



THE CONSORTIUM
ACADEMY TRUST

Shaping Positive Futures

Records Management Policy

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

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Policy Owner (Position)	DPO
Statutory / Recommended	Recommended
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**NB – This document can only be considered valid when viewed on The Consortium Academy Trust website. If the copy is printed or downloaded and saved elsewhere the Policy date should be cross referenced to ensure the current document is the latest version. The linked policies can be found at www.consortiumtrust.co.uk*

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Statement of intent

The Consortium Academy Trust (“the Trust”), in the course of its activities, retains 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 school 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 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:

- UK General Data Protection Regulation (UK GDPR)
- EU GDPR
- 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 in particular:

- DfE (2023) ‘Data protection in schools’
- DfE (2018) ‘Data protection: a toolkit for schools’
- DfE (2023) ‘Careers guidance and access for education and training providers’
- ESFA (2022) ‘Record keeping and retention information for academies and academy trusts’
- Information Records Management Society (IRMS) (2019) ‘Information Management Toolkit for Schools’

- IRMS (2019) 'Academies Toolkit'
- ICO (2023) 'How do we document our processing activities?'
- ICO (2023) 'Controllers checklist'

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 the Compliance and Data Protection Manager 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.

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 school'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 school'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 schools which are primary schools, the school 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 school. The responsibility for these records will then transfer to the next school that the learner attends.
- 3.7. For those Trust schools which are secondary schools, the school 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 school 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 school.

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	Action taken after retention period ends
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	Securely disposed of.
Images used in displays	Whilst the learner is at school and beyond if an agreement has been reached with the learner	CCTV is recorded over after 30 days
Images used for marketing purposes	In line with the consent period	
Biometric data	For the duration of the event/activity, or whilst the learner remains at school, whichever is less, plus one month	
CCTV footage	30 days – unless there is a known incident under investigation	
Postcodes, names and characteristics	Whilst the learner is at school, plus five years	
House number and road	For the duration of the event/activity, plus one month	
Admissions		
Register of admissions from LA Team	Every entry in the admissions register will be preserved for a period of three years after the date on which the entry was made	Information is reviewed and the register may be kept permanently
Admissions (where the admission is successful)	Date of admission, plus one year	Securely disposed of
Admissions appeals (where the appeal is unsuccessful)	Resolution of the case, plus one year	
[Secondary schools only] In-year secondary school admissions	Whilst the learner remains at the school, plus one year	
Proof of address (supplied as part of the admissions process)	Current academic year, plus one year	
Learners' educational records		
[Primary schools only] Learners' educational records	Whilst the learner 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 and retained for the statutory period

[Secondary schools and sixth forms only] Learners' educational records	25 years after the learner's date of birth	Reviewed and securely disposed of if no longer needed
Public examination results	Added to the learner's record and transferred to next school	All uncollected certificates must be securely destroyed
Internal examination results	Added to the learner's record and transferred to next school	Transferred to the next school
Behaviour records	Added to the learner's record and transferred to the next school Copies are held whilst the learner is at school, plus one year	Securely disposed of
Exclusion records	Added to the learner's record and transferred to the next school Copies are held whilst the learner is at school, plus one year	
Child protection information held on a learner's record	Stored securely for the same length of time as the learner's record Records also subject to any instruction given by the Independent Inquiry into Child Sex Abuse (IICSA)	Securely disposed of – shredded
Child protection records held in a separate file	25 years after the learner's date of birth Records also subject to any instruction given by the IICSA	
Timetable	Current academic year, plus one year	
Learners' work	Current academic year, plus one year	
Education, training or employment destinations data (post 16)	Whilst the learner is at the school, plus three years or from the end of KS4, whichever is earliest	Securely disposed of
Attendance		
Attendance registers	Every entry is retained for a period of three years after the date on which the entry was made	Securely disposed of
Correspondence relating to any absence (authorised or unauthorised)	Current academic year, plus two years	
Medical information and administration		
Permission slips	For the duration of the period that medication is given, plus one month	Securely disposed of
Medical conditions – ongoing management	Added to the learner's record and transferred to the next school Copies held whilst the learner is at school, plus one year	
Medical incidents that have a behavioural or safeguarding influence	Added to the learner's record and transferred to the next school Copies held whilst the learner is at school, plus 25 years	

SEND		
SEND files, reviews and EHC plans, including advice and information provided to parents regarding educational needs and accessibility strategy	The learner's date of birth, plus 25 years	Securely disposed of
Curriculum Management		
SATs results	25 years after the learner's date of birth (as stated on the learner's record)	Securely disposed of
Examination papers	Until the appeals/validation process has been completed	
Published Admission Number (PAN) reports	Current academic year, plus six years	
Valued added and contextual data	Current academic year, plus six years	
Self-evaluation forms (internal moderation)	Current academic year, plus one year	
Self-evaluation forms (external moderation)	Retained until superseded	Securely disposed of
School Development Plan	Retained until superseded	

