



The de Ferrers Trust

Records Retention Policy

Author:	Director of Governance and Compliance
Approval needed by:	Chief Executive Officer
Consultation required	Data Protection Officer
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Introduction

The main aim of this policy is to enable The de Ferrers Trust to manage records effectively and in compliance with the General Data Protection Regulations (GDPR). As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.

The de Ferrers Trust is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.

The table that follows sets out the main categories of information that we hold and the length of time we intend to hold them. In producing this table, guidance has been sought from the Record Management Society.

Retention

Retention periods are independent of format and therefore can be applied to any medium whether paper or electronic.

Archive

Some records are required to be retained for several years although they may no longer be referenced on a regular basis. These records are to be stored in a safe environment and would normally be stored on academy/trust premises. Where capacity is an issue then the use of the local authority archive facilities should be sourced.

Destruction

Due to the ongoing Independent Inquiry into Child Sexual Abuse (IICSA) neither pupil nor staff records should be destroyed until further notice. Where records should **not be** destroyed, this has been noted in the 'Action' column.

At the end of the retention period appropriate action should be taken as outlined in the retention schedule that follows.

Where standard disposal is required the record can be disposed of using an appropriate method. This could be in a recyclable waste paper bin (paper) or simply by deleting an electronic file.

Where secure disposal is indicated, this should be taken to mean disposal using a confidential system. This may be a collection facility or the use of a cross-cut shredder. Where files are stored electronically, files should also be deleted from the any backups where applicable.

Data management systems should be regularly reviewed to ensure we are not retaining data any longer than is necessary and appropriate archiving should take place.

1. Management of the trust and our academies

This section contains retention periods connected to the general management of the trust. This covers the work of the trust, our academies, our governance arrangements, members of senior management, the admissions process and operational administration.

	Basic Description	File	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record
1.1 Governance					
1.1.1	Agendas for all meetings within the governance structure.		There may be data protection issues if the meeting is dealing with confidential issues relating to staff.	Permanent - An electronic copy should be stored on The Trust Governor (a cloud based portal for governance business). A hard copy should be retained with the (signed) master set of minutes. Any other copies can be disposed of.	Secure disposal
1.1.2	Minutes of all meetings within the governance structure.		There may be data protection issues if the meeting is dealing with confidential issues relating to staff.	Permanent – An electronic copy should be stored on The Trust Governor (a cloud based portal for governance business). A hard copy should be signed and retained with a hard copy of the agenda. Clerks may wish to produce an inspection copy ¹ which should be retained for 3 years from the date of the meeting only.	Secure disposal.
1.1.3	Reports presented at a meeting within the governance structure		There may be data protection issues if the report deals with confidential issues relating to staff.	Reports should be kept for a minimum of 6 years (electronically on The Trust Governor). However, if the minutes refer directly to individual reports then the reports should be kept with the master minutes permanently.	Secure disposal or retain with the signed set of the minutes.

¹ An inspection copy is something the Clerk to the Local Governing Body may wish to retain so that requestors can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Date of the meeting + a minimum of 6 years	Secure disposal
1.1.5	Governance framework documents including Articles of Association	No	Permanent	These should be retained by the trust whilst the trust remains open and then offered to the County Archives Service upon closure.
1.1.6	Trusts and Endowments managed by the trust board	No	Permanent	These should be retained by the trust whilst the trust remains open and then offered to the County Archives Service upon closure.
1.1.7	Action plans	No	Life of the action plan + 3 years	Secure disposal
1.1.8	Policy documents	No	Life of the policy + 3 years	Secure disposal
1.1.9	Records relating to complaints dealt with by the trust board.	Yes	Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes.	Secure disposal
1.1.10	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Date of report + 10 years	Secure disposal
1.1.11	Proposals concerning the change of status of a maintained school	No	Date proposal accepted or declined + 3 years	Secure disposal

	including Specialist Status Schools and Academies			
1.2 Senior Management Team				
1.2.1	Log books of activity in the academy maintained by the senior management team	There may be data protection issues if the log book refers to individual students or members of staff.	Date of the last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate.
1.2.2	Minutes of senior management team meetings and the meetings of other internal administrative bodies.	There may be data protection issues if the minutes refers to individual students or members of staff	Date of the meeting + 5 years then review.	Secure disposal.
1.2.3	Reports created by the senior management team	There may be data protection issues if the report refers to individual students or members of staff	Date of the report + a minimum of 5 years then review.	Secure disposal.
1.2.4	Records created by the senior management team or other staff with administrative responsibilities.	There may be data protection issues if the records refer to individual students or members of staff.	Current academic year + 6 years then review.	Secure disposal.
1.2.5	Correspondence created by senior management team and other members	There may be data protection issues if the records refer to individual students	Date of correspondence + 3 years then review.	Secure disposal.

