



LINCOLN ANGLICAN
ACADEMY TRUST

DIOCESE OF LINCOLN

Records Management Policy

Church schools serving their communities through excellence, exploration and encouragement within the love of God.

The diocese of Lincoln is called to faithful worship, confident discipleship and joyful service and our church schools bear witness to our belief that every child is made in the image of God and loved by Him. They were founded for the good of their local communities so that children can be educated through the values and stories of Christianity.

Policy Owner: LAAT CEO

Policy Date: December 2021

Policy Review Date: December 2023

Excellence

Exploration

Encouragement

Statement of Intent

The Lincoln Anglican Academy Trust (hereafter 'LAAT' or 'the Trust') is committed to maintaining the confidentiality of its information and ensuring that all records within the Trust and school are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulation (GDPR), the Trust also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

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

This document complies with the requirements set out in the GDPR, which came into effect on 25 May 2018.

The retention periods outlined in this policy are good practice guidelines only, and schools should ensure that they consider requirements specific to their school when implementing these timeframes. 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 by schools.

1. Legal Framework

- 1.1. This policy has due regard to legislation including, but not limited to, the following:
 - General Data Protection Regulation (2016)
 - The Data Protection Act (2018)
 - Freedom of Information Act 2000
 - Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- 1.2. This policy also has due regard to the following guidance:
 - Information Records Management Society 'Information Management Toolkit for Schools' 2019
- 1.3. This policy will be implemented in accordance with the following policies and procedures:
 - Data Protection and Freedom of Information Policy
 - ICT User and Social Media Policy
 - Internal Risk Management Policies and Procedures

2. Responsibilities

- 2.1. The Trust as a whole has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.
- 2.2. The **LAAT Directors** hold overall responsibility for this policy and for ensuring it is implemented correctly.
- 2.3. The **Data Protection Officer** is responsible for promoting compliance with this policy and reviewing the policy every two years, in conjunction with the **LAAT Directors**.

- 2.4. All staff members are responsible for ensuring that all records for which they are responsible are accurate, maintained and stored securely in accordance with the retention periods outlined in this policy, and are disposed of correctly.

3. Retention of Pupil Records and Other Pupil-Related Information

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

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	Three years after the date on which the entry was made	Information is reviewed and the register may be kept permanently
Secondary school admissions	The current academic year, plus one year	Securely disposed of
Proof of address (supplied as part of the admissions process)	The current academic year, plus one year	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Added to the pupil's record	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was not successful)	Until the appeals process has been completed	Securely disposed of
Pupils' educational records		
Primary 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	Securely disposed of
Public examination results	Added to the pupil's record	Unallocated certificates should be returned to the Examination Board after reasonable attempts to contact the pupil have failed.

Internal examination results	Added to the pupil's record	Securely disposed of
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	Securely disposed of – shredded
Child protection records held in a separate file	25 years after the pupil's date of birth	Securely disposed of – shredded
Attendance		
Attendance registers	Last date of entry on to the register, plus three years	Securely disposed of
Correspondence relating to any absence (authorised or unauthorised)	Current academic year, plus two years	Securely disposed of
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)	Securely disposed of, 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 stated on the pupil's record)	Securely disposed of, unless it is subject to a legal hold
Accessibility strategy	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of, 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)	Securely disposed of
Examination Results (school's copy)	Current year + 6 years	Securely disposed of

Examination papers	Until the appeals/validation process has been completed	Securely disposed of
Published Admission Number (PAN) reports	Current academic year, plus six years	Securely disposed of
Valued added and contextual data	Current academic year, plus six years	Securely disposed of
Self-evaluation forms	Current academic year, plus six years	Securely disposed of
Pupils' work	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	Securely disposed of
Extra-curricular activities		
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip	Securely disposed of
Parental consent forms for school trips where a major incident occurred	25 years after the pupil's date of birth on the pupil's record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils)	Securely disposed of
Walking bus registers	Three years from the date of the register being taken	Securely disposed of
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	Securely disposed of
Referral forms	Whilst the referral is current	Securely disposed of
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	Securely disposed of
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4. Retention of Staff Records

