



# Hope Academy

A joint Catholic & Church of England Academy

## Records Management Policy



Review and approved	October 2024
Approved by	Principal
Next review due	October 2025

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## Statement of intent

Hope Academy is committed to maintaining the confidentiality of its information and ensuring that all records within the academy are only accessible to the appropriate individuals. In line with the requirements of the UK GDPR, the 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 academy has created this policy to outline how records are stored, accessed, monitored, retained and disposed of to meet the academy's statutory requirements. The procedure for archiving of documents can be found in appendix 1 of this policy, for further information please contact the DPO.

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

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## 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 (2021) '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'

This policy will be implemented in accordance with the following academy policies and procedures:

- Archived Files Log
- Cyber Response Plan
- Data Asset Register Overview & Audit
- Data Protection Policy
- Disposal of Records Log

- Freedom of Information Policy
- IT Acceptable Use Policy

## 2. Roles and responsibilities

The academy has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.

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

The DPO is responsible for:

- The management of records at the academy.
- Promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the 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.

The following persons have day to day responsibility for records management in certain areas, they will ensure good practice and promote compliance with this policy so that information can be retrieved easily, appropriately and timely.

Area of Work	Responsible Officer
<b>Child Protection</b>	
<ul style="list-style-type: none"> <li>• Child Protection files</li> <li>• Allegation of a child protection nature against a member of staff, including where the allegation is unfounded</li> </ul>	Designated Safeguarding Lead
<b>Governors</b>	
<ul style="list-style-type: none"> <li>• Minutes</li> <li>• Agendas</li> <li>• Reports</li> <li>• Annual Parents' meeting papers</li> <li>• Instruments of Government</li> <li>• Trusts and Endowments</li> <li>• Action Plans</li> <li>• Policy documents</li> </ul>	PA to the Principal

<ul style="list-style-type: none"> <li>• Complaints files</li> <li>• Annual Reports required by the Department for Education and Skills</li> </ul>	
<p><b>Management</b></p>	
<ul style="list-style-type: none"> <li>• Minutes of the Senior Leadership Team and other internal administrative bodies</li> <li>• Reports made by the principal or the leadership team</li> <li>• Records created by the principal, vice principals, assistant principals, associate assistant principals, heads of year and other members of staff with administrative responsibilities</li> <li>• Correspondence created by the principal, vice principals, assistant principals, associate assistant principals, heads of year and other members of staff with administrative responsibilities</li> <li>• Professional development plans</li> <li>• Academy development plans</li> <li>• Admissions – if the admission is successful</li> <li>• Admissions – if the appeal is unsuccessful</li> <li>• Admissions – Secondary Schools – Casual</li> <li>• Proofs of address supplied by parents as part of the admissions process</li> </ul>	<p>Admissions Officer PA to the Principal</p>
<p><b>Students</b></p>	
<ul style="list-style-type: none"> <li>• Admission Registers</li> <li>• Attendance registers</li> <li>• Student record cards</li> <li>• Student files</li> <li>• Special Educational Needs files, reviews and Individual Education Plans</li> <li>• Letters authorising absence</li> <li>• Absence books</li> <li>• Examination results</li> <li>• Any other records created in the course of contact with students</li> <li>• Statement maintained under The Education Act 1996 - Section 324</li> </ul>	<p>Attendance Officer Exams Officer Heads of House SENCO School Trip Co-Ordinator</p>

