



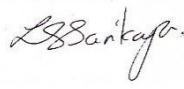
THE ST. BART'S  
ACADEMY  
— TRUST —

## Records Management Policy

March 2023 v2

# The St. Bart's Academy Trust

## Records Management Policy

<b>Produced Date:</b>	<b>March 2023</b>	
<b>Approved by Trust Board:</b>		<b>Lisa Sarikaya</b> Chief Executive Officer
<b>Review Date:</b>	<b>September 2025</b>	

Date	Section Amended	Signature
01/03/2023	TSB Policy Adopted – v6	S. Jones
October 2023	<b>Section 5</b> - Retention of Staff Records amended to ensure retention of disciplinary records is in line with SBMAT Disciplinary Procedures	Mrs S Cope



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## Statement of intent

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

The Trust has created this policy to outline how records are stored, accessed, monitored, retained and disposed of to meet statutory requirements.

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

## 1. Legal framework

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

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

This policy also has due regard to the following guidance:

- DfE (2018) 'Data protection: a toolkit for schools'
- DfE (2023) 'Careers guidance and access for education and training providers'
- ESFA (2022) 'Record keeping and retention information for academies and academy trusts'
- Information Records Management Society (IRMS) (2019) 'Information Management Toolkit for Schools'
- IRMS (2019) 'Academies Toolkit'

## 2. Roles and responsibilities

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

The COO and Principal hold the overall responsibility for this policy and for ensuring it is implemented correctly.

The Data Protection Officer (DPO) is responsible for:

- The management of records at the Trust / Academy.
- Promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the compliance and due diligence officer/ Principal.
- Ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of safely and correctly.

All staff members are responsible for ensuring that any records they are responsible for (including emails) are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

## 3. Management of paper-based and electronically stored pupil records

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

The following information is stored within a pupil record, and will be easily accessible:

- Forename, surname, and date of birth
- Unique pupil number
- Note of the date when the file was opened
- Any preferred names
- Emergency contact details and the name of the pupil's doctor

- Any allergies or other medical conditions that are important to be aware of
- Names of people with parental responsibility, including their home address(es) and telephone number(s)
- Any other agency involvement, e.g. speech and language therapist
- Reference to any other linked files
- Admissions form
- Details of any SEND
- If the pupil has attended an early years setting, the record of transfer
- Data collection form
- Annual written reports to parents
- Notes relating to major incidents and accidents involving the pupil
- Any information about an EHC plan and support offered in relation to the EHC plan
- Medical information relevant to the pupil's on-going education and behaviour
- Any notes indicating child protection disclosures and reports
- Any information relating to exclusions
- Any correspondence with parents or external agencies relating to major issues, e.g. mental health
- Notes indicating that records of complaints made by parents or the pupil
- Statutory Assessment results
- Attendance information
- Parental consent forms for educational visits, photographs and videos, etc.
- Consent to administer medication and administration records
- Copies of pupil birth certificates, passports etc.
- Correspondence with parents about minor issues, e.g. behaviour
- Pupil work
- Previous data collection forms that have been superseded

Hard copies of complaints made by parents or pupils are stored in a file in a secure / lockable location. Accident and incident information is stored separately on the Academy electronic information system and held in line with the retention periods outlined in this policy. The Academy will ensure that no pupil records are altered or amended before transferring them to the next school or Academy that the pupil will attend. The only exception is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, the DPO will remove these records.

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

The Academy 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 or Academy that the pupil attends.

The Academy 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 and at the mutual agreement of the recipient, with an accompanying list of the files included. The Academy or 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 Academy.

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

The table below outlines the Academy's retention periods for individual pupil 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 be destroyed in line with the retention periods below.

