Records Management Policy

1. Contents

2. Version control

Date	Version	Revision	Owner
24/09/18	1.0	New Policy Document	Future Generation Trust Policy Team
15/01/21	2.0	Reviewed in line with updated Data Protection Policy	Future Generation Trust Policy Team
13/03/23	3.0	Scheduled policy review	Future Generation Trust Policy Team

3. Introduction

Future Generation Trust is committed to the protection of all personal data and ensuring that it can only be accessed by individuals with appropriate authority. In line with the requirements of The UK General Data Protection Regulation (GDPR) the Trust also has the responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose for which they were originally obtained.

The policy outlines how records are stored, accessed, monitored, retained and disposed of. The Data Protection Lead at each academy is responsible for ensuring that retention and destruction protocols are adhered to.

The retention periods outlined within this policy are good practice guidelines only and are based upon information provided by the Information Records Management Society (IRMS). Please note that it is not an exhaustive list of records that may be retained by the Trust.

4. Legal framework

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

- Data Protection Act (2018) and The UK General Data Protection Regulation (GDPR)
- Information Records Management Society (IRMS) Information Management Toolkit for Schools (2019)
- IRMS Academies Toolkit (2019)
- ESFA Record keeping and retention information for academies (2022)

This policy has due regard to the Trust's policies and procedures, including, but not limited to:

- Child Protection & Safeguarding Policy
- Data Protection Policy
- Network and IT Security Policy
- Subject Access Request Procedure

5. Responsibilities

The Future Generation Trust Board has overall responsibility for this policy.

The Headteacher and Local Governing Body of each academy are responsible for managing records in line with the requirements outlined within this policy.

The Trust's Data Protection Officer is responsible for promoting and ensuring compliance for records management at each academy. Our Data Protection Officer is Stuart Ayres (Chief Executive Officer), and they can be contacted at Future Generation Trust Office, Hobnock Road, Essington, Wolverhampton, WV11 2RF. Tel: 01922 496570, or e-mail: office@futuregenerationtrust.co.uk

The Data Protection Lead at each academy is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined within this policy, and for ensuring that all personal data that is no longer required is disposed of correctly. Our Data Protection Leads are:

Etching Hill CE Primary Academy	Zoe Hasketh-Boston	Business Manager
Gentleshaw Primary Academy	Nikkie Boston	Office Manager
Moat Hall Primary Academy	Kate Hutton	Office Support Manager
St John's Primary Academy	Laura Greenhouse	PA to the Headteacher
St Peter's CE Primary Academy	Rosie Chandler	Bursar

All employees are responsible for ensuring that any personal data for which they are responsible for is accurate, maintained securely and disposed of correctly, in line with this policy.

6. Management of Pupil Records

Pupil records are specific documents that are used throughout their time in education. They are passed on to each school that a pupil attends and include all personal information relating to them, including date of birth, home address, school attended and achievement data.

The following information is accessible from a pupil's record:

- Forename, surname and preferred name (if applicable);
- Date of birth and gender;
- Address;
- Unique Pupil Number (UPN), name of school, date of admission and date of leaving;
- Ethnic origin, religion and first language;
- School Photograph;
- Names of parents/carers and their home addresses, telephone numbers and e-mail addresses;
- Sibling links;
- Emergency contact details;
- Name of doctor; any allergies or medical conditions;
- Eligibility for free school meals;
- Dietary requirements;
- Attendance information;
- Behavioural information;
- Achievement data.

Whilst less accessible, pupil records will also include:

- Admissions forms;
- Special educational needs and disability information (SEND);
- Information relating to an Education and Healthcare Plan;
- Any information relating to Child Protection or Safeguarding;
- Annual written reports to parents/carers;
- Information relating to major accidents or incidents involving a pupil;
- Information relating to any exclusions;
- Any correspondence with parents/carers or specialist external agencies regarding a pupil;
- CCTV images;
- Photographs and videos (only where parental consent has been given);
- Consent forms for trips and residential visits.

The table in the appendices to this document outlines the Trust's retention periods for individual pupil records and the action that will be taken at the end of the retention period. This relates to both paper and electronic records.

