

Freedom of Information Request:

Date received: Two emails sent on 2nd February 2023 at 1051hrs to LSST@Loxford.net addressed to Loxford School, Ilford.

Requested by: Alison Melville (request-945043-0bab22c8@whatdotheyknow.com and request-945044-bcf53ff4@whatdotheyknow.com).

Date replied: 13th February 2023 (20 working days following the date of receipt, excluding any day which is not a school day (this effectively equates to a period of 20 school days); or 60 working days following the date of receipt – whichever is shorter.

- request-045043-0bab22c8@whatdotheyknow.com: Copy of your policy for Subject Access Requests:

This is currently published on our school website within the Data Protection Policy – Section 9:

https://loxfordtrust.s3.amazonaws.com/uploads/key_information/POLICY-DATA-PROTECTION.pdf?t=1658232089

- request-945044-bcf53ff4@whatdotheyknow.com: Copy of your Records Retention policy:

Please see enclosed.

Although Loxford School Trust has considered your request strictly in accordance with the Freedom of Information Act, if any or all of the information provided is to be published or broadcast, we would like the opportunity to comment on the information provided, in so far as that publication or broadcast refers to, or in any way identifies, Loxford School Trust before the information is published or broadcast.

Loxford School Trust can be contacted on 020 8514 4666.



If you are unhappy with the outcome of your request, you may ask for an internal review within 20 working days of the date of this response. Please contact the Information Officer at Loxford School Trust, Loxford School, Loxford Lane, Ilford , Essex, IG1 2UT who will arrange an internal review of your case.

If you have a complaint about the handling of your enquiry then please contact the Information Officer within 20 working days of the date of this response at the above address.

If you consider the outcome of your complaint to be unsatisfactory you also have a right of appeal to the Information Commissioner at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113.

www.ico.org.uk

Yours sincerely,



Mrs Anita Johnson OBE

CEO/ Headteacher

Loxford School Trust



LOXFORD

School Trust

THE LOXFORD SCHOOL TRUST FILE RETENTION POLICY

Document Control	
Document Title: File Retention Policy	
Version Number: 02	Author(s) (name, job title): Jaime Wells HRO Trust Wide
Date Approved: November 2021	Document Status: Live
Effective Date: November 2021	Approved By: A Johnson
Superseded Version: File Retention Policy	Date of Next Review: Autumn Term 2023

Policy Rationale

Safe Destruction of Data

(i) Disposal of records that have reached the end of the minimum retention period allocated

The fifth data protection principle as per the data protection rules (updated for GDPR) states that:

“Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes”

In each school, the leadership must ensure that records that are no longer required for business use are reviewed as soon as possible under the criteria set out so that only the appropriate records are destroyed.

The school review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained by the school for research or litigation purposes.

Whatever decisions are made they need to be documented as part of the records management policy within the school.

(ii) Safe destruction of records

All records containing personal information, or sensitive policy information should be made either unreadable or unreconstructable.

- Paper records should be shredded using a cross-cutting shredder
- CDs / DVDs / Floppy Disks should be cut into pieces
- Audio / Video Tapes and Fax Rolls should be dismantled and shredded
- Hard Disks should be dismantled and sanded

Any other records should be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways. Do not put records in with the regular waste or a skip.

There are companies who can provide confidential waste bins and other services which can be purchased to ensure that records are disposed of in an appropriate way.

- a) Where an external provider is used it is recommended that all records must be shredded on-site in the presence of an employee. The organisation must also be able to prove that the records have been destroyed by the company who should provide a Certificate of Destruction. Staff working for the external provider should have been trained in the handling of confidential documents.

The shredding needs to be planned with specific dates and all records should be identified as to the date of destruction.

It is important to understand that if the records are recorded as to be destroyed but have not yet been destroyed and a request for the records has been received

they MUST still be provided.

- b) Where records are destroyed internally, the process must ensure that all records are recorded and authorised to be destroyed by a member of the Leadership team and the destruction recorded. Records should be shredded as soon as the record has been documented as being destroyed.

