection Act (DPA) 1998 are met.

- (a) Hard copy records will be placed in approved confidential waste bags.
- (b) Electronic records irretrievably delete records where possible or archive information which will be 'put beyond use'. This means the trust will be:
 - 1. Unable to use the personal data to inform any decision in respect of any individual
 - 2. Not be able to give any other organisation access to the personal data
 - 3. Surround the personal data with appropriate security

The schedule below is arranged by type of record, with the 'Retention Period' column specifying how long the records are kept for and the 'Final Action' column describes how they should be disposed of.

On an annual basis the Trust will review the records that it holds against this schedule.

Schedule of Records Retention

| Type of | DPA | Storage and | Statutory | Retention | Final Action |
|--|---|--|--|---|--|
| Record/Document | Applies? | Security | Provision | Period | |
| Trustees | | | | | |
| Trustee application forms – successful applicants | Yes | Paper based/lockable filing cabinet or Electronic/password protected | | End of term of office + 1 year | Destroy as confidential waste or delete securely if electronic |
| Trustee application forms – unsuccessful applicants | Yes | Paper based/lockable filing cabinet or Electronic/password protected | | Date of election + 6 months | Destroy as confidential waste or delete securely if electronic |
| Records relating to complaints dealt with by the Trustee Board | Yes | Paper based/lockable filing cabinet or Electronic/password protected | | Date of resolution of complaint + 7 years | Destroy as confidential waste or delete securely if electronic |
| Records for all full governing body, committee and panel meetings, including: a) agendas b) any report, statutory policy (including Admissions Policy) or other paper considered at governing body meeting c) signed minutes | Yes, if meeting deals with staff matters | Paper based/lockable filing cabinet or Electronic/password protected | School Governance (England) Regulations (2013) | Permanent | |

| Type of | DPA | Storage and | Statutory | Retention | Final Action |
|-----------------------|----------|-----------------------|-----------|-----------|-----------------|
| Record/Document | Applies? | Security | Provision | Period | |
| Individual Pupil Reco | rds | | | | |
| MIS data | Yes | Integris/password | | 25 years | Deleted from |
| | | protected | | from date | database |
| | | | | of birth | |
| Examination Results | Yes | Paper | | 7 years | Destroy as |
| | | based/lockable filing | | from | confidential |
| | | cabinet or | | student | waste or delete |
| | | Electronic/password | | leaving | securely if |
| | | protected | | school | electronic |

| Pupil records including reports, performance records | Yes | Provision Map/password protected, electronic or paper based/lockable filing cabinet | Limitation Act 1980 | 25 years from date of birth | Archived on leaving date and deleted securely or destroy as confidential waste |
|---|-----|---|------------------------|---|--|
| SEN Records/medical records Includes: SEN reviews Individual Education Plans (IEPs) / pupil profiles Health questionnaires Parental consent forms Health care plans Records of medicine administered Work experience agreement | Yes | Provision Map/password protected or Paper based/lockable filing cabinet | | 25 years from date of birth | Archived on leaving date and deleted securely or destroy as confidential waste |
| Activity Trip consent form signed by parent/guardian where no incident occurs | Yes | Paper based/lockable filing cabinet or Electronic/password protected | | Date of event plus 1 year | Destroy as confidential waste or delete securely if electronic |
| Activity Trip consent form signed by parent/guardian where a major incident occurs | Yes | Paper based/lockable filing cabinet or Electronic/password protected | Limitation Act 1980 | Date of birth of child involved in incident plus 22 years | Destroy as confidential waste or delete securely if electronic |
| Admission forms, including photo permissions, permission to go off site | Yes | Paper based/lockable filing cabinet or Electronic/password protected | | When pupil leaves school | Destroy as confidential waste or delete securely if electronic |

| Type of Record/Document | DPA Applies? | Storage and Security | Statutory Provision | Retention Period | Final Action | | |
|---|--------------|--|---|--|---|--|--|
| Human Resources | | | | | | | |
| Interview notes and recruitment records (including any preemployment vetting information) for unsuccessful candidates | Yes | Paper based/lockable filing cabinet or Electronic/password protected | | Date of Interview + 1 year (unless we have authority to keep the person's details on record should future opportunities come up) | Destroy as confidential waste or delete securely if electronic | | |
| Pre-employment vetting information (successful DBS checks) | Yes | Paper based/lockable filing cabinet or Electronic/password protected | DfE 'KCSIE' guidance (regularly updated) | Maximum of date of check + 6 months | Destroy as confidential waste or delete securely if electronic | | |
| Staff personnel files | Yes | Paper based/lockable filing cabinet or Electronic/password protected | Limitation Act (1980) | End of employment + 7 years | Destroy as confidential waste or delete securely if electronic | | |
| Staff sickness records | Yes | Paper based/lockable filing cabinet or Electronic/password protected | | End of employment + 7 years as staff personnel files | Destroy as confidential waste or delete securely if electronic | | |
| Disciplinary Proceedings (non- safeguarding/child protection related) | Yes | Paper based/lockable filing cabinet or Electronic/password protected | | End of employment + 7 years as staff personnel files | Destroy as confidential waste or delete securely if electronic | | |
| Disciplinary Proceedings (safeguarding/child protection related) | Yes | Paper based/lockable filing cabinet or Electronic/password protected | DfE 'KCSIE' guidance (regularly updated) | Until normal pension age, or for 10 years from date of allegation, whichever is longer | Destroy as confidential waste or delete securely if electronic | | |
| Records of industrial tribunals, disciplinary panes, appeals | Yes | Paper based/lockable filing cabinet or Electronic/password protected | Limitation Act can apply | End of employment + 7 years | | | |

