Records Management Policy

Policy Code:	HR33
Policy Start Date:	March 2026
Policy Review Date:	March 2027

Please read this policy in conjunction with the policies listed below:

- HR5 Acceptable Use Policy
- HR6 Data Protection Policy
- HR6A Data Breach Policy
- HR12 Staff Disciplinary Policy
- HR29 Code of Conduct Policy
- HR35 Clear Desk Policy
- HR36 Complaints Policy
- ICT2 Online Safety Policy

1 Policy Statement

1.1 As a public body, the Trust is required by law to manage records appropriately. Legislation such as the Data Protection Act 2018, UK GDPR, Freedom of Information Act 2000 and Environmental Information Regulations 2004 set out specific requirements in relation to the creation and management of records.

1.2 Maintaining appropriate and effective records management practices will help the Trust to deliver and meet our statutory duties. By adopting this policy, the Trust aims to ensure that the record, in whatever form it takes, is accurate, reliable, ordered, complete, useful, up-to-date and accessible whenever it is needed.

1.3 References to the Trust or Academy within this policy specifically include all nursery, primary, secondary and special academies within the Trust, as well as Priory Apprenticeships and Lincolnshire ITT.

1.4 This policy does not form part of any member of staff's contract of employment and it may be amended at any time.

2 Roles, Responsibility and Implementation

2.1 The People, Performance and Operations Committee has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. This committee delegates day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Data Protection Officer.

2.2 This policy is approved by the People, Performance and Operations Committee before being ratified at the next available Trust Board meeting. Approval and ratification is minuted, with records kept by the Clerk to Trustees.

2.3 Leaders and Managers have a specific responsibility to ensure the fair application of this policy and all staff are responsible for supporting colleagues and ensuring its success.

3 Aims

3.1 To ensure that the Trust appropriately manages a record through its life cycle from creation or receipt, through maintenance and use to final disposal (for destruction, transfer or permanent retention).

3.2 To ensure that all Trust staff, governors, Trustees, elected members, partners, suppliers and stakeholders are aware of what they must do to manage records in an effective and efficient way.

3.3 To ensure that records are:

- easily and efficiently located, accessed and retrieved;
- better protected and securely stored; and
- disposed of safely and at the right time.

3.4 To reduce corporate risk through compliance with relevant legislation.

4 Scope

4.1 This policy shall apply to the management of records in all technical or physical formats or media, created or received by the Trust in the conduct of its business activities.

4.2 This policy applies to all Trust staff (both permanent and temporary), contractors, consultants, volunteers, secondees, elected members, governors, Trustees, partners, suppliers and stakeholders who have access to records, wherever these records may be located.

5 Definitions

5.1 **Record:** A record is recorded information, in any form, including data in systems, produced or received and then kept in order to support and/or give evidence of an activity. Since a record is recorded information, no record may be modified.

5.2 **Format:** A record can be in any format including (but not limited to): paper, email, audio/visual, electronic documents, systems data, databases, digital images and photographs.

5.3 **Records Management:** The control of records during their lifetime, from creation to storage and retention until the eventual archival preservation or destruction.

5.4 **Records Creator:** The person that produces and receives and then keeps them in its record-keeping system.

5.5 **Record-Keeping System:** System or procedures by which the records are created, captured, secured, maintained and disposed.

5.6 **Records Declaration:** The process through which records are identified as such and distinguished by other information that is not to be regarded as recorded information.

5.7 **Official Copy:** The official copy of a record is the copy intended to give evidence of the activity supported by the record and therefore, if need

be, is the one to be submitted to public authorities and other stakeholders and partners.

5.8 **Convenience Copy:** A convenience copy of a record is a copy of a record created for the convenience of the records creator or of someone working for the records creator e.g., to give him/her quicker access to the information contained in the record.

5.9 **Primary Responsibility:** The primary responsibility over a record identifies which organisational unit/person is in charge of keeping the official copy of a record and deciding about specific issues concerning its management.

5.10 **Vital Records:** Records without which an organisation would be unable to function, or to prove that a key activity has taken place.

5.11 **EDRMS:** The Trust's Electronic Documents and Record Management System. The EDRMS may be made up of one or more IT platforms.

