

Record Management, Retention & Disposal Policy



Review Date

March 2023

Ratified

October 2023

Next Review Date

February 2027

Responsible Directorate

Operations

Our Trust

*These four critical questions make it clear who we are and what we do.
We ask ourselves these questions to guide our work and our improvement.*

Why do we exist?

To **transform life chances** by achieving the highest possible standards and preparing all our students to lead successful lives.

How do we behave?

- **Hard work**
We are determined to see things through to the end and are resilient when faced with challenges.
- **Integrity**
We do the right thing because it is the right thing to do.
- **Teamwork**
We work together to help everyone succeed.

What do we do?

- We educate, safeguard and champion all our learners.
- We set high standards for ourselves and our learners.
- We build the powerful knowledge and cultural capital which stimulate social mobility and lifelong learning.

How will we succeed?

1. Aligned autonomy
2. Keeping it simple
3. Talent development

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1 | Introduction

- 1.1 The Policy statement provides a mandate for the management and retention of all records and information management functions.
- 1.2 This This Policy applies to the retention of all records within Academy Transformation Trust (ATT) on how it manages its records, including electronic records. The guidance below relates to records that contain 'personal data'. Personal data is defined under the General Data Protection Regulation (GDPR) as:
- Any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (GDPR article 4).
- 1.3 Under data protection laws 2018 it is ATT's responsibility to ensure compliance with the Data Protection Act 2018 (General Data Protection Regulation GDPR). This responsibility is delegated to each school for day-to-day management of this Policy. Where records contain personal data ATT employees need to be aware of the additional obligations they need to meet.
- 1.4 The Data Protection Act 2018 introduces several legal obligations in relation to records containing personal data. This includes obligations such as:
- advising data subjects of the information which is held on them.
 - the purpose for which the data is held or process such information.
 - how long personal data is held for (the retention period).
 - the legal basis for which the personal data is processed.
 - the data subject's rights in relation to the data.
- 1.5 Personal data should be kept for no longer than necessary. This means that all ATT employees needs to be aware of how long each type of record must be retained in law, where it might be judicious to retain records for a longer period and how to destroy records that are no longer needed.
- 1.6 Under the Freedom of Information Act 2000, ATT are required to maintain a retention schedule listing the records created during its business. The retention schedule lays down the length of time for which the records must be maintained and the action which is taken when it is of no further administrative use (what is destroyed, when and by whom).
- 1.7 This Policy is based on recommendations from the Information and Records Management Society for maintained schools in England and guidance from the Chartered Institute of Personal & Development.
- 1.8 ATT recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the

organisation. This document provides the policy framework through which effective management can be achieved and audited.

- 1.9 This Policy applies to all records created, received or maintained by ATT staff while carrying out their work functions. This Policy also applies to all accounting records required for retention by the Charity Commission under the Charities Act 2011 and under the Companies Act 2006 as well as those records required by HMRC and others to be retained. Records are defined as all those documents which facilitate the business carried out by ATT 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 copy or electronic copy.

2 | Action Plan

- 2.1 ATT keep records under a wide variety of headings These include:

- Health and Safety
- Finance
- Governance
- Pupil Management
- School Management
- Human Resources (HR)

- 2.2 ATT has a responsibility to maintain these records and record keeping systems in accordance with regulatory requirements.

- 2.3 The person with overall responsibility for this Policy is the Trusts Data Protection Officer (DPO) who will give guidance for good record management practice and will promote compliance with this Policy so that information will be retrieved easily, appropriately and in a timely fashion.

- 2.4 The storage and retention of digital information will be handled on a day-to-day basis by the Director of ICT under guidance of the Principal at school level and the Director of People Strategy at Trust level, ensuring that records are held securely, backed-up on suitable systems, archived when necessary and checked regularly for ease of retrieval when required. Guidance may also be required from a school nominated Data Protection Lead to ensure compliance.