<ul style="list-style-type: none"> <li>• Proposed statement or amended statement</li> <li>• Advice and information to parents regarding educational needs</li> <li>• Accessibility Strategy</li> <li>• Children’s SEN Files</li> <li>• Parental permission slips for school trips – where there has been no major incident</li> <li>• Parental permission slips for school trips – where there has been a major incident</li> <li>• Records created by schools to obtain approval to run an Educational Visit outside the</li> </ul>	
<p><b>Curriculum</b></p>	
<ul style="list-style-type: none"> <li>• Curriculum development</li> <li>• Curriculum returns</li> <li>• Syllabus</li> <li>• Schemes of work</li> <li>• Timetable</li> <li>• Class record books</li> <li>• Mark Books</li> <li>• Record of homework set</li> <li>• Students’ work</li> <li>• Examination results</li> <li>• PAN reports</li> <li>• Value added records</li> </ul>	<p>Curriculum Leader Exams Officer Teaching Staff</p>
<p><b>Personnel Records</b></p>	
<ul style="list-style-type: none"> <li>• Timesheets, sick pay</li> <li>• Staff Personal files</li> <li>• Interview notes and recruitment records</li> <li>• Pre-employment vetting information (including CRB checks)</li> <li>• Disciplinary proceedings:</li> <li>• Records relating to accident/injury at work</li> <li>• Annual appraisal/assessment records</li> <li>• Salary cards</li> <li>• Maternity pay records</li> <li>• Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995</li> </ul>	<p>HR Manager Site Manager</p>



<ul style="list-style-type: none"> <li>• Proofs of identity collected as part of the process of checking “portable” enhanced CRB disclosure</li> </ul>	
<b>Health &amp; Safety</b>	
<ul style="list-style-type: none"> <li>• Accessibility Plans</li> <li>• Accident Reporting</li> <li>• COSHH</li> <li>• Incident reports</li> <li>• Policy Statements</li> <li>• Risk Assessments</li> <li>• Process of monitoring of areas where employees and persons are likely to have come in contact with radiation</li> <li>• Fire Precautions log books</li> </ul>	Site Manager
<b>Administrative</b>	
<ul style="list-style-type: none"> <li>• Employer's Liability certificate</li> <li>• Inventories of equipment and furniture</li> <li>• General file series</li> <li>• School brochure or prospectus</li> <li>• Circulars (staff/parents/students)</li> <li>• Newsletters</li> </ul>	Admin Manager Finance Manager Receptionist
<b>Finance</b>	
<ul style="list-style-type: none"> <li>• Annual Accounts</li> <li>• Loans and grants</li> <li>• Contracts</li> <li>• Copy orders</li> <li>• Budget reports, budget monitoring etc</li> <li>• Invoice, receipts and other records covered by the Financial Regulations</li> <li>• Annual Budget and background papers</li> <li>• Order books and requisitions</li> <li>• Delivery Documentation</li> <li>• Debtors' Records</li> <li>• School Fund – Cheque books</li> <li>• School Fund – Paying in books</li> <li>• School Fund – Ledger</li> <li>• School Fund – Invoices</li> <li>• School Fund – Receipts</li> </ul>	Finance Manager Student Services



<ul style="list-style-type: none"> <li>• School Fund – Bank statements</li> <li>• Applications for free school meals, travel, uniforms etc</li> <li>• Student grant applications</li> <li>• Free school meals registers</li> </ul>	
<b>Property</b>	
<ul style="list-style-type: none"> <li>• Title Deeds</li> <li>• Plans</li> <li>• Maintenance and contractors</li> <li>• Leases</li> <li>• Lettings</li> <li>• Burglary, theft and vandalism report forms</li> <li>• Maintenance log books</li> <li>• Contractors' Reports</li> </ul>	Finance Manager Site Manager
<b>Department for Children, Schools and Families</b>	
<ul style="list-style-type: none"> <li>• HMI reports</li> <li>• OFSTED reports and papers</li> <li>• Returns</li> <li>• Circulars from Department for Children, Schools and Families</li> </ul>	PA to the Principal Data Manager
<b>School Meals</b>	
<ul style="list-style-type: none"> <li>• Dinner Register</li> <li>• School Meals Summary Sheets</li> </ul>	Catering Manager
<b>Family Liaison Officers and Parent Support Assistants</b>	
<ul style="list-style-type: none"> <li>• Reports for outside agencies – where the report has been included on the case file created by the outside agency</li> <li>• Referral forms</li> <li>• Contact data sheets</li> <li>• Contact database entries</li> <li>• Group Registers</li> </ul>	Pastoral Team

The above is not an exhaustive list of the records held and will be updated as and when required.



