

Horizons Specialist Academy Trust

Records Management Policy

Adopted by the Finance, Risk & General Purposes Committee : 7 July 2020
Date of next review: Summer term 2021
Responsible Officer: Data Protection Officer

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Statement of intent

Horizons Specialist Academy Trust (“The Trust”) is committed to maintaining the confidentiality of its information and ensuring that all records within the Trust 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.

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

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

Public Sector Equality Duty

Horizons Specialist Academy Trust has carefully considered and analysed the impact of this policy on equality and the possible implications for pupils, parents and staff with protected characteristics, as part of our commitment to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.

1. Legal framework

- 1.1. This policy has due regard to legislation including, but not limited to, the following:
 - General Data Protection Regulation (2018)
 - Freedom of Information Act 2000
 - Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
 - Data Protection Act 2018
- 1.2. This policy also has due regard to the following guidance:
 - Information Records Management Society (IRMS) 'Academies Toolkit' 2019
 - DfE (2018) 'Data Protection tool kit for schools'
 - DfE (2018) 'Careers guidance and access for education and training'
- 1.3. This policy will be implemented in accordance with the following Trust policies and procedures:
 - Data Protection Policy
 - Freedom of Information Policy
 - Information Security Policy

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 Data Protection Officer (DPO) is responsible for the management of records at Horizons Specialist Academy Trust.
- 2.3. The DPO is responsible for promoting compliance with this policy and reviewing the policy on an annual basis.
- 2.4. The DPO 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.
- 2.5. 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.

3. Management of pupil records

- 3.1. 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.
- 3.2. The following information is stored on the front of a pupil record, and will be easily accessible:

- Legal name, preferred name, 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
 - Ethnic origin, religion and first language (if not English)
 - Emergency contact details, the name of the pupil's doctor's practice and contact information
 - Any allergies, dietary requirements or other medical conditions that are important to be aware of
 - Names of parents/carers, including their home address(es), telephone number(s) and any other contact information
 - Admission number, the date of admission and the date of leaving, where appropriate
 - Any other agency involvement, e.g. speech and language therapist
 - Previous school information
 - Identification if Child Protection/Child In Need
- 3.3. The following information is stored in a pupil record, and will be easily accessible:
- Admissions form
 - Fair processing notice – only the most recent notice will be included
 - Full year written report to parents
 - End of year achievement report
 - Notes relating to accidents involving the pupil
 - Any information about an education and healthcare (EHC) plan and support offered in relation to the EHC plan
 - Any information relating to exclusions
 - Any correspondence with parents or external agencies relating to major issues, e.g. mental health, holiday requests, absence notes
 - All information received from primary/previous school
- 3.4. The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the pupil:
- Parental and, where appropriate, pupil consent forms for residential visits, photographs and videos, etc.
 - Correspondence with parents about minor issues, e.g. behaviour
- 3.5. Hard copies of disclosures and reports relating to child protection/Child In Need /Early Help are stored in a separate pupil file stored in a securely locked filing cabinet in the Designated Safeguarding Officer's or Principal's office (CP/CIN) or in the Parent Support Advisor's Office (Early Help) – a note indicating this is marked on the pupil's file.

The following information will be stored at the front of the child protection/child in need/Early Help files:

- Name of Child
- DOB
- RAISE ID
- UPN
- School
- Entry date to school
- Date of CIN/ CPP
- Date discharged from CP/CIN

The following information will be stored in the CP/CIN files:

- Copy of CPOMS chronology and meeting chronology sheet
- Key contact sheet recording:
 1. Name of Child
 2. DOB
 3. UPN
 4. Name of School
 5. Current Year group
 6. Current Address
 7. Name and contact details of parents/carers with parental responsibility
 8. Name of anyone child is not allowed contact with
 9. Name and contact details of current social worker
 10. Name contact details of any other named professional
 11. Names and DOBs of siblings and the Schools they attend
- Current Child Protection Plan/Child In Need Plan/Early Help Assessment
- Initial Child Protection Report/Review Child Protection Report/Core Group minutes/Planning Meeting Minutes/TAC/TAF minutes. (Copy of official minutes and HSAT DSL minutes)
- Cause for concern reports/Children's Hub (First Contact) response letter/Strategy minutes (Copy of official minutes and HSAT DSL minutes)
- Pupil Risk Assessments