- 2.5 Employees of ATT must ensure that records for which they are responsible are accurate, kept securely, and are maintained and disposed of in accordance with the Management and Retention Policy. Loss and destruction of records that contain personal data can carry significant penalties from the Information Commissioner's Office (ICO). It is important that all employees, Trustees and Governors of ATT are aware of this. ensure personal data is not placed at risk and that there are appropriate safeguards in place. There may be further consequences for individuals who fail to comply with the Management and Retention Policy.

- 2.6 The central Senior Finance member is responsible for the secure retention of financial documents for the period required by the Companies Act. Each school is responsible for the secure retention of all financial documents which support the information held by the central Senior Finance member. These documents may be requested by authorised external agencies at any time, for example auditors or the Education and Skills Funding Agency. The central Senior Finance member determines with the Director of ICT the secure retention of electronic accounting records.

3 | The Benefits of a Management Retention Policy

- 3.1 Managing records against the retention schedule becomes normal processing and employees can be confident that they are managing data in an appropriate manner.
- 3.2 Employees can be confident about shredding/erasing information at the appropriate time, with necessary safeguards in place.
- 3.3 Information which is subject to freedom of information and data protection legislation will be available as required.
- 3.4 ATT is not maintaining and storing information unnecessarily.

4 | Archives

- 4.1 Archived records will:
- Be treated as confidential records.
 - Not necessarily be as accessible as current records but will still be retrievable.
 - Be stored securely or may be kept electronically.
- 4.2 Points to consider when deciding whether records will be stored electronically or in hard copy:
- Do the records need to be kept in the original format (for legal reasons)
 - Does the medium chosen to archive records have an acceptable lifespan for records that will have to be retained for a very long time.

- Where records are archived electronically or in hard copy there must be an adequate means for accessing and printing the record.

4.3 A record of all documents that have been archived electronically or in hard copy will be kept.

5 | Disposal of Records

5.1 When the period of retention has expired and there is no other reason to keep them, the records may be disposed of safely and securely.

5.2 When disposing of records containing personal or sensitive data ATT must ensure that the documents are securely destroyed.

5.3 Ways this can be achieved:

- Use of a cross-cutting shredding machine on site.
- Use of a shredding service which comes to site and shred the documents on site (a certificate of destruction will be issued when this service is used).
- Cutting up CDs and similar items.
- Dismantling and destroying hard drives. (This may be done by the IT team on site or by a specialist IT company).

5.4 A list is kept of records which have been destroyed. This includes:

- Any file reference.
- The file title or a brief description.
- The number of files and date range.
- The name of the authorising officer.
- The date the file was destroyed.

6 | Disposal of Records

6.1 This Policy has been developed within the context of the Data Protection Policy and Procedures and with other legislation or regulations (including audit, equal opportunities and ethics) and will be monitored to ensure that the legal retention guidelines, which may change periodically, are adhered to.

6.2 In addition ATT recognises the specific requirements for the retention of accounting records and other corporate records by the Information and Records Management Society (IMRS),

HMRC and under the Companies Act 2006 and will therefore monitor the guidelines as recommended.

7 | Reviewing

- 7.1 When the period of retention has expired and there is no other reason to keep them, the records may be disposed of safely and securely.

