



South Downs Learning Trust

A MULTI ACADEMY TRUST

RECORDS MANAGEMENT POLICY

DATE APPROVED BY TRUSTEES	MAY 2019
DATE OF NEXT REVIEW	MAY 2021
STATUS	MANDATORY (Within SDLT suite of data protection policies)

OUR VISION

A community of primary and secondary academies that are the first choice for students and families in Sussex, with an outstanding reputation for high aspiration and high achievement.

South Downs Learning Trust Records Management Policy

The Trust recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the trust and its academies, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

1. Scope of the policy

1.1 This policy applies to all records created, received or maintained by staff of the trust in the course of carrying out its functions.

1.2 Records are defined as all those documents which facilitate the business carried out by the trust and/or academies and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

1.3 A small percentage of the records of the trust and/or academies will be selected for permanent preservation as part of the institution's archives and for historical research. This should be done in liaison with the County Archives Service.

2. Responsibilities

2.1 The trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Executive Headteacher and the relevant Headteacher/Head of School where the records relate to a particular academy within the trust or to a particular student attending an academy within the trust.

2.2 The person responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

2.3 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the trust’s records management guidelines.

3. Relationship with existing policies

This policy has been drawn up within the context of:

- Data Protection Policy
- Freedom of Information Policy and Publication Scheme
- IT policy
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

Signed: _____ [Executive Headteacher]

This policy follows the IRMS Schools Toolkit where appropriate however, the requirements for data retention as set out through legislation has not significantly changed through GDPR, but many other aspects of data retention have changed due to how and why data is processed under GDPR and increased emphasis on data minimisation. This policy also complies with ESCC Keeping Safeguarding Records of Child Protection and Welfare Concerns Guidance for Early Years Settings, Schools and Colleges (April 2019) as well as East Sussex County Council retention schedule which indicates governing body minutes should be held for six years and then archived at County.

Four Periods of Data Retention (Managing Pupil Records) or IRMS Recommendations (Other)

1. One month after the event about which you create data is active, in order to ensure any ‘loose ends’ are tied up.
2. One year after the pupil to whom the data relates is at your school, in order to ensure smooth ‘handover’ activity related to the child is passed on to a subsequent school.
3. For 5 years after a pupil has left your school, to support longer term but detailed analysis of progress, attainment, support for different pupil groups etc. This is the area where ‘blurring’ of the data discussed below can gain most traction.
4. Long term, until the child is 25 years of age or older, for instances where detailed information about activities in school may form an important part of safeguarding for that individual.

Managing Pupil Records (DFE Four Periods of Data Retention)	Other (IRMS Specific Data Retention Period)
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Admissions Attainment Attendance Behaviour Exclusions Identify management and authentication Catering and free school meal management Trips and activities Medical information and administration Safeguarding Special educational need	Child Protection Curriculum & Educational Visits Governance Management Personal Records Health & Safety Administrative and General Administrative and General Accounts and Statements including Budget Management Contract Management Property Management and Maintenance
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Pupils - Personal identifiers, contacts and pupil characteristics

(Data protection: a toolkit for Schools April 2018, Department For Education)

Data item group	Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
Admissions		 (admissions files)	 (admissions appeals)		Admissions files Admissions data is used extensively from the period of the school receiving it up until the point where children enrol. It is then used for some validation and cross checking of enrolment details. Once enrolled, the child's records in the MIS become the core record. Data about children who enrolled but didn't get in is useful, but any intelligence gathered from it (for example, where in the city children are interested in our school, or the SEN make up) is aggregated within the first year to a level being non-personal, after that, the detailed data within the admission file could be deleted.