- School Reports
 - Any other reports/letters relevant to Safeguarding
 - Receipt of acceptance (case transfer receipt)
- 3.6. Hard copies of complaints made by parents or pupils are stored in a file in the Principal's office – a note indicating this is marked on the pupil's file.
 - 3.7. Actual copies of accident and incident information are stored separately on the Trust'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.
 - 3.8. CPOMS – Any data stored electronically via CPOMS is transferred to the pupil's next school (if relevant). Data stored via CPOMS will be subject to the same retention schedules as hard copies.
 - 3.9. The Trust will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.
 - 3.10. 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, pastoral lead, will remove these records.
 - 3.11. Electronic records relating to a pupil's record will also be transferred to the pupils' next school. Section 10 of this policy outlines how electronic records will be transferred.
 - 3.12. [Primary schools only] The Trust will not keep any copies of information stored within a pupil's record, unless there is ongoing legal action at the time during which the pupil leaves the academy. The responsibility for these records will then transfer to the next school that the pupil attends.
 - 3.13. [Secondary schools and sixth form colleges only] If any pupil attends the academy until statutory school leaving age, the pupil's records will be kept until the pupil reaches the age of 25 years.
 - 3.14. The Trust 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 the Trust.

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

- 4.1. 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.
- 4.2. 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
Central government		
Returns made to central government	Current year plus six years	Securely disposed of
Ofsted reports and papers	Life of report then review	Securely disposed of
Personal identifiers, contacts and personal characteristics		
Images used for identification purposes	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less plus one month	Securely disposed of
Images used in displays	Whilst the pupil is at school – unless consent has been received to continue use after the pupil has left school	Securely disposed of
Images used for marketing purposes	In line with consent period	Securely disposed of
Biometric data	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month	Securely disposed of
Admissions		
All records relating to the creation and implementation of the Admissions Policy	Life of policy plus three years	Securely disposed of
Admissions (successful)	Date of admission plus one year	Securely disposed of
Admissions appeals (unsuccessful)	Resolution of case plus one year	Securely disposed of
Register of admissions	Whilst the pupil remains at the school plus three years	Information is reviewed and the register may be kept permanently
[Secondary schools only] Secondary school admissions	Whilst the pupil remains at the school plus one year	Securely disposed of
Proof of address (supplied as part of the admissions process)	Whilst the pupil remains at the school plus one year	Securely disposed of

Type of file	Retention period	Action taken after retention period ends
Supplementary information submitted, including religious and medical information etc (where the admission was successful)	Information added to the pupil file	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 schools only] Pupils' educational records	Whilst the pupil remains at the school	If the pupil transfers to an independent school, transfers to home-schooling, leaves the country or dies whilst at the school, the file should be returned to the LA and retained for the statutory period
[Secondary schools and sixth forms only] Pupils' educational records	25 years after the pupil's date of birth	Securely disposed of
Public examination results	<p>Added to the pupil's record and transferred to next school</p> <p>Copies with pupils' names are held whilst the pupil is at school, plus five years</p> <p>Copies with pupils' names removed are held for 25 years after the pupil's date of birth</p>	Uncollected certificates returned to the examination board
Internal examination results	<p>Added to the pupil's record and transferred to next school</p> <p>Copies with pupils' names are held whilst the pupil is at school, plus five years</p> <p>Copies with pupils' names removed are held for 25 years after the pupil's date of birth</p>	Securely disposed of