(iii) Freedom of Information Act 2000 (FoIA 2000)

The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction

Members of staff should record at least:

- File reference (or other unique identifier);
- File title (or brief description);
- Number of files and date range
- The name of the authorising officer
- Date action taken

Following this guidance will ensure that the school is compliant with the Data Protection rules and the Freedom of Information Act 2000.

LOXFORD SCHOOL TRUST RETENTION SCHEDULE

BOARD OF TRUSTEES AND LGBs				
Description	Data protection issues	Statutory provisions	Retention Period	Action at end of period
Articles of association and funding agreement	No		Permanent	
Action plans	No		Life of plan + 3 years	Secure disposal
Policy documents	No		Life of plan + 3 years	Secure disposal
Records of complaints	Yes		Date of resolution +6 years and more in cases of contentious disputes	Secure disposal
Minutes of meetings	Yes			Secure disposal

Reports to Trustees or LGBS	Yes		Min of 6 years. If minutes refer to individual reports they should be kept permanently	Secure disposal or Retain with signed set of minutes
LOXFORD SCHOOL TRUST CHIEF EXECUTIVE OFFICER AND SLT				
School development plans	No		Life of plan + 3 years	Secure Disposal
Minutes of meetings	Yes		Date of meeting + 3 years then review	Secure disposal
SCHOOLS ADMISSIONS PROCESS				
Successful admissions	Yes	Schools Admissions code	Date of admission + 1 year	Secure disposal
Unsuccessful admissions	Yes	Schools Admissions code	Resolution of case + 1 year	Secure disposal
Register of admissions	Yes	School attendance: Departmental Advice	3 years for each entry after date on which entry was made	Secure disposal
Proof of address	Yes	School Admissions	Current year + 1 year	Secure disposal
Supplementary information (e.g. religion, medical conditions)	Yes		Added to student file for successful admissions. Deleted after appeal process expires for unsuccessful admissions	Secure disposal
Admissions policy	No	Schools Admissions code	Life of policy + 3 years	Secure disposal
OPERATIONAL ADMINISTRATION				
Visitors books/electronic sign in	Yes		Current year + 6 years	Secure disposal
General File Series	No		Current year +5 years then REVIEW	Secure disposal
Newsletters	No		Current year + 1 year	Standard Disposal

HUMAN RESOURCES: RECRUITMENT				
Description	Date protection issues	Statutory provisions	Retention Period	Actions at end of period
Records leading to appointment of new Headteacher	Yes		Date of appointment +6 years	Secure disposal
Records leading to appointment of new employee	Yes		Date of appointment + 6months (relevant info added to personnel file for successful candidates)	Secure disposal
DBS checks	Yes	Keeping Children Safe in Education 2020	Schools must not keep copies of DBS certificates	Secure disposal
Proof of identity and right to work checks	Yes		Added to personnel file	
HUMAN RESOURCES: OPERATIONAL STAFF MANAGEMENT				
Personnel file	Yes		Termination of employment +6 years	Secure disposal
Appraisal records	Yes		Current year +5 years	Secure disposal
HUMAN RESOURCES: DISCIPLINARY AND GRIEVANCE PROCEDURES				
Disciplinary proceedings	Yes		Outcome + 6 years	Secure disposal (records to be removed from personnel files, if added)
Allegations of child protection nature	Yes	Keep Children Safe in education 2020	Individuals normal retirement age or 10 years from date of allegation, whichever is longer. (If found to be malicious removed from personnel files).	Secure disposal (must be shredded)
HUMAN RESOURCES: PAYROLL AND PENSIONS				
Maternity pay records	Yes		Current year + 3 years	Secure disposal
Records held under Retirement Benefits Schemes	Yes		Current year + 6 years	Secure disposal

HUMAN RESOURCES: HEALTH AND SAFETY				
Health & Safety Policy Statements	No		Life of policy + 3 years	Secure disposal
Risk assessments	No		Life of assessment + 3 years	Secure disposal
Records re; injury at work	Yes		Date of incident + 12 years	Secure disposal
Accident reports	Yes		Date of incident +6 years (adults); + 25 years (child).	Secure disposal
Fire precaution log books	No		Current year +6 years	Secure disposal
COSHH	No		Current year +40 years	Secure disposal
Asbestos records	No		Last action +40 years	Secure disposal

