

Horizons Specialist Academy Trust

Records Management Policy

Adopted by the Finance, Risk & General Purposes Committee : 14 June 2022
Date of next review: Summer term 2023
Responsible Officer: Data Protection Officer

Contents:

Statement of intent

Public Sector Equality Duty

1. Legal framework
2. Responsibilities
3. Management of pupil records
4. Retention of pupil records and other pupil-related information
5. Retention of staff records
6. Retention of senior leadership and management records
7. Retention of health and safety records
8. Retention of financial records
9. Retention of other school records
10. Storing and protecting information
11. Accessing information
12. Digital continuity statement
13. Information audit
14. Disposal of data
15. Monitoring and review

Statement of intent

Horizons Specialist Academy Trust (“The Trust”) is committed to maintaining the confidentiality of its information and ensuring that all records within the Trust are only accessible by the appropriate individuals. In line with the requirements of the UK General Data Protection Regulation (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.

This policy has been created to outline how records are stored, accessed, monitored, retained and disposed of, in order to meet the statutory requirements.

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

Public Sector Equality Duty

Horizons Specialist Academy Trust has carefully considered and analysed the impact of this policy on equality and the possible implications for pupils, parents and staff with protected characteristics, as part of our commitment to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.

1. Legal framework

- 1.1. This policy has due regard to legislation including, but not limited to, the following:
 - The UK General Data Protection Regulation (UK GDPR)
 - Freedom of Information Act 2000
 - Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
 - Data Protection Act 2018
- 1.2. This policy also has due regard to the following guidance:
 - Information Records Management Society (IRMS) 'Academies Toolkit' 2019
 - DfE (2018) 'Data Protection tool kit for schools'
 - DfE (2018) 'Careers guidance and access for education and training'
- 1.3. This policy will be implemented in accordance with the following Trust policies and procedures:
 - Data Protection Policy
 - Freedom of Information Policy
 - Information Security Policy

2. Responsibilities

- 2.1. The Trust as a whole has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.
- 2.2. The Data Protection Officer (DPO) is responsible for the management of records at Horizons Specialist Academy Trust.
- 2.3. The DPO is responsible for promoting compliance with this policy and reviewing the policy on an annual basis.
- 2.4. The DPO is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of correctly.
- 2.5. All staff members are responsible for ensuring that any records for which they are responsible for are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

3. Management of pupil records

- 3.1. 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 includes all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.
- 3.2. The following information is stored on the front of a pupil record, and will be easily accessible:

- Legal name, preferred name, gender and date of birth
 - Unique pupil number
 - Note of the date when the file was opened
 - Note of the date when the file was closed, if appropriate
 - Ethnic origin, religion and first language (if not English)
 - Emergency contact details, the name of the pupil's doctor's practice and contact information
 - Any allergies, dietary requirements or other medical conditions that are important to be aware of
 - Names of parents/carers, including their home address(es), telephone number(s) and any other contact information
 - Admission number, the date of admission and the date of leaving, where appropriate
 - Any other agency involvement, e.g. speech and language therapist
 - Previous school information
 - Identification if Child Protection/Child In Need
- 3.3. The following information is stored in a pupil record, and will be easily accessible:
- Admissions form
 - Fair processing notice – only the most recent notice will be included
 - Full year written report to parents
 - End of year achievement report
 - Notes relating to accidents involving the pupil
 - Any information about an education and healthcare (EHC) plan and support offered in relation to the EHC plan
 - Any information relating to exclusions
 - Any correspondence with parents or external agencies relating to major issues, e.g. mental health, holiday requests, absence notes
 - All information received from primary/previous school
- 3.4. The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the pupil:
- Parental and, where appropriate, pupil consent forms for residential visits, photographs and videos, etc.
 - Correspondence with parents about minor issues, e.g. behaviour
- 3.5. Hard copies of disclosures and reports relating to child protection/Child In Need /Early Help are stored in a separate pupil file stored in a securely locked filing cabinet in the Designated Safeguarding Officer's or Principal's office (CP/CIN) or in the Parent Support Advisor's Office (Early Help) – a note indicating this is marked on the pupil's file.

