

Records Management Policy

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Statement of intent

The Sigma 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 UK 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.

The Sigma Trust has created this policy to outline how records are stored, accessed, monitored, retained and and disposed of, and how long data is retained for, in order to meet the Trust's statutory requirements.

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

NB. For the purpose of this document the term Headteacher refers to Headteacher, Head of School and Executive Headteacher.

1. Legal framework

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

- UK General Data Protection Regulation (UK GDPR)
- EU GDPR
- Data Protection Act 2018
 - Freedom of Information Act 2000
 - Limitation Act 1980 (as amended by the Limitation Act 1980)

1.2. This policy also has due regard to the following guidance:

- Information Records Management Society (IRMS) (2019) 'Information Management Toolkit for Schools'
- DfE (2018) 'Data protection: a toolkit for schools'
- DfE (2021) 'Careers guidance and access for education and training providers'
- ESFA (2022) 'Record keeping and retention information for academies and academy trusts'
- IRMS (2019) 'Academies Toolkit'

1.3. This policy will be implemented in accordance with the following Trust policies and procedures:

Data Protection Policy

Freedom of Information Policy

2. Roles and Responsibilities

- 2.1. The whole Trust has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.
- 2.2. The Sigma Trust, in conjunction with the headteacher, holds overall responsibility for this policy and for ensuring it is implemented correctly.
- 2.3. The school data lead, in conjunction with The Sigma Trust and the headteacher, are responsible for the management of records within their school.
- 2.4. The school data lead, in conjunction with The Sigma Trust and the headteacher, are responsible for promoting compliance with this policy, and reviewing the policy on an annual basis.

- 2.5. The school data lead, in conjunction with The Sigma Trust and the headteacher, are responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of correctly.
- 2.6. All staff members are responsible for ensuring that any records for which they are responsible (including emails) 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 documents that are passed to each school that a pupil attends and include all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievements.
- 3.2. The following information is stored on the front of a pupil record, and will be easily accessible:
 - Forename, surname, and date of birth,
 - Unique pupil number
 - Note of the date when the file was opened
- 3.3. The following information is stored inside the front cover of a pupil record, and will be easily accessible:

Any preferred names

Emergency contact details and the name of the pupil's doctor

Any allergies or other medical conditions that are important to be aware of

Names of people with parental responsibility, including their home addresses and telephone numbers

Name of the school, admission number, the date of admission and the date of leaving

Any other agency involvement, e.g. speech and language therapist

Reference to any other linked files

- 3.4. The following information is stored on a pupil record, and will be easily accessible:
 - Admissions form
 - Details of any special educational needs and disabilities (SEND)
 - If the pupil has attended an early years setting, the record of transfer
 - Data collection or data checking form
 - Annual written reports to parents
 - National curriculum and agreed syllabus record sheets
 - Notes relating to major incidents and accidents involving the pupil
 - Any information about an EHC plan, and support offered in relation to the EHC plan

- 3.10. The only exception to the above is any records placed on the pupil's file that have a shorter retention period and may need to be removed. In such cases, the data records clerk responsible for disposing of records will remove these records.
- 3.11. Electronic records relating to the pupil's record will also be transferred to the pupil's next school.
- 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 Trust. The responsibility for these records will then transfer to the next Trust that the pupil attends.
- 3.13. [Secondary schools and sixth form colleges] If any pupil attends a Trust school until statutory school leaving age, the school will keep the pupil's records until the pupil reaches the age of 25 years.
- 3.14. The school 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 will be required to sign a copy of the list to indicate that they have received the files, and return this to the school.

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 also be destroyed in line with the retention periods below.

Type of file	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 pupil remains at school, whichever is less, plus one month	Securely disposed of
Images used in displays	Whilst the pupil is at school	Securely disposed of
Images used for marketing purposes,	In line with the consent period	Securely disposed of