				<p>It is important to retain detailed data for a year, any appeals for which richer data about other successful/unsuccessful appeals may be relevant typically happen in the first year.</p> <p>Information about admissions appeals</p> <p>When dealing with appeals, having a reasonable history of any other appeals in some detail can be needed to deal with the particular appeal. The information is needed alongside the admissions policies of the time.</p>
Attainment			✓	<p>Formative assessment data is useful as a child is building towards a particular more formal assessment. Once the child leaves the school, it has little value in terms of retention.</p> <p>Summative attainment is the main outcome of what children 'attain' in school. It is important that future schools where pupils go on to learn can understand previous attainment. Whilst often that information is 'passed on' smoothly as children move phase, it is not always the case, and thus retaining the names alongside the main attainment data for 1 year after the pupil has left the school feels proportionate.</p> <p>Trend analysis is important, 3 to 5 years is often the 'trend' people look at, but longer may be relevant. Whilst this must be fully flexible in reporting small sub groups, and the data would wish to be retained at individual level, some personal data (for example, name) could be removed from the data to reduce sensitivity.</p> <p>After 3 to 5 years, then aggregated summaries that have no risk of identifying individuals are all that are typically needed to be retained.</p>
Attendance		✓		<p>Attendance data probably resides in some 'operational' systems in schools, such as cashless catering. In these systems, the data should only be retained until the associated business processes have concluded (for example, payment of meals). The start of the next academic year once all bills are settled feels proportionate.</p> <p>Attendance is related to individual attainment and so being able to relate attendance to attainment whilst in our care is important. Keeping it in detailed, individual form for one year after the pupil leaves school support conversations about detailed attendance that may be needed to best support that child.</p> <p>After that period, non-identifiable summary statistics are all that is required to support longer term trend analysis of attendance patterns.</p> <p>We noted another GDPR principle here that may apply to attendance. Under data minimisation, where 'paper records' capture attendance, this paper record duplicates the electronic version and is</p>

					probably required once the paper has been transferred to a stable electronic format.
Behaviour		✓			This is all relevant for managing children when with at your school. 1 year allows a period of 'handover' to next institution with conversations supported by rich data if relevant.
Exclusions		✓			Exclusion data should be 'passed on' to subsequent settings. That school then has responsibility for retaining the full history of the child. If a private setting or the school is unsure on where the child has gone, then the school should ensure the LA already has the exclusion data.
Identity management and authentication	✓ (images used for identity management)				
Catering and free school meal management		✓ (meal administration)	✓ (free school meal eligibility information)		<p>A short historic record of what a child has had may be useful in case of any food-related incidents at school, or parental queries about the types of meals their children are choosing. Keeping for up to one year also allows time to do accounting work associated with catering. Typically 'one month' may not be enough, but 'one year' feels enough.</p> <p>Due to the way school funding works, free school meal eligibility is a financial matter, and thus keeping this data for 6+1 feels appropriate. This 7-year record also needs to be portable with the pupil, as historic dates can be used for funding.</p>
Trips and activities	✓ (field file) ✓ (educational visitors into school)		✓ (financial information related to trips)	✓ (major medical events)	<p>Financial information related to trips should be retained for 6 years + 1 for audit purposes. This would include enough child identifiers to be able to confirm contributions.</p> <p>A 'field file' is the information that is taken on a trip by a school. This can be destroyed following the trip, once any medicines administered on the trip have been entered onto the core system. If there is a minor medical incident on the trip (for example, a medical incident dealt with by staff in the way it would be dealt with 'within school'), then adding it into the core system would be done.</p> <p>If there is a major incident (for example, a medical incident that needed outside agency) then retaining the entire file until time that the youngest child becomes 25 would be appropriate.</p>

