



Data Retention Policy

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Policy statement

- Faringdon Learning Trust (FLT) is committed to maintaining the confidentiality of its information and ensuring that all records within FLT or any of the FLT schools are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, each school 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, in order to meet the school's statutory requirements.
- This document complies with the requirements set out in the Data Protection Act 2018 (DPA 2018), which is the UK's implementation of the General Data Protection Regulation.
- The tables for retention periods are based on information provided by the Information Records Management Society (IRMS) and are not an exhaustive list of records that may be kept. Where the IRMS has not provided guidance for disposal methods or retention periods, good practice recommendations are shown.

Legal framework

- This policy has due regard to legislation including, but not limited to, the following:
 - General Data Protection Regulation (2016)
 - Freedom of Information Act 2000
 - Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
 - Data Protection Act 2018
 - Companies Act
- This policy also has due regard to the following guidance:
 - Information Records Management Society 'Information Management Toolkit for Schools' 2016
- This policy will be implemented in accordance with, and read alongside, the following school policies and procedures:
 - Data Protection Policy
 - Freedom of Information Policy
 - E-security Policy

Responsibilities

- FLT Board of Trustees has an accountability for ensuring the Trust meets its statutory requirements.
- The Chief Executive Officer (CEO) holds overall responsibility for this policy and for ensuring it is implemented correctly.

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- The GDPR Trust Lead (Operations Manager) is accountable for promoting compliance with this policy and reviewing the policy on a 3 yearly basis, in conjunction with the CEO.
- The Head Teacher is responsible for the compliance within their school.
- The Data Champion at each school is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of correctly at their school.
- All staff members are responsible for ensuring that any records for which they are responsible for are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

Management of 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 that a pupil attends and includes all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.
- These guidelines apply to information created and stored both physically and electronically.

Primary School Pupil Records

- The following information is stored on a pupil record, and will be easily accessible:
 - Forename, surname, gender and date of birth
 - Unique pupil number
 - Note of the date when the file was opened
 - Note of the date when the file was closed, if appropriate
- The following information is stored on a pupil record, and will be easily accessible:
 - Ethnic origin, religion and first language (if not English)
 - Any preferred names
 - Position in their family, e.g. eldest sibling
 - 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 parents, including their home address(es) and telephone number(s)
 - Name of the school, admission number, the date of admission and the date of leaving, where appropriate
 - Any other agency involvement, e.g. speech and language therapist
- The following information is retained in our pupil records:
 - Enrolment form
 - Details of any SEND
 - If the pupil has attended an early years setting, the record of transfer
 - Pupil Privacy Notice – only the most recent notice will be included
 - Annual written reports to parents

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- National curriculum and agreed syllabus record sheets
- Notes relating to major incidents and accidents involving the pupil
- Any information about an education and healthcare (EHC) plan and support offered in relation to the EHC plan
- Any notes indicating child protection disclosures and reports are held
- 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 are held
- The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the pupil in the in a way that is compliant with GDPR principles:
 - Absence notes
 - Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
 - Correspondence with parents about minor issues, e.g. behaviour
 - Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in a securely locked filing cabinet - a note indicating this is marked on the pupil's file.
 - Hard copies of complaints made by parents or pupils are stored in a secure file – a note indicating this is marked on the pupil's file.
 - Actual copies of accident and incident information are stored separately on RET's management information system and held in line with the Retention periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.
- FLT will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.
- The only exception to the above is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, the person responsible for disposing records, will remove these records.
- Electronic records relating to a pupil's record will also be transferred to the pupils' next school. This policy outlines how electronic records will be transferred.
- FLT will, wherever possible, **avoid** sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to FLT.

Secondary School Pupil Records

Items which should be included on the pupil record

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- If the pupil has attended an early years setting, then the record of transfer should be included on the pupil file
- Admission form (application form)
- Privacy Notice [if these are issued annually only the most recent need be on the file]
- Photography Consents
- Years Record
- Annual Written Report to Parents
- National Curriculum and Religious Education Locally Agreed Syllabus Record Sheets
- Any information relating to a major incident involving the child (either an accident or other incident)
- Any reports written about the child
- Any information about a statement and support offered in relation to the statement
- Any relevant medical information (should be stored in the file in a sealed envelope clearly marked as such)
- Child protection reports/disclosures (should be stored in the file in a sealed envelope clearly marked as such)
- Any information relating to exclusions (fixed or permanent)
- Any correspondence with parents or outside agencies relating to major issues
- Details of any complaints made by the parents or the pupil

The following records should be stored separately to the pupil record as they are subject to shorter retention periods and if they are placed on the file then it will involve a lot of unnecessary weeding of the files once the pupil leaves the school.