<b>Personal identifiers, contacts and personal characteristics</b>		
<b>Type of file</b>	<b>Retention period</b>	<b>Action taken after retention period ends</b>
Images used for identification purposes	For the duration of the event/activity, or whilst the pupil remains at the Academy, whichever is less, plus one month	Securely disposed of
Images used in displays	Whilst the pupil is at the Academy	Securely disposed of
Images used for marketing purposes	In line with the consent period	Securely disposed of
Biometric data	For the duration of the event/activity, or whilst the pupil remains at the Academy, whichever is less, plus one month	Securely disposed of
Postcodes, names and characteristics	Whilst the pupil is at the Academy, plus five years	Securely disposed of
House number and road	For the duration of the event/activity, plus one month	Securely disposed of

<b>Admissions</b>		
<b>Type of file</b>	<b>Retention period</b>	<b>Action taken after retention period ends</b>
Register of admissions	Every entry in the admissions register will be preserved for a period of three years after the date on which the entry was made	Information is reviewed and the register may be kept permanently
Admissions (where the admission is successful)	Date of admission, plus one year	Securely disposed of
Admissions appeals (where the appeal is unsuccessful)	Resolution of the case, plus one year	Securely disposed of
Proof of address (supplied as part of the admissions process)	Current academic year, plus one year	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Information added to the pupil file	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was not successful)	Retained until the appeals process is complete	Securely disposed of
All records relating to the creation and implementation of the Admissions Policy	Life of the policy, plus three years and then review	Securely disposed of



## Pupils' educational records

Type of file	Retention period	Action taken after retention period ends
Pupils' educational records	Whilst the pupil remains at the Academy	<p>Transferred to the next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the Academy and retained for the statutory period</p> <p>The IRMS advises to retain the information for a short period to allow for any queries or reports to be completed or where linked records in the Academy information management system have not yet reached the end of their retention period and deleting would cause problems</p>
Behaviour records	<p>Added to the pupil's record and transferred to the next school or Academy</p> <p>Copies are held whilst the pupil is at the Academy, plus one year</p>	Securely disposed of
Exclusion records	<p>Added to the pupil's record and transferred to the next school or Academy</p> <p>Copies are held whilst the pupil is at the Academy, plus one year</p>	Securely disposed of
Child protection information held on a pupil's record	<p>Stored for the same length of time as the pupil's record</p> <p>Records also subject to any instruction given by the Independent Inquiry into Child Sex Abuse (IICSA)</p>	Securely disposed of – shredded
Child protection records held in a separate file	<p>25 years after the pupil's date of birth</p> <p>Records also subject to any instruction given by the IICSA</p>	Securely disposed of – shredded
Curriculum returns	Current academic year, plus three years	Review and allocate a further retention period or securely dispose of
Schemes of work	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Timetable	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of

Record of homework set	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Pupils' work	Returned to pupil at the end of current academic year  If this is not possible, hold for the current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Education, training or employment destinations data	Whilst the pupil is at the Academy, plus at least three years or from the end of KS4, whichever is earliest	Securely disposed of

### Attendance

Type of file	Retention period	Action taken after retention period ends
Attendance registers	Every entry is retained for a period of three years after the date on which the entry was made	Securely disposed of
Correspondence relating to any absence (authorised or unauthorised)	Current academic year, plus two years	Securely disposed of

### Medical information and administration

Type of file	Retention period	Action taken after retention period ends
Permission slips	For the duration of the period that medication is given, plus one month	Securely disposed of
Medical conditions – ongoing management	Added to the pupil's record and transferred to the next school or Academy  Copies held whilst the pupil is at the Academy, plus one year	Securely disposed of
Medical incidents that have a behavioural or safeguarding influence	Added to the pupil's record and transferred to the next school or Academy  Copies held whilst the pupil is at the Academy, plus 25 years	Securely disposed of

## SEND

Type of file	Retention period	Action taken after retention period ends
SEND files, reviews and EHC plans, including advice and information provided to parents regarding educational needs and accessibility strategy	The pupil's date of birth, plus 31 years	Securely disposed of

## Curriculum management

Type of file	Retention period	Action taken after retention period ends
SATs results	25 years after the pupil's date of birth (as stated on the pupil's record)  A composite of the whole year's results may be held for the current year plus six years, for comparative purposes	Securely disposed of
Published Admission Number (PAN) reports	Current academic year, plus six years	Securely disposed of
Valued added and contextual data	Current academic year, plus six years	Securely disposed of
Self-evaluation forms (internal moderation)	Current academic year, plus one year	Securely disposed of
Self-evaluation forms (external moderation)	Retained until superseded	Securely disposed of
Pupils' work	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	Securely disposed of