- 4.1. The table below outlines the Trust's retention period for staff records and the action that will be taken after the retention period, in line with any requirements.
- 4.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Operational		
Staff members' personal file	Termination of employment, plus six years	Securely disposed of
Timesheets	Current academic year, plus six years	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus six years	Securely disposed of
Recruitment		
Records relating to the appointment of a new Headteacher	Date of termination of appointment, plus six years	Securely disposed of
Records relating to the appointment of new members of staff (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of
Records relating to the appointment of new members of staff (successful candidates)	Relevant information added to the member of staff's personal file and other information retained for six months	Securely disposed of
Pre-employment vetting information - DBS certificates	For the duration of employment plus 6 years	Securely disposed of
Proof of identify as part of the enhanced DBS check	After identity has been proven	Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy this will be placed on the staff member's personal file, if not, securely disposed of

Evidence of right to work in the UK	Added to staff personal file or, if kept separately, termination of employment plus no less than two years	Securely disposed of
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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	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 1	Date of warning, plus 6 months	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 2	Date of warning, plus 12 months	Securely disposed of – if placed on staff personal file, removed from file
Final warning	Date of warning, plus 18 months	Securely disposed of – if placed on staff personal file, removed from file
Dismissal	Date of dismissal, plus 6 years	Securely disposed of
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related and is disposed of as above	Securely disposed of

5. Retention of Senior Leadership and Management Records

- 5.1. The table below outlines the Trust'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
Directors and Local Boards		
Agendas for LAAT Board and/or Local Board/Council 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 Board of Directors meetings	Permanent	
Inspection copies of the minutes of Board of Directors meetings	Date of meeting, plus three years	Shredded if they contain any sensitive and personal information
Reports presented to the Board of Directors	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
Minutes and Reports of Local Board/Council Meetings	Permanent	
Meeting papers relating to the annual parents' meeting	Date of meeting, plus a minimum of six years	Securely disposed of
Articles of Association	Permanent	
Trusts and endowments managed by the Board of Directors	Permanent	
Action plans created and administered by the Board of Directors	Duration of the action plan, plus three years	Securely disposed of
Policy documents created and administered by the Board of Directors, Local Boards/Councils	Duration of the policy, plus three years	Securely disposed of

Records relating to complaints dealt with by the Board of Directors, Local Board/Council	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
Annual reports required by external regulatory bodies, i.e. DfE, ESFA	Date of report plus 10 years	Securely disposed of
Proposals concerning changing the status of the school	Date proposal accepted or declined, plus three years	Securely disposed of
Senior Leadership Team (SLT)		
Log books of activity in the school maintained by SLT	Date of last entry, plus a minimum of six years	Reviewed and offered to the local authority archives service if appropriate
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 SLT	Date of the report, plus a minimum of three years	Reviewed and securely disposed of
Records created by the SLT and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed and securely disposed of
Correspondence created by the SLT and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Reviewed and securely disposed of
Professional development plan	Duration of the plan, plus six years	Securely disposed of
School development plan	Duration of the plan, plus three years	Securely disposed of

6. 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.

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

Type of file	Retention period	Action taken after retention period ends
Health and safety		
Health and safety policy statements	Duration of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years	Securely disposed of
Records relating to accidents and injuries at work	Date of incident, plus 12 years. In the case of serious accidents, a retention period of 15 years is applied	Securely disposed of
Accident reporting – adults	Date of the incident, plus six years	Securely disposed of
Accident reporting – pupils	25 years after the pupil’s date of birth, on the pupil’s record	Securely disposed of
Control of substances hazardous to health	Current academic year, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation	Date of last action, plus 50 years	Securely disposed of
Fire precautions log books	Current academic year, plus six years	Securely disposed of

7. 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 academic year, plus three years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year, plus six years	Securely disposed of
Risk management and insurance		
Employer's liability insurance certificate	Closure of the school, plus 40 years	Securely disposed of
Asset management		
Inventories of furniture and equipment	Current academic year, plus six years	Securely disposed of
Burglary, theft and vandalism report forms	Current academic year, plus six years	Securely disposed of
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/Trust	Date of last payment, plus 12 years	Information is reviewed then securely disposed of
All records relating to the creation and management of budgets	Duration of the budget, plus three years	Securely disposed of
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus six years	Securely disposed of
Records relating to the collection and banking of monies	Current financial year, plus six years	Securely disposed of
Records relating to the identification and collection of debt	Current financial year, plus six years	Securely disposed of
Contract management		
All records relating to the management of contracts under seal	Last payment on the contract, plus 12 years	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract, plus six years	Securely disposed of