7. Management of Other Records

In the course of our activities as a multi-academy trust we may collect and process personal data in other records. These include:

- Governance records;
- Management records;
- Human Resources records;
- Health and Safety records;
- Financial records;
- Estate Management records.

The table in the appendices to this document also outlines the Trust's retention periods for these records and the action that will be taken at the end of the retention period. This relates to both paper and electronic records.

8. Data Audits

Each academy conducts a data audit on an **annual basis** in order to review the nature of the information being held, how it is used and to ensure that it is being managed in line with the Trust's Data Protection Policy. These audits include:

- Paper documents and records;
- Electronic documents and records;
- Databases;
- Photographs and video recordings.

9. Disposal of Data

Each academy must dispose of records in line with the retention periods and methods detailed within the table in Appendix A. Where 'secure disposal' is referenced this means shredding for hard copies and deletion from current systems for electronic files. In addition, the Trust uses a third party company for the secure deletion of hard drives.

10.   Monitoring and Review

The Future Generation Trust Board has overall responsibility for this policy and for reviewing its implementation and effectiveness. The Headteacher has operational responsibility for implementation at their academy.

This policy will be reviewed every two years. However, each academy must review the records that they manage on an annual basis in line with the requirements detailed within this policy.

Policy adopted on: **30 March 2023**

Review Date: **March 2025**

Signed: Fliss Dale   **Designation:** Chair of Trust Board

Appendix A - Schedule of Processing Activities & Retention Periods

File Description	Retention Period	Action at the end of Retention Period
Agendas and minutes of Trust Board & Governing Body meetings	One master copy (signed) should be retained **permanently** and all other copies can be disposed of	n/a Spare copies disposed of securely
Personal information relating to former Governors, Directors or Members	Date of leaving, plus 6 years	Disposed of securely
Records relating to the election of parent/staff governors	Date of election, plus 6 months	Disposed of securely
Reports presented to the Trust Board & Governing Body	Current academic year, plus 6 years	Disposed of securely
Previous versions of policies	Current academic year, plus 3 years	Disposed of securely
Records relating to formal complaints dealt with by the Governing Body and/or Trust Board	Date of resolution of the complaint, plus 6 years	Reviewed for further retention in case of contentious disputes, then disposed of securely
Copies of correspondence that identify individuals	Date of correspondence, plus 3 years	Disposed of securely
Declarations of Interest	Retained until place offered or child is beyond Year 6 age	Disposed of securely
Admissions – if the application is successful	Date of admission, plus 1 year	Disposed of securely
Admissions – if the application/appeal is unsuccessful	Resolution of case, plus 1 year	Disposed of securely

Pupil educational records (including year end reports)	Retained whilst the pupil remains at the academy The IRMS advises to retain the information for a short period to allow for any queries or reports to be completed or where linked records in the academy information management system have not yet reached the end of their retention period and deleting would cause problems.	The file should follow the pupil to their next educational establishment when they leave the academy
Emergency Contacts	Retained whilst the pupil remains at the academy (obsolete records disposed of)	Disposed of securely
Consents relating to The UK GDPR compliance – Pupils	Retained whilst pupil remains at the academy	Disposed of securely
Consents relating to The UK GDPR compliance - Workforce	Retained whilst individual associated with Future Generation Trust	Disposed of securely
Child Protection & Safeguarding information	25 years after the pupil's date of birth	Disposed of securely
Attendance registers (including pupil signing in late or leaving early)	Last date of entry, plus 6 years	Disposed of securely
Authorisation of absence letters	Current academic year, plus 2 years	Disposed of securely
SEND files, reviews and Individual Education Plans	25 years after the pupil's date of birth	Disposed of securely
Pupil's work	Retained for the current academic year, plus 1 year (where not already returned to the pupil)	Disposed of securely
Medication records	Current academic year, plus 2 years	Disposed of securely
Parental Consent Forms for trips or visits where there has been a major incident	25 years after the pupil's date of birth	Disposed of securely
Medical Forms & Parental Consent Forms for trips and residential visits	Retained until trip and shared with residential centre (if applicable)	Disposed of securely
Pastoral records	Current academic year, plus 2 years, then review	Review if still required depending upon circumstances, then disposed of securely