Appendix 1: Retention and Disposal Schedule

Health & Safety			
	Processing Activity	Recommended Retention Period	Action at End of Period
1.	Health & Safety Risk Assessments - Individual Specific	3 Years from last entry.	Secure Disposal
2.	Accident Reports (over age 18)	3 Years from last entry.	Secure Disposal
3.	Accident Reports (under age 18)	3 Years from last entry.	Secure Disposal
4.	RIDDOR Record(s)	3 Years from last entry.	Secure Disposal
5.	COSHH Record(s)	Current year + 10 Years the review.	Secure Disposal
6.	Asbestos Record(s) and Incident Reporting	Last action + 40 years.	Secure Disposal
7.	Radiation Record(s) and Incident Reporting	2 Years from examination date. Until person has reached age 75 at least 30 years.	Secure Disposal
8.	Fire Safety Records	Current year + 3 years.	Secure Disposal
9.	Register Staff, Parents and Visitors Onsite	Visitors, last entry + 6 years.	Secure Disposal
Finance			
1.	Employer's Liability Insurance	Life of school + 40 years.	Secure Disposal
2.	Inventory Assets	Furniture/assets - current year + 6.	Secure Disposal
3.	Annual Accounts	Current year + 6.	Standard Disposal
4.	Loans/Grants Including Bursaries	Last payment on loan + 12 years.	Secure Disposal
5.	Management Accounts, Forecasts and Budgets	Life of the budget + 3 years.	Secure Disposal
6.	Invoices/Receipts Including Expenses	Current year + 6.	Secure Disposal
7.	Bank Statement	6 years.	Secure Disposal
8.	Debt Record	6 years.	Secure Disposal
9.	Pupil Premium Fund Records (Free School Meals)	Date pupil leaves + 6 years.	Secure Disposal
10.	Management of Contracts Under Seal	Last payment + 12 years.	Secure Disposal
11.	Management of Contracts Under Signature	Last payment + 6 years.	Secure Disposal
12.	Title Deeds	20 years.	National Archives
13.	Property Leases	Expiry + 6 years.	Secure Disposal
14.	Records Relating to Building Management	Life of school.	Secure Disposal

15.	Insurance Broker - AJG	6 years. Data relating to claims: Basic claim - 3 years. Complex claim up to 40 years.	Secure Disposal
16.	Tax Form(s) (PAYE)	6 years.	Secure Disposal
17.	Family Cashless Payments	6 years.	Secure Disposal
Governance			
1.	Government Instruments, Records and Training	Life of the school.	Secure Disposal
2.	Records Relating to Governor(s) Appointment	Parents & staff Governors not appointed by Governors 6 months. Co-opted end of their term (25 years in case of allegations involving children).	Secure Disposal
3.	Records Relating to the Appointment of a Chair	Once decision recorded in minutes, records can be deleted.	Archive
4.	Meetings Agendas and Minutes	Life of the school.	Secure Disposal
5.	Records Relating to Governors Visits	3 years.	Secure Disposal
6.	Complaints Dealt with by Governors or Principals	6 years from date resolved. Where negligence is involved, 15 years. Where child protection issues are raised 40 years.	Secure Disposal
7.	Register of Business Interests	6 years.	Secure Disposal
8.	Governors Code of Conduct	A copy of each version to be kept for life of the organisation.	Secure Disposal
9.	Governors DBS Checks	Date of DBS check + 6 months.	Secure Disposal
10.	Suspension/Exclusion Panels	6 years.	Secure Disposal
11.	Records Relating to Governor Panels (Stage 3 Complaints and Stage 3 Disciplinary Hearing)	6 years.	Secure Disposal
Pupil Management			
1.	Admission(s) - Successful	Date of admission + 1 year.	Secure Disposal
2.	Admission(s) - Unsuccessful	Resolution of case + 1 year.	Secure Disposal
3.	Pupil File - Primary School	Primary schools - whilst child remains at the school (records will move with pupil).	Secure Disposal
4.	Pupil File - Secondary School	Secondary school(s) - pupil date of birth + 25 years. child with special needs, date of birth + 25 years.	Secure Disposal