- Absence notes
- Parental consent forms for trips/outings [in the event of a major incident all the parental consent forms should be retained with the incident report not in the pupil record]
- Correspondence with parents about minor issues
- Accident forms (these should be stored separately and retained on the school premises until their statutory retention period is reached. A copy could be placed on the pupil file in the event of a major incident)

Responsibility for the pupil record once the pupil leaves the school

- The school which the pupil attended until statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25 years.

Retention of pupil records and other pupil-related information

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

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- 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 |
|--|--|--|
| Admissions | | |
| Register of admissions from Local Authority | Three years after the date on which the entry was made | Information is reviewed and the register may be kept permanently |
| Secondary school admissions from Local Authority | The current academic year, plus one year | Secure Disposal |
| Proof of address (supplied as part of the enrolment process) | The current academic year, plus one year | Secure Disposal |
| Supplementary information submitted, including religious and medical information etc. (where the admission was successful) | Added to the pupil's file | Secure Disposal |
| Supplementary information submitted, including religious and medical information etc. (where the admission was not successful) | Until the appeals process has been completed | Secure Disposal |
| Pupils' educational records | | |
| Primary Pupils' educational records | Whilst the pupil remains at the school | 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 LA and retained for the statutory period |
| Secondary Pupils' educational records | 25 years after the pupil's date of birth | Secure Disposal |

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| Public examination results | Added to the pupil's record | Uncollected certificates returned to the examination board |
| Internal examination results | Added to the pupil's record | Secure Disposal |
| Child protection information held on a pupil's record | Stored in a sealed envelope for the same length of time as the pupil's record | Secure Disposal – shredded |
| Child protection records held in a separate file | 25 years after the pupil's date of birth | Secure Disposal – shredded |
| Attendance | | |
| Attendance registers | Last date of entry on to the register, plus three years | Secure Disposal |
| Letters authorising absence | Current academic year, plus two years | Secure Disposal |
| SEND | | |
| SEND files, reviews and individual education plans | 25 years after the pupil's date of birth (as stated on the pupil's record) | Information is reviewed and the file may be kept for longer than necessary if it is required for the school to defend themselves in a 'failure to provide sufficient education' case |
| Statement of SEN maintained under section 324 of the Education Act 1996 or an EHC plan maintained under section 37 of the Children and Families Act 2014 (and any amendments to the statement or plan) | 25 years after the pupil's date of birth (as stated on the pupil's record) | Secure Disposal, unless it is subject to a legal hold |
| Information and advice provided to parents regarding SEND | 25 years after the pupil's date of birth (as | Secure Disposal, unless it is subject to a legal hold |

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| | stated on the pupil's record) | |
| Accessibility strategy | 25 years after the pupil's date of birth (as stated on the pupil's record) | Secure Disposal, unless it is subject to a legal hold |
| Curriculum management | | |
| SATs results | 25 years after the pupil's date of birth (as stated on the pupil's record) | Secure Disposal |
| Examination papers | Until the appeals/validation process has been completed | Secure Disposal |
| Published Admission Number (PAN) reports | Current academic year, plus six years | Secure Disposal |
| Valued added and contextual data | Current academic year, plus six years | Secure Disposal |
| Self-evaluation forms | Current academic year, plus six years | Secure Disposal |
| Pupils' work | Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year | Secure Disposal |
| Extra-curricular activities | | |
| Primary Schools– Records created by schools to obtain approval to run an Educational Visit outside the Classroom | Date of visit + 14 years | Secure Disposal |