					<p>Permission to go on the trip slips will contain personal data, and destroying them after the trip unless any significant incident arises is appropriate, otherwise refer to the policies above.</p> <p>Schools sometimes share personal data with people providing 'educational visits' into school. There should be good policies in place to ensure that the sharing is proportionate and appropriately deleted afterwards.</p>
Medical information and administration	<p>✓</p> <p>(permission slips)</p>	<p>✓</p> <p>(medical conditions and ongoing management)</p>		<p>✓</p> <p>(medical incidents (potentially))</p>	<p>To support any handover work about effective management of medical conditions to a subsequent institution.</p> <p>Permission forms that parents sign should to be retained for the period that medication is given, and for 1 month afterwards if no issue is raised by child/parent. If no issue is raised in that time, that feels a reasonable window to assume all was administered satisfactorily. Adding this policy to the permission slip would seem prudent.</p> <p>Medical 'incidents' that have a behavioural or safeguarding angle (including the school's duty of care) should refer to the retention periods associated with those policies.</p>
Safeguarding				<p>✓</p>	<p>All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained along with those records.</p>
Special educational needs					<p>Refer to IRMS toolkit</p>
Personal identifiers, contacts and personal characteristics	<p>✓</p> <p>(images used in identity systems)</p> <p>✓</p> <p>(biometrics)</p>	<p>✓</p> <p>(images used in displays in school)</p>		<p>✓</p> <p>(postcodes)</p> <p>✓</p> <p>(names)</p> <p>✓</p> <p>(characteristics)</p>	<p>Images are used for different reasons, and the reason should dictate the retention period. Images used purely for identification can be deleted when the child leaves the setting. Images used in displays etc. can be retained for educational purposes whilst the child is at the school. Other usages of images (for example, marketing) should be retained for and used in line with the active informed consent, captured at the outset of using the photograph.</p> <p>Biometric data (typically fingerprints used in things like catering) should be used and retained as set out in the active informed consent gained at the outset, but typically this should not be retained long after the activity that requested its use has finished (for example, the child no longer attends the school to have a meal).</p> <p>As set out in other sections, names are needed for smooth handover to subsequent schools for up to one year.</p>

	 (house number and road)				<p>Postcode data is useful in analysing longer-term; performance trends or how catchment/pupil populations are shifting over time, but full address data (house number and road) is not required for that activity.</p> <p>Schools may well provide references for pupils for up to 3 years after they leave, and so retaining the name in the core pupil record is important (this doesn't mean it needs to be retained in all systems). Keeping names attached to safeguarding files for longer than this may be entirely appropriate – see safeguarding section.</p> <p>Characteristics form an essential part of trend analysis, and so retention is in line with those needs.</p>
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Child Protection

(Information Management Toolkit for Schools, Version 5, 1st February 2016, IRMS)

Basic File Description	Data Protection Issue X/✓	Retention Period (operational)	Action at the end of the administrative life of the record
Child Protection Record : Primary	✓	Retain for the time which the pupil remains at the primary school	Secure transfer to the secondary school or other primary school when the child leaves the school. Where the pupil transfers to an independent school, is home schooled or leaves the country, the file should be returned to the LA. Copies should only be retained where there is ongoing legal action.
Child Protection Record: Secondary	✓	DOB + 25 years then review	Secure disposal

Allegation of a child protection nature against a member of staff, including where the allegation is unfounded.	✓	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer	Secure disposal – the records must be shredded
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Curriculum & Educational Visits

(Information Management Toolkit for Schools, Version 5, 1st February 2016, IRMS)

Basic File Description	Data Protection Issue X/✓	Retention Period (operational)	Action at the end of the administrative life of the record
School development plan	X	Current year + 6 years	Secure disposal
Curriculum returns	X	Current year + 3 years	Secure disposal
Schemes of work	X	Current year + 1 year	Secure disposal
Timetable	X	Current year + 1 year	Secure disposal
Mark books	X	Current year + 1 year	Secure disposal
Class record books	X	Current year + 1 year	Secure disposal
Record of homework set	X	Current year + 1 year	Secure disposal
Pupils work	X	Current year + 1 year Where possible work should be given to the pupil at the end of the academic year	Secure disposal
Examination Results	✓	Current year + 6 years	Secure disposal