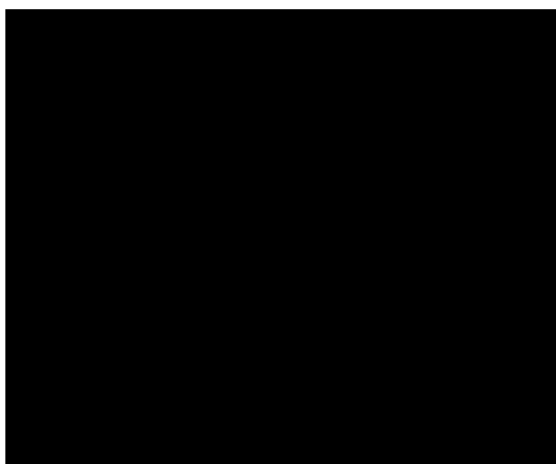
Pupils' educational records		
Primary school pupils' educational records	Whilst the pupil remains at the school	Transferred to the next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period
Secondary school and sixth form pupils' educational records	25 years after the pupil's date of birth	Reviewed and securely disposed of if no longer needed
Public examination results	Added to the pupil's record and transferred to next school	All uncollec951 506.

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
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 pupil remains at school, plus one year	Securely disposed of
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 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 - shredded
Educational visitors in school – sharing of personal information	Until the conclusion of the visit, plus one month	Securely disposed of
Family liaison officers and home-school liaison assistants		
Day books	Current academic year, plus two years	Reviewed and securely destroyed if no longer required
Reports for outside agencies	Duration of the pupil's time at school	Securely disposed of
Referral forms	Whilst the referral is current	Securely disposed of
Contact data sheets	Current academic year	Reviewed and securely destroyed if no longer active

Contact database entries	Current academic year	Reviewed and securely destroyed if no longer required
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Staff training (except where the training relates to dealing with pupils, e.g. first aid or health and safety)	Retained in the personnel file	Securely disposed of
Staff training (where the training relates to pupils, e.g. safeguarding or other pupil-related training)	Date of the training, plus 40 years	Securely disposed of
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	Securely disposed of
Records relating to the appointment of new members of staff or governors (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of
Pre-employment vetting information (successful candidates)	For the duration of the employee's employment, plus six years	Securely disposed of
[REDACTED]	Up to six months	Securely disposed of

Proof of identify as



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 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 retained until IICSA enquiries are complete</p>	Reviewed and securely disposed of – shredded
Disciplinary warnings e.g. first, final written warnings.	Retained on personnel file but will be disregarded for further disciplinary purposes after the expiry of the warning.	Retained on personnel file but will be disregarded for further disciplinary purposes after the expiry of the warning.
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related and is disposed of <u>as above</u>	Securely disposed of

6. Retention of governance records

- 6.1. The table below outlines the Trust's retention periods for governance records, and the action that will be taken after the retention period, in line with any requirements.
- 6.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

7. Retention of senior leadership and management records

- 7.1. The table below outlines the Trust'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.

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
Governance		
Agendas for trustee and LGC 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 governance meetings	Permanent – or at least for 10 years from the date of the meeting	Shredded if they contain any sensitive or personal information but the local archives will be consulted first
Reports presented to the board that are referred to in the minutes	Permanent – all others disposed of without retention	Local archives consulted and then securely disposed of

Meeting papers relating to the annual parents' meeting

Date of meeting, plus a minimum of six years



If child protection or safeguarding issues f

Trustee and LGC code of conduct	Dynamic document – kept permanently	Securely disposed of
Records relating to the training required and received by trustees and LGC members	Date the trustee/LGC member steps down, plus six years	Securely disposed of
Records relating to the induction programme for new trustees and LGC members	Date on which the trustee and LGC member's appointment ends, plus six years	Securely disposed of
Records relating to DBS checks carried out on the clerk and members of the board and local governance committees	Date of the DBS check, plus six months	Securely disposed of
Trustee and LGC member personnel files	Date on which the trustee/LGC member's appointment ends, plus six years	Securely disposed of
Trust Governance		
Governance statement	Life of governance statement, plus six years	Securely disposed of
Articles of association	Life of the academy	Securely disposed of
Memorandum of understanding	Can be disposed of once the academy has been incorporated	Securely disposed of
Memorandum of understanding of shared governance among schools	Life of memorandum of understanding, plus six years	Securely disposed of
Constitution	Life of the academy	Securely disposed of
Special resolutions to amend the constitution	Life of the academy	Securely disposed of
Written scheme of delegation	Life of the scheme of delegation, plus 10 years	Securely disposed of
Directors' appointment	Life of appointment, plus six years	Securely disposed of