	of staff with administrative responsibilities	or members of staff.		
1.2.6	Development plans	Yes	Life of the plan + 6 years	Secure disposal
1.3 Admissions Process				
1.3.1	All records relating to the creation and implementation of the Academy's Admissions Policy	No	Life of the policy + 3 years then review	Secure disposal
1.3.2	Admissions – if the admission is successful	Yes	Date of admission + 1 year	Secure disposal
1.3.3.	Admissions – if the appeal is unsuccessful	Yes	Resolution of case + 1 year	Secure disposal
1.3.4	Register of Admissions	Yes	Every entry in the admission register must be persevered for a period of 6 years after the date on which the entry was made.	Review – academies may wish to consider keeping the admission register permanently as often they will receive enquiries from past students to confirm the dates they attended the school.
1.3.5	Admissions – secondary – casual	Yes	Current year + 1 year	Secure disposal
1.3.6	Proofs of address supplied by parents as part of the admissions process	Yes	Current year + 1 year	Secure disposal
1.3.7	Supplementary information form including additional information such as religion, medical	Yes	For successful admissions – This information should be added to the student file. For unsuccessful admissions – until	Secure disposal

	conditions etc		appeals process completed	
Operational Administration				
1.4.1	General file series	No	Current year + 5 years then review	Secure disposal
1.4.2	Records relating to the creation and publication of the academy brochure/prospectus	No	Current year + 3 years	Standard disposal
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or students	No	Current year + 1 year	Standard disposal
1.4.4	Newsletters and other items with a short operational use	No	Current year + 1 year	Standard disposal (archive)
1.4.5	Visitors books and signing in sheets	Yes	Current year + 6 years then review	Secure disposal
1.4.6	Records relating to the creation and management of Parent Teacher Associations, Old Pupils Associations and equivalent groups	No	Current year + 6 years then review	Secure disposal

2. Human Resources

This section deals with all matters of Human Resources management within the trust.

	Basic Description	File	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record
2.1 Recruitment					
2.1.1	All records leading up to the appointment of a new Chief Executive and Principal		Yes	Date of appointment + 6 years	Secure disposal
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates		Yes	Date of appointment of successful candidate + 12 months	Secure disposal
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate		Yes	All the relevant information should be added to the staff personnel file (see below) and all other information retained for 6 months.	Secure disposal
2.1.4	Pre-employment vetting information – DBS checks		No	The academy does not have to keep copies of the DBS certificates. If the academy does so the copy must NOT be retained for more than 6 months.	Secure disposal
2.1.5	Proof of identity collected as part of the process of checking ‘portable’ enhanced DBS disclosure		Yes	Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file.	
2.1.6	Pre-employment vetting information –		Yes	Where possible these documents should be added to the staff	Secure disposal

	evidence proving right to work in the United Kingdom ²		personnel file [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	
2.2 Operational Staff Management				
2.2.1	Staff Personnel File	Yes	Termination of employment + 6 years	Do not destroy
2.2.2	Timesheets	Yes	Current year + 6 years	Secure disposal
2.2.3	Annual appraisal/assessment records	Yes	Current year + 5 years	Do not destroy
2.3 Management of Disciplinary and Grievance Process				
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded.	Yes	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then review. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned.	Do not destroy
2.3.2	Disciplinary proceedings	Yes	Oral warnings ³ – date of warning + 6 months Written warning – level 1 – date of warning + 6 months Written warning – level 2 – date of	Do not destroy

² Employers are required to take a “clear copy” of the documents which they are shown as part of this process.

³ Where the warning relates to child protection issues see above,. If the disciplinary proceedings relate to a child protection matter please contact your Safeguarding Children Officer for further advice.

			<p>warning + 12 months</p> <p>Final written warning – date of warning + 18 months</p> <p>Case not found – If the incident is child protection related then see above, otherwise dispose of at the conclusion of the case.</p>	
2.3.3	Warnings subsequently found to be based on an unfounded case (excluding child protection related warning)	Yes	No retention required – date case found to be unfounded	Do not destroy

3. Estates Management

This section deals with all matters of Estates management within the trust.