5.	Pupil File – Contact and Next of Kin Details	Whilst child remains at school + 3 years.	Secure Disposal
6.	Child Protection Files (not held on pupil file but separately)	Child date of birth + 25 years.	Secure Disposal
7.	Attendance Register	Date on entry + 3 years.	Secure Disposal
8.	Assessment of Support/Help for Pupil Attendance	7 years.	Secure Disposal
9.	Files Relating to Special Educational Needs	Child date of birth + 25 years.	Secure Disposal
10.	Curriculum and Staff Assessment Returns	3 years.	Secure Disposal
11.	Examination Results (School Copy)	6 years.	Secure Disposal
12.	Examination Results (Pupil Copy - Held on Pupil File)	Child date of birth + 25 years.	Secure Disposal
13.	Completed Examination Papers	Until any appeals/validation process has ended.	Secure Disposal
14.	School Trips and Educational Experiences	Conclusion of the trip. If there has been an incident, date of birth of the pupil(s) involved + 25 years.	Secure Disposal
15.	Curriculum and Outcomes (Internal Summative)	Kept on pupil record (internal moderation + 1 academic year.	Secure Disposal
16.	Home School Communication	Whilst child remains at school + 3 years.	Secure Disposal
17.	Health and Medication	Whilst child remains at school + 3 years.	Secure Disposal
Human Resources			
1.	Recruitment - Unsuccessful	Date of unsuccessful notice + 6 months.	Secure Disposal
2.	DBS Checks – Successful Applicants	Length of employment + 6 Years.	Secure Disposal
3.	Evidence of Right to Work – Successful Candidates	Length of employment + 6 Years.	Secure Disposal
4.	Equality and Diversity Monitoring	Length of employment + 6 Years.	Review
5.	Staff Personnel File	Length of employment + 6 Years.	Secure Disposal
6.	Employee Benefit Scheme - Vivup	Length of employment + 6 Years.	Secure Disposal
7.	Appraisals and Assessment Records	6 Years.	Secure Disposal
8.	Sickness Absence Monitoring	From date of absence + 6 Years.	Secure Disposal
9.	Occupational Health Provider – Maitland Medical	From date of absence + 6 Years.	Secure Disposal
10.	Occupational Health Provider – Education Mutual	From date of absence + 6 Years.	Secure Disposal
11.	Training - Leading to Professional Development	5 Years after employment (CIPD)	Secure Disposal
12.	Training - Not Involving Children (e.g. First Aid, Health & Safety etc)	5 Years after employment (CIPD)	Secure Disposal
13.	Staff Training - Involving Children (e.g. Safeguarding)	Age 25 + 7 Years	Secure Disposal

14.	Allegation Against a Member of Staff Relating to Child Protection	10 Years.	Review
15.	Disciplinary Proceedings	6 Years.	Secure Disposal
16.	Records Relating to Conversion of School to Academy Status	6 Years.	Secure Disposal
17.	Payroll	6 Years.	Secure Disposal
18.	Pension - Local Government Pension Scheme	6 Years.	Secure Disposal
19.	Pension -Teachers Pension Scheme	6 Years.	Secure Disposal
School Management			
1.	Minutes of Senior Management Meetings	3 Years.	Secure Disposal
2.	Head Staff and Senior Management Reports	3 Years.	Secure Disposal
3.	School Development Plans	3 Years.	Secure Disposal
4.	School Brochures, Prospectus and Newsletters	3 Years.	Secure Disposal
5.	Catering Provider - Chartwells (The Compass Group)	6 Years.	Secure Disposal
6.	IT Monitoring System - Smoothwall	6 Years.	Secure Disposal
7.	External Moderation	Until superseded.	Secure Disposal
8.	Timetables	1 Year.	Secure Disposal
9.	Class Record and Marking Books	1 Year.	Secure Disposal
10.	Record of Homework Set-Up	1 Year.	Secure Disposal
11.	Pupils work	1 Year.	Secure Disposal
12.	Family Liaison Officer Records	2 Years.	Secure Disposal
13.	Reports from Outside Agencies (Regarding a Particular Child)	Whilst child attending school, then destroyed.	Secure Disposal
14.	Referral Forms	While the referral is current.	Secure Disposal
15.	Family Liaison Group Registers	2 Years.	Secure Disposal
16.	Transfer Sheets (From Another School)	2 Years.	Secure Disposal
17.	Local Authority Attendance Returns	1 Years.	Secure Disposal
18.	Census Returns	5 Years.	Secure Disposal
19.	Records Relating to Parent Evenings	6 Years.	Secure Disposal