6 Official Copies of Records

6.1 There shall be only one official copy of each corporate record.

6.2 If there are two records identical to each other to be kept by the Trust in order to give evidence of two different corporate processes, they shall be considered as two separate records, each one associated with its specific features i.e., retention and disposal schedule, file plan code etc. For example, a member of staff performance report kept both in the personal staff member file of the member of staff, and in a litigation file involving the same member of staff.

7 Modifying Records

7.1 Records shall not be modified.

7.2 A new record shall be produced if the information contained in a record is to be corrected, amended or added.

7.3 This former record is to be kept in compliance with the relevant retention and disposal schedule.

8 Access to Records

8.1 Records shall only be accessed by relevant staff for a business purpose.

8.2 Records shall only be disseminated to members of the public in line with the relevant legislation framework and with any other relevant Trust policy and procedure.

8.3 Access to the Trust records which contain personal data shall be granted (exemptions apply) in accordance with The Trust's Subject Access Request procedure (see section 14).

9 Storing Records

9.1 Records shall be kept in a condition so as to ensure continuing authenticity, accessibility, retrievability, intelligibility and usability throughout their whole life-cycle (including, for those selected for long-term or permanent retention, the period when they are kept in the archives).

10 Retention and Disposal

10.1 The Trust's retention and disposal schedules can be found in Appendix A. The Trust adheres to the Information Management Toolkit for Academies.

10.2 The Trust's retention and disposal schedules shall comply with all relevant UK statutory (including all HMRC) provisions currently in force.

10.3 A Head of Service, who has primary responsibility over the record, shall be required to authorise a change to the retention or disposal schedule following the expiration of a record. If it is in contrast with the original schedule, the reason for the change needs to be documented.

10.4 Legal provisions shall take precedent over proposed modifications.

10.5 The Trust shall ensure that retention and disposal schedules are available to all staff and those managing access to the Trust records.

11 Exceptions to retention periods

11.1 There are some situations where records need a longer retention period. This may include:

- the records have been maintained for purposes of research;
- the information in the records is relevant to legal action that has been started but not finished;
- the records have been archived for historical purposes, e.g., relevant to legal proceedings linked to the organisation; and/or
- the records could be needed as part of an official inquiry.

11.2 Where there are legal proceedings, the Trust will seek/be guided by legal advice as to how long to retain the records.

11.3 Where records are kept for longer than the recommended period, files should be clearly marked/a note added with the reasons for the extension period.

12 Destruction of Records

12.1 If provided by the relevant retention and disposal schedules, corporate records are to be destroyed when their retention periods expire.

12.2 Before destroying any record, it is necessary to verify that there are no specific circumstances that may prevent the destruction, such as legal holds (issued by a Court) or new business needs e.g., the record might be useful to support either legal defence or another corporate activity.

12.3 Destruction of corporate records shall be authorised in writing by the relevant manager, or authorised deputy, of the service area which has primary responsibility over them.

12.4 The service area which has primary responsibility over the records shall ensure all existing copies of the records are destroyed, regardless of format and location.

12.5 Destruction of records shall be recorded on a Disposal Register (a template is available from HR). The register is to be kept in digital format by the service and a copy sent to the HR Department.

12.6 Paper records are to be destroyed by using the corporately provided lockable confidential disposal bins or confidential waste bags or by shredding the record using a cross cut shredder.

12.7 Confidential waste bags and lockable bins must be kept in a location not accessible to the public. Confidential waste bags are to be held and secured at all times to prevent unauthorised access.

12.8 Microforms, microfiches, microfilms and non-digital photos must be kept separate from paper records and placed in confidential waste bags reserved just for them.

12.9 Electronic records kept in a corporate application shall be deleted using the functionality within the application.

12.10 Sanitisation procedures for ICT storage media holding electronic records which includes optical, magnetic and solid state storage media vary with

the media type, but typical methods include overwriting, degaussing and physical destruction.

12.11 In all instances where ICT storage media is destroyed, a certificate of destruction shall be provided and held as a permanent record by the relevant service area.