	Basic File Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record
3.1 Health and Safety				
3.1.1	Health and Safety Policy	No	Life of policy + 3 years	Secure disposal
3.1.2	Health and Safety Risk Assessments	No	Life of risk assessment + 3 years	Secure disposal
3.1.3	Records relating to accident/injury at	Yes	Date of incident + 12 years. In the case of serious accidents a further	Secure disposal

	work		retention period will need to be applied.	
3.1.4	Accident reporting	Yes	Adults – Date of incident + 7 years Children – DOB of the child + 25 years	Secure disposal
3.1.5	Control of Substances Hazardous to Health (COSHH)	No	Current year + 40 years	Secure disposal
3.1.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Last action + 40 years	Secure disposal
3.1.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No	Last action + 50 years	Secure disposal
3.1.8	Fire Precautions log books	No	Current year + 7 years	Secure disposal
3.2 Property Management				
3.2.1	Title deeds of properties belonging to the trust	No	Permanent These should follow the property unless the property has been registered with the Land Registry	
3.2.2	Plans of property belonging to the	No	These should be retained whilst the building belongs to the trust and	

	trust		should be passed on to any new owners if the building is leased or sold.	
3.2.3	Leases of property leased by the trust	No	Expiry of lease + 6 years	Secure disposal
3.2.4	Records relating to the lettings	No	Current year + 6 years	Secure disposal
3.3 Maintenance				
3.3.1	All records relating to maintenance carried out by contractors	No	Current year + 6 years	Secure disposal
3.3.2	All records relating to maintenance carried out by employees including maintenance log books	No	Current year + 6 years	Secure disposal

4. Financial Management of the School

This section deals with all aspects of the financial management of the school including the administration of school meals

	Basic File Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record
4.1 Payroll and Pensions				
4.1.1	Maternity pay records	Yes	Current year + 3 years	Secure disposal
4.1.2	Records held under Retirement Benefits Schemes	Yes	Current year + 6 years	Secure disposal
4.2 Risk Management and Insurance				

4.2.1	Employer's Liability Insurance Certificate	No	Closure of the trust + 40 years	Secure disposal
4.3 Asset Management				
4.3.1	Inventories of furniture and equipment	No	Current year + 6 years	Secure disposal
4.3.2	Burglary, theft and vandalism report forms	No	Current year + 6 years	Secure disposal
4.4 Accounts and Statements including budget management				
4.4.1	Annual accounts	No	Current year + 6 years	Standard disposal (archive)
4.4.2	Loans and grants managed by the trust	No	Date of last payment on the loan + 12 years then review	Secure disposal
4.4.3	Student grant applications	Yes	Current year + 3 years	Secure disposal
4.4.4	All records relating to the creation and management of budgets including the annual budget statement and background papers	No	Life of the budget + 6 years	Secure disposal
4.4.5	Invoices, receipts, order books, requisitions and delivery notice	No	Current financial year + 6 years	Secure disposal
4.4.6	Records relating to the collection and banking of monies	No	Current financial year + 6 years	Secure disposal
4.4.7	Records relating to the identification	No	Current financial year + 6 years	Secure disposal

	and collection of debt			
4.5 Contract Management				
4.5.1	All records relating to the management of contracts under seal	No	Last payment on the contact + 12 years	Secure disposal
4.5.2	All records relating to the management of contracts under signature	No	Last payment on the contract + 6 years	Secure disposal
4.5.3	Records relating to the monitoring of contracts	No	Current year + 2 years	Secure disposal
4.6 School Fund				
4.6.1	School fund – cheque books, paying in books, ledger, invoices, receipts, bank statements and journey books.	No	Current year + 6 years	Secure disposal
4.7 School Meals Management				
4.7.1	Free School Meals Registers	Yes	Current year + 6 years	Secure disposal
4.7.2	School Meals Registers	Yes	Current year + 3 years	Secure disposal
4.7.3	School Meals Summary Sheets	No	Current year + 3 years	Secure disposal

5. Student Management

This section includes all records which are created during the time a student spends at one of our academies. For information about accident reporting see under Health and Safety above.