## Extra-curricular activities

Type of file	Retention period	Action taken after retention period ends
Trip packs – information taken on educational visits	Until the end of the visit  Where a minor incident occurs, files are added to the core system as appropriate	Shredded upon return to the Academy
Financial information relating to educational visits	Whilst the pupil remains at the Academy, plus one year	Securely disposed of
Parental consent forms for educational visits where no major incident occurred	Until the conclusion of the visit, unless a visit risk assessment decides the forms are likely to be	Securely disposed of – shredded

	required for any reason, in which case they should be retained for 22 years after the pupil's date of birth	
Parental consent forms for educational visits where a major incident occurred	25 years after the pupil's date of birth on the pupil's record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils)	Securely disposed of – shredded
Educational visitors in the Academy – sharing of personal information	Until the conclusion of the visit, plus one month	Securely disposed of
Walking bus registers	Date of the register being taken plus six years	Securely disposed of If held electronically, all copies should be destroyed at the same time

### Catering and free school meal management

Type of file	Retention period	Action taken after retention period ends
Meal administration	Whilst the pupil is at the Academy, plus one year	Securely disposed of
Meal eligibility	Whilst the pupil is at the Academy, plus five years	Securely disposed of
School meal registers	Current year plus three years	Securely disposed of
Free school meal registers (where used as a basis for funding)	Current year plus six years	Securely disposed of
School meals summary sheets	Current year plus three years	Securely disposed of

## 5. Retention of staff records

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

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

Operational		
Type of file	Retention period	Action taken after retention period ends
Staff members' personnel file	Termination of employment, plus six years, unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file will be retained until the IICSA enquiries are complete	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus six years	Securely disposed of
Sickness absence monitoring (where sickness pay is not paid)	Current academic year, plus three years	Securely disposed of
Sickness absence monitoring (where sickness pay is paid)	Current academic year, plus six years	Securely disposed of

Staff training (where training leads to CPD)	Length of time required by the CPD professional body	Securely disposed of
Staff training (except where the training relates to dealing with pupils, e.g. first aid or health and safety)	Retained in the personnel file	Securely disposed of
Staff training (where the training relates to pupils, e.g. safeguarding or other pupil-related training)	Date of the training, plus 40 years	Securely disposed of

### Recruitment

Type of file	Retention period	Action taken after retention period ends
Records relating to the appointment of a new principal (unsuccessful attempts)	Date of appointment, plus six months.	Securely disposed of
Records relating to the appointment of a new principal (successful appointments)	Added to personnel file and retained until the end of appointment, plus six years, except in cases of negligence or claims of child abuse, then records are retained for at least 15 years	Securely disposed of
Records relating to the appointment of new members of staff or governors (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of
Pre-employment vetting information (successful candidates)	For the duration of the employee's employment, plus six years	Securely disposed of
DBS certificates	Up to six months	Securely disposed of
Proof of identify as part of the enhanced DBS check	If it is necessary to keep a copy, it will be placed in the staff member's personnel file	Securely disposed of
Evidence of right to work in the UK	Added to staff personnel file or, if kept separately, termination of employment, plus no longer than two years	Securely disposed of

### Disciplinary and grievance procedures

Type of file	Retention period	Action taken after retention period ends
Child protection allegations, including where the allegation is unproven	<p>Added to staff personnel file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer</p> <p>If allegations are malicious, they are removed from personnel files</p> <p>If allegations are found, they are kept on the personnel file and a copy is provided to the person</p>	Reviewed and securely disposed of – shredded

	concerned unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file is retained until IICSA enquiries are complete	
Formal Verbal Warnings	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file
Formal Written Warning	Date of warning, plus twelve months	Securely disposed of – if placed on staff personnel file, removed from file
Final Formal Written Warning	Date of warning, plus 24 months	Securely disposed of – if placed on staff personnel file, removed from file
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related, then it is disposed of as above	Securely disposed of

## 6. Retention of governance records

The table below outlines the school's retention periods for governance 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.

