



THE CONSORTIUM
ACADEMY TRUST

Records Management Policy

The Consortium Academy Trust (TCAT)
An Exempt Charity Limited by Guarantee
Company Number 07665828

Status:	Live
Policy Owner (Position)	DPO
Statutory / Recommended	Recommended
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Advisory Committee	Trust Board
Linked Documents and Policies	CCTV Policy, Data Protection Policy, ICT Acceptable Use Policy and Freedom of Information Policy

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Statement of intent

The Consortium Academy Trust (“the Trust”) in the course of its activities keeps and processes certain information about its staff members, governors, learners and their families, suppliers and other individuals.

This policy applies to every employee, governor, trustee, member, worker (including any agency, casual or temporary worker), volunteer and contractor who is employed or otherwise engaged at any academy operated by the Trust (each a “Data User”).

This policy sets out details of how long the Trust retains specific categories of information (including personal information). Under UK data protection legislation, the Trust is legally required to ensure that information which is capable of identifying any individual(s) is not retained by the Trust for any longer than is necessary for the purposes for which that information is processed by the Trust. The purpose of this policy is to provide the Trust’s Data Users with explicit guidance on how long the categories of information below should be retained by the Trust.

This policy should be read in conjunction with the following related Trust policies:

- Data Protection Policy
- ICT Acceptable Use Policy
- CCTV Policy
- Freedom of Information Policy

In respect of those categories of information below which are to be retained by the Trust in case of a future claim involving the Trust, if any such claim is subsequently made or notified to the Trust within any such retention period referred to below then the retention period for the relevant information may be extended as necessary in order for the Trust to deal with the relevant claim.

1. Legal framework

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

- General Data Protection Regulation ((EU) 2016/679)
- 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 in particular:

- Information Records Management Society (2016) 'Information Management Toolkit for Schools'
- DfE (2018) 'Data protection: a toolkit for schools'

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 Trust's Data Protection Officer (DPO) is Gilly Stafford (Company Secretary/Clerk to the Trust) and whose email address is dpo@consortiumtrust.co.uk. The DPO is responsible for overseeing data protection compliance within the Trust, including promoting compliance with this policy and reviewing the policy (which will be conducted every two years).

2.3. 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.

2.4. This policy does not form part of any employee's contract of employment and it may be amended by the Trust at any time. Any changes will be notified in writing.

3. Management of learner records

3.1. Learner records are specific documents that are used throughout a learner's time in the education system – they are passed to each school that a learner attends and includes all personal information relating to them, such as:

- Forename, surname, gender and date of birth
- Unique learner number
- Note of the date when the file was opened
- Note of the date when the file was closed, if appropriate
- Ethnic origin, religion and first language
- Any preferred names
- Position in their family, e.g. eldest sibling
- Emergency contact details and the name of the learner'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
- 3.2. The following information is stored in a learner record, and will be easily accessible to those who are authorised to access it:
- Admissions form
 - Details of any SEND
 - If the learner has attended an early years setting, the record of transfer
 - Learner Data Protection Statement (only the most recent statement will be included)
 - Annual written reports to parents
 - National curriculum and agreed syllabus record sheets
 - Notes relating to major incidents and accidents involving the learner
 - Any information about an education, health and care (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 learner are held
- 3.3. The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the learner in the relevant academy's office:
- Absence notes
 - Parental and, where appropriate, learner consent forms for educational visits, photographs and videos, etc.
 - Correspondence with parents about minor issues, e.g. behaviour
- 3.4. Hard copies of disclosures and reports relating to child protection are to be subject to particularly stringent security procedures, such as in a securely locked filing cabinet only accessible to a limited number of appropriately authorised staff (e.g. child protection officer). A note indicating the existence of any such records will be marked on the learner's file.
- 3.5. Hard copies of complaints made by parents or learners, and actual copies of accident and incident information, are to be stored securely in a file in the relevant academy's office. A note indicating the existence of any such records will be marked on the learner's file. An additional copy of information relating to major accidents or incidents may be placed in the relevant learner's file.
- 3.6. For those Trust academies which are primary schools, the academy will not ordinarily keep any copies of information stored within a learner's record unless there is ongoing

legal action at the time during which the learner leaves the academy. The responsibility for these records will then transfer to the next school that the learner attends.

- 3.7. For those Trust academies which are secondary schools, the academy will ordinarily retain the learner’s records until the learner reaches the age of 25 except where otherwise stated in this policy.
- 3.8. Each Trust academy must, wherever possible, avoid sending a learner record by post. Where a learner record must be sent by post, it must be sent by registered post, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the sending academy.