Annual report and accounts	Date of report, plus 10 years	Securely disposed of
Annual return	Date of report, plus 10 years	Securely disposed of
Appointment of trustees and governors and directors	Life of appointment, plus six years	Securely disposed of
Statement of trustees' responsibilities	Life of appointment, 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
Register of directors	Life of academy, plus six years	Securely disposed of
Register of directors' interests	Life of academy, plus six years	Securely disposed of
Register of directors' residential addresses	Life of academy, plus six years	Securely disposed of
Register of gift, hospitality and entertainments	Life of academy, plus six years	Securely disposed of
Register of members	Life of academy, plus six years	Securely disposed of
Register of secretaries	Life of academy, plus six years	Securely disposed of
Register of trustees' interests	Life of academy, plus six years	Securely disposed of
Declaration of interests	Life of academy, plus six years	Securely disposed of
Headteachers and senior leadership team (SLT)		

Log books of activity in the academy maintained by the headteacher

Date of last ee

Records created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed annually and securely disposed of if not needed
Correspondence created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Securely disposed of
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

Academy and school

Accident reporting – adults	Three years after the last entry in the accident reporting book	Securely disposed of
Accident reporting – pupils	Three years after the last entry in the accident reporting book	Securely disposed of
Records kept under the Control of Substances Hazardous to Health Regulations	Date of incident, 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		

Type of file	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	Securely disposed of
Timesheets, clock cards and flexitime records	Current academic year, plus three years	Securely disposed of
Absence record	Current academic year, plus three years	Securely disposed of
Batches	Current academic year, plus six years	Securely disposed of
Bonus sheets	Current academic year, plus three years	Securely disposed of
Car allowance claims	Current academic year, plus three years	Securely disposed of
Car loans	Current academic year, plus three years	Securely disposed of
Car mileage outputs	Current academic year, plus six years	Securely disposed of
Elements	Current academic year, plus two years	Securely disposed of



Income tax form P60



[REDACTED]	[REDACTED]	[REDACTED]	Securely disposed of
[REDACTED]	[REDACTED]		

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
Trust finance records		
This section contains recommended retention periods for academy-specific finance information.		
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 return	Current financial year, plus six years	Securely disposed of
Borrowing powers	Current financial year, plus six years	Securely disposed of
Budget plan	Current financial year, plus six years	Securely disposed of

Charging and remissions policy

Per-pupil funding records	Date of last payment of funding, plus six years	Securely disposed of
Exclusions agreements	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 of loan, plus six years if the loan is under	Securely disposed of

10. Retention of other Trust records

10.1. 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.

10.2.

All records relating to the maintenance of the Trust 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	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 school or Trust 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 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	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 pupil associations	Current academic year, plus six years	Reviewed, then securely disposed of
Walking bus registers	Date of register, plus six years	Securely disposed of
School privacy notice which is sent to parents	Until superseded, plus six years	Standard disposal
Consents relating to school activities	While pupil attends the school	Secure disposal

11. Retention of emails

Group email addresses, e.g. SLT@school.co.uk, will have an assigned member* nBT/F2 11.04 Tf1 0 0 1 168



Emails can act as evidence of the school's activities, i.e. in business and fulfilling statutory duties, so all relevant emails (e.g. invoices) will be retained for at least 12 months.

Invoices received and sent in emails will be printed off and hard copies retained in accordance with [section 8](#) of this policy.

The School's expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in the school's Online Safety Policy. All emails will be automatically deleted after 12 months, unless stated otherwise.

Correspondence created by the SLT and other members of staff with administrative responsibilities will be retained for three years before being reviewed and, if necessary, securely disposed of.

Personal emails, i.e. emails that do not relate to work matters or are from family members, will be deleted as soon as they are no longer needed.

Staff members will review and delete any emails they no longer require at the end of every



- 13.4. Any room or area where personal or sensitive data is stored will be locked when unattended.
- 13.5. Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 13.6. Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site. Where data is saved on removable storage or a portable device, the device is kept in a locked and fireproof

13.13. When sending confidential information by fax, staff always check that the recipient is correct before sending.

13.14. 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 UK 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 school premises accepts full responsibility for the security of the data.

If documents that have been taken off the school premises will be left unattended, the staff member will leave the documents in the locked boot of a car or keep them on their person.

13.15. A record will be kept of any document that is taken off the school premises that logs

14. Accessing information

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

14.1. All members of staff, parents of registered pupils and other users of the school, eg 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 Trust is doing to comply with its obligations under the UK GDPR.