<b>Governance</b>		
<b>Type of file</b>	<b>Retention period</b>	<b>Action taken after retention period ends</b>
Agendas for governing board / committee meetings	One copy alongside the original set of minutes – all others disposed of without retention	Local archives consulted before secure disposal
Original, signed copies of the minutes of governing board / committee meetings	Permanent – or at least for 10 years from the date of the meeting	Shredded if they contain any sensitive or personal information, but the local archives will be consulted first
Reports presented to the governing board / committee that are referred to in the minutes	Permanent – all others disposed of without retention	Local archives consulted and then securely disposed of
Meeting papers relating to the annual parents' meeting	Date of meeting, plus a minimum of six years	Securely disposed of
Instruments of government	Permanent	Local archives consulted and then securely disposed of
Trusts and endowments managed by the governing board / committee	Permanent	Local archives consulted and then securely disposed of
Action plans created and administered by the governing board / committee	Until superseded or whilst relevant	Securely disposed of
Policy documents created and administered by the governing board / committee	Until superseded or whilst relevant	Securely disposed of

Records relating to complaints dealt with by the governing board / committee or principal	Date of resolution of complaint, plus six years  If negligence is involved, records are retained for the current academic year, plus 15 years  If child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years	Reviewed for further retention in case of contentious disputes, then securely disposed of
Annual reports required by the DfE	Date of report, plus 10 years	Securely disposed of
Proposals concerning changing the status of the school / Academy	Date proposal accepted or declined, plus three years	Securely disposed of
Records relating to the appointment of co-opted governors	Date of election, plus six months	Securely disposed of
Records relating to the election of the chair of the governing committee and the vice chair	Destroyed after the decision has been recorded in the minutes	Securely disposed of
Scheme of delegation and terms of reference for committees	Until superseded or whilst relevant	Reviewed and offered to the local archives if appropriate
Meeting schedule	Current academic year	Standard disposal
Register of attendance at governing board / committee meetings	Date of last meeting in the book, plus six years	Securely disposed of
Records relating to governor monitoring visits	Date of the visit, plus three years	Securely disposed of
All records relating to the conversion of the school to academy status	Permanent	Local archives are consulted before disposal
Correspondence sent and received by the governing board / committee or principal	Current academic year, plus three years	Securely disposed of
Records relating to the appointment of the clerk to the governing board / committee	Date on which the clerk's appointment ends, plus six years	Securely disposed of
Records relating to the terms of office of serving governors, including evidence of appointment	Date on which the governor's appointment ends, plus six years	Securely disposed of
Records relating to governor declaration against disqualification criteria	Date on which the governor's appointment ends, plus six years	Securely disposed of
Register of business interests	Date the governor's appointment ends, plus six years	Securely disposed of
Governor code of conduct	Dynamic document – kept permanently	Securely disposed of
Records relating to the training required and received by governors	Date the governor steps down, plus six years	Securely disposed of

Records relating to the induction programme for new governors	Date on which the governor's appointment ends, plus six years	Securely disposed of
Records relating to DBS checks carried out on the clerk and members of the governing board / committee	Date of the DBS check, plus six months	Securely disposed of
Governor personnel files	Date on which the governor's appointment ends, plus six years	Securely disposed of

<b>Trust governance</b>		
<b>Type of file</b>	<b>Retention period</b>	<b>Action taken after retention period ends</b>
Governance statement	Life of governance statement, plus six years	Securely disposed of
Articles of association	Life of the academy	Securely disposed of
Memorandum of understanding	Can be disposed of once the academy has been incorporated	Securely disposed of
Memorandum of understanding of shared governance among schools	Life of memorandum of understanding, plus six years	Securely disposed of
Constitution	Life of the academy	Securely disposed of
Special resolutions to amend the constitution	Life of the academy	Securely disposed of
Written scheme of delegation	Life of the scheme of delegation, plus 10 years	Securely disposed of
Trustees – appointment	Life of appointment, plus six years	Securely disposed of
Trustees – disqualification	Date of disqualification, plus 15 years	Securely disposed of
Trustees – termination of office	Date of appointment, plus six years	Securely disposed of
Annual trustee report	Date of report, plus 10 years	Securely disposed of
Annual report and accounts	Date of report, plus 10 years	Securely disposed of
Annual return	Date of report, plus 10 years	Securely disposed of
Appointment of trustees and governors and directors	Life of appointment, plus six years	Securely disposed of
Statement of trustees' responsibilities	Life of appointment, plus six years	Securely disposed of
Appointment and removal of members	Life of appointment, plus six years	Securely disposed of
Strategic review	Date of review, plus six years	Securely disposed of
Register of Trustees	Life of academy, plus six years	Securely disposed of
Register of Trustees interests	Life of academy, plus six years	Securely disposed of
Register of Trustees residential addresses	Life of academy, plus six years	Securely disposed of
Register of gift, hospitality and entertainments	Life of academy, plus six years	Securely disposed of
Register of members	Life of academy, plus six years	Securely disposed of