13 Convenience Copies of Records

13.1 Corporate retention and disposal schedules do not apply to convenience copies, which are to be destroyed as soon as they are no longer needed to facilitate the work of the person who has produced them.

14 Data Protection

14.1 The Trust shall ensure all records which contain personal and special category data are processed in accordance with the Data Protection Act 2018 and UK GDPR. Please refer to HR6 Data Protection Policy.

15 Subject Access Requests (SARs)

15.1 The Trust shall ensure that it complies with its obligations under the Data Protection Act 2018 in regards to any SARs.

15.2 For further information or to submit an SAR, please email SAR@prioryacademies.co.uk. For further details of the process please refer to HR6 Data Protection Policy.

16 Information Security

16.1 The Trust shall ensure appropriate security controls are applied to all records.

16.2 The Trust shall ensure that HR5 ICT Acceptable Use Policy is available to all staff.

17 Policy Changes

17.1 This policy may only be amended or withdrawn by The Priory Federation of Academies Trust.

Appendix A – Retention and Disposal Schedule
Please note, all files relate to any documents/records saved electronically and in paper format.

1.1 Governance of the Academy Trust

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
1.1.1	Governance statement	Yes		Life of the governance statement + 6 years	Secure disposal
1.1.2	Articles of Association	No		Life of the Academy and/or Trust	
1.1.3	Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	Secure disposal
1.1.4	Memorandum of Understanding of Shared Governance among schools	No	*Companies Act 2006 section 355*	Life of Memorandum of Understanding + 6 years	Secure disposal
1.1.5	Constitution	No		Life of the Academy	
1.1.6	Special Resolutions to amend the Constitution	No		Life	
1.1.7	Written Scheme of Delegation	No	*Companies Act 2006 section 355*	Life of Written Scheme of Delegation + 10 years	Secure disposal
1.1.8	Directors – Appointment	No		Life of Appointment + 6 years	Secure disposal
1.1.9	Directors – Disqualification	No	*Company Directors Disqualification Act*	Date of disqualification + 15 years	Secure disposal
1.1.10	Directs – Termination of Office	No		Date of termination + 6 years	Secure disposal
1.1.11	Annual Report – Trustees Report	No	*Companies Act 2006 section 355*	Date of report + 10 years	Secure disposal
1.1.12	Annual Reports and Accounts	No	*Companies Act 2006 section 355*	Date of report + 10 years	Secure disposal

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
1.1.13	Annual Return	No	*Companies Act 2006 section 355*	Date of report + 10 years	Secure disposal
1.1.14	Appointment of Trustees and Governors and Directors	Yes		Life of appointment + 6 years	Secure disposal
1.1.15	Statement of Trustees Responsibilities	No		Life of appointment + 6 years	Secure disposal
1.1.16	Appointment and removal of Members	No		Life of appointment + 6 years	Secure disposal
1.1.17	Strategic Review	No		Date of the review + 6 years	Secure disposal
1.1.18	Strategic Plan (School Development Plans)	No		Life of plan + 6 years	Secure disposal
1.1.19	Accessibility Plan	There may be if the plan refers to specific pupils	*Limitation Act 1980 (Section 2)*	Life of plan + 6 years	Secure disposal

1.2 Board of Directors, Members Meetings and Governing Body

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
1.2.1	Board Meeting Minutes	Could be if the minutes refer to living individuals	*Companies Act 2006 section 248*	Minutes must be kept for at least 10 years from the date of the meeting	Offer to archives
1.2.2	Board Decisions	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	Offer to archives
1.2.3	Board Meeting: Annual Schedule of Business	No		Current year	Secure disposal