### **3. Management of student records Check that we do have all the info in the file**

Student records are specific documents that are used throughout a student's time in the education system, they are passed to each academy/school that a student 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 on the front of a student record, and will be easily accessible:

- Forename, surname, and date of birth
- Unique student number
- Note of the date when the file was opened

The following information is stored on the data sheet (a digital copy is also on SIMS), and will be easily accessible:

- Any preferred names
- Emergency contact details and the name of the student'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
- The following information is stored in a student record, and will be easily accessible:
- Admissions form
- Details of any SEND
- If the student has attended an early years setting, the record of transfer
- Data collection or data checking form
- Annual written reports to parents
- National curriculum and agreed syllabus record sheets
- Notes relating to major incidents and accidents involving the student
- Any information about an EHC plan and support offered in relation to the EHC plan
- Medical information relevant to the student'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 student
- Examination results – student copy
- SATs results

The following information is subject to shorter retention periods and, therefore, will be stored electronically on Arbor:

- Attendance registers and information
- Absence notes and correspondence
- Parental and, where appropriate, student consent forms for educational visits, photographs and videos, etc.
- Accident forms – forms about major accidents will be recorded on the student record
- Consent to administer medication and administration records
- Copies of student birth certificates, passports etc.
- Correspondence with parents about minor issues, e.g. behaviour
- Student work
- Previous data collection forms that have been superseded

Hard copies of disclosures and reports relating to child protection are stored in a securely locked filing cabinet in the academy archives, a note indicating this is marked on the student's file.

Copies of complaints made by parents or students are stored on a system accessible by the principal's office, a note indicating this is marked on the student's file.

Actual copies of accident and incident information are stored separately on the academy's management information system and held in line with the retention periods outlined in this policy, a note indicating this is marked on the student's file. An additional copy may be placed in the student's file in the event of a major accident or incident.

The academy will ensure that no student records are altered or amended before transferring them to the next academy/school that the student will attend. The only exception is if any records placed on the student's file have a shorter retention period and may need to be removed. In such cases, the DPO will authorise the removal of these records.

Electronic records relating to a student's record will also be transferred to the students' next academy/school.

If any student attends the academy until statutory academy leaving age, the academy will keep the student's records until the student reaches the age of 25 years.

The academy will, wherever possible, avoid sending a student record by post. Where a student record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The academy/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 student records and other student-related information**

The table below outlines the academy's retention periods for individual student 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.

Type of file	Retention period	Action taken after retention period ends
<b>Personal identifiers, contacts and personal characteristics</b>		
Images used for identification purposes	For the duration of the event/activity, or whilst the student remains at the academy, whichever is less, plus one month	Securely disposed of
Images used in displays	Whilst the student 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 student remains at the academy, whichever is less, plus one month	Securely disposed of
Postcodes, names and characteristics	Whilst the student 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>		
Register of admissions (Data Protection Issues)	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) (Data Protection Issues)	Date of admission, plus one year	Securely disposed of
Admissions appeals (where the appeal is unsuccessful) (Data Protection Issues)	Resolution of the case, plus one year	Securely disposed of
In-year secondary academy admissions (Data Protection Issues)	Whilst the student remains at the academy, plus one year	Securely disposed of

Proof of address (supplied as part of the admissions process) (Data Protection Issues)	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 student 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
<b>Students' educational records</b>		
Students' educational records (Data Protection Issues) Limitation Act 1980	25 years after the student's date of birth	Reviewed and securely disposed of if no longer needed
Public examination results	Added to the student's record and transferred to next academy	All uncollected certificates returned to the examination board or destroyed after one year
Internal examination results (Data Protection Issues)	Added to the student's record and transferred to next academy	Transferred to the next academy
Behaviour records	Added to the student's record and transferred to the next academy  Copies are held whilst the student is at academy, plus one year	Securely disposed of
Exclusion records	Added to the student's record and transferred to the next academy  Copies are held whilst the student is at academy, plus one year	Securely disposed of