Register of secretaries	Life of academy, plus six years	Securely disposed of
Register of trustees' interests	Life of academy, plus six years	Securely disposed of
Declaration of interests	Life of academy, plus six years	Securely disposed of

## 7. Retention of senior leadership and management records

The table below outlines the Trust / Academy's retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements.

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

Principal and SLT		
Type of file	Retention period	Action taken after retention period ends
Minutes of CLT/ SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus three years	Reviewed annually and securely disposed of if not needed
Reports created by the CEO / Principal or CLT/ SLT	Date of the report, plus a minimum of three years	Reviewed annually and securely disposed of if not needed
Records created by the CEO / Principal, Deputy CEO / Vice Principal, and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed annually and securely disposed of if not needed
Correspondence created by the CEO / Principal, Deputy CEO/ Vice Principal, and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Securely disposed of
Professional development plan	Held on the individual's personnel record. If not, then it is retained for the duration of the plan, plus six years	Securely disposed of
SDP	Duration of the plan, plus three years	Securely disposed of

## 8. Retention of health and safety records

The table below outlines the Trust / Academy's retention periods for health and safety records, and the action that will be taken after the retention period, in line with any requirements.

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

Health and safety		
Type of file	Retention period	Action taken after retention period ends
Health and safety policy statements	Duration of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years provided that a copy of the risk assessment is stored with	Securely disposed of

	the accident report if an incident has occurred	
Records relating to any reportable death, injury, disease or dangerous occurrence under RIDDOR	Date of incident, plus three years provided that all records relating to the incident are held on the personnel file	Securely disposed of
Accident reporting – adults	Three years after the last entry in the accident reporting system	Securely disposed of
Accident reporting – pupils	Three years after the last entry in the accident reporting system	Securely disposed of
Records kept under the Control of Substances Hazardous to Health Regulations	Date of incident, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation (maintenance records or controls, safety features and PPE)	Two years from the date on which the examination was made	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation (dose assessment and recording)	Until the person to whom the record relates would have reached 75-years-old, but in any event for at least 30 years from when the record was made	Securely disposed of
Fire precautions log books	Current academic year, plus three years	Securely disposed of
Health and safety file to show current state of buildings, including all alterations (wiring, plumbing, building works etc.) to be passed on in the case of change of ownership	Permanent	Passed to new owner on sale or transfer of building

## 9. Retention of financial records

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

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

<b>Payroll and pensions</b>		
<b>Type of file</b>	<b>Retention period</b>	<b>Action taken after retention period ends</b>
Maternity pay records	Current academic year, plus three years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year, plus six years	Securely disposed of
Timesheets, clock cards and flexitime records	Current academic year, plus three years	Securely disposed of