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
1.2.4	Board Meeting: Procedures for conduct of meeting	No	*Limitation Act 1980 *Section 2)*	Date procedures superseded + 6 years	Secure disposal
	Committees				
1.2.5	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	Offer to archives
	General Members' Meeting				
1.2.6	Records relating to the management of General Members' Meetings	Could be if the minutes refer to living individuals	*Companies Act 2006 section 248*	Minutes must be kept for at least 10 years from the date of the meeting	Offer to archives
1.2.7	Records relating to the management of the Annual General Meetings	Could be if the minutes refer to living individuals	*Companies Act 2006 section 248*	Minutes must be kept for at least 10 years from the date of the meeting	Offer to archives
	Governors				
1.2.8	Agendas for Governing Body meetings	Could be if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes All other copies can be disposed of	Secure disposal
1.2.9	Minutes of, and papers considered at, meetings of the Governing Body and its committees	Could be if the meeting is dealing with confidential issues relating to staff		Principal set (signed) – Life of the Academy Inspection copies - Date of the meeting + 3 years	Secure disposal
1.2.10	Reports presented to the Governing Body	Could be if the meeting is dealing with confidential issues		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, then the reports	Secure disposal or retain with the signed set of minutes

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
		relating to staff		should be kept for the life of the Academy	
	Statutory Registers				
1.2.15	Register of Directors		*Companies Act 2006*	Life of the Trust + 6 years	Secure disposal
1.2.16	Register of Directors' interests (not a statutory register)	Yes		Life of the Trust + 6 years	Secure disposal
1.2.17	Register of Directors' residential addresses	Yes, if Director has chosen to register a service address at Companies House	*Companies Act 2006*	Life of the Trust + 6 years	Secure disposal
1.2.18	Register of gifts, hospitality and entertainments		*Companies Act 2006*	Life of the Trust + 6 years	Secure disposal
1.2.19	Register of members		*Companies Act 2006*	Life of the Trust + 6 years	Secure disposal
1.2.20	Register of secretaries		*Companies Act 2006*	Life of the Trust + 6 years	Secure disposal
1.2.21	Register of Trustees interests	Yes		Life of the Trust + 6 years	Secure disposal
1.2.22	Declaration of Interests Statements (governors) (not a statutory register)	Yes		Life of the Trust + 6 years	Secure disposal

1.3 Funding and Finance

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
	Strategic Finance				
1.3.1	Statement of financial activities for the year	No		Current financial year + 6 years	Secure disposal
1.3.2	Financial planning	No		Current financial year + 6 years	Secure disposal
1.3.3	Value for money statement	No		Current financial year + 6 years	Secure disposal
1.3.4	Records relating to the management of VAT	No		Current financial year + 6 years	Secure disposal
1.3.5	Whole government accounts returns	No		Current financial year + 6 years	Secure disposal
1.3.6	Borrowing powers	No		Current financial year + 6 years	Secure disposal
1.3.7	Budget plan	No		Current financial year + 6 years	Secure disposal
1.3.8	Charging and remissions policy	No		Date policy superseded + 3 years	Secure disposal
	Audit Arrangements				
1.3.9	Audit Committee and appointment of responsible officers	No		Life of the Academy	
1.3.10	Independent Auditor's report on regularity	No		Financial year report relates to + 6 years	Secure disposal
1.3.11	Independent Auditor's report on financial statements	No		Financial year report relates to + 6 years	Secure disposal
	Funding Agreements				
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements	No		Date of last payment of funding + 6 years	Secure disposal

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
1.3.13	Funding Agreement – Termination of the funding agreement	No		Date of last payment of funding + 6 years	Secure disposal
1.3.14	Funding Records – Capital Grant	No		Date of last payment of funding + 6 years	Secure disposal
1.3.15	Funding Records – Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	Secure disposal
1.3.16	Funding Records – General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	Secure disposal
1.3.17	Per pupil funding records	No		Date of last payment of funding + 6 years	Secure disposal
1.3.18	Exclusions agreement	No		Date of last payment of funding + 6 years	Secure disposal
1.3.19	Funding records	No		Date of last payment of funding + 6 years	Secure disposal
1.3.20	Gift Aid and Tax Relief	No		Date of last payment of funding + 6 years	Secure disposal
1.3.21	Records relating to loans	No		Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	Secure disposal
	Payroll and pensions				
1.3.22	Maternity pay records	Yes	*Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)*	Current year + 3 years	Secure disposal
1.3.23	Records held under Retirement Benefits Schemes (information Powers) Regulations 1995	Yes	*Regulation 15 Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI1995/3103)*	From the end of the year in which the accounts were signed for a minimum of 6 years	Secure disposal