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| Secondary Schools– Records created by schools to obtain approval to run an Educational Visit outside the Classroom | Date of visit + 10 years | Secure Disposal |
| Parental consent forms for school trips where no major incident occurred | Until the conclusion of the trip | Can be held up to 22 years after the pupil's date of birth. However this need is low. |
| Parental consent forms for school trips where a major incident occurred | 25 years after the pupil's date of birth on the pupil's record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils) | Secure Disposal |
| Walking bus registers | Three years from the date of the register being taken | Secure Disposal |
| Family liaison officers and home-school liaison assistants | | |
| Day books | Current academic year, plus two years | Reviewed and destroyed if no longer required |
| Reports for outside agencies | Duration of the pupil's time at school | Secure Disposal |
| Referral forms | Whilst the referral is current | Secure Disposal |
| Contact data sheets | Current academic year | Reviewed and destroyed if no longer active |
| Contact database entries | Current academic year | Reviewed and destroyed if no longer required |
| Group registers | Current academic year, plus two years | Secure Disposal |

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Retention of staff records

- The table below outlines the school'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 |
|---|---|--|
| Operational | | |
| Staff members' personal file | Termination of employment, plus six years | Secure Disposal |
| Timesheets | Current academic year, plus six years | Secure Disposal |
| Annual appraisal and assessment and professional development records | Current academic year, plus five years | Secure Disposal |
| Recruitment | | |
| Records relating to the appointment of new members of staff (unsuccessful candidates) | Date of appointment of successful candidate, plus 6-12 months | Secure Disposal |
| Records relating to the appointment of new members of staff (successful candidates) | Relevant information added to the member of staff's personal file and all other information retained for 6 months | Secure Disposal |
| DBS certificates | Record satisfactory or unsatisfactory result for duration of employment. Other information to be deleted | Secure Disposal |
| Proof of identify as part of the enhanced DBS check | After identity has been proven | Reviewed and a note kept of what was seen and what has been checked – if it is necessary |

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| | | to keep a copy this will be placed on the staff member's personal file, if not, Secure Disposal |
| Evidence of right to work in the UK | Added to staff personal file and destroyed in line with staff file destruction date | Secure Disposal |
| Single Central Record (SCR) | Only when employed/ volunteering | Secure Disposal |
| Disciplinary and grievance procedures | | |
| Child protection allegations, including where the allegation is unproven | Added to staff personal file, and until the individual's normal Retirement age, or 10 years from the date of the allegation – whichever is longer If allegations are malicious, they are removed from personal files | Reviewed and securely disposed of – shredded |
| Oral warnings | Date of warning, plus six months | Secure Disposal – if placed on staff personal file, removed from file |
| Written warning – level 1 | Date of warning, plus 6 months | Secure Disposal – if placed on staff personal file, removed from file |
| Written warning – level 2 | Date of warning, plus 12 months | Secure Disposal – if placed on staff personal file, removed from file |
| Final warning | Date of warning, plus 18 months | Secure Disposal – if placed on staff personal file, removed from file |
| Records relating to unproven incidents | Conclusion of the case, unless the incident is child | Secure Disposal |

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| | protection related and is disposed of | |
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Retention of management records

- The table below outlines the school'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 |
|--|--|--|
| Governing Body/ Directing Board | | |
| Agendas for governing body/ board meetings | One copy alongside the original set of minutes – all others disposed of without Retention | Securely disposed of |
| Original, signed copies of the minutes of governing body/ board meetings | Permanent | Retained indefinitely |
| Inspection copies of the minutes of governing body/ board meetings | Date of meeting, plus three years | Shredded if they contain any sensitive and personal information |
| Reports presented to the governing body/ board | Minimum of six years, unless they refer to individual reports – these are kept permanently | Securely disposed of or, if they refer to individual reports, Retained with the signed, original copy of minutes |
| Articles of association | Permanent | Retained indefinitely |
| Trusts and endowments managed by the board | Permanent | Retained indefinitely |
| Action plans created and administered by the governing body/ board | Duration of the action plan, plus three years | Secure Disposal |

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| Policy documents created and administered by the governing body/ board | Duration of the policy, plus three years | Secure Disposal |
| Records relating to complaints dealt with by the governing body/ board | Date of the resolution of the complaint, plus a minimum of six years | Reviewed for further Retention in case of contentious disputes, then securely disposed of |
| Proposals concerning changing the status of the school | Date proposal accepted or declined, plus three years | Secure Disposal |
| CEO, Head teachers and senior leadership team (SLT) | | |
| Log books of activity in FLT schools maintained by the Head teachers | Date of last entry, plus a minimum of six years | Reviewed and securely disposed of |
| Minutes of SLT meetings and the meetings of other internal administrative bodies | Date of the meeting, plus three years | Reviewed and securely disposed of |
| Reports created by the CEO, Head teacher or SLT | Date of the report, plus a minimum of three years | Reviewed and securely disposed of |
| Records created by any member of staff with administrative responsibilities | Current academic year, plus six years | Reviewed and securely disposed of |
| Correspondence created by the CEO, Head teacher, SLT, heads of year and other members of staff with administrative responsibilities | Date of correspondence, plus three years | Reviewed and securely disposed of |
| School development plan | Duration of the plan, plus three years | Secure Disposal |