Absence record	Current academic year, plus three years	Securely disposed of
Batches	Current academic year, plus six years	Securely disposed of
Bonus sheets	Current academic year, plus three years	Securely disposed of
Car allowance claims	Current academic year, plus three years	Securely disposed of
Car loans	Current academic year, plus three years	Securely disposed of
Car mileage outputs	Current academic year, plus six years	Securely disposed of
Elements	Current academic year, plus two years	Securely disposed of
Income tax form P60	Current academic year, plus six years	Securely disposed of
Insurance	Current academic year, plus six years	Securely disposed of
Members allowance register	Current academic year, plus six years	Securely disposed of
National insurance – schedule of payments	Current academic year, plus six years	Securely disposed of
Overtime / Additional Hours	Current academic year, plus three years	Securely disposed of
Part-time fee claims	Current academic year, plus six years	Securely disposed of
Pay packet receipt by employee	Current academic year, plus two years	Securely disposed of
Payroll awards	Current academic year, plus six years	Securely disposed of
Payroll (gross/net weekly or monthly)	Current academic year, plus six years	Securely disposed of
Payroll reports	Current academic year, plus six years	Securely disposed of
Payslips (copies)	Current academic year, plus six years	Securely disposed of
Pension payroll	Current academic year, plus six years	Securely disposed of
Personal bank details	Until superseded, plus three years	Securely disposed of
Sickness records	Current academic year, plus three years	Securely disposed of
Staff returns	Current academic year, plus three years	Securely disposed of
Superannuation adjustments	Current academic year, plus six years	Securely disposed of
Superannuation reports	Current academic year, plus six years	Securely disposed of

Tax forms	Current academic year, plus six years	Securely disposed of
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### Risk management and insurance

Type of file	Retention period	Action taken after retention period ends
Employer's liability insurance certificate	Closure of the Trust / Academy, plus 40 years	Securely disposed of

### Asset management

Type of file	Retention period	Action taken after retention period ends
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

### Accounts and statements including budget management

Type of file	Retention period	Action taken after retention period ends
Annual accounts	Current academic year, plus six years	Disposed of against common standards
Loans and grants managed by the Trust / Academy	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

Type of file	Retention period	Action taken after retention period ends
All records relating to the management of contracts under seal	Last payment on the contract, plus 12 years	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract, plus six years	Securely disposed of
All records relating to the monitoring of contracts	Life of the contract, plus six or 12 years	Securely disposed of

<b>School fund</b>		
<b>Type of file</b>	<b>Retention period</b>	<b>Action taken after retention period ends</b>
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of

<b>School meals</b>		
<b>Type of file</b>	<b>Retention period</b>	<b>Action taken after retention period ends</b>
FSM registers (where the register is used as a basis for funding)	Current academic year, plus six years	Securely disposed of
School meals registers	Current academic year, plus three years	Securely disposed of
School meals summary sheets	Current academic year, plus three years	Securely disposed of

<b>Pupil finance</b>		
<b>Type of file</b>	<b>Retention period</b>	<b>Action taken after retention period ends</b>
Pupil premium fund records	Date the pupil leaves the Academy plus six years	Securely disposed of

<b>Trust finance records</b>		
<b>Type of file</b>	<b>Retention period</b>	<b>Action taken after retention period ends</b>
Statement of financial activities for the year	Current financial year, plus six years	Securely disposed of
Financial planning	Current financial year, plus six years	Securely disposed of
Value for money statement	Current financial year, plus six years	Securely disposed of
Records relating to the management of VAT	Current financial year, plus six years	Securely disposed of
Whole of government accounts return	Current financial year, plus six years	Securely disposed of
Borrowing powers	Current financial year, plus six years	Securely disposed of
Budget plan	Current financial year, plus six years	Securely disposed of
Charging and remissions policy	Date policy superseded, plus three years	Securely disposed of

Independent auditor's report on regularity	Financial year report relates to, plus six years	Securely disposed of
Independent auditor's report on financial statements	Financial year report relates to, plus six years	Securely disposed of
Funding agreement	Date of last payment of funding, plus six years	Securely disposed of
Funding records – capital grant	Date of last payment of funding, plus six years	Securely disposed of
Funding records – general annual grant	Date of last payment of funding, plus six years	Securely disposed of
Per-pupil funding records	Date of last payment of funding, plus six years	Securely disposed of
Exclusions agreements	Date of last payment of funding, plus six years	Securely disposed of
Funding records	Date of last payment of funding, plus six years	Securely disposed of
Gift aid and tax relief	Date of last payment of funding, plus six years	Securely disposed of
Records relating to loans	Date of last payment of loan, plus six years if the loan is under £10,000 or date of last payment of loan, plus 12 years if the loan is over £10,000	Securely disposed of

## 10. Retention of other school records

The table below outlines the Trust / Academy retention periods for any other 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.