Child protection information held on a student's record (Data Protection Issues) Education Act 2002 s175	Stored in a sealed envelope for the same length of time as the student's record  Records also subject to any instruction given by the Independent Inquiry into Child Sex Abuse (IICSA)	Securely disposed of – shredded
Child protection records held in a separate file (Data Protection Issues) Education Act 2002 s175	25 years after the student's date of birth  Records also subject to any instruction given by the IICSA	Securely disposed of – shredded
Curriculum returns	Current academic year, plus three years	Securely disposed 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
Class record books	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Mark books	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
Students' work	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 student is at the academy, plus three years or from the end of KS4, whichever is earliest	Securely disposed of

<b>Attendance</b>		
Attendance registers (Data Protection Issues)	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
<b>Medical information and administration</b>		
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 student’s record and transferred to the next academy  Copies held whilst the student is at the academy, plus one year	Securely disposed of
Medical incidents that have a behavioural or safeguarding influence	Added to the student’s record and transferred to the next academy  Copies held whilst the student is at academy, plus 25 years	Securely disposed of
<b>SEND</b>		
Statement maintained under The Education Act 1996 s324 (Data Protection Issues) Special Educational Needs and Disability Act 2001 s1	The student’s date of birth, plus 30 years	Securely disposed of

Proposed statement or amended statement (Data Protection Issues) Special Educational Needs and Disability Act 2001 s1	The student's date of birth, plus 30 years	Securely disposed of
SEND files, reviews and EHC plans, including advice and information provided to parents regarding educational needs and accessibility strategy	The student's date of birth, plus 31 years	Securely disposed of
<b>Curriculum management</b>		
SATs results	25 years after the student's date of birth (as stated on the student's record)	Securely disposed of
Examination papers	Until the appeals/validation process has been completed	Securely disposed of
Published Admission Number (PAN) reports (Data Protection Issues)	Current academic year, plus six years	Securely disposed of
Valued added and contextual data (Data Protection Issues)	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
Students' work	Returned to students at the end of the academic year, or retained for the current academic year, plus one year	Securely disposed of
<b>Extra-curricular activities</b>		
Field file – information taken on academy trips	Until the conclusion of the trip, plus one month	Securely disposed of

	Where a minor incident occurs, field files are added to the core system as appropriate	
Records created by the academy to obtain approval to run an educational visit outside the classroom	Date of visit, plus 10 years	Securely disposed of
Financial information relating to academy trips	Whilst the student remains at academy, plus one year	Securely disposed of
Parental consent forms for academy trips where no major incident occurred (Data Protection Issues)	Until the conclusion of the trip	Securely disposed of – shredded
Parental consent forms for academy trips where a major incident occurred (Data Protection Issues) Limitation Act 1980	25 years after the student’s date of birth on the student’s record (permission slips of all students on the trip will also be held to show that the rules had been followed for all students)	Securely disposed of – shredded
Educational visitors in academy – sharing of personal information	Until the conclusion of the visit, plus one month	Securely disposed of
<b>Family liaison officers and home-academy liaison assistants</b>		
Day books (Data Protection Issues)	Current academic year, plus two years	Reviewed and securely destroyed if no longer required
Reports for outside agencies (Data Protection Issues)	Duration of the student’s time at academy	Securely disposed of
Referral forms (Data Protection Issues)	Whilst the referral is current	Securely disposed of
Contact data sheets (Data Protection Issues)	Current academic year	Reviewed and securely destroyed if no longer active
Contact database entries (Data Protection Issues)	Current academic year	Reviewed and securely destroyed if no longer required
Group registers (Data Protection Issues)	Current academic year, plus two years	Securely disposed of





Catering and free academy meal management		
Meal administration	Whilst the student is at academy, plus one year	Securely disposed of
Meal eligibility	Whilst the student is at academy, plus five 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.