| SSP Records | Yes | Stored securely by | | 7 years from | Destroy as |
|-----------------------|-----|--------------------|-------------|---------------|--------------|
| | | payroll provider | | first date of | confidential |
| | | portal/password | | leave | waste or |
| | | protected | | | delete |
| | | | | | securely if |
| | | | | | electronic |
| Staff maternity or | Yes | Stored securely by | Statutory | 4 years from | Destroy as |
| paternity pay records | | payroll provider | Maternity | the end of | confidential |
| | | portal/password | Pay | the tax year | waste or |
| | | protected | Regulations | in which the | delete |
| | | | (1986 – as | leave ends | securely if |
| | | | amended) | | electronic |

| Type of Record/Document Finance | DPA Applies? | Storage and Security | Statutory Provision | Retention Period | Final Action |
|--|-----------------|-------------------------------|--------------------------|---|--------------------|
| Annual accounts | No | Electronic/password protected | | Current year + 6 years | Delete securely |
| Annual budget and background papers | No | Electronic/password protected | | Current year + 6 years | Delete securely |
| Budget reports and budget monitoring records | No | Electronic/password protected | | Current year + 3 years | Delete securely |
| Records covered by various financial regulations (including: invoices, any records relating to banking | No | Electronic/password protected | Financial regulations | Current financial year + 6 years | Delete securely |
| Contracts: under signature | | Electronic/password protected | Limitation Act (1980) | Contract completion date + 7 years | Delete securely |
| Payroll records | Yes | Carter and Coley porta | Financial regulations | Current year + 6 years | |
| Records relating to individuals' pension details | Yes | Electronic/password protected | Financial regulations | End of employment + 7 years | Delete securely |

| Type of | DPA | Storage and | Statutory | Retention | Final Action |
|--|------------------|--|------------------------|---------------------|------------------------------|
| Record/Document | Applies? | Security | Statutory Provision | Period | Fillal Action |
| Health and Safety | Applies: | Security | FIOVISION | renou | |
| Fire logs (records of | Yes | Electronic/password | Limitation | Current year | Delete securely |
| drills and tests) | 163 | protected | Act (1980) | + 6 years | Defete securery |
| Maintenance for any | No | Electronic/password | , , | Current year | Delete securely |
| work equipment, | | protected | | + 10 years | |
| ladders, PAT etc | | | | | |
| Health and Safety | | Electronic/password | | Current year | Delete securely |
| Inspection records | DDA | protected | Chahadaaa | + 10 years | Final Astion |
| Type of | DPA Applies 2 | Storage and | Statutory Provision | Retention Period | Final Action |
| Record/Document | Applies? | Security | Provision | Periou | |
| Property | T | | I | T _ | |
| Title Deeds for all properties belonging | No | Paper based/lockable filing cabinet or | | Permanent | Retain in school whilst |
| to the school | | Electronic/password | | | operational |
| to the school | | protected | | | operational |
| Plans of all properties | No | Paper based/lockable | | Permanent | Retain in |
| belonging to the | | filing cabinet or Electronic/password | | | school whilst |
| school | | protected | | | operational |
| Leases of properties | No | Paper based/lockable | | Expiry of | Destroy as |
| leased to the school | | filing cabinet or | | lease + 7 | confidential |
| | | Electronic/password protected | | years | waste or delete |
| | | protected | | | securely if electronic |
| Records relating to the | No | Paper based/lockable | | Current year | Destroy as |
| letting of school | INO | filing cabinet or | | + 3 years | confidential |
| premises | | Electronic/password | | , , , , , , | waste or delete |
| | | protected | | | securely if |
| | | | | | electronic |
| All maintenance | No | Paper based/lockable | | Current year | Destroy as |
| records for the school | | filing cabinet or Electronic/password | | + 6 years | confidential waste or delete |
| | | protected | | | securely if |
| | | | | | electronic |
| Inventories of | No | Electronic/password | | Current year | Delete securely |
| equipment and | | protected | | + 6 years | , |
| furniture | | | | | |
| Insurance documents | No | Paper based/lockable | | Whilst | Destroy as |
| | | filing cabinet or Electronic/password | | current + 2 | confidential |
| | | protected | | years | waste or delete securely if |
| | | | | | electronic |
| Grants expenditure | No | Paper based/lockable | | Current + 6 | Destroy as |
| records | | filing cabinet or | | years | confidential |
| | | Electronic/password | | | waste or delete |
| | | protected | | | securely if |
| | | | | | electronic |

| Type of Record/Document | DPA Applies? | Storage and Security | Statutory Provision | Retention Period | Final Action | | |
|------------------------------------|-----------------|--|------------------------|--|--|--|--|
| Examinations (Private and Trust) | | | | | | | |
| Access arrangements information | Yes | Paper based/lockable filing cabinet or Electronic/password protected | | Trust – in line with retention schedule for CRLT students Private – until the end of the exam cycle plus 2 years | Destroy as confidential waste or delete securely if electronic | | |
| Alternative Site Arrangements | No | Paper based/lockable filing cabinet or Electronic/password protected | | End of exam cycle | Destroy as confidential waste or delete securely if electronic | | |
| Attendance registers/seating plans | Yes | Paper based/lockable filing cabinet or Electronic/password protected | | End of exam cycle | Destroy as confidential waste or delete securely if electronic | | |
| Certificates | Yes | Paper based/lockable filing cabinet or Electronic/password protected | | Until collected by candidate | | | |
| Entry Forms | Yes | Paper based/lockable filing cabinet or Electronic/password protected | | End of exam cycle | Destroy as confidential waste or delete securely if electronic | | |

^{*}please refer to examinations Data Protection Policy for more information