SATs records – results	✓	Current year + 6 years The results should also be on the pupil's educational records	Secure disposal
Examination papers	✓	The examination papers should be kept until any appeal/ validation process is complete	
PAN reports	✓	Current year + 6 years	Secure disposal
Value added and contextual data	✓	Current year + 6 years	Secure disposal
Self-evaluation forms	✓	Current year + 6 years	Secure disposal
Records created to obtain approval to run an educational visit outside the classroom – Primary	X	Date of visit + 14 years	Secure disposal
Records created to obtain approval to run an educational visit outside the classroom – Secondary	X	Date of visit + 10 years	Secure disposal

Governance

(Information Management Toolkit for Schools, Version 5, 1st February 2016, IRMS)

Basic File Description	Data Protection Issue X/✓	Retention Period (operational)	Action at the end of the administrative life of the record
Minutes: Pre-conversion GB Principal set (signed)	X	Permanent	Retain in school for 6 years from date of meeting and then send for permanent archiving

Minutes : Trust Board and Local Governing Committees	X	Permanent	Retain in school for 6 years from date of meeting and then send for permanent archiving
Agendas	X	Date of meeting, one copy held with master set of minutes	Secure disposal
Reports	X	Date of report + 6 years	Retain in school for 6 years from date of meeting
Instruments of Governance – Articles, Funding Agreement and Supplemental Funding Agreements	X	Permanent	Retained whilst Trust / academy is open
Trusts and Endowments	X	Permanent	Retain whilst Trust / academy is open
Action Plans	X	Life of action plan + 3 years	Secure disposal
Policy documents	X	Expiry of policy + 3 years	Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process) and then secure disposal
Complaints	✓	Date of resolution of complaint + 6 years	Retain in Trust/ academy for the first 6 years. Review for further retention in the case of contentious disputes. Secure disposal
Annual reports required by the DFE	X	Date of report + 10 years	Secure disposal
Proposals for schools to become or be established as Specialist Status	X	Date of proposal accepted or declined + 3years	Secure disposal

Management

(Information Management Toolkit for Schools, Version 5, 1st February 2016, IRMS)

Basic File Description	Data Protection Issue X/✓	Retention Period (operational)	Action at the end of the administrative life of the record
Log books of activity in the academy maintained by the Headteacher	✓	Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry
Minutes of SLT and other internal administrative bodies	✓	Date of meeting + 3 years, then review	Secure disposal
Reports created by the Headteacher or the management team	✓	Date of report + 3 years, then review	Secure disposal
Records created by HTs, DHTs, HOYs, and other members of staff with admin responsibilities	✓	Closure of file + 6 years, then review	Secure disposal
Correspondence created by HTs, DHTs, HOYs, and other members of staff with admin responsibilities	✓	Date of correspondence + 3 years	Secure disposal
Professional development files	✓	Life of the plan + 6 years	Secure disposal
School development plans	X	Life of the plan + 3 years	Secure disposal
All records relating to the creation and implementation of the School Admission Policy	X	Life of the policy + 3 years, then review	Secure disposal

Admissions Appeals - if the admission is successful	✓	Admission + 1 year Unless the papers form part of the pupil's records	Secure disposal
Admissions - if the appeal is unsuccessful	✓	Resolution of case + 1 year	Secure disposal
Admissions - casual	✓	Current + 1 year Unless the papers form part of the pupil's records	Secure disposal
Proofs of address supplied by parents as part of the admissions process	✓	Current + 1 year Unless it forms part of the pupil's records	Secure disposal
Supplementary Information Form – Successful application	✓	Information should be added to pupil file	Secure disposal
Supplementary Information Form – unsuccessful application	✓	Until appeal process is completed	Secure disposal

Personal Records

(Information Management Toolkit for Schools, Version 5, 1st February 2016, IRMS)

Basic File Description	Data Protection Issue X/✓	Retention Period (operational)	Action at the end of the administrative life of the record
Timesheets, sick pay	✓	Current year + 6 years	Secure disposal