<b>Property management</b>		
<b>Type of file</b>	<b>Retention period</b>	<b>Action taken after retention period ends</b>
Title deeds of properties belonging to the Trust / Academy	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the Trust / Academy	For as long as the building belongs to the Trust / Academy	Transferred to new owners if the building is leased or sold
Leases of property leased by or to the Trust / Academy	Expiry of lease, plus six years	Securely disposed of
Records relating to the letting of Trust / Academy premises	Current financial year, plus six years	Securely disposed of

<b>Maintenance</b>		
<b>Type of file</b>	<b>Retention period</b>	<b>Action taken after retention period ends</b>
All records relating to the maintenance of an Academy carried out by contractors	For as long as the Trust / Academy owns the building and then passed onto any new	Securely disposed of

	owners if the building is leased or sold	
All records relating to the maintenance of an Academy carried out by Trust / Academy employees	For as long as the Trust / Academy owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of

Operational administration		
Type of file	Retention period	Action taken after retention period ends
General file series	Current academic year, plus five years	Reviewed and securely disposed of
Records relating to the creation and publication of the Academy brochure and/or prospectus	Current academic year, plus three years	If a copy is not preserved by the school, standard disposal
Newsletters and other items with short operational use	Current academic year, plus one year	One copy archived, other copies standard disposal
Visitors' books and signing-in sheets (Inventory Records)	Last entry in the logbook, plus six years	Reviewed then securely disposed of
Records relating to the creation and management of parent-teacher associations and/or old pupil associations	Current academic year, plus six years	Reviewed then securely disposed of
Walking bus registers	Date of register, plus six years	Securely disposed of
Privacy notice which is sent to parents	Until superseded, plus six years	Standard disposal
Consents relating to Academy activities	While pupil attends the school	Secure disposal

## 11. Retention of emails

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

Emails can act as evidence of the Academy's activities, i.e. in business and fulfilling statutory duties, so all relevant emails, e.g. invoices, will be retained for **at least 12 months**. Invoices received and sent in emails will be printed off and retained in accordance with Section 8 of this policy.

The Trust expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in the Trust Acceptable Use Policy (Including Remote Online Learning and Communication), Staff Code of Conduct Policy and Online Safety Policy. Staff members will review and delete emails they no longer require after **12 months**, unless stated otherwise.

Correspondence created by the SLT and other members of staff with administrative responsibilities will be retained for **3 years** before being reviewed and, if necessary, securely disposed of.

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

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

All SARs will be handled in accordance with the Trust Data Protection Policy. FOI requests will be handled in accordance with the Trust Freedom of Information Policy.

When handling a request for information, the DPO will speak to the requestor to clarify the scope of the request and whether emails will be required to fulfil the SAR or FOI request. Where an SAR has been made electronically, the information will be provided in a commonly used electronic format. All requests will be responded to without delay and at the latest, within one month of receipt.

If a request is manifestly unfounded, excessive or repetitive, a fee will be charged. All fees will be based on the administrative cost of providing the information.

Where a request is manifestly unfounded or excessive, the Trust / Academy holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

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

## 12. Identifying information

Under the UK GDPR, all individuals have the right to data minimisation and data protection by design and default – as the data controller, the Trust / Academy ensures appropriate measures are in place for individuals to exercise this right.

Wherever possible, the Trust / Academy uses pseudonymisation, also known as the ‘blurring technique’, to reduce the risk of identification.

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

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

## 13. Storing and protecting information

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

The Trust has implemented a 3-2-1 solution for backup. Daily automated backups are run nightly to Synology NAS drive. A weekly backup is run to external Hard Drive which is auto ejected on completion to preserve as an offline copy. Academies have two external drives that they must alternate weekly. The current offline external drive should be stored in a fireproof safe or off the Academy site with a designated staff member. A third copy of the backup data is copied from the NAS drive to an Academy specific OneDrive account on the SBMAT Office 365. Only the ICT Team/Academy ICT Support can access this data. All backups are run overnight before the beginning of the next school day.