Type of file	Retention period	Action taken after retention period ends
<b>Operational</b>		
Staff members' personnel file (Data Protection Issues)	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) (Data Protection Issues)	Length of time required by the CPD professional body	Securely disposed of
Staff training (except where the training relates to dealing with students, e.g. first aid or health and safety)	Retained in the personnel file	Securely disposed of

(Data Protection Issues)		
Staff training (where the training relates to students, e.g. safeguarding or other student-related training) (Data Protection Issues)	Date of the training, plus 40 years	Securely disposed of
<b>Recruitment</b>		
Records relating to the appointment of a new principal (unsuccessful attempts) (Data Protection Issues)	Date of appointment, plus six months.	Securely disposed of
Records relating to the appointment of a new principal (successful appointments) (Data Protection Issues)	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) (Data Protection Issues)	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 (Data Protection Issues)	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**

<p>Child protection allegations, including where the allegation is unproven (Data Protection Issues) Employment Practices Code: Supplementary Guidance 2.13.1</p>	<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 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 retained until IICSA enquiries are complete</p>	<p>Reviewed and securely disposed of</p>
<p>Oral warnings (Data Protection Issues)</p>	<p>Date of warning, plus six months</p>	<p>Securely disposed of – if placed on staff personnel file, removed from file</p>
<p>Written warning – level 1 (Data Protection Issues)</p>	<p>Date of warning, plus six months</p>	<p>Securely disposed of – if placed on staff personnel file, removed from file</p>
<p>Written warning – level 2 (Data Protection Issues)</p>	<p>Date of warning, plus 12 months</p>	<p>Securely disposed of – if placed on staff personnel file, removed from file</p>
<p>Final warning (Data Protection Issues)</p>	<p>Date of warning, plus 18 months</p>	<p>Securely disposed of – if placed on staff personnel file, removed from file</p>
<p>Records relating to unproven incidents (Data Protection Issues)</p>	<p>Conclusion of the case, unless the incident is child protection related, then it is disposed of as above</p>	<p>Securely disposed of</p>



## 6. Retention of governance records

The table below outlines the academy'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.

Type of file	Retention period	Action taken after retention period ends
<b>Governance</b>		
Agendas for governing board 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 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 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	Permanent	Local archives consulted and then securely disposed of
Action plans created and administered by the governing board	Until superseded or whilst relevant	Securely disposed of
Policy documents created and administered by the governing board	Until superseded or whilst relevant	Securely disposed of
Records relating to complaints dealt with by the governing board or principal (Data Protection Issues)	Date of resolution of complaint, plus six years	Reviewed for further retention in case of contentious disputes, then securely disposed of

	<p>If negligence is involved, records are retained for the current academic year, plus 15 years</p> <p>If child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years</p>	
Annual reports required by the DfE Education (Governors Annual Reports) (England) (Amendment) Regulations 2002 (SI 2002/1171)	Date of report, plus 10 years	Securely disposed of
Proposals concerning changing the status of the 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 board 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 full governing board 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 academy to academy status	Permanent	Local archives are consulted before disposal
Correspondence sent and received by the governing board or principal	Current academic year, plus three years	Securely disposed of

Records relating to the appointment of the clerk to the governing board	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	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>		
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 academies	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
Directors – appointment	Life of appointment, plus six years	Securely disposed of
Directors – disqualification	Date of disqualification, plus 15 years	Securely disposed of
Directors – 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 directors	Life of academy, plus six years	Securely disposed of
Register of directors' interests	Life of academy, plus six years	Securely disposed of
Register of directors' 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 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.

Type of file	Retention period	Action taken after retention period ends
<b>Principal and SLT</b>		
Log books of activity in the academy maintained by the principal (Data Protection Issues)	Date of last entry, plus a minimum of six years	Reviewed and offered to the local archives if appropriate
Minutes of SLT meetings and the meetings of other internal administrative bodies (Data Protection Issues)	Date of the meeting, plus three years	Reviewed annually and securely disposed of if not needed
Reports created by the principal or SLT (Data Protection Issues)	Date of the report, plus a minimum of three years	Reviewed annually and securely disposed of if not needed
Records created by the principal, vice principals, assistant principals, associate assistant principals, heads of year and other members of staff with administrative responsibilities (Data Protection Issues)	Current academic year, plus six years	Reviewed annually and securely disposed of if not needed
Correspondence created by the principal, vice principals, assistant principals, associate assistant principals, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Securely disposed of



Professional development plan (Data Protection Issues)	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
School Development Plans (SDP)	Duration of the plan, plus three years	Securely disposed of

## 8. Retention of health and safety records

The table below outlines the 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.