Retention of health and safety records

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

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

| Type of file | Retention period | Action taken after Retention period ends |
|--|---|--|
| Health and safety | | |
| Health and safety policy statements | Duration of policy, plus three years | Secure Disposal |
| Health and safety risk assessments | Duration of risk assessment, plus three years | Secure Disposal |
| Records relating to accidents and injuries at work | Date of incident, plus 12 years. In the case of serious accidents, a Retention period of 15 years is applied | Secure Disposal |
| Accident requiring reporting to HSE – adults | Date of the incident, plus six years | Secure Disposal |
| Accident requiring reporting to HSE – pupils | 25 years after the pupil's date of birth, on the pupil's record | Secure Disposal |
| Accidents not requiring reporting to HSE | 1 yr from date of incident | Secure Disposal |
| Control of substances hazardous to health (CoSHH) | Current academic year, plus 40 years | Secure Disposal |
| Information relating to areas where employees and persons are likely to come into contact with asbestos | Date of last action, plus 40 years | Secure Disposal |
| Information relating to areas where employees and persons are likely to come into contact with radiation | Date of last action, plus 50 years | Secure Disposal |

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| Fire precautions log books | Current academic year, plus six years | Secure Disposal |
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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.

| Type of file | Retention period | Action taken after Retention period ends |
|--|---|---|
| Payroll pensions | | |
| Maternity pay records | Current tax year, plus three years | Secure Disposal |
| Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Retained until further recommendations (pensions regulator) | Secure Disposal |
| Risk management and insurance | | |
| Employer's liability insurance certificate | Closure of the school, plus 40 years | Secure Disposal |
| Asset management | | |
| Inventories of furniture and equipment | Current academic year, plus six years | Secure Disposal |
| Burglary, theft and vandalism report forms | Current academic year, plus six years | Secure Disposal |
| Accounts and statements including budget management | | |
| Annual accounts | Current academic year, plus six years | Disposed of against common standards |
| Loans and grants managed by the school | Date of last payment, plus 12 years | Information is reviewed then securely disposed of |

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| All records relating to the creation and management of budgets | Duration of the budget, plus three years | Secure Disposal |
| Invoices, receipts, order books, requisitions and delivery notices | Current financial year, plus six years | Secure Disposal |
| Records relating to the collection and banking of monies | Current financial year, plus six years | Secure Disposal |
| Records relating to the identification and collection of debt | Current financial year, plus six years | Secure Disposal |
| Contract management | | |
| All records relating to the management of contracts under seal | Last payment on the contract, plus 12 years | Secure Disposal |
| All records relating to the management of contracts under signature | Last payment on the contract, plus six years | Secure Disposal |
| All records relating to the monitoring of contracts | Current academic year, plus two years | Secure Disposal |
| School fund | | |
| Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books | Current academic year, plus six years | Secure Disposal |
| School meals | | |
| Free school meals registers | Current academic year, plus six years | Secure Disposal |
| School meals registers | Current academic year, plus three years | Secure Disposal |
| School meals summary sheets | Current academic year, plus three years | Secure Disposal |

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Retention of other school records

- The table below outlines the school's Retention periods for any other records held by the school, 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 |
|---|---|---|
| Property management | | |
| Title deeds of properties belonging to the school | Permanent | Transferred to new owners if the building is leased or sold |
| Plans of property belonging to the school | For as long as the building belongs to the school | Transferred to new owners if the building is leased or sold |
| Leases of property leased by or to the school | Expiry of lease, plus six years | Secure Disposal |
| Records relating to the letting of school premises | Current financial year, plus six years | Secure Disposal |
| Maintenance | | |
| All records relating to the maintenance of the school carried out by contractors | Current academic year, plus six years | Secure Disposal |
| All records relating to the maintenance of the school carried out by school employees | Current academic year, plus six years | Secure Disposal |
| Operational administration | | |
| General file series | Current academic year, plus five years | Reviewed and securely disposed of |
| Records relating to the creation and publication of the | Current academic year, plus three years | Disposed of against common standards |