Extra-curricular activities		
Field file – information taken on school trips	Until the conclusion of the trip, plus one month Where a minor incident occurs, field files are added to the core system as appropriate	Securely disposed of
Financial information relating to school trips	Whilst the learner remains at school, plus one year	
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip	Securely disposed of – shredded
Parental consent forms for school trips where a major incident occurred	25 years after the learner's date of birth on the learner's record (permission slips of all learners on the trip will also be held to show that the rules had been followed for all learners)	
Educational visitors in school – sharing of personal information	Until the conclusion of the visit, plus one month	Securely disposed of
Free school meals		
Meal eligibility	Whilst the learner is at school, plus five years	Securely disposed of

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	Action taken after retention period ends
Operational		
Staff members' personnel 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. CCTV footage is recorded over after 30 days
CCTV footage	30 days – unless there is a known incident under investigation	
Staff Single Central Record Details	Termination of employment plus 12 months	
Annual appraisal and assessment records	Current academic year, plus six years	
Sickness absence monitoring (where sickness pay is not paid)	Current academic year, plus three years	
Sickness absence monitoring (where sickness pay is paid)	Current academic year, plus six years	
Staff training (where training leads to CPD)	Length of time required by the CPD professional body	
Staff training (except where the training relates to dealing with learners, e.g. first aid or health and safety)	Retained in the personnel file	
Staff training (where the training relates to learners, e.g. safeguarding or other learner-related training)	Date of the training, plus 40 years	
Recruitment		
Records relating to the appointment of a new Headteacher (unsuccessful attempts)	Date of appointment, plus six months.	Securely disposed of
Records relating to the appointment of a new Headteacher (successful appointments)	Added to personnel file and retained until the end of appointment, plus six years, except in cases of negligence or claims of child abuse, then records are retained for at least 15 years	
Records relating to the appointment of new members of staff or governors (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	
Pre-employment vetting information (successful candidates)	For the duration of the employee's employment, plus six years	

DBS certificates	Up to six months	
Proof of identify as part of the enhanced DBS check	If it is necessary to keep a copy, it will be placed in the staff member's personnel file	Securely disposed of
Evidence of right to work in the UK	Added to staff personnel file or, if kept separately, termination of employment, plus no longer than two years	

Disciplinary and grievance procedures		
Child protection allegations, including where the allegation is unproven	<p>Added to staff personnel 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 personnel 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 retained until IICSA enquiries are complete</p>	Reviewed and securely disposed of – shredded
Oral warnings	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file
Written warning – level 1	Date of warning, plus six months	
Final warning	Date of warning, plus 18 months	
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related, then it is disposed of as above	Securely disposed of

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 file	Retention Period	Action taken after retention period ends
Governance		
Agendas for governing board meetings	One copy alongside the original set of minutes – all others disposed of without retention	Local archives consulted before secure disposal
Original, signed copies of the minutes of governing board meetings	Permanent – all other copies disposed of without retention	n/a
Reports presented to the governing board that are referred to in the minutes	Permanent – all others disposed of without retention	
Instruments of government, including articles of association	Permanent	
Action plans created and administered by the governing board	Until superseded or whilst relevant	Securely disposed of
Policy documents created and administered by the governing board	Until superseded or whilst relevant	
Records relating to complaints	Current academic year, plus six years If negligence is involved, records are retained for the current academic year, plus 15 years If child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years	Reviewed for further retention in case of contentious disputes, then securely disposed of
Annual reports required by the DfE	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	
Records relating to the election of the chair of the governing board and the vice chair	Destroyed after the decision has been recorded in the minutes	
Scheme of delegation and terms of reference for committees	Until superseded or whilst relevant	Reviewed and offered to the local archives if appropriate
Meeting schedule	Current academic year	Standard disposal
Register of attendance at full governing board meetings	Date of last meeting in the book, plus six years	Securely disposed of
Records relating to governor monitoring visits	Date of the visit, plus three years	
All records relating to the conversion of the school to academy status	Permanent	n/a

Records relating to the terms of office of serving governors, including evidence of appointment	Date on which the governor's appointment ends, plus six years	Securely disposed of
Records relating to governor declaration against disqualification criteria	Date on which the governor's appointment ends, plus six years	
Register of business interests	Date the governor's appointment ends, plus six years	
Records relating to the training required and received by governors	Date the governor steps down, plus six years	
Records relating to the induction programme for new governors	Date on which the governor's appointment ends, plus six years	
Records relating to DBS checks carried out on the clerk and members of the governing board	Date of the DBS check, plus six months	
Governor personal data (date of birth and address)	Date on which the governor's appointment ends, plus six years	
Headteacher and SLT		
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus three years	Reviewed annually and securely disposed of if not needed
Professional development plan	Held on the individual's personnel record. If not, then it is retained for the duration of the plan, plus six years	Securely disposed of