Type of file	Retention period	Action taken after retention period ends
Behaviour records	Added to the pupil's record and transferred to the next school Copies are held whilst the pupil is at school, plus one year	Securely disposed of
Exclusion records	Added to the pupil's record and transferred to the next school Copies are held whilst the pupil is at school, plus one year	Securely disposed of
Historic child protection information held on a pupil's record	Stored in a sealed envelope for 25 years after the pupil's date of birth then reviewed Records also subject to any instruction given by the Independent Inquiry into Child Sex Abuse (IICSA)	Securely disposed of – must be shredded
Child protection/Child In Need/Early Help records held in a separate file	25 years after the pupil's date of birth then reviewed Records also subject to any instruction given by the IICSA	Securely disposed of - must be shredded
Education, training or employment destinations data	Whilst the pupil is at the school, plus at least three years or from the end of KS4, whichever is earliest	Securely disposed of
Attendance		
Attendance registers	Last date of entry onto the register, plus three years	Securely disposed of
Letters authorising absence	Current academic year, plus two years	Securely disposed of
Medical		
Permission slips	For the duration of the period that medication is given, plus one year	Securely disposed of
Medical conditions – ongoing management	Added to the pupil's record and transferred to the next school	Securely disposed of

Type of file	Retention period	Action taken after retention period ends
	Copies held whilst the pupil is at school, plus one year	
Medical incidents that have a behavioural or safeguarding influence	Added to the pupil's record and transferred to the next school Copies held whilst the pupil is at school, plus 25 years	Securely disposed of
SEND		
SEND files, reviews and individual education plans, including advice and information to parents regarding SEND and the accessibility strategy	Pupil's date of birth plus 31 years	Information is reviewed and the file may be kept for longer than necessary if it is required for the Trust to defend themselves in a 'failure to provide sufficient education' case
Curriculum management		
SATs results	A composite of the year's results may be held for the current year plus six years, for comparative purposes	Securely disposed of
Examinations results (school copy)	Current year plus six 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

Type of file	Retention period	Action taken after retention period ends
Curriculum returns	Current year plus three years	Securely disposed of
Schemes of work	Current year plus one year	Securely disposed of
Class record books	Current year plus one year	Securely disposed of
Mark books	Current year plus one year	Securely disposed of
Record of homework set	Current 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
Field file – information taken on school trips	Until the conclusion of the trip Where a minor incident occurs, field files are added to the core systems as appropriate	Securely disposed of
Financial information relating to school trips	Whilst the pupil remains at school, plus one year	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
Educational visitors in school – sharing of personal information	Until the conclusion of the visit plus one month	Securely disposed of
Parent Support Advisers		
Reports for outside agencies	Duration of the pupil's time at school	Securely disposed of
Parent Support Referral forms	Whilst the referral is current	Securely disposed of
Electronic Data base of case files	25 years after the pupil's date of birth (as stated on the pupil's record)	

Type of file	Retention period	Action taken after retention period ends
		Securely disposed of, unless it is subject to a legal hold
Catering and free school meal management		
Free school meals registers	Current year plus six years	Securely disposed of
School meals registers	Current year plus three years	Securely disposed of
School meals summary sheets	Current year plus three years	Securely disposed of

5. Retention of staff records

- 5.1. 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.
- 5.2. 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 unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file will be retained until the IICSA enquiries are complete	Securely disposed of
Timesheets	Current academic year, plus six years	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus five years	Securely disposed of
Records relating to the agreement of pay and conditions	Date pay and conditions superseded plus six years	Securely disposed of
Training needs analysis	Current year plus one year	Securely disposed of
Recruitment		
Records relating to the appointment of a new Principal	Date of appointment, plus six years except in cases of negligence or claims of child abuse, then records are retained for at least 15 years	Securely disposed of

Records relating to the appointment of new members of staff (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
DBS Enhanced results snapshot	Added to the member of staff's personal file	Securely disposed of
DBS certificates	After information has been documented on Single Central Record	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 not less than two years	Securely disposed of
Records relating to the TUPE process	Date last member of staff transfer or leaves the organisation plus six years	Securely disposed of
Disciplinary and grievance procedures		
Child protection allegations, including where the allegation is unproven	<p>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</p> <p>If allegations are malicious, they are removed from personal files</p> <p>If allegations are found, they are kept on the personnel file and a copy is provided to the person concerned unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file is</p>	Reviewed and securely disposed of – shredded

	retained until IICSA enquiries are complete	
Oral warnings	Date of warning plus six months	Securely disposed of – if placed on staff personnel file, removed from file
Informal management guidance	Placed in staff's personal file indefinitely	Securely disposed of
Written warning	Date of warning, plus 12 months. A valid record will be kept in staff's personal file	Securely disposed of
Final warning	Date of warning, plus 18 months. A valid record will be kept in staff's personal file	Securely disposed of
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related and is disposed of as <u>above</u>	Securely disposed of