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
1.3.24	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	Secure disposal
1.3.25	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	Secure disposal
1.3.26	Payroll records	Yes		Date payroll run + 6 years	Secure disposal
	Risk Management and Insurance				
1.3.27	Insurance policies	No		Date the policy expires + 6 years	Secure disposal
1.3.28	Records relating to the settlement of insurance claims	No		Date claim settled + 6 years	Secure disposal
1.3.29	Employer's Liability Insurance Certificate	No		Closure of the Academy + 40 years	Secure disposal
	Endowment Funds and Investments				
1.3.30	Investment policies	No		Life of the investment + 6 years	Secure disposal
1.3.31	Management of Endowment Funds	No		Life of the fund + 6 years	Secure disposal
	Accounts and Statements				
1.3.32	Annual accounts	No		Current year + 6 years	Standard disposal
1.3.33	Loans and grants managed by the Academy	No		Date of last payment on the loan + 12 years then REVIEW	Secure disposal
1.3.34	Student Grant applications	Yes		Current year + 3 years	Secure disposal
1.3.35	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No		Life of the budget + 3 years	Secure disposal

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
1.3.36	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	Secure disposal
1.3.37	Records relating to the collection and banking of monies	No		Current financial year + 6 years	Secure disposal
1.3.38	Records relating to the identification and collection of debt	No		Current financial year + 6 years	Secure disposal
	Contract Management				
1.3.39	All records relating to the management of contracts under seal	No	*Limitation Act 1980*	Last payment on the contract + 12 years	Secure disposal
1.3.40	All records relating to the management of contracts under signature	No	*Limitation Act 1980*	Last payment on the contract + 6 years	Secure disposal
1.3.41	All records relating to the monitoring of contracts	No		Current year + 2 years	Secure disposal
	Asset Management				
1.3.42	Inventories of furniture and equipment	No		Current year + 6 years	Secure disposal
1.3.43	Burglary, theft and vandalism report forms	No		Current year + 6 years	Secure disposal
1.3.44	Records relating to the leasing of shared facilities, such as sports centres	No		Current year + 6 years	Secure disposal
1.3.45	Land and building valuations	No		Date valuation superseded + 6 years	Secure disposal
1.3.46	Disposal of assets	No		Date asset disposed of + 6 years	Secure disposal
1.3.47	Community School leases for land	No		Date lease expires + 6 years	Secure disposal
1.3.48	Commercial transfer arrangements	No		Date of transfer + lifetime of academy within Trust	Secure disposal

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
1.3.49	Transfers of land to the Academy Trust	No		Life of land ownership then transfer to new owner	Secure disposal
1.3.50	Transfers of freehold land	No		Life of land ownership then transfer to new owner	Secure disposal
	School Fund				
1.3.51	School Fund – Cheque books	No		Current year + 6 years	Secure disposal
1.3.52	School fund – Paying in books	No		Current year + 6 years	Secure disposal
1.3.53	School Fund – Ledger	No		Current year + 6 years	Secure disposal
1.3.54	School Fund – Invoices	No		Current year + 6 years	Secure disposal
1.3.55	School Fund – Receipts	No		Current year + 6 years	Secure disposal
1.3.56	School Fund – Bank statements	No		Current year + 6 years	Secure disposal
1.3.57	School Fund – Journey books	No		Current year + 6 years	Secure disposal
	School Meals				
1.3.58	Free school meals registers	Yes		Current year + 6 years	Secure disposal
1.3.59	Schools meals registers	Yes		Current year + 3 years	Secure disposal
1.3.60	School meals summary sheets	No		Current year + 3 years	Secure disposal

1.4 Policies, Frameworks and Overarching Requirements

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
1.4.1	Data Protection Policy, including data protection notification	No		Date policy superseded + 6 years	Secure disposal
1.4.2	Freedom of Information Policy	No		Date policy superseded + 6 years	Secure disposal
1.4.3	Information Security Breach Policy	No		Date policy superseded + 6 years	Secure disposal
1.4.4	Special Educational Needs Policy	No		Date policy superseded + 6 years	Secure disposal
1.4.5	Complaints Policy	No		Date policy superseded + 6 years	Secure disposal
1.4.6	Risk and Control Framework	No		Life of framework + 6 years	Secure disposal
1.4.7	Rules and Bylaws	No		Date rules or bylaws superseded + 6 years	Secure disposal
1.4.8	Home School Agreements	No		Date agreement revised + 6 years	Secure disposal
1.4.9	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	Secure disposal