FINANCIAL MANAGEMENT: RISK MANAGEMENT AND INSURANCE				
Description	Data protection issues	Statutory provisions	Retention policy	Actions at end of period
Employer's Liability Insurance Certificate			Closure of school +40 years	Secure disposal

FINANCIAL MANAGEMENT: ASSET MANAGEMENT				
Inventories	No		Current year + 6 years	Secure disposal
Burglary/theft/vandalism reports			Current year + 6 years	Secure disposal

FINANCIAL MANAGEMENT: ACCOUNTS AND BUDGET MANAGEMENT				
Annual Accounts	No		Current + 6 years	Standard disposal
Records re: creation and management of budgets			Life of budget +3 years	Secure disposal
Invoices, receipts, order books, requisitions, delivery notices	No		Current financial year + 6 years	Secure disposal
Records re: debt collection			Current financial year + 6 years	Secure disposal

PREMISES MANAGEMENT				
Description	Data protection issues	Statutory provisions	Retention policy	Actions at end of period
Title properties belonging to	No		Permanent	

Loxford School Trust Ltd				
Plans of Loxford School Trust Ltd property	No		As long as property belongs to Loxford School Trust Ltd	Passed onto new owners, if applicable
Records re; lettings of Loxford School Trust	No		Current financial year +6 years	Secure disposal

STUDENT MANAGEMENT: EDUCATIONAL RECORD				
Description	Data protection issues	Statutory provisions	Retention policy	Actions at end of period
Student's educational record	Yes		DOB of student +25 years	Secure disposal
Child protection info held on student file	Yes	Keeping Children Safe in Education 2020	In a sealed envelope for same period of time as student file	Secure disposal (must be shredded)
Child protection info held in separate file(s)	Yes	Keeping Children Safe in Education 2020	DOB of student +25 years	Secure disposal (must be shredded)
STUDENT MANAGEMENT: ATTENDANCE				
Attendance Registers	Yes		3 years after date on which each entry register was made	Secure disposal
Records of authorised absences	Yes		Current academic year +2 years	Secure disposal
Records of medical rooms	Yes		Current academic year +2 years	Secure disposal
Files, reviews and education plans	Yes		DOB of student +25 years	Secure disposal
Statement maintained under Section 234 Education Act 1990	Yes		DOB of student +25 years	Secure disposal
Accessibility Strategy	Yes		DOB of student +25 years	Secure disposal

CURRICULUM MANAGEMENT: STATISTICS AND MANAGEMENT INFORMATION				
Description	Data protection issues	Statutory provisions	Retention policy	Actions at end of period
Exam results	Yes		Current year +6 years	Secure disposal
Exam papers	Yes		Until any appeals/validation process is complete	Secure disposal
PAN reports	Yes		Current year +6 years	Secure disposal
Value added/ contextual data	Yes		Current year +6 years	Secure disposal
CURRICULUM MANAGEMENT: IMPLEMENTATION				
Schemes of work	No		Current year +1 year	Secure disposal
Students work	No		Returned to the pupil or Current year + 1 year	Secure disposal
Mark books	No		Current year +1 year	Secure disposal
Record of homework set	No		Current year +1 year	Secure disposal
Timetable	No		Current year +1 year	Secure disposal

EXTRA-CURRICULAR ACTIVITIES				
Description	Data protection issues	Statutory provisions	Retention policy	Actions at end of period
Consent form for trips with no major incident	Yes		End of the trip	Secure disposal
Consent form for trips with major incident	Yes		DOB of student +25 years	Secure disposal
Records re: approval to run an external trip	No	Outdoor Education Advisers' Panel National Guidance	Date of visit + 10 years	Secure disposal

CENTRAL GOVERNMENT & LOCAL AUTHORITY				
Description	Data protection issues	Statutory provisions	Retention policy	Actions at end of period
OFSTED reports	No		Life of the report, then review	Secure disposal
Census reports	No		Current year +5 years	Secure disposal

Attendance returns	Yes		Current year +1 year	Secure disposal
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