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

- 4.1. The table below outlines the Trust’s retention periods for individual learner records and the action that will be taken after the retention period.
- 4.2. Except where otherwise stated, the retention periods and required actions listed below apply to both electronic and paper copies of any information and files.

Type of Information	Retention period	Statutory Reference
Personal identifiers, contacts and personal characteristics		
Images used for identification purposes	For the duration of the event/activity, or whilst the learner remains at school, whichever is less, plus one month	n/a
Biometric data	For the duration of the consent validity period, whichever is less, plus one month	n/a
Address (including postcode), names and characteristics	Until learner’s 25th birthday	n/a

Admissions		
Register of admissions from the admissions team	One year from date of admission	n/a
Admissions appeals	One year from date of admission (or, if appeal is unsuccessful, one year from the resolution of the appeal)	n/a
Proof of address (supplied as part of the admissions process)	One year from date of admission	n/a
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Paper copy to be retained for 15 months from date of admission; electronic copy to be retained whilst the learner remains at the school, plus one year	n/a
Supplementary information submitted, including religious and medical information etc. (where the admission was not successful)	Six months from the date of notification that admission was not successful	n/a
Personal information relating to learner emergency contacts	One year after the learner leaves the academy	n/a
Learners' educational records		
Learners' educational records (primary schools)	Whilst the learner remains at the primary school - transferred to next destination when they leave	n/a
Learners' educational records (secondary schools) including alternative curriculum provision	25 years after the learner's date of birth	n/a
Public examination results	Whilst the learner is at school, plus two years	n/a
Internal examination results	25 years after the learner's date of birth	n/a
Behaviour records	25 years after the learner's date of birth	n/a
Exclusion records	25 years after the learner's date of birth	n/a

Child protection information	25 years after the learner's date of birth	n/a
Attendance		
Attendance registers	25 years after the learner's date of birth	n/a
Medical information and administration		
Proof of medical appointment	For up to one year after the appointment	n/a
Medical conditions – ongoing management	25 years after the learner's date of birth	n/a
Medical incidents that have a behavioural or safeguarding influence	25 years after the learner's date of birth	n/a
SEND		
SEND files, reviews and individual education plans	25 years after the learner's date of birth	n/a
An EHC Statement/plan maintained under section 37 of the Children and Families Act 2014 (and any amendments to the statement or plan)	30 years after the learner's date of birth	n/a
Information and advice provided to parents regarding SEND	25 years after the learner's date of birth	n/a
Curriculum Management		
SATs results	Copies with learners' names are held whilst the learner is at primary school, and then transferred to secondary school. Held until the learner is 25 years old.	n/a
Examination papers	Until the appeals/validation process has been completed	n/a
Learners' work	Returned to learners at the end of the academic year, or retained for the current academic year, plus one year	n/a

Extra-curricular activities		
Field file – information taken on school trips	<p>Until the conclusion of the trip, plus one month</p> <p>Where an incident occurs on the trip, field files may be retained for a longer period as appropriate depending on the relevant circumstances</p>	n/a
Financial information relating to school trips	Current financial year, plus six years	Academies Financial Handbook
Parental consent forms for learners attending school trips (where no incident occurred relating to the learner)	Until the conclusion of the trip	n/a
Parental consent forms for school trips (where learner was involved in any incident)	25 years after the learner's date of birth	n/a
External trips Evolve form	Until the conclusion of the trip, unless any learner was involved in any incident on the trip in which case the retention period will be the learner's 25th birthday	n/a
Free school meals		
Free school meals eligibility	25 years after the learner's date of birth	n/a

5. Retention of staff records

- 5.1. 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.
- 5.2. Except where otherwise stated, the retention periods and required actions listed below apply to both electronic and paper copies of any information and files.

Type of Information	Retention period	Statutory Reference
Operational		
Staff personnel records including training records and disciplinary / grievance hearings (including information held within SIMS)	Until termination of employment, plus six years	Time limits on litigation (s.5 Limitation Act 1980)
Annual appraisal and assessment records	Until termination of employment, plus six years	Time limits on litigation (s.5 Limitation Act 1980)
Facts relating to redundancies	6 months from the end of employment	Statutory time limit for making a redundancy claim (Employment Rights Act 1996)
Recruitment		
Records relating to the appointment of new members of staff, including application forms and interview notes (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Time limits on litigation (s.123 Equality Act 2010)
Records relating to the appointment of new members of staff, including application forms and interview notes (successful candidates)	Until termination of employment, plus six years	n/a
DBS certificates, checks and disclosures of criminal records forms	Up to six months from date of check unless assessed as relevant to ongoing employment relationship. Once a conviction is spent, should be deleted unless it is an excluded profession	Rehabilitation of Offenders Act 1974 & Information Commissioner's Employment Practices Code. See also related government guidance.
Proof of identity 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	n/a