2. Human Resources

2.1 Recruitment

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
2.1.1	All records leading up to the appointment of a new Headteacher	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 + 6 months	Secure disposal
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All 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	*DBS Update Service Employer Guide*	Information relating to the DBS certificate should be added to the Staff Personnel File	Secure disposal
2.1.5	Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	Yes		Date of appointment + 6 years	Secure disposal
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	*An employer's guide to right to work checks (Home Office)*	Where possible, these documents should be added to the Staff Personnel file, but if they are kept separately, then the Home Office requires that the documents are kept for termination of the employment plus not less than 2 years	Secure disposal
2.1.7	Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff	Secure disposal

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
				Personnel file, but if they are kept separately, then the Home Office requires that the documents are kept for termination of the employment plus not less than 2 years	
2.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisations + 6 years	Secure disposal

2.2 Operational Staff Management

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
2.2.1	Staff Personnel File, including employment contract and staff training records	Yes	*Limitation Act 1980 (Section 2)*	Termination of employment + 6 years	Secure disposal
2.2.2	Timesheets	Yes		Current year + 6 years	Secure disposal
2.2.3	Annual appraisal/assessment records	Yes		Current year + 5 years	Secure disposal
2.2.4	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	Secure disposal
2.2.5	Training needs analysis	No		Current year + 1 year	Secure disposal

2.3 Management of Disciplinary and Grievance Processes

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded Applies to any adult working with the Trust's children	Yes	*Keeping children safe in education* *Working together to safeguard children. A guide to inter-agency working to safeguarding and promote the welfare of children*	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer Then REVIEW	Secure disposal These records must be shredded
2.3.2	Low-level concern about an adult working with the Trust's children	Yes	*Keeping children safe in education*	At least until the individual leaves the school's employment, then REVIEW	Secure disposal These records must be shredded
2.3.3	Disciplinary Proceedings	Yes			
	Oral warning			Date of warning + 6 months*	Secure disposal**
	Written warning – level 1			Date of warning + 6 months*	Secure disposal**
	Written warning – level 2			Date of warning + 12 months*	Secure disposal**
	Final warning			Date of warning + 18 months*	Secure disposal**
	Case not found			If the incident is child protection related, then see 2.3.1. Otherwise, dispose of at the conclusion of the case.	Secure disposal**

* Where the warning relates to child protection issues, see section 2.3.1
** If warnings are placed on personnel files, then they must be weeded from the file.

2.4 Health and Safety

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
2.4.1	Health and Safety policy statements	No		Life of the policy + 3 years	Secure disposal
2.4.2	Health and Safety risk assessments	No		Life of the risk assessment + 3 years	Secure disposal
2.4.3	Accident and incident reporting	Yes	*Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980*	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below: Adults – Date of incident + 3 years Children – Date of birth of the child + 25 years	Secure disposal
2.4.4	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No		Last action + 40 years	Secure disposal
2.4.5	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		Last action + 50 years	Secure disposal
2.4.6	Fire precautions log books	No		Current year + 6 years	Secure disposal
2.4.7	Fire risk assessments	No	*Fire Service Order 2005*	Life of the risk assessment + 5 years	Secure disposal

3. Management of the Academy

3.1 Admissions

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
3.1.1	All records relating to the creation and implementation of the School Admissions' Policy	No	*School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014*	Life of the policy + 3 years then REVIEW	Secure disposal
3.1.2	Admissions – if the admission is successful	Yes	*School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014*	Date of admission + 1 year	Secure disposal
3.1.3	Admissions – if the appeal is unsuccessful	Yes	*School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014*	Resolution of the case + 1 year	Secure disposal
3.1.4	Register of admissions	Yes	*School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities*	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	REVIEW