Staff personal file	✓	Termination + 6 years	Secure disposal
All records relating to appointment of HT	✓	Date of appointment + 6 years	Secure disposal
Interview notes and recruitment records – unsuccessful candidates	✓	Date of appointment of successful candidate + 6 months	Secure disposal
Timesheets, sick pay	✓	Current year + 6 years	Secure disposal
Pre-employment vetting information – DBS checks	✓	Date of check + 6 months Don't have to keep copies of the DBS certificate	
Proof of Identity collected as part of the process for checking 'portable' enhanced DBS disclosure	✓	This should be checked and a note kept of what has been seen and checked. If copy documents are kept then keep on the file.	Secure disposal
employment vetting information – Evidence proving the right to work in the UK	✓	Documents should be on the personnel file. If held separately – date of termination + 2 years	Secure disposal
Disciplinary – Oral warning	✓	Date of warning + 6 months	Secure disposal – if placed on personnel file it needs to be removed
Disciplinary –Written warning	✓	Date of warning + 6 months	Secure disposal– if placed on personnel file it needs to be removed
Disciplinary – Final warning		Date of warning + 18 months	Secure disposal
Case not found	✓	If child protection issue see Child Protection section above, in all other cases at the end of the case.	Secure disposal
Assessment under health and safety regulations and records of consultations with	✓	Permanently	

safety representatives and committees			
Records relating to accident/injury at work	✓	Date of incident + 12 years. In the case of a serious incident a further retention period will be applied	Secure disposal
Annual appraisal	✓	Current year + 5 years	Secure disposal
Maternity pay records	✓	Current year + 3 years	Secure disposal
Parental leave	✓	Until child is 18	Secure disposal
Money Purchase Details	✓	6 years after transfer or value taken	Secure disposal
Payroll- Income tax, NI returns, HMRC correspondence	✓	Current year + 6 years	Secure disposal
Inland Revenue/ HMRC approvals	✓	Permanently	
Retirement Benefits Scheme	✓	Current year + 6 years	Secure disposal
Pension scheme investment policies	✓	12 years from the ending of any benefit payable under the policy	Secure disposal
Pensioners' records	✓	12 years after the end of benefit	Secure disposal
Redundancy details, payments etc	✓	6 years after the date of redundancy	Secure disposal
Staff work – books and staff electronic folder of work created whilst employed	✓ (potentially)	Current year + 1 year	Secure disposal
Emails – Staff who are no longer employed at the Trust	✓ (potentially)	Staff email accounts will only be retained for the period of employment. On the cessation of employment, the email account and emails will be terminated within 6 months from cessation unless there is a legal reason for retention.	Secure disposal

Health and Safety

(Information Management Toolkit for Schools, Version 5, 1st February 2016, IRMS)

Basic File Description	Data Protection Issue X/✓	Retention Period (operational)	Action at the end of the administrative life of the record
Policy statements	X	Life of policy + 3 years	Secure disposal
Risk assessments	X	Life of risk assessment + 3 years	Secure disposal
Control of substances hazardous to health	X	Current year + 40 years	Secure disposal
Monitoring areas where employees and persons are likely to have become in contact with asbestos	✓ (potentially)	Last action + 40 years	Secure disposal
Monitoring areas where employees and persons are likely to have become in contact with radiation	✓ (potentially)	Last action + 50 years	Secure disposal
Accident reporting – adults	✓	Date of incident + 6 years	Secure disposal
Accident reporting – children	✓	DOB of child + 25 years	Secure disposal
Fire precaution log books	X	Current year + 6 years	Secure disposal

Administrative and General

(Information Management Toolkit for Schools, Version 5, 1st February 2016, IRMS)