Any confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access. Confidential paper records are not left unattended or in clear view when held in a location with general access.

Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed up **off-site**. Where digital data is saved on removable storage or a portable device, the device will be kept in a **locked filing cabinet, drawer or safe** when not in use. Memory sticks will not be used



to hold personal information unless they are password-protected and fully encrypted. All electronic devices are password-protected to protect the information on the device in case of theft. Where possible, the Trust / Academy enables electronic devices to allow the remote blocking or deletion of data in case of theft

All electronic devices are password-protected to protect the information on the device in case of theft

If staff and governors need to use their personal laptops for Trust / Academy purposes, particularly if they are working from home, they will bring their device into Trust / Academy before using it for work to ensure the appropriate software can be downloaded and information encrypted.

All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

Emails containing sensitive or confidential information are password-protected if there are unsecure servers between the sender and the recipient. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients. When sending confidential information staff will always check that the recipient is correct before sending

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 Trust / Academy premises accepts full responsibility for the security of the data.

If documents that have been taken off the Academy premises will be left unattended, the staff member will leave the documents in the locked boot of a car or keep them on their person. Before sharing data, staff always ensure that:

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

The Trust / Academy has data sharing agreements with all data processors and third parties with whom data is shared. These agreements are developed by the DPO and cover information about issues such as access controls and permissions.

Records are kept of what level of access each staff member has to data. This record details information including:

- What level of access each staff member has.
- Limits on how staff members access data.
- What actions staff members can perform.
- What level of access is changed or retained when a staff member changes role within the Academy.
- Who is able to authorise requests to change permissions and access.

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

Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the Academy containing sensitive information are supervised at all times. The physical security of the Trust / Academy's buildings and storage systems, and access to them, is reviewed on a **daily** basis. If an increased risk in vandalism, burglary or theft is identified, extra measures to secure data storage will be put in place.

The Trust / Academy will regularly test, assess and evaluate the effectiveness of any and all measures in place for data security.

The Trust /Academy takes its duties under the UK GDPR seriously and any unauthorised disclosure may result in disciplinary action. The COO/Principal is responsible for continuity and recovery measures are in place to ensure the security of protected data.

Any damage to or theft of data will be managed in accordance with the Trust Data and Cyber-security Breach Prevention and Management Plan.

As a result of the UK's exit of the EU data controllers and processors follow the UK GDPR, and the Data Protection Act 2018, where:

- As UK data controllers, they collect, store or process the personal data of individuals residing in the UK.
- As non-UK data controllers, they offer goods or services to, or monitor the behaviour of, UK residents.

Data controllers and processors follow the EU GDPR where:

- They collect, store or process the personal data of individuals residing in the EU.
- As non-EU data controllers, they offer goods or services to, or monitor the behaviour of, EU residents.

## 14. Accessing information

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

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

- Know what information the Trust / Academy 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 school is doing to comply with its obligations under the UK GDPR.

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

Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents. The Trust / Academy will adhere to the provisions outlined in the Trust Data Protection Policy when responding to requests seeking access to personal information.

## 15. Information audit

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

- Paper documents and records
- Electronic documents and records

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

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

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

The DPO is responsible for completing the information audit. The information audit will include the following:

- The Trust / Academy'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

The DPO will consult with staff members involved in the information audit process to ensure that the information is accurate.

## 16. Disposal of data

Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.

All records containing personal or sensitive information will be made either unreadable or unreconstructable.

Where disposal of information is outlined as secure disposal, this will be shredded or pulped. Electronic information will be scrubbed clean and, where possible, cut, archived or digitalised. The DPO will keep a record of all files that have been destroyed.

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.

If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

Where information has been kept for administrative purposes, the DPO will review the information again after **3** 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 **3** subsequent years.

Where information must be kept permanently, this information is exempt from the normal review procedures.

Records and information that might be of relevant to the Independent Inquiry into Child Sexual Abuse (IICSA) will not be disposed of or destroyed.

## **17. Monitoring and review**

This policy will be reviewed **every two years** by the Trust.

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





# THE ST. BART'S ACADEMY

— TRUST —

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