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
3.1.5	Admissions – Secondary Schools - Casual	Yes		Current year + 1 year	Secure disposal
3.1.6	Proofs of address supplied by parents as part of the admissions process	Yes	*School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels December 2014*	Current year + 1 year	Secure disposal
3.1.7	Supplementary information form, including additional information such as religion and medical conditions	Yes			
	For successful admissions			This information should be added to the pupil file	Secure disposal
	For unsuccessful admissions			Until appeals process is complete	Secure disposal

3.2 Headteacher and Senior Leadership Team

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
3.2.1	Log books of activity in the school maintained by the Headteacher	There may be if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then REVIEW	Secure disposal
3.2.2	Minutes of Senior Leadership Team meetings and meetings of other internal administrative bodies	There may be if the minutes refer to individual pupils		Date of the meeting + 3 years then REVIEW	Secure disposal

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
		or members of staff			
3.2.3	Reports created by the Headteacher or the Leadership Team	There may be if the reports refer to individual pupils or members of staff		Date of the report + 3 years then REVIEW	Secure disposal
3.2.4	Records created by Headteacher, Deputy Headteacher, Assistant Headteachers, Heads of Year and other members of staff with administrative responsibilities	There may be if the records refer to individual pupils or members of staff		Current academic year + 6 years then REVIEW	Secure disposal
3.2.5	Correspondence created by Headteacher, Deputy Headteacher, Assistant Headteachers, Heads of Year and other members of staff with administrative responsibilities	There may be if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then REVIEW	Secure disposal
3.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	Secure disposal

3.3 Operational Administration

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
3.3.1	Management of complaints	Yes		Date of complaint resolved + 3 years	Secure disposal
3.3.2	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	Secure disposal

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
3.3.3	Records relating to the management of software licences	No		Date of licence expires + 6 years	Secure disposal
3.3.4	General file series	No		Current year + 5 years then REVIEW	Secure disposal
3.3.5	Records relating to the creation and publication of the academy brochure or prospectus	No		Current year + 3 years	Secure disposal
3.3.6	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	Standard disposal
3.3.7	Newsletters and other items with a short operational use	No		Current year + 1 year	Standard disposal
3.3.8	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	Secure disposal
3.3.9	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	Secure disposal

4. Property Management

4.1 Property Management

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
4.1.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	
4.1.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	Secure disposal
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	Secure disposal
4.1.5	Disaster continuity and disaster recovery plans	No		Date the plan superseded + 3 years	Secure disposal

4.2 Maintenance

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	Secure disposal
4.2.2	All records relating to the maintenance of the school carried out by school employees, including maintenance log books	No		Current year + 6 years	Secure disposal

4.3 Fleet Management

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g. contracts/leases, quotes, approvals	No	*Limitation Act 1980 (Section 2)*	Disposal of the vehicle + 6 years	Secure disposal
4.3.2	The process of managing allocation and maintenance of vehicles, e.g. lists of who was driving the vehicles and when, maintenance	No	*Limitation Act 1980 (Section 2)*	Disposal of the vehicle + 6 years	Secure disposal
4.3.3	Service logs and vehicle logs	No	*Limitation Act 1980 (Section 2)*	Life of the vehicle, then either to be retained for 6 years by the school or to be returned to the lease company	Secure disposal
4.3.4	GPS tracking data relating to the vehicles	No	*Limitation Act 1980 (Section 2)*	Date of the journey + 6 years	Secure disposal

5 Pupil Management

5.1 Pupil's Educational Record

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	*The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437*		
	Nursery		Early years foundation stage statutory framework	Records relating to individual children must be retained for a reasonable period of time after they have left the provision.	Secure disposal The file should follow the pupil when they leave the nursery setting. Electronic data held on the MIS will be retained until the child reaches the end of KS1.
	Primary			Retain whilst the child remains at the primary school	Secure disposal The file should follow the pupil when they leave the primary setting. Electronic data held on the MIS will be retained until the child reaches the end of KS3. If the pupil dies whilst at the primary school, is electively home educated (EHE) or leaves the country the Trust will archive their files for the statutory retention period.
	Secondary		*Limitation Act 1980 