6. Retention of governance, senior leadership and management records

6.1. The table below outlines the Trust's retention periods for governance, 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 board		
Articles of Association	Life of the Academy/Trust	Securely disposed of
Written Scheme of Delegation	Life of Written Scheme of Delegation plus 10 years	Securely disposed of
Directors / Governors – Appointment	Life of appointment plus six years	Securely disposed of

Directors / Governors – Disqualification	Date of disqualification plus 15 years	Securely disposed of
Directors / Governors – Termination of Office	Date of termination plus six years	Securely disposed of
Annual Report required by DfE	Date of report plus 10 years	Securely disposed of
Register of attendance at full governing body meetings	Date of last meeting plus six years	Securely disposed of
Appointment and removal of Members	Life of appointment plus six years	Securely disposed of
Strategic Review	Date of review plus six years	Securely disposed of
Agendas for governing board / committee / local governance / Members meetings	Date of meeting plus 10 years	Securely disposed of
Original, signed copies of the minutes of governing board / committee / local governance / Members meetings	Permanent	If unable to store, these will be provided to the county archives service
Papers considered at meetings of the governing board / committees/ local governance	Life of the Academy	Securely disposed of
Inspection copies of the minutes of governing board / committee / local governance meetings	Date of meeting, plus three years	Shredded if they contain any sensitive and personal information
Policy documents created and administered by the governing board	Duration of the policy, plus three years	Securely disposed of
Records relating to complaints dealt with by the governing 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 an academy	Date proposal accepted or declined, plus three years	Securely disposed of
Procedures for conduct at meetings	Date procedures superseded plus six years	Securely disposed of
Statutory registers		
Register of Directors / Members / Secretaries	Life of the Academy/Trust plus six years	Securely disposed of
Register of Directors', Members' and Governors' interests	Life of the Academy/Trust plus six years	Securely disposed of

Register of Directors' residential addresses	Life of the Academy/Trust plus six years	Securely disposed of
Register of gifts, hospitality and entertainments	Life of the Academy/Trust plus six years	Securely disposed of
Declaration of interests statements	Life of the Academy/Trust plus six years	Securely disposed of
CEO, Executive Principal, Principals and senior leadership teams (SLTs)		
Log books of activity in the academies maintained by the Principals	Date of last entry, plus a minimum of six years	Reviewed and offered to the county archives service if appropriate
Minutes of Executive leadership team, 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, Executive Principal, Principals or SLTs	Date of the report, plus a minimum of three years	Reviewed and securely disposed of
Records created by the CEO, Executive Principal, Principals, SLTs, and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed and securely disposed of
Correspondence created by the CEO, Executive Principal, Principals, SLTs, 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
Academy Improvement plan	Duration of the plan, plus three years	Securely disposed of
Trust's Strategic Plan	Duration of plan, plus three years	Securely disposed of
Management of complaints	Date complaint resolved plus three years	Securely disposed of

7. Retention of health and safety records

- 7.1. The table below outlines the Trust'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. 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 (COSHH)	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 (dose assessment and recording)	Until the person to whom the record relates would have reached 75 years old, but in any event for at least 30 years from when the record was made	Securely disposed of
Fire precautions log books	Current academic year, plus six years	Securely disposed of
Fire risk assessments	Like of risk assessment plus six years	Securely disposed of
Incident reports	Current year plus 20 years	Securely disposed of