Evidence of right to work in the UK	Until termination of employment, plus six years	n/a
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Disciplinary and grievance procedures		
Disciplinary proceedings - case not found	Destroy immediately at the conclusion of the case (unless related to child protection, in which case specific HR/legal advice must be sought)	n/a
Management counselling	Date of counselling, plus 12 months	n/a
Oral warnings	Date of warning, plus six months	n/a
Written warning – level 1	Date of warning, plus six months	n/a
Final warning	Date of warning, plus 18 months	n/a
Child protection allegations which are substantiated	Until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer	Keeping Children Safe in Education 2018

6. Retention of senior leadership and management records

- 6.1. 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.
- 6.2. Except where otherwise stated, the retention periods and required actions listed below apply to both electronic and paper copies of any information and files.

Type of Information	Retention period	Statutory Reference
Governing board		
Governing board papers (including meeting agendas, action plans, signed minutes, reports and records of complaints)	One hard copy and one electronic copy of the meeting 'pack' to be retained for 6 years. The original set of minutes to be retained permanently– all other copies disposed of without retention	n/a
Annual reports created under the requirements of The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002	Date of report, plus 10 years	The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002
Governor personal information (including Members, Trustees and Local Governors)	One year after involvement as a governor ceases	n/a
DBS certificates, checks and disclosures of criminal records forms	Up to six months from date of check unless assessed as relevant to ongoing employment relationship. Once a conviction is spent, should be deleted unless it is an excluded profession	Rehabilitation of Offenders Act 1974 & Information Commissioner's Employment Practices Code. See also related government guidance.
Proof of identity 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	n/a
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus six years	n/a
Reports and formal correspondence created by the headteacher or SLT	Date of the report, plus a minimum of six years	n/a

Professional development plan	Duration of the plan, plus six years	n/a
Academy/Trust development plan	Duration of the plan, plus six years	n/a

7. Retention of health and safety records

- 7.1. 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.
- 7.2. Except where otherwise stated, the retention periods and required actions listed below apply to both electronic and paper copies of any information and files.

Type of Information	Retention period	Statutory Reference
Health and safety		
Health and safety policy statements	Duration of policy, plus three years	n/a
Health and safety risk assessments	Duration of risk assessment, plus three years	n/a
Records relating to accidents and injuries - adults	Date of incident, plus 4 years. In the case of serious accidents (ones that could lead to a long term condition), a retention period of 15 years is applied	Regulation 12 Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations 2013 Latent Damages Act 1986
Records relating to accidents and injuries - learners	25 years after the learner's date of birth	General practice in education sector
Health records for any person who was placed under health surveillance at any time during their employment (including in relation to asbestos and radiation)	40 years from the date of the last entry	The Control of Substances Hazardous to Health Regulations 2002
Fire log books	Current academic year, plus six years	n/a

8. Retention of financial records

- 8.1. 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.
- 8.2. Except where otherwise stated, the retention periods and required actions listed below apply to both electronic and paper copies of any information and files.

Type of Information	Retention period	Statutory Reference
Payroll and pensions		
Statutory Maternity Pay records and calculations	3 years after the end of the tax year in which the maternity pay period ends	Regulation 26 Statutory Maternity Pay (General) Regulations 1986
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year, plus six years	Regulation 15 The Retirement Benefits Schemes (Information Powers) Regulations 1995
Statutory Sick Pay records and calculations	3 years after the end of the tax year to which the records relate	Regulation 13A Statutory Sick Pay (General) Regulations 1982
Payroll and wages records	6 years from financial year-end in which payments were made	Schedule 18 para 21 Finance Act 1998 Finance Act 1998
Income Tax and NI returns; Correspondence with Tax Office	6 years from the financial year-end in which payments were made	Schedule 18 para 21 Finance Act 1998 (as such records may fall within the definition of payroll and wage records)
Risk management and insurance		
Employer's liability insurance certificate	Closure of the school, plus 40 years	Longest employee claim statutory limitation period
Asset management		
Inventories of assets	Current academic year, plus six years	n/a
Accounts and statements including budget management		
Annual accounts	Current academic year, plus six years	Academies Financial Handbook
Loans and grants managed by the school	Date of last payment, plus 6 years (except where the	Limitation Act 1980

	loan/grant was made under a deed, in which case the period shall be extended to 12 years following the date of last payment)	
All records relating to the creation and management of budgets	Duration of the budget, plus six years	Academies Financial Handbook
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus six years	Academies Financial Handbook
Records relating to the collection and banking of monies	Current financial year, plus six years	Academies Financial Handbook
Records relating to the identification and collection of debt	Current financial year, plus six years	Academies Financial Handbook