The following information will be stored at the front of the child protection/child in need/Early Help files:

- Name of Child
- DOB
- RAISE ID
- UPN
- School
- Entry date to school
- Date of CIN/CP
- Date discharged from CP/CIN

The following information will be stored in the CP/CIN files:

- Copy of CPOMS chronology and meeting chronology sheet
- Key contact sheet recording:
 1. Name of Child
 2. DOB
 3. UPN
 4. Name of School
 5. Current Year group
 6. Current Address
 7. Name and contact details of parents/carers with parental responsibility
 8. Name of anyone child is not allowed contact with
 9. Name and contact details of current social worker
 10. Name contact details of any other named professional
 11. Names and DOBs of siblings and the Schools they attend
- Current Child Protection Plan/Child In Need Plan/Early Help Assessment
- Initial Child Protection Report/Review Child Protection Report/Core Group minutes/Planning Meeting Minutes/TAC/TAF minutes. (Copy of official minutes and HSAT DSL minutes)
- Cause for concern reports/Children's Hub (First Contact) response letter/Strategy minutes (Copy of official minutes and HSAT DSL minutes)
- Pupil Risk Assessments

- School Reports
 - Any other reports/letters relevant to Safeguarding
 - Receipt of acceptance (case transfer receipt)
- 3.6. Hard copies of complaints made by parents or pupils are stored in a file in the Principal's office – a note indicating this is marked on the pupil's file.
 - 3.7. Actual copies of accident and incident information are stored separately on the Trust's management information system and held in line with the retention periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.
 - 3.8. CPOMS – Any data stored electronically via CPOMS is transferred to the pupil's next school (if relevant). Data stored via CPOMS will be subject to the same retention schedules as hard copies.
 - 3.9. The Trust will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.
 - 3.10. The only exception to the above is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, pastoral lead, will remove these records.
 - 3.11. Electronic records relating to a pupil's record will also be transferred to the pupils' next school. Section 10 of this policy outlines how electronic records will be transferred.
 - 3.12. [Primary schools only] The Trust will not keep any copies of information stored within a pupil's record, unless there is ongoing legal action at the time during which the pupil leaves the academy. The responsibility for these records will then transfer to the next school that the pupil attends.
 - 3.13. [Secondary schools and sixth form colleges only] If any pupil attends the academy until statutory school leaving age, the pupil's records will be kept until the pupil reaches the age of 25 years.
 - 3.14. The Trust 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 Trust.

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

- 4.1. 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.
- 4.2. 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 |
|----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| Central government | | |
| Returns made to central government | Current year plus six years | Securely disposed of |
| Ofsted reports and papers | Life of report then review | Securely disposed of |
| Personal identifiers, contacts and personal characteristics | | |
| 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 – unless consent has been received to continue use after the pupil has left school | Securely disposed of |
| Images used for marketing purposes | In line with 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 |
| Admissions | | |
| All records relating to the creation and implementation of the Admissions Policy | Life of policy plus three years | Securely disposed of |
| Admissions (successful) | Date of admission plus one year | Securely disposed of |
| Admissions appeals (unsuccessful) | Resolution of case plus one year | Securely disposed of |
| Register of admissions | Whilst the pupil remains at the school plus three years | Information is reviewed and the register may be kept permanently |
| [Secondary schools only] Secondary school admissions | Whilst the pupil remains at the school plus one year | Securely disposed of |
| Proof of address (supplied as part of the admissions process) | Whilst the pupil remains at the school plus one year | Securely disposed of |