8. Retention of financial records

- 8.1. The table below outlines the Trust's retention periods for financial records and the action that will be taken after the retention period, in line with any requirements.
- 8.2. 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
Strategic finance		
Statement of financial activities for the year	Current financial year plus six years	Securely disposed of
Financial planning	Current financial year plus six years	Securely disposed of
Value for money statement	Current financial year plus six years	Securely disposed of
Records relating to the management of VAT	Current financial year plus six years	Securely disposed of
Whole of government accounts returns	Current financial year plus six years	Securely disposed of
Budget plan	Current financial year plus six years	Securely disposed of
Charging and remissions policy	Date policy superseded plus three years	Securely disposed of
Audit arrangements		
Independent Auditor's report on regularity	Financial year report relates to plus six years	Securely disposed of
Independent Auditor's report on financial statements	Financial year report relates to plus six years	Securely disposed of
Funding agreements		
Funding Agreement with Secretary of State and supplemental funding agreements	Date of last payment of funding plus six years	Securely disposed of
Funding Agreement – termination of funding agreement	Date of last payment of funding plus six years	Securely disposed of
Funding Records – Capital Grant / Earmarked Annual Grant / General Annual Grant	Date of last payment of funding plus six years	Securely disposed of
Per pupil funding records	Date of last payment of funding plus six years	Securely disposed of
Funding records	Date of last payment of funding plus six years	Securely disposed of
Gift Aid and Tax Relief	Date of last payment of funding plus six years	Securely disposed of
Records relating to loans	Date of last payment on loan plus six years if the loan is under £10k or date of last payment on loan plus 12 years if the loan is over £10k	Securely disposed of

Payroll and 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
Management of Teachers' Pensions Scheme / Records relating to pension registrations	Date of last payment of the pension plus six years	Securely disposed of
Absence record / staff returns / sickness record	Current academic year plus three years	Securely disposed of
Bonus / car allowances / car loans / overtime	Current academic year plus three years	Securely disposed of
Payroll records	Date of payroll run plus six years	Securely disposed of
National insurance schedule of payments	Current academic year plus six years	Securely disposed of
Personal bank details	Current academic year plus three years	Securely disposed of
Superannuation adjustments / superannuation reports / tax forms / P60	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
Insurance policies	Date the policy expires plus six years	Securely disposed of
Records relating to the settlement of insurance claims	Date claims settled plus six years	Securely disposed of
Endowment funds and investments		
Investment policies	Life of the investment plus six years	Securely disposed of
Management of endowment funds	Life of fund plus six 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
Records relating to the leasing of shared facilities	Current academic year, plus six years	Securely disposed of
Land and building valuations	Date valuation superseded plus six years	Securely disposed of
Disposal of assets	Date asset disposed of plus six years	Securely disposed of
Community school leases for land	Date lease expires plus six years	Securely disposed of
Commercial transfer arrangements	Date of transfer plus six years	Securely disposed of
Transfer of land to the Academy Trust	Life of land ownership then transfer to new owner	Securely disposed of
Transfer of freehold land	Life of land ownership then transfer to new owner	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	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	Final payment, 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 12 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
Pupil finance		
Student grant applications	Current academic year, plus three years	Securely disposed of
Pupil premium fund records	Date the pupil leaves the school plus six years	Securely disposed of

9. Retention of other school records

- 9.1. The table below outlines the Trust's retention periods for any other records held by the Trust, and the action that will be taken after the retention period, in line with any requirements.
- 9.2. 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
Property management		
Title deeds of properties belonging to the Trust	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the Trust	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 Trust	Expiry of lease, plus six years	Securely disposed of
Records relating to the letting of Trust premises	Current financial year, plus six years	Securely disposed of
Business continuity and disaster recovery plans	Date and plan superseded plus three years	Securely disposed of
Fleet management		
The process of acquisition and disposal of vehicles through lease or purchase, eg contracts/leases, quotes, approvals	Disposal of the vehicle plus six years	Securely disposed of

The process of managing allocations of maintenance vehicles, eg lists of who was driving the vehicles and when, maintenance	Disposal of the vehicle plus six years	Securely disposed of
Service logs and vehicle logs	Life of the vehicle, then either to be retained for six years by school or to be returned to lease company	Securely disposed of
GPS tracking data relating to vehicles	Date of journey plus six years	Securely disposed of
Maintenance		
All records relating to the maintenance of the academies carried out by contractors	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of
All records relating to the maintenance of the academies carried out by Trust employees	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of
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 Trust/academy brochures	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
Records relating to the management of software licences	Date of last payment on contract plus six years	Securely disposed of