	Basic File Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record
5.1 Student's Educational Record				
5.1.1	Student's Educational Record required	Yes	Primary – retain whilst the child remains at the primary school	<p>Whilst IICSA is still pending – DO NOT DESTROY</p> <p>Once IICSA has concluded and the Order not to destroy has been lifted - The file should follow the student when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> •To another primary school •To a secondary school •To a pupil referral unit •If the student dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. <p>If the student transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for students who have not transferred in the normal way. It makes more sense to transfer the</p>

			Secondary – DOB of the student + 25 years	record to the Local Authority as it is more likely that the student will request the record from the Local Authority Secure disposal
5.1.2	Examination results – student copies	Yes	This information should be added to the student files	Public examinations – all uncollected certificates should be returned to the examination board.
5.1.3	Child protection information held on student file	Yes	If any records relating to child protection issues are placed on the student file, it should be in a sealed envelope and then retained for the same period of time as the student file.	Primary school – retain for the duration of the pupil's attendance at the school and transfer to secondary school. Secondary school – Do not destroy . Consider transfer to off-site storage on child reaching school leaving age.
5.1.4	Child protection information held in separate files ⁴	Yes	DOB of child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record.	Do not destroy . Consider transfer to off-site storage on child reaching school leaving age.
5.2 Attendance				
5.2.1	Attendance registers	Yes	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made.	Secure disposal

⁴ Retention periods relating to the allegations made against adults can be found in the Human Resources section of this retention schedule.

5.2.2	Correspondence relating to authorised absence	Yes	Current academic year + 2 years	Secure disposal
5.3 Special Educational Needs				
5.3.1	Special Educational Needs files, reviews, individual educational plans, statements and any amendments made to the statement	Yes	<p>Primary – retain for duration of attendance at school and transfer to secondary school</p> <p>Secondary – DOB of the student + 35 years</p>	<p>Do not destroy for the time being in view of IICSA</p> <p>Ordinarily - This retention period is the minimum retention period that any student file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a ‘failure to provide sufficient education’ case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.</p> <p>Secure disposal – unless the document is subject to a legal hold.</p>
5.3.2	Advice and information provided to parents regarding educational needs	Yes	DOB of the student + 25 years [this would normally be retained on the student file]	Secure disposal – unless the document is subject to a legal hold.
5.3.3	Accessibility strategy	Yes	DOB of the student + 25 years [this would normally be retained on the student file]	Secure disposal – unless the document is subject to a legal hold.

6. Curriculum Management

	Basic File Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record
6.1 Statistics and Management Information				
6.1.1	Curriculum returns	No	Current year + 3 years	Secure disposal
6.1.2	Examination results (academy copy)	Yes	Current year + 6 years	Secure disposal
	SATs records	Yes	Results should be recorded on the student's educational file and will therefore be retained until the student reaches the age of 25 years. The academy may wish to keep a composite record of all the whole year SATs results. These should be kept for the current year + 6 years to allow suitable comparison Examination papers should be kept until any appeals/validation process is complete	Secure disposal
6.1.3	Published Admission Number (PAN) reports	Yes	Current year + 6 years	Secure disposal
6.1.4	Value added and contextual data	Yes	Current year + 6 years	Secure disposal
6.1.5	Self-Evaluation Forms	Yes	Current year + 6 years	Secure disposal
6.2 Implementation of Curriculum				
6.2.1	Schemes of work, timetable, class record books, mark books, record of	No	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or secure disposal.

	homework set			
6.2.2	Student work	No	Where possible student's work should be returned to the student at the end of the academic year if this is not the academy's policy then the current year + 1 year.	Secure disposal.

7. Extra-Curricular Activities

	Basic File Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record
7.1 Educational Visits Outside the Classroom				
7.1.1	Records created by academies to obtain approval to run an Educational Visit outside the classroom where there has not been a major incident	No	Date of visit + 14 years	Secure disposal
7.1.2	Records created by academies to obtain approval to run an Educational Visit outside the classroom where there has been a major incident	No	DOB of the student + 21 years	Secure disposal
7.1.3	Parental consent forms for trips where there has been no incident	Yes	Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most academies do not have

				the storage capacity to retain every single consent form issued for this period of time.
7.1.4	Parental permission slips for trips where there has been a major incident	Yes	DOB of the student involved in the incident + 25 years. The permission slips for all the students on the trip need to be retained to show that the rules had been followed for all students	Secure disposal
7.2 Walking Bus				
7.2.1	Walking bus registers	Yes	Date of register + 3 years. This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting.	Secure disposal
7.3 Family Liaison Officers and Home School Liaison Assistants (and equivalents)				
7.3.1	Day books	Yes	Current year + 2 years then review	Secure disposal
7.3.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency	Yes	Whilst the child is attending one of our academies and then destroy.	Secure disposal
7.3.3	Referral forms	Yes	While the referral is current	Secure disposal
7.3.4	Contact data sheet	Yes	Current year then review, if contact is no longer active then destroy.	Secure disposal
7.3.5	Contact database entries	Yes	Current year then review if contact is no longer active then destroy.	Secure disposal
7.3.6	Group registers	Yes	Current year + 2 years	Secure disposal

8. Central Government and the Local Authority

This section covers records created in the course of interaction between the trust, academy and the local authority.