| Type of file | Retention period | Action taken after retention period ends |
|--------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Supplementary information submitted, including religious and medical information etc (where the admission was successful) | Information added to the pupil file | Securely disposed of |
| Supplementary information submitted, including religious and medical information etc. (where the admission was not successful) | Until the appeals process has been completed | Securely disposed of |
| Pupils' educational records | | |
| [Primary schools only] Pupils' educational records | Whilst the pupil remains at the school | If the pupil transfers to an independent school, transfers to home-schooling, leaves the country or dies whilst at the school, the file should be returned to the LA and retained for the statutory period |
| [Secondary schools and sixth forms only] Pupils' educational records | 25 years after the pupil's date of birth | Securely disposed of |
| Public examination results | <p>Added to the pupil's record and transferred to next school</p> <p>Copies with pupils' names are held whilst the pupil is at school, plus five years</p> <p>Copies with pupils' names removed are held for 25 years after the pupil's date of birth</p> | Uncollected certificates returned to the examination board |
| Internal examination results | <p>Added to the pupil's record and transferred to next school</p> <p>Copies with pupils' names are held whilst the pupil is at school, plus five years</p> <p>Copies with pupils' names removed are held for 25 years after the pupil's date of birth</p> | Securely disposed of |

| Type of file | Retention period | Action taken after retention period ends |
|---------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| Behaviour records | Added to the pupil's record and transferred to the next school Copies are held whilst the pupil is at school, plus one year | Securely disposed of |
| Exclusion records | Added to the pupil's record and transferred to the next school Copies are held whilst the pupil is at school, plus one year | Securely disposed of |
| Historic child protection information held on a pupil's record | Stored in a sealed envelope for 25 years after the pupil's date of birth then reviewed Records also subject to any instruction given by the Independent Inquiry into Child Sex Abuse (IICSA) | Securely disposed of – must be shredded |
| Child protection/Child In Need/Early Help records held in a separate file | 25 years after the pupil's date of birth then reviewed Records also subject to any instruction given by the IICSA | Securely disposed of - must be shredded |
| Education, training or employment destinations data | Whilst the pupil is at the school, plus at least three years or from the end of KS4, whichever is earliest | Securely disposed of |
| Attendance | | |
| Attendance registers | Last date of entry onto the register, plus three years | Securely disposed of |
| Letters authorising absence | Current academic year, plus two years | Securely disposed of |
| Medical | | |
| Permission slips | For the duration of the period that medication is given, plus one year | Securely disposed of |
| Medical conditions – ongoing management | Added to the pupil's record and transferred to the next school | Securely disposed of |

| Type of file | Retention period | Action taken after retention period ends |
|-----------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | Copies held whilst the pupil is at school, plus one year | |
| 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 | Securely disposed of |
| SEND | | |
| SEND files, reviews and individual education plans, including advice and information to parents regarding SEND and the accessibility strategy | Pupil's date of birth plus 31 years | Information is reviewed and the file may be kept for longer than necessary if it is required for the Trust to defend themselves in a 'failure to provide sufficient education' case |
| Curriculum management | | |
| SATs results | A composite of the year's results may be held for the current year plus six years, for comparative purposes | Securely disposed of |
| Examinations results (school copy) | Current year plus six years | 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 | Current academic year, plus six years | 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 |

| Type of file | Retention period | Action taken after retention period ends |
|--------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| Curriculum returns | Current year plus three years | Securely disposed of |
| Schemes of work | Current year plus one year | Securely disposed of |
| Class record books | Current year plus one year | Securely disposed of |
| Mark books | Current year plus one year | Securely disposed of |
| Record of homework set | Current year plus one year | Securely disposed of |
| Extra-curricular activities | | |
| Parental consent forms for school trips where no major incident occurred | Until the conclusion of the trip | Securely disposed of |
| Field file – information taken on school trips | Until the conclusion of the trip Where a minor incident occurs, field files are added to the core systems as appropriate | Securely disposed of |
| 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 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 |
| Educational visitors in school – sharing of personal information | Until the conclusion of the visit plus one month | Securely disposed of |
| Parent Support Advisers | | |
| Reports for outside agencies | Duration of the pupil's time at school | Securely disposed of |
| Parent Support Referral forms | Whilst the referral is current | Securely disposed of |
| Electronic Data base of case files | 25 years after the pupil's date of birth (as stated on the pupil's record) | |

| Type of file | Retention period | Action taken after retention period ends |
|-------------------------------------------------|-------------------------------|------------------------------------------------------------|
| | | Securely disposed of, unless it is subject to a legal hold |
| Catering and free school meal management | | |
| Free school meals registers | Current year plus six years | Securely disposed of |
| School meals registers | Current year plus three years | Securely disposed of |
| School meals summary sheets | Current year plus three years | Securely disposed of |

