



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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| Advisory Committee | Trust Board |
| Linked Documents and Policies | CCTV Policy Data Protection Policy ICT Acceptable Use Policy Freedom of Information Policy |

**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 (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:

- Information Records Management Society (IRMS) (2019) ‘Information Management Toolkit for Schools’
- DfE (2018) ‘Data protection: a toolkit for schools’
- DfE (2018) ‘Careers guidance and access for education and training providers’

2. Responsibilities

- 2.1. The Trust as a whole has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.
- 2.2. The Trust's Data Protection Officer (DPO) is Gilly Stafford 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 | |
| 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 | |
| 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 returned to the examination board |
| Internal examination results | Added to the learner's record and transferred to next school | Transferred to the next school |

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| 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 | |
| Curriculum returns | Current academic year, plus three years | Securely disposed of |
| Schemes of work | Current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |
| Timetable | Current academic year, plus one year | |
| Class record books | Current academic year, plus one year | |
| Mark books | Current academic year, plus one year | |
| Record of homework set | Current academic year, plus one year | |
| Learners' work | Current academic year, plus one year | |
| Education, training or employment destinations data | 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 31 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 | |
| Learners' work | Returned to learners at the end of the academic year, or retained for the current academic year, plus one year | |
| 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 |
| 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 | |
| | | |

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| 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 | | |
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| 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 dealt with by the governing board or Headteacher | 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 |

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| 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 |
| School Development Plan | Duration of the plan, plus three years | |

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 precautions log books | 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 |
| 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 | |
| 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, 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' books and signing-in sheets | Last entry in the logbook, plus six years | Reviewed then securely disposed of |
| Records relating to the creation and management of parent-teacher associations and/or old learner associations | Current academic year, plus six years | |
| Consents relating to school activities | While learner attends the school | Secure disposal |

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.