	Basic Description	File	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record
8.1 Local Authority					
8.1.1	Secondary transfer sheets (primary)		Yes	Current year + 2 years	Secure disposal
8.1.2	Attendance returns		Yes	Current year + 1 year	Secure disposal
8.1.3	School census returns		No	Current year + 5 years	Secure disposal
8.1.4	Circulars and other information sent from the Local Authority		No	Operational use	Secure disposal
8.2 Central Government					
8.2.1	Ofsted reports and papers		No	Life of the report then review	Secure disposal
8.2.2	Returns made to central government		No	Current year + 6 years	Secure disposal
8.2.3	Circulars and other information sent from central government		No	Operational use	Secure disposal

9. Other

This section covers other records created in the course of trust/academy business, not covered by any of the previous areas.

	Basic Description	File	Data Protection Issues	Retention Period	Action at the end of the
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	Description	Issues		administrative life of the record
9.1 Biometric Data				
9.1.1	Any biometric data that is stored, and used, for an automated biometric recognition system.	Yes	Only to be retained for as long as it is being used (and consent is in place)	Secure disposal

10. Schedule of amendments

Date	Section	Amendment
20.05.2020	10	Addition of a schedule of amendments
	Front cover	Approval level changed from trust board to CEO
	'Destruction'	Added 'Due to the ongoing Independent Inquiry into Child Sexual Abuse (IICSA) neither pupil nor staff records should be destroyed until further notice. Where records should not be destroyed, this has been noted in the 'Action' column.'
	1.2.2 – minutes of SMT meetings	Increased retention period from 3 to 5 years.
	1.2.3 - Reports created by SMT	Increased retention period from 3 to 5 years
	1.2.6 – development plans	Removed the word 'professional'
	1.2.7 – trust and academy development plans	Removed completely as covered in 1.2.6
	1.3.4 – register of admissions	Retention period increased from 3 years to 6 years
	2.1.2 - All records leading up to the appointment of a new	Retention period increased from 6 months to 12 months

	member of staff – unsuccessful candidates	
	2.2.1 – Staff personnel files	Added ‘do not destroy’ due to IICSA
	2.2.3 - Annual appraisal/assessment records	Added ‘do not destroy’ due to IICSA
	2.3.1 - Allegation of a child protection nature against a member of staff including where the allegation is unfounded.	Added ‘do not destroy’ due to IICSA
	2.3.2 - Disciplinary proceedings	Added ‘do not destroy’ due to IICSA
	2.3.3 Warnings subsequently found to be based on an unfounded case (excluding child protection related warning)	New section added. Ordinarily we wouldn’t keep these but due to IICS added ‘do not destroy’.
	3.1.4 – accident reporting	Increased retention period from 6 to 7 years.
	3.1.8 - Fire Precautions log books	Increased retention period from 6 to 7 years
	4.4.4 - All records relating to the creation and management of budgets including the annual budget statement and	Retention period increased from 3 to 6 years

	background papers	
	5.1.1 - Student's Educational Record required	Added 'do not destroy' due to IICSA
	5.1.3 - child protection information held on student file.	Added 'Primary school – retain for the duration of the pupil's attendance at the school and transfer to secondary school. Secondary school – Do not destroy. Consider transfer to off-site storage on child reaching school leaving age.'
	5.1.4 - Child protection information held in separate files	Added 'Do not destroy. Consider transfer to off-site storage on child reaching school leaving age.'
	5.3.1 - Special Educational Needs files, reviews, individual educational plans, statements and any amendments made to the statement	Altered retention period from 'dob + 25 years' to 'dob + 35 years' but added 'do not destroy' in view of IICSA
	7.1.1. Records created by academies to obtain approval to run an Educational Visit outside the classroom	Added 'where there has not been a major incident' and altered the retention period to 14 years from date of visit.
	7.1.2 - Records created by academies to obtain approval to run an Educational Visit outside the classroom where there has been a	New entry

	major incident	
	7.1.2 - Parental consent forms for trips where there has been no incident	Amended to 7.1.3
	7.1.3 - Parental permission slips for trips where there has been a major incident	Amended to 7.1.4
	Section 9	New section to include biometric data