5. Retention of staff records

- 5.1. 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.
- 5.2. 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 |
|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| Operational | | |
| Staff members' personal 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 |
| Timesheets | Current academic year, plus six years | Securely disposed of |
| Annual appraisal and assessment records | Current academic year, plus five years | Securely disposed of |
| Records relating to the agreement of pay and conditions | Date pay and conditions superseded plus six years | Securely disposed of |
| Training needs analysis | Current year plus one year | Securely disposed of |
| Recruitment | | |
| Records relating to the appointment of a new Principal | Date 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 (unsuccessful candidates) | Date of appointment of successful candidate, plus six months | Securely disposed of |
| Records relating to the appointment of new members of staff (successful candidates) | Relevant information added to the member of staff's personal file and other information retained for six months | Securely disposed of |
| DBS Enhanced results snapshot | Added to the member of staff's personal file | Securely disposed of |
| DBS certificates | After information has been documented on Single Central Record | Securely disposed of |
| Proof of identify as part of the enhanced DBS check | After identity has been proven | Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy this will be placed on the staff member's personal file, if not, securely disposed of |
| Evidence of right to work in the UK | Added to staff personal file or, if kept separately, termination of employment, plus not less than two years | Securely disposed of |
| Records relating to the TUPE process | Date last member of staff transfer or leaves the organisation plus six years | Securely disposed of |
| Disciplinary and grievance procedures | | |
| Child protection allegations, including where the allegation is unproven | <p>Added to staff personal 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</p> | Reviewed and securely disposed of – shredded |

| | | |
|----------------------------------------|------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| | retained until IICSA enquiries are complete | |
| Oral warnings | Date of warning plus six months | Securely disposed of – if placed on staff personnel file, removed from file |
| Informal management guidance | Placed in staff's personal file indefinitely | Securely disposed of |
| Written warning | Date of warning, plus 12 months. A valid record will be kept in staff's personal file | Securely disposed of |
| Final warning | Date of warning, plus 18 months. A valid record will be kept in staff's personal file | Securely disposed of |
| Records relating to unproven incidents | Conclusion of the case, unless the incident is child protection related and is disposed of as <u>above</u> | Securely disposed of |

6. Retention of governance, senior leadership and management records

6.1. The table below outlines the Trust's retention periods for governance, 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 |
|-----------------------------------|----------------------------------------------------|------------------------------------------|
| Governing board | | |
| Articles of Association | Life of the Academy/Trust | Securely disposed of |
| Written Scheme of Delegation | Life of Written Scheme of Delegation plus 10 years | Securely disposed of |
| Trustee / Governors – Appointment | Life of appointment plus six years | Securely disposed of |

| | | |
|-------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| Trustee / Governors – Disqualification | Date of disqualification plus 15 years | Securely disposed of |
| Trustee / Governors – Termination of Office | Date of termination plus six years | Securely disposed of |
| Annual Report and Accounts required by DfE | Date of report plus 10 years | Securely disposed of |
| Register of attendance at full governing body meetings | Date of last meeting 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 |
| Agendas for governing board / committee / local governance / Members meetings | Date of meeting plus 10 years | Securely disposed of |
| Original, signed copies of the minutes of governing board / committee / local governance / Members meetings | Permanent | If unable to store, these will be provided to the county archives service |
| Papers considered at meetings of the governing board / committees/ local governance | Life of the Academy | Securely disposed of |
| Inspection copies of the minutes of governing board / committee / local governance meetings | Date of meeting, plus three years | Shredded if they contain any sensitive and personal information |
| Policy documents created and administered by the governing board | Duration of the policy, plus three years | Securely disposed of |
| Records relating to complaints dealt with by the governing board | Date of the resolution of the complaint, plus a minimum of six years | Reviewed for further retention in case of contentious disputes, then securely disposed of |
| Proposals concerning changing the status of an academy | Date proposal accepted or declined, plus three years | Securely disposed of |
| Procedures for conduct at meetings | Date procedures superseded plus six years | Securely disposed of |
| Statutory registers | | |
| Register of Trustees / Members / Secretaries | Life of the Academy/Trust plus six years | Securely disposed of |
| Register of Trustees', Members' and Governors' interests | Life of the Academy/Trust plus six years | Securely disposed of |