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| school brochure and/or prospectus | | |
| Records relating to the creation and distribution of circulars to staff, parents or pupils | Current academic year, plus one year | Disposed of against common standards |
| Newsletters and other items with short operational use | Current academic year plus one year | Disposed of against common standards |
| Visitors' books and signing-in sheets | Current academic year, plus 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 |

Storing and protecting information

- The Trust GDPR Lead will undertake a risk analysis to identify which records are vital to the management of FLT and these records will be stored in the most secure manner.
- IT Services will conduct a back-up of information:
 - Sharepoint daily differential, 30-day full backup
 - Information on One-Drive is not backed up.
 - Information on emails is not backed up apart from key email boxes such as Office and Headteacher accounts.
- This is 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.
- Data is backed up to a cloud third party solution stored in a UK data centre. More information can be found at <https://www.redstor.com/>
- 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 on a network drive that is regularly backed-up.
- 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.

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- USB external devices are not to hold personal information
- USB external devices are to be password-protected and fully encrypted.
- All electronic devices are password-protected to protect the information on the device in case of theft.
- Where possible, FLT enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 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 to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email.
- Circular emails to parents are sent via a messaging service so that email addresses are not disclosed to other recipients.
- 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 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 school premises accepts full responsibility for the security of the data.
- Before sharing data, staff always ensure that:
 - They have the correct legal basis to share it.
 - Adequate security is in place to protect it.
 - The data recipient has been outlined in a privacy notice.
- All staff members will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer or safe with restricted access.
- Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.
- The physical security of the school's buildings and access is reviewed termly by the Caretaker in conjunction with the Head teacher. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the Operations Manager and extra measures to secure data storage will be put in place.
- The school takes its duties under the Data Protection Act 2018 seriously and any unauthorised disclosure may result in disciplinary action.
- IT Services is responsible for continuity and recovery measures are in place to ensure the security of protected data.

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Accessing information

- FLT is transparent with data subjects, the information held and how it can be accessed.
- All members of staff, parents of registered pupils and other users of FLT schools, e.g. visitors and third-party clubs, are entitled to:
 - Know what information the school 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 Data Protection Act 2018.
- All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the DPA 2018, to access certain personal data being held about them or their child.
- Personal information can be shared with pupils above the age of 12, when they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents, with their consent.
- Pupils aged 12 and above are considered to be at an appropriate age to make decisions for themselves, and are entitled to have their personal information handled in accordance with their rights.
- The school will adhere to the provisions outlined in the school's Data Protection Policy when responding to requests seeking access to personal information.

Digital continuity statement

- Digital data that is retained for longer than six years will be named as part of a digital continuity statement.
- The ICT Manager will identify any digital data that will need to be named as part of a digital continuity statement.
- The data will be archived to Office 365 which is password protected, and securely backed up to a protected cloud provider off site.
- Memory sticks will never be used to store digital data, subject to a digital continuity statement.
- The 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 purpose and 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

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- 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 Data Protection Act 2018

Information audit

- FLT conducts information audits on an annual basis against all information held by FLT to evaluate the information FLT is holding, receiving and using, and to ensure that this is correctly managed in accordance with the Data Protection Act 2018. 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
- 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 Data Protection Officer, in conjunction with the GDPR Trust lead, is responsible for completing the information audit. The information audit will include the following:
 - FLT'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 GDPR Trust lead will consult with staff members involved in the information audit process to ensure that the information is accurate.

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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.
- Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut.
- Where the disposal action is indicated as reviewed before it is disposed, the relevant staff will review the information against its administrative value – if the information should be kept for administrative value, and the relevant staff member 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 relevant staff member 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
- PC hardware that store any data are destroyed via a third party company who provide certification of the work completed.

Monitoring and review

- This policy will be reviewed every three years by GDPR Trust lead (Operations Manager) in conjunction with the CEO.
- Any changes made to this policy will be communicated to all members of staff and the Board of Trustees and the Local Governing Bodies.

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