Type of file	Retention period	Action taken after retention period ends
<b>Health and safety</b>		
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 the accident report if an incident has occurred	Securely disposed of
Records relating to any reportable death, injury, disease or dangerous occurrence under RIDDOR (Data Protection Issues)	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 (Data Protection Issues)	Three years after the last entry in the accident reporting book	Securely disposed of
Accident reporting – students (Data Protection Issues)	Three years after the last entry in the accident reporting book	Securely disposed of
Records kept under the Control of Substances Hazardous to Health Regulations COSHH (Data Protection Issues)	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 academy'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.

Type of file	Retention period	Action taken after retention period ends
<b>Payroll and pensions</b>		
Maternity pay records (Data Protection Issues) Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) revised 1999 by (SI 1999/567)	Current academic year, plus three years	Securely disposed of

Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 (Data Protection Issues)	Current academic year, plus six years	Securely disposed of
Timesheets, clock cards and flexitime records (Data Protection Issues) Financial Regulations	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	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
<b>Risk management and insurance</b>		
Employer's liability insurance certificate	Closure of the academy, plus 40 years	Securely disposed of Passed to the LA if the academy closes
<b>Asset management</b>		
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

<b>Accounts and statements including budget management</b>		
Annual accounts Financial Regulations	Current academic year, plus six years	Disposed of against common standards
Loans and grants managed by the academy Financial Regulations	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 Financial Regulations	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
<b>Contract management</b>		
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>Academy fund</b>		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
<b>Academy meals</b>		
FSM registers (where the register is used as a basis for funding) (Data Protection Issues) Financial Regulations	Current academic year, plus six years	Securely disposed of
Academy meals registers	Current academic year, plus three years	Securely disposed of

Academy meals summary sheets	Current academic year, plus three years	Securely disposed of
<b>Student finance</b>		
Student grant applications	Current academic year, plus three years	Securely disposed of
Student premium fund records	Date the student leaves the academy, plus six years	Securely disposed of
<b>Trust finance records</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
Audit and risk committee and appointment of responsible officers	Life of the academy	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-student 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 academy records

The table below outlines the academy's retention periods for any other records held by the academy, 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
<b>Property management</b>		
Title deeds of properties belonging to the academy	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the academy	For as long as the building belongs to the academy	Transferred to new owners if the building is leased or sold
Leases of property leased by or to the academy	Expiry of lease, plus six years	Securely disposed of
Records relating to the letting of academy premises	Current financial year, plus six years	Securely disposed of
<b>Maintenance</b>		



All records relating to the maintenance of the academy carried out by contractors Financial Regulations	For as long as the academy 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 academy carried out by academy employees	For as long as the academy owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of
<b>Operational administration</b>		
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 academy, standard disposal
Records relating to the creation and distribution of circulars to staff, parents or students	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	One copy archived, other copies standard disposal
Visitors' books and signing-in sheets	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 student associations	Current academic year, plus six years	Reviewed then securely disposed of
Academy privacy notice which is sent to parents	Until superseded, plus six years	Standard disposal
Consents relating to academy activities	While student attends the academy	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 9 of this policy.

The academy's expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in the academy's e-Safety Policy. All emails will be automatically deleted after **12 months**, unless stated otherwise.

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

Personal emails, i.e. emails that do not relate to work matters or are from family members, will be deleted as soon as they are no longer needed. Staff members will review and delete any emails they no longer require at the end of every term.

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 subject access request (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 academy's Data Protection Policy. FOI requests will be handled in accordance with the academy's 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. All requests will be responded to without delay and at the latest, within one month of receipt.

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 academy ensures appropriate measures are in place for individuals to exercise this right.

Wherever possible, the academy uses pseudonymisation, also known as the 'blurring technique', to reduce the risk of identification.

Once an individual has left the 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.

Where data is required to be retained over time, e.g. attendance data, the academy removes any personal data not required and keeps only the data needed.