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	Action taken after retention period ends
Health and safety		
Health and safety risk assessments	Duration of risk assessment, plus three years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred	Securely disposed of
Records relating to any reportable death, injury, disease or dangerous occurrence under RIDDOR	Date of incident, plus three years provided that all records relating to the incident are held on the personnel file	
Accident reporting – adults	Three years after the last entry in the accident reporting book	
Accident reporting – learners	Three years after the last entry in the accident reporting book	
Records kept under the Control of Substances Hazardous to Health Regulations	Date of incident, plus 40 years	
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action, plus 40 years	
Information relating to areas where employees and persons are likely to come into contact with radiation (maintenance records or controls, safety features and PPE)	Two years from the date on which the examination was made	
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	
Fire risk assessments	Current academic year, plus three years	

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	Action taken after retention period ends
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	
Timesheets, overtime and flexitime records	Current academic year, plus three years	
Absence record	Current academic year, plus three years	
Car mileage claims	Current academic year, plus six years	Securely disposed of
Income tax form P60	Current academic year, plus six years	
National insurance – schedule of payments	Current academic year, plus six years	
Payroll (gross/net weekly or monthly)	Current academic year, plus six years	
Payroll reports	Current academic year, plus six years	
Payslips (copies)	Current academic year, plus six years	
Pension payroll	Current academic year, plus six years	
Personal bank details	Until superseded, plus three years	
Sickness records	Current academic year, plus three years	
Superannuation adjustments	Current academic year, plus six years	
Superannuation reports	Current academic year, plus six years	
Tax forms	Current academic year, plus six years	
Risk management and insurance		
Employer’s liability insurance certificate	Closure of the school, plus 40 years	Securely disposed of
Asset management		
Inventories of assets	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
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	
Records relating to the collection and banking of monies	Current financial year, plus six years	
Records relating to the identification and collection of debt	Final payment, plus six years	
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	
All records relating to the monitoring of contracts	Life of the contract, plus six or 12 years	
School fund		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of

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	Action taken after retention period ends
Property management		
Title deeds of properties belonging to the school	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the school	For as long as the building belongs to the school	
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	
Maintenance		
All records relating to the maintenance of the school 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 school carried out by school employees	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	
Operational administration		
Records relating to the creation and publication of the school brochure and/or prospectus	Current academic year, plus three years	If a copy is not preserved by the school, standard disposal
Records relating to the creation and distribution of circulars to staff	Current academic year, plus one year	Disposed of against common standards
Records relating to the creation and distribution of circulars to parents or learners	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	One copy archived, other copies standard disposal
Visitors' electronic sign in	Current academic year, plus one year	Reviewed then securely disposed of

10. Storing and protecting information

- 10.1. The DPO will periodically undertake a risk analysis to identify which records are vital to Trust and school management and these records will be stored in a secure manner.
- 10.2. The Trust and each school have 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.
- 10.3. Where possible, backed-up information will be stored securely and in a different location to the live servers.
- 10.4. Confidential paper records are to be kept in a locked filing cabinet, drawer or safe, with restricted access.
- 10.5. Confidential paper records should **not** be left unattended or in clear view when held in a location with general access.
- 10.6. Memory sticks are not to be used to hold personal information unless they are password-protected and fully encrypted.
- 10.7. All electronic devices are to be password-protected to protect the information on the device in case of theft.
- 10.8. Where reasonably possible, the Trust enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 10.9. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- 10.10. 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 via a telephone call.
- 10.11. The DPO is responsible for ensuring that continuity and recovery measures are in place to ensure the security of protected data.
- 10.12. Any damage to or theft of data will be managed in accordance with the Trust's Data Protection Policy.

11. Information audit

- 11.1. The Trust conducts audits against all information held by the Trust and each school to evaluate the information held, received and used by the Trust or relevant school, 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
- 11.2. The Data Protection Links for each school have completed process mapping of all data that enters and leaves the school. This information is recorded on GDPR Sentry.
- 11.3. The DPO conducts periodic reviews of the information held in each school to ensure compliance with this policy.

12. Accessing Information

We are transparent with data subjects, the information we hold and how it can be accessed.

All members of staff, parents of registered learners 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 UK GDPR.

All members of staff, parents of registered learners and other users of the school and its facilities have the right, under the UK GDPR, to access certain personal data being held about them or their child.

Personal information can be shared with learners 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. Learners who are considered by the school to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights. This is communicated using data protection statements to all stakeholders.

13. Disposal of Data

Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.

Where disposal of information is outlined as secure disposal, this will be shredded or pulped. Electronic information will be scrubbed clean and, where possible, cut, archived or digitalised.

Where information must be kept permanently, this information is exempt from the normal review procedures.

Records and information that might be of relevant to the Independent Inquiry into Child Sexual Abuse (IICSA) will not be disposed of or destroyed.

14. School Closures and Record Keeping

Academy conversion

If a school closes and subsequently becomes an academy, all records relating to learners who are transferring to the academy will be transferred.

If the school will retain the existing building when it converts to an academy, all records relating to the management of the buildings will be transferred.

All other records created and managed when the school was part of the LA will become the responsibility of the LA.