All records relating to the monitoring of contracts	Current academic year, plus two years	Securely disposed of
School fund		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
School meals		
Free school meals registers	Current academic year, plus six years	Securely disposed of
School meals registers	Current academic year, plus three years	Securely disposed of
School meals summary sheets	Current academic year, plus three years	Securely disposed of

8. 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	<u>Transferred to new owners if the building is leased or sold</u>
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	Securely disposed of
Records relating to the letting of school premises	Current financial year, plus six years	Securely disposed of
Maintenance		
All records relating to the maintenance of the school carried out by contractors	Current academic year, plus six years	Securely disposed of

All records relating to the maintenance of the school carried out by school employees	Current academic year, plus six years	Securely disposed of
Operational administration		
General file series which do not come under any other categories	Current academic year, plus five years	Reviewed and securely disposed of
Records relating to the creation and publication of the school/Trust brochure and/or prospectus	Current academic year, plus three years	Disposed of against common standards
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus one year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year plus one year	Disposed of against common standards
Visitors' books and signing-in sheets	Current academic year, plus two years	Reviewed then securely disposed of
Records relating to the creation and management of parent-teacher associations and/or old pupil associations	Current academic year, plus six years	Reviewed then securely disposed of

9. Storing and Protecting Information

- 9.1. The **Business and Operations Partner (BOP)** will undertake a risk analysis to identify which records are vital to school management and these records will be stored in the most secure manner.
- 9.2. The BOP/IT Service Provider will conduct 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.
- 9.3. Where possible, backed-up information will be stored off the school premises, using a central back-up service operated by the IT Service Provider.
- 9.4. Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.
- 9.5. Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 9.6. 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.

- 9.7. 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.
- 9.8. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.
- 9.9. All electronic devices are password-protected to protect the information on the device in case of theft.
- 9.10. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 9.11. Staff do not use their personal laptops or computers for school purposes unless a signed agreement for the use of personal equipment is in place.
- 9.12. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- 9.13. Files containing sensitive or confidential information shared via email 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.
- 9.14. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 9.15. When sending confidential information by fax, members of staff always check that the recipient is correct before sending.
- 9.16. 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.
- 9.17. 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.
- 9.18. 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.
- 9.19. 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.
- 9.20. The physical security of the school's buildings and storage systems, and access to them, is reviewed **termly** by the **site manager**. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the **Headteacher/Executive Head** and extra measures to secure data storage will be put in place.

- 9.21. The Trust takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.
- 9.22. Any damage to or theft of data will be managed in accordance with the Trust's' **Security Breach Management Plan**.

10. Accessing Information

- 10.1. **LAAT** is transparent with data subjects, the information we hold and how it can be accessed.
- 10.2. All members of staff, parents of registered pupils and other users of the school, 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 GDPR.
- 10.3. All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the GDPR, to access certain personal data being held about them or their child.
- 10.4. Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents.
- 10.5. Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.
- 10.6. The Trust will adhere to the provisions outlined in the Data Protection and FOI Policy when responding to requests seeking access to personal information.

11. Disposal of Data

- 11.1. Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.
- 11.2. Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut.
- 11.3. Where the disposal action is indicated as reviewed before it is disposed, the information will be reviewed against its administrative value – if the information should be kept for administrative value, this will be recorded.
- 11.4. If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

- 11.5. Where information has been kept for administrative purposes, the information will be reviewed again after **three** years and the same process conducted. 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.
- 11.6. Where information must be kept permanently, this information is exempt from the normal review procedures

12. Monitoring and Review

- 12.1. This policy will be reviewed every two years by the **DPO** in conjunction with the **Board of Directors**.
- 12.2. Any changes made to this policy will be communicated to all members of staff, governors and Directors.