14.2. All members of staff, parents of registered pupils 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.

14.3. Personal information can be shared with pupils 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.

14.4. Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

14.5. The Trust will adhere to the provisions outlined in the Trust's Data Protection Policy when responding to requests seeking access to personal information.

15. Digital continuity statement (information stored in a format that is usable long term)

15.1. Digital data that is retained for longer than six years will be identified by the DPO and named as part of a digital continuity statement.

15.2. The Sigma Trust, in conjunction with the headteacher, will identify any digital data that will need be named as part of a digital continuity statement.

15.3. The data will be

- A statement of the business purpose and requirements for keeping the records
- The names of the individuals responsible for long term data preservation
- A description of the information assets to be covered by the digital preservation statement
- A description of when the record needs to be captured into the approved file formats
- A description of the appropriate supported file formats for long term preservation
- A description of the retention of all software specification information and licence information
- A description of how access to the information asset is to be managed in accordance with the UK GDPR

16. Information audit

16.1. The Trust conducts information audits on an annual basis against all information held by the Trust to evaluate the information the Trust is holding, receiving and using, and to ensure that this is correctly managed in accordance with the UK GDPR. This includes the following information:

Paper documents and records

Electronic documents and records

Databases

Microfilm or microfiche

Sound recordings

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?

- 16.4. The Trust Data Manager will consult with staff members involved in the information audit process to ensure that the information is accurate.
- 16.5. Once it has been confirmed that the information is accurate, the Data Manager will record all details on the Trust's Data Asset Register.
- 16.6. An information asset owner is assigned to each asset or group of assets. They will be responsible for managing the asset appropriately, ensuring it meets the school's requirements, and for monitoring risks and opportunities.
- 16.7. The information displayed on the Data Asset Register will be shared with the headteacher and CEO to gain their approval.

17. Disposal of data

- 17.1. 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.
- 17.2. All records containing personal or sensitive information will be made either unreadable or unreconstructable.
- 17.3. 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, archived or digitalised. The school Data Manager will keep a record of all files that have been destroyed.
- 17.4. Where the disposal action is indicated as reviewed before it is disposed, the school Data manager will review the information against its administrative value – if the information should be kept for administrative value, the school Data manager will keep a record of this.
- 17.5. 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.
- 17.6. Where information has been kept for administrative purposes, the school Data manager 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 subsequent three years.

- 17.7. Where information must be kept permanently, this information is exempt from the normal review procedures.
- 17.8. Records and information that might be relevant to the Independent Inquiry into Child Sexual Abuse (IICSA) will not be disposed of or destroyed.

18. Academy conversion

If the school closes and subsequently becomes an academy, all records relating to pupils 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.

Academy closure

If the academy is closing, the trust will follow the DfE's guidance on what should happen to records retained by the trust, which can be found in the DfE's ['Record keeping and retention information for academies and academy trusts'](#) guidance.

Sale or re-use of the site

If the school site is being sold or re-allocated to another use, the LA will take responsibility for the records from the date the school closes.

Merger of schools

If the school merges with another school to create one school, the new school will be responsible for retaining all current records originating from the former schools.

The DPO will determine the outcome of each group of records; these outcomes are as follows:

- Securely destroy all records that are expired and due for disposal, in accordance with the retention periods outlined in this policy.
- Transfer to the successor school or academy all records that are current and that will be required by the new school or academy.
- Transfer to the LA all records that are dormant but still need to be retained to comply with legal and business retention requirements.
- Transfer to the local record office any records with historical value.

Managing records

The DPO will identify which records need to be destroyed or transferred to the relevant body – they will allocate personnel as necessary to sort through records.



The DPO will notify the other organisations as soon as possible so that necessary disposal, storage and transfer arrangements can be made. The school's ICT provider will also be notified so that arrangements can be made to ensure the safe transfer or deletion of electronic records, including all back-up copies.

When sorting records, the DPO and their team will:

- Review all records held within the school as soon as notification of closure is received, including paper and electronic records.
- Use the retention periods outlined in this policy to categorise the records into those to be destroyed and those that need to be transferred.
- Contact the 600371100030 g0 Gva(ce)-t bodd,de toknSt d3hMa1P@S(A0x02,JO(6.16Ft5(A5X€