### **13. Storing and protecting information**

The DPO will undertake a business impact assessment to identify which records are vital to academy management and these records will be stored in the most secure manner. The DPO will oversee a back-up of information on a termly 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.

Where possible, backed-up information will be stored off the academy premises, using a central back-up cloud service operated by the LA. The DPO will ensure that the location of the cloud storage and the security offered is appropriate for the information and records stored on it.

Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access. Any room or area where personal or sensitive data is stored will be locked when unattended.

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 data is saved on removable storage or a portable device, the device is kept in a locked and fireproof filing cabinet, drawer or safe when not in use. Memory sticks are not 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 academy enables electronic devices to allow the remote blocking or deletion of data in case of theft. Staff and governors do not use their personal laptops or computers for academy purposes. 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 or sent via a secure encrypted or data transfer system to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email. Personal information is never put in the subject line of an email. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

When sending confidential information by fax, members of staff 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 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. A record will be kept of any document that is taken off the academy premises that logs the location of the document and when it is returned to the academy site, this includes records that are digitally remotely accessed.

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 academy has data sharing agreements with all data processors and third parties with whom data is shared. These agreements cover information about issues such as access controls and permissions.

A record is 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.

Staff are required to use their academy login details to use photocopiers and printers.

The physical security of the academy's buildings and storage systems, and access to them, is reviewed termly by the site manager in conjunction with the DPO. 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.

All systems that allow staff and students to remotely access information from the academy's network whilst they are not physically at the academy have strong security controls in place which are reviewed termly by the ICT Manager.

The DPO decides what restrictions are necessary to prevent information or records being downloaded, transferred or printed while the user is not on the academy site.

The academy takes its duties under the UK GDPR seriously and any unauthorised disclosures may result in disciplinary action.

The DPO is responsible for ensuring 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 academy's Risk Protection Arrangement: Cyber Response 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 students and other users of the academy, e.g. visitors and third-party clubs, are entitled to:

- Know what information the 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 academy is doing to comply with its obligations under the UK GDPR.

All members of staff, parents of registered students and other users of the 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 students 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. Students who are considered by the academy to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

The academy will adhere to the provisions outlined in the academy's Data Protection Policy when responding to requests seeking access to personal information.

## 15. Digital continuity statement

Digital data that is retained for longer than six years will be identified by the DPO and named as part of a Digital Continuity Statement. The data will be archived to dedicated files on the academy's server, which are password-protected, this will be backed-up in accordance with Section 13 of this policy.

Memory sticks are never used to store digital data, subject to a Digital Continuity Statement.

The ICT Manager in part with St Helens IT Services will review new and existing storage methods annually and, where appropriate, add them to the digital continuity statement.

The following information will be included within the Digital Continuity Statement:

- A statement of the business purposes and statutory requirements for keeping the records
- The names of the individuals responsible for long term data preservation
- A description of the information assets to be covered by the digital preservation statement
- A description of when the record needs to be captured into the approved file formats
- A description of the appropriate supported file formats for long-term preservation
- A description of the retention of all software specification information and licence information
- A description of how access to the information asset register is to be managed in accordance with the UK GDPR

## 16. Information audit

The academy conducts information audits on an annual basis against all information held by the academy 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
- 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 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.

Once it has been confirmed that the information is accurate, the DPO will record all details on the academy's Data Asset Register.

An information asset owner is assigned to each asset or group of assets. They will be responsible for managing the asset appropriately, ensuring it meets the academy's requirements, and for monitoring risks and opportunities.

The information displayed on the Data Asset Register will be shared with the principal to gain their approval.

## **17. 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 unreadable.

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, in line with the Freedom of Information Act 2000.

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 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.

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.

## **18. Academy closures and record keeping**

### **18.1 Academy closure**

If the academy is closing, the trust will follow the DfE's guidance on what should happen to records retained by the trust, which can be found in the DfE's 'Record keeping and retention information for academies and academy trusts' guidance.

### **18.2 Sale or re-use of the site**

If the academy site is being sold or re-allocated to another use, the LA will take responsibility for the records from the date the academy closes.