| | | |
|-------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|--------------------------------------------------------------------|
| Register of Trustees' residential addresses | Life of the Academy/Trust plus six years | Securely disposed of |
| Register of gifts, hospitality and entertainments | Life of the Academy/Trust plus six years | Securely disposed of |
| Declaration of interests statements | Life of the Academy/Trust plus six years | Securely disposed of |
| CEO, Executive Principal, Principals and senior leadership teams (SLTs) | | |
| Log books of activity in the academies maintained by the Principals | Date of last entry, plus a minimum of six years | Reviewed and offered to the county archives service if appropriate |
| Minutes of Executive leadership team, SLT meetings and the meetings of other internal administrative bodies | Date of the meeting, plus three years | Reviewed and securely disposed of |
| Reports created by the CEO, Executive Principal, Principals or SLTs | Date of the report, plus a minimum of three years | Reviewed and securely disposed of |
| Records created by the CEO, Executive Principal, Principals, SLTs, and other members of staff with administrative responsibilities | Current academic year, plus six years | Reviewed and securely disposed of |
| Correspondence created by the CEO, Executive Principal, Principals, SLTs, and other members of staff with administrative responsibilities | Date of correspondence, plus three years | Reviewed and securely disposed of |
| Professional development plan | Duration of the plan, plus six years | Securely disposed of |
| Academy Improvement plan | Duration of the plan, plus three years | Securely disposed of |
| Trust's Strategic Plan | Duration of plan, plus three years | Securely disposed of |
| Management of complaints | Date complaint resolved plus three years | Securely disposed of |

7. Retention of health and safety records

- 7.1. 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.
- 7.2. 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 |
|------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| 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 | Securely disposed of |
| Records relating to accidents and injuries at work | Date of incident, plus 12 years. In the case of serious accidents, a retention period of 15 years is applied | Securely disposed of |
| Accident reporting – adults | Date of the incident, plus six years | Securely disposed of |
| Accident reporting – pupils | 25 years after the pupil's date of birth, on the pupil's record | Securely disposed of |
| Control of substances hazardous to health (COSHH) | Current academic year, 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 (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 | Like of risk assessment plus six years | Securely disposed of |
| Incident reports | Current year plus 20 years | Securely disposed of |

8. Retention of financial records

- 8.1. 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.
- 8.2. 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 |
|---------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| Strategic finance | | |
| 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 returns | 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 arrangements | | |
| 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 agreements | | |
| Funding Agreement with Secretary of State and supplemental funding agreements | Date of last payment of funding plus six years | Securely disposed of |
| Funding Agreement – termination of funding agreement | Date of last payment of funding plus six years | Securely disposed of |
| Funding Records – Capital Grant / Earmarked Annual Grant / 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 |
| 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 on loan plus six years if the loan is under £10k or date of last payment on loan plus 12 years if the loan is over £10k | Securely disposed of |