School privacy notice which is sent to parents	Until superseded plus six years	Securely disposed of
Consent relating to school activities	While pupils attends the school	Securely disposed of

10. Storing and protecting information

- 10.1. The ICT Manager will ensure back-up of information is conducted on a weekly 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.
- 10.2. Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.
- 10.3. Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 10.4. Digital data is coded, encrypted or password-protected when being sent off site.
- 10.5. Memory sticks are not used to hold personal information.
- 10.6. All electronic devices are password-protected to protect the information on the device in case of theft.
- 10.7. Where possible, the Trust enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 10.8. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- 10.9. 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 separately.
- 10.10. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 10.11. When sending confidential information by fax, members of staff always check that the recipient is correct before sending.
- 10.12. 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 premises accepts full responsibility for the security of the data.
- 10.13. 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.

- 10.14. 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.
- 10.15. Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas containing sensitive information are supervised at all times.
- 10.16. The physical security of the Trust's buildings and storage systems, and access to them, is reviewed termly by the Premises & Facilities Manager. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the Principal and extra measures to secure data storage will be put in place.
- 10.17. The Trust takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.
- 10.18. The IT Manager is responsible for continuity and recovery measures are in place to ensure the security of protected data.
- 10.19. Any damage to or theft of data will be managed in accordance with the Trust's Security Breach Management Plan.

11. Accessing information

- 11.1. Horizons Specialist Academy Trust is transparent with data subjects, the information we hold and how it can be accessed.
- 11.2. All members of staff, parents of registered pupils and other users of the Trust's academies, e.g. visitors and third-party clubs, are entitled to:
 - Know what information the Trust 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 Trust is doing to comply with its obligations under the GDPR.
- 11.3. All members of staff, parents of registered pupils and other users of the Trust's academies and its facilities have the right, under the GDPR, to access certain personal data being held about them or their child.
- 11.4. Personal information can be shared with pupils once they are considered to be at an appropriate age (13 years), responsible for their own affairs, and have capacity to make decisions; although, this information can still be shared with parents.
- 11.5. Pupils who are considered to be at an appropriate age (13 years) to make decisions for themselves, and have capacity to make decisions, are entitled to have their personal information handled in accordance with their rights.
- 11.6. The Trust will adhere to the provisions outlined in the Trust's GDPR Data Protection Policy when responding to requests seeking access to personal information.

12. Personal Data audit

- 12.1. The Trust conducts personal data audits on an annual basis against all information held by the Trust to evaluate the information the academy is holding, receiving and using, and to ensure that this is correctly managed in accordance with the GDPR. This includes the following information:
 - Paper documents and records
 - Electronic documents and records
 - Databases
 - Microfilm or microfiche
 - Sound recordings
 - Video and photographic records
 - Hybrid files, containing both paper and electronic information
- 12.2. The 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 audit. The audit will include the following:
 - The Trust'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
- 12.4. The DPO will consult with staff members involved in the information audit process to ensure that the information is accurate.
- 12.5. Once it has been confirmed that the information is accurate, the DPO will record all details on the Trust's Personal Data Audit Register.
- 12.6. This information will be shared with the CEO to gain their approval.

13. Disposal of data

- 13.1. 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.
- 13.2. 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. The DPO will keep a record of all files that have been destroyed.
- 13.3. Where the disposal action is indicated as reviewed before it is disposed, the DPO will review the information against its administrative value – if the information should be kept for administrative value, the DPO will keep a record of this.
- 13.4. 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.

- 13.5. Where information has been kept for administrative purposes, the DPO will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.
- 13.6. Where information must be kept permanently, this information is exempt from the normal review procedures.
- 13.7. Records and information that might be of relevance to the Independent Inquiry into Child Sexual Abuse (IICSA) will not be disposed of or destroyed.

14. Monitoring and review

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