### **18.3 Merger of academies**

If the academy merges with another school or academy to create one academy, the new academy will be responsible for retaining all current records originating from the former academies.

The DPO will determine the outcome of each group of records; these outcomes are as follows:

- Securely destroy all records that are expired and due for disposal, in accordance with the retention periods outlined in this policy.
- Transfer to the successor school or academy all records that are current and that will be required by the new academy.
- Transfer to the LA all records that are dormant but still need to be retained to comply with legal and business retention requirements.
- Transfer to the local record office any records with historical value.

### **18.4 Managing records**

The DPO will identify which records need to be destroyed or transferred to the relevant body, they will allocate personnel as necessary to sort through records.



The DPO will notify the other organisations as soon as possible so that necessary disposal, storage and transfer arrangements can be made. The academy's ICT provider will also be notified so that arrangements can be made to ensure the safe transfer or deletion of electronic records, including all back-up copies.

When sorting records, the DPO and their team will:

- Review all records held within the academy as soon as notification of closure is received, including paper and electronic records.
- Use the retention periods outlined in this policy to categorise the records into those to be destroyed and those that need to be transferred.
- Contact the relevant body to make arrangements for the safe and secure transfer of records.
- Sort, list and box the records in preparation for the transfer, ensuring records are stored in a safe environment whilst awaiting collection.
- Plan how the disposal of records will be undertaken.
- Sort expired records in readiness for confidential disposal, ensuring they are stored securely whilst awaiting disposal.

All forms of storage will be completely emptied before the building is vacated or before disposal. Records awaiting transfer will be held in a secure area. The identity of any third parties collecting or disposing of records will be checked and a collection receipt will be obtained.

Records will be disposed of in line with the 'Disposal of data' section of this policy. Electronic records will be either transferred to the new body or deleted. All ICT equipment will be decommissioned in accordance with the academy's ICT Acceptable Use Policy.

No records will be left behind once the academy building is vacated.

## **19. Monitoring and review**

This policy will be reviewed on an annual basis by the DPO in conjunction with the principal. The next scheduled review date for this policy is January 2024.

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

## Appendix 1: Record archiving procedure

It is a fundamental requirement that all records are retained for a minimum period, for legal, operational, research and safety reasons. This document will provide Hope Academy staff with procedures to be used when archiving.

### Archiving process

Records that require archiving must be boxed, tagged and recorded using the following process:

- Contact the main office to request the number of boxes required, only the designated boxes will be accepted.
- Box up your documents. Records must be packed in alphabetical or chronological order, whichever is appropriate to the records, leaver arch files or box files should not be put into the archiving boxes. Please do not over pack the boxes.
- A copy of the list of contents should be attached to the lid and a subsequent copy placed inside the box.
- Once the boxes are filled check the Retention Schedules for the records retention period. Contact the main office, informing them of the correct retention period. They will then provide the correct number of labels (a copy of which can be seen in appendix 2). The labels will be sent to you.
- An electronic copy of the contents of the box, should be emailed to the DPO & Office Manager containing the following information:
  - Box Number
  - Box Description
  - Archive Date
  - Retention Date
  - List of Contents (created during packing stage)

This will ensure the Academy knows what records have been archived, for retrieval and audit purposes.

Please do not use any other codes or box numbers.

When the boxes are ready to be sent to archive, contact the general office with the number of boxes you have and the school where pick up is required.

The box will not be accepted if it does not have the completed label on and a copy of its contents.

### Retrieval of records

If you require a record to be retrieved, contact the main office with the following details:


- Box Number

- Archive Date
- Name/Details of Record

Once the box has been finished with, contact the Archiving contact to arrange pick up.

## Appendix 2: Archiving label

The below label will be completed by the Office Manager or DPO and should be attached to the front of the archiving box.

 <b>Hope Academy</b> <small>A joint Catholic &amp; Church of England Academy</small>			
<h3>Archiving Information</h3>			
Box Number			
Box Description			
Archive Date		Retention Period	
Review Date		DESTRUCTION DATE	