| Payroll and pensions | | |
|--------------------------------------------------------------------------------------|----------------------------------------------------|----------------------|
| 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 |
| Management of Teachers' Pensions Scheme / Records relating to pension registrations | Date of last payment of the pension plus six years | Securely disposed of |
| Absence record / staff returns / sickness record | Current academic year plus three years | Securely disposed of |
| Bonus / car allowances / car loans / overtime | Current academic year plus three years | Securely disposed of |
| Payroll records | Date of payroll run plus six years | Securely disposed of |
| National insurance schedule of payments | Current academic year plus six years | Securely disposed of |
| Personal bank details | Current academic year plus three years | Securely disposed of |
| Superannuation adjustments / superannuation reports / tax forms / P60 | Current academic year plus six years | Securely disposed of |
| Risk management and insurance | | |
| Employer's liability insurance certificate | Closure of the school, plus 40 years | Securely disposed of |
| Insurance policies | Date the policy expires plus six years | Securely disposed of |
| Records relating to the settlement of insurance claims | Date claims settled plus six years | Securely disposed of |
| Endowment funds and investments | | |
| Investment policies | Life of the investment plus six years | Securely disposed of |
| Management of endowment funds | Life of fund plus six years | Securely disposed of |
| Asset management | | |
| 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 |
| Records relating to the leasing of shared facilities | Current academic year, plus six years | Securely disposed of |
| Land and building valuations | Date valuation superseded plus six years | Securely disposed of |
| Disposal of assets | Date asset disposed of plus six years | Securely disposed of |
| Community school leases for land | Date lease expires plus six years | Securely disposed of |
| Commercial transfer arrangements | Date of transfer plus six years | Securely disposed of |
| Transfer of land to the Academy Trust | Life of land ownership then transfer to new owner | Securely disposed of |
| Transfer of freehold land | Life of land ownership then transfer to new owner | Securely disposed of |
| Accounts and statements including budget management | | |
| 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 |
| Contract management | | |
| 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 | Current academic year, plus 12 years | Securely disposed of |

| School fund | | |
|-----------------------------------------------------------------------------------------------|-------------------------------------------------|----------------------|
| Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books | Current academic year, plus six years | Securely disposed of |
| School meals | | |
| Free school meals registers | Current academic year, plus six years | Securely disposed of |
| School meals registers | Current academic year, plus three years | Securely disposed of |
| Pupil finance | | |
| 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 |

9. Retention of other school records

- 9.1. The table below outlines the Trust's retention periods for any other records held by the Trust, and the action that will be taken after the retention period, in line with any requirements.
- 9.2. 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 |
|-----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-------------------------------------------------------------|
| Property management | | |
| Title deeds of properties belonging to the Trust | Permanent | Transferred to new owners if the building is leased or sold |
| Plans of property belonging to the Trust | 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 Trust | Expiry of lease, plus six years | Securely disposed of |
| Records relating to the letting of Trust premises | Current financial year, plus six years | Securely disposed of |
| Business continuity and disaster recovery plans | Date and plan superseded plus three years | Securely disposed of |
| Fleet management | | |
| The process of acquisition and disposal of vehicles through lease or purchase, eg contracts/leases, quotes, approvals | Disposal of the vehicle plus six years | Securely disposed of |

| | | |
|-----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| The process of managing allocations of maintenance vehicles, eg lists of who was driving the vehicles and when, maintenance | Disposal of the vehicle plus six years | Securely disposed of |
| Service logs and vehicle logs | Life of the vehicle, then either to be retained for six years by school or to be returned to lease company | Securely disposed of |
| GPS tracking data relating to vehicles | Date of journey plus six years | Securely disposed of |
| Maintenance | | |
| All records relating to the maintenance of the academies 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 academies carried out by Trust 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 |
| Operational administration | | |
| General file series | Current academic year, plus five years | Reviewed and securely disposed of |
| Records relating to the creation and publication of the Trust/academy brochures | Current academic year, plus three years | Disposed of against common standards |
| 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 | Disposed of against common standards |
| Visitors' books and signing-in sheets | Current academic year, plus two 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 |
| Records relating to the management of software licences | Date of last payment on contract plus six years | Securely disposed of |

| | | |
|------------------------------------------------|---------------------------------|----------------------|
| School privacy notice which is sent to parents | Until superseded plus six years | Securely disposed of |
| Consent relating to school activities | While pupils attends the school | Securely disposed of |