School Census Returns	Current academic year, plus 5 years	Disposed of securely
Single Central Register	Live document	Disposed of securely
Business Continuity Plan	Re-issued at annual review or earlier if any contact details change	Disposed of securely
Health & Safety Risk Assessments	Life of risk assessment, plus 3 years provided that a copy of the risk assessment is stored with the accident records if an incident has occurred	Disposed of securely
Accident records (pupils)	25 years after the pupil's date of birth	Disposed of securely
Accident records (staff) Accident Book – BI 510	Date of accident/injury at work, plus 12 years (In the case of serious accidents a further retention period may need to be applied) Completed pages must removed from the book and kept secure with restricted access	Disposed of securely
Accident records (adults)	Date of accident, plus 6 years	Disposed of securely
Control of Substances Hazardous to Health (COSHH)	Current academic year, plus 40 years	Disposed of securely
Fire Safety Log Books	Current academic year, plus 6 years	Disposed of securely
Alarm key holder list	Live document	Disposed of securely
Visitors signing in & out records	Current academic year, plus 6 years	Disposed of securely
Payroll records Including timesheets)	Current academic year, plus 6 years	Disposed of securely
Maternity pay records	Current academic year, plus 3 years	Disposed of securely
Records held under Retirement Benefits Schemes	Current academic year, plus 6 years	Disposed of securely
Annual accounts	Current academic year, plus 6 years	Disposed of securely

Invoices, receipts, order books, requisitions and delivery notes	Current academic year, plus 6 years	Disposed of securely
Records relating to the collection and banking of monies	Current academic year, plus 6 years	Disposed of securely
Records relating to the identification and collection of debt (including dinner money)	Current academic year, plus 6 years	Disposed of securely
Staff personnel files	Termination of employment, plus 6 years	Disposed of securely
Pre-employment checks	Any documents copied will be kept on the individual's personnel file.	Disposed of securely
Change of personal details	Any documents copied will be kept on the individual's personnel file.	Disposed of securely
Staff recruitment (unsuccessful applicants)	Date of appointment, plus 6 months	Disposed of securely
Annual appraisal records	Current academic year, plus 5 years	Disposed of securely
E-mail system	Leavers accounts disabled and deleted upon leaving the organisation	Disposed of securely
Allegations of a child protection nature against a member of staff including where the allegation is unfounded	Added to individual's personnel file until normal retirement age or 10 years from the date of the allegation – whichever is longer Allegations that are found to be malicious will be removed	Disposed of securely
Disciplinary Proceedings Oral Warning Written Warning – level 1 Written Warning – level 2 Final Warning Case not found	 Date of warning, plus 6 months Date of warning, plus 6 months Date of warning, plus 12 months Date of warning plus 18 months At conclusion of case (unless child protection related, see note above)	 ALL Removed from personnel file at appropriate time interval and disposed of securely
All records relating to the management of contracts	Last payment on the contract, plus 6 years	Disposed of securely

Bank Account: cheque books, paying in books, ledgers, invoices, receipts and bank statements	Current academic year, plus 6 years	Disposed of securely
Free school meals registers	Current academic year, plus 6 years	Disposed of securely
All records relating to premises management	Current academic year, plus 6 years	Disposed of securely
Inventories of furniture and equipment	Current academic year, plus 6 years	Disposed of securely
All records relating to Before and After school clubs	Current academic year, plus 6 years	Disposed of securely
All records relating to pre-school services provided on-site	Retained until child leaves pre-school facility	Disposed of securely
Website	Reviewed regularly to ensure content is up to date	Out of date material removed
Network and IT Security Incident Log – Pupils	Retained whilst the pupil remains at the academy	Disposed of securely
Network and IT Security Incident Log - Workforce	Retained for 10 years from the date of the incident	Disposed of securely
Social Media	Reviewed regularly to ensure content posted is in line with approved policy	Any content not compliant with approved policy removed
NQT Records	6 years from completion of NQT	Disposed of securely