Contract management		
All records relating to the management and monitoring of contracts entered into as a deed	Termination date of the contract, plus 12 years	Limitation Act 1980
All records relating to the management and monitoring of contracts under signature	Termination date of the contract, plus six years	Limitation Act 1980
School fund		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Academies Financial Handbook
School meals		
Free school meals registers	Current academic year, plus six years	Academies Financial Handbook

9. Retention of other school records

9.1. 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.

9.2. Except where otherwise stated, the retention periods and required actions listed below apply to both electronic and paper copies of any information and files.

Type of Information	Retention period	Statutory Reference
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	Termination/expiry of lease, plus six years (except where the lease was made under a deed, in which case the period shall be extended to 12 years following the date of termination/expiry)	Limitation Act 1980
Records relating to the letting of school premises	Current financial year, plus six years	Limitation Act 1980

Maintenance		
All records relating to the maintenance of the school carried out by contractors/employees	Current academic year, plus six years	Academies Financial Handbook
Operational administration		
Newsletters and other items with short operational use	Current academic year plus one year	n/a
Visitors' books and signing-in sheets	One year	n/a
Single Central Record	Permanent (excluding DBS certificate itself) Delete staff leavers after 6 months.	n/a
DBS certificates, checks and disclosures of criminal records forms for volunteers	Up to six months from date of check unless assessed as relevant to ongoing employment relationship. Once a conviction is spent,	Rehabilitation of Offenders Act 1974 & Information Commissioner's Employment Practices Code. See also related government guidance

	should be deleted unless it is an excluded profession	
Proof of identity as part of the enhanced DBS check for volunteers	After identity has been proven - reviewed and a note kept of what was seen and what has been checked	n/a

10. Identifying information

- 10.1. Under applicable UK data protection legislation, all individuals have the right (subject to certain statutory exemptions and limitations) to data minimisation and data protection by design and default – as the data controller, the school ensures appropriate measures are in place in order for individuals to exercise this right.
- 10.2. Wherever possible, the school uses pseudonymisation or anonymisation to reduce risk of identification.

11. Storing and protecting information

- 11.1. The DPO will periodically undertake a risk analysis to identify which records are vital to Trust and academy management and these records will be stored in a secure manner.
- 11.2. The Trust and each academy has in place systems to regularly back up information 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.
- 11.3. Where possible, backed-up information will be stored securely and in a different location to the live servers.
- 11.4. Confidential paper records are to be kept in a locked filing cabinet, drawer or safe, with restricted access.
- 11.5. Confidential paper records should not be left unattended or in clear view when held in a location with general access.
- 11.6. Memory sticks are not to be used to hold personal information unless they are password-protected and fully encrypted.
- 11.7. All electronic devices are to be password-protected to protect the information on the device in case of theft.
- 11.8. Where reasonably possible, the Trust enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 11.9. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

- 11.10. Emails containing sensitive or confidential information are to be 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.
- 11.11. The DPO is responsible for ensuring that continuity and recovery measures are in place to ensure the security of protected data.
- 11.12. Any damage to or theft of data will be managed in accordance with the Trust's Data Protection Policy.

12. Information audit

- 12.1. The Trust conducts information audits periodically against all information held by the Trust and each academy to evaluate the information held, received and used by the Trust or relevant academy, and to ensure that this is correctly managed in accordance with applicable data protection legislation. This includes the following information:
- Paper documents and records
 - Electronic documents and records
 - Databases
 - Sound recordings
 - Video and photographic records
 - Hybrid files, containing both paper and electronic information
- 12.2. 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
- 12.3. The DPO is responsible for completing the information audit. The information audit will include the following:
- The reasons for keeping information
 - The information needed in connection with each reason
 - The legal basis for keeping the information for the relevant reasons
 - The format in which data is stored
 - How long data needs to be kept for
 - Vital records status and any protective marking
- 12.4. Once it has been confirmed that the information is accurate, the DPO will record all details on the Trust's Information Asset Register.

13. Disposal of data

- 13.1. Where paper copies of information are to be disposed of, this will be using the relevant secure shredding facility available to the Trust or particular academy or collected in confidential waste bags by disposal by an approved contractor.
- 13.2. Where electronic devices are to be disposed of, this will be done securely by the relevant IT department or an approved contractor under the instruction of the relevant IT department.