10. Storing and protecting information

- 10.1. The ICT Manager will ensure back-up of information is conducted on a weekly basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.
- 10.2. Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.
- 10.3. Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 10.4. Digital data is coded, encrypted or password-protected when being sent off site.
- 10.5. Memory sticks are not used to hold personal information.
- 10.6. All electronic devices are password-protected to protect the information on the device in case of theft.
- 10.7. Where possible, the Trust enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 10.8. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- 10.9. Emails containing sensitive or confidential information are password-protected to ensure that only the recipient is able to access the information. The password will be shared with the recipient separately.
- 10.10. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 10.11. When sending confidential information by fax, members of staff always check that the recipient is correct before sending.
- 10.12. 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 premises accepts full responsibility for the security of the data.
- 10.13. 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.

- 10.14. All staff members will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer or safe with restricted access.
- 10.15. Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas containing sensitive information are supervised at all times.
- 10.16. The physical security of the Trust's buildings and storage systems, and access to them, is reviewed termly by the Premises & Facilities 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.
- 10.17. The Trust takes its duties under the UK GDPR seriously and any unauthorised disclosure may result in disciplinary action.
- 10.18. The IT Manager is responsible for continuity and recovery measures are in place to ensure the security of protected data.
- 10.19. Any damage to or theft of data will be managed in accordance with the Trust's Security Breach Management Plan.

11. Accessing information

- 11.1. Horizons Specialist Academy Trust is transparent with data subjects, the information we hold and how it can be accessed.
- 11.2. All members of staff, parents of registered pupils and other users of the Trust's academies, e.g. visitors and third-party clubs, are entitled to:
 - Know what information the Trust holds and processes about them or their child and why.
 - Understand how to gain access to it.
 - Understand how to provide and withdraw consent to information being held.
 - Understand what the Trust is doing to comply with its obligations under the UK GDPR.
- 11.3. All members of staff, parents of registered pupils and other users of the Trust's academies and its facilities have the right, under the UK GDPR, to access certain personal data being held about them or their child.
- 11.4. Personal information can be shared with pupils once they are considered to be at an appropriate age (13 years), responsible for their own affairs, and have capacity to make decisions; although, this information can still be shared with parents.
- 11.5. Pupils who are considered to be at an appropriate age (13 years) to make decisions for themselves, and have capacity to make decisions, are entitled to have their personal information handled in accordance with their rights.
- 11.6. The Trust will adhere to the provisions outlined in the Trust's Data Protection Policy when responding to requests seeking access to personal information.

12. Personal Data audit

- 12.1. The Trust conducts personal data audits on an annual basis against all information held by the Trust to evaluate the information the academy 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
- 12.2. The 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
- 12.3. The DPO is responsible for completing the audit. The audit will include the following:
- The Trust's data needs
 - The information needed to meet those needs
 - The format in which data is stored
 - How long data needs to be kept for
 - Vital records status and any protective marking
 - Who is responsible for maintaining the original document
- 12.4. The DPO will consult with staff members involved in the information audit process to ensure that the information is accurate.
- 12.5. Once it has been confirmed that the information is accurate, the DPO will record all details on the Trust's Personal Data Audit Register.
- 12.6. This information will be shared with the CEO to gain their approval.

13. Disposal of data

- 13.1. 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.
- 13.2. Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut. The DPO will keep a record of all files that have been destroyed.
- 13.3. Where the disposal action is indicated as reviewed before it is disposed, the DPO will review the information against its administrative value – if the information should be kept for administrative value, the DPO will keep a record of this.

- 13.4. 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.
- 13.5. Where information has been kept for administrative purposes, the DPO 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.
- 13.6. Where information must be kept permanently, this information is exempt from the normal review procedures.
- 13.7. Records and information that might be of relevance to the Independent Inquiry into Child Sexual Abuse (IICSA) will not be disposed of or destroyed.

14. Monitoring and review

- 14.1. Any changes made to this policy will be communicated to all members of staff and the governing board.