Basic File Description	Data Protection Issue X/✓	Retention Period (operational)	Action at the end of the administrative life of the record
Ofsted Reports and papers	X	Life of the report and then review	
Returns made to central government	X	Current year + 6 years	
Employer's Liability Certificate	X	Closure of school + 40 years	Secure disposal
Inventories of equipment and furniture	X	Current year + 6 years	Secure disposal
Burglary, theft and vandalism report	X	Current year + 6 years	Secure disposal
Records in relating to the creation and publication of the Trust marketing material and academy brochures	X	Current year + 1 year	Standard disposal
Records in relation to the creation of circulars to staff, parents and students	X	Current year + 1 year	Standard disposal
Visitors books and signing in sheets	✓	Current year + 6 years and review	Secure disposal
Records relating to PTAs/ Pas	X	Current year + 6 years and review	Secure disposal
Photographs	✓	The year the photograph is taken unless specific consent has been obtained for the	Secure disposal

		photographs to be retained for longer for a specific purpose as they are needed	
CCTV – general footage	✓	6 months from date of footage. The footage is recorded over and this may occur over a shorter period of time but it will not be more than 6 months	Standard disposal
CCTV – footage used for particular uses	✓	For the period necessary to deal with the legitimate purpose for which the footage is needed such as exclusion, police investigation	Secure disposal
Visitor manual signing in records	✓	Current year + 1 year	Secure disposal
Visitor digital signing in records	✓	Current year + 1 year	Secure disposal

Accounts and Statements including Budget Management

(Information Management Toolkit for Schools, Version 5, 1st February 2016, IRMS)

Basic File Description	Data Protection Issue X/✓	Retention Period (operational)	Action at the end of the administrative life of the record
Annual Accounts	X	Current year + 6 years	Standard disposal
Loans and grants managed by the Trust and the academies	X	Date of last payment on the loan + 12 years then review	Secure disposal
All records relating to the creation management of budgets	X	Life of the budget + 3 years	Secure disposal

All records relating to the creation of management accounts	X	Life of the management accounts + 3 years	Secure disposal
Invoices, purchase orders, receipts, order books and requisitions, delivery notes	X	Current financial year + 6 years	Secure disposal
Records relating to the collection and banking of income and monies	X	Current financial year + 6 years	Secure disposal
Records relating to the identification and collection of debt	X	Current financial year + 6 years	Secure disposal
Petty cash books	X	Current year + 6 years	Secure disposal
Cheque Books	X	Current year + 6 years	Secure disposal
Paying in books	X	Current year + 6 years	Secure disposal
Accounting ledgers, Bank statements, bank reconciliations, and cashflow statements	X	Current year + 6 years	Secure disposal
VAT Reports	X	Current year + 6 years	

Contract Management

(Information Management Toolkit for Schools, Version 5, 1st February 2016, IRMS)

Basic File Description	Data Protection Issue	Retention Period (operational)	Action at the end of the administrative life of the record
	X/✓		

records relating to the management of contracts under seal	X	Last payment on the contract + 12 years	Secure disposal
All records relating to the management of contracts under signature	X	Last payment on the contract + 6 years	Secure disposal
Records relating to the monitoring of contracts	X	Current year + 2 years	Secure disposal

Property Management and Maintenance

(Information Management Toolkit for Schools, Version 5, 1st February 2016, IRMS)

Basic File Description	Data Protection Issue X/✓	Retention Period (operational)	Action at the end of the administrative life of the record
Title deeds of Trust property	X	Permanent	
Plans of property belonging to the Trust	X	Retained whilst the site belongs to the Trust and then passed to the new occupier	
Leases	X	Expiry of lease + 6 years	Secure disposal
Records of lettings	X	Current financial year + 6 years	Secure disposal
All records of maintenance relating to academy sites undertaken by contractors	X	Current year + 6 years	Secure disposal

All records relating to the maintenance of the academies undertaken by Trust employees including maintenance log books	X	Current year + 6 years	Secure disposal
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Further guidance to those set out in this policy can be found in the Records Management Toolkit for Schools and can be found on the Information and Records Management Society's website (www.irms.org.uk/resources/information-guides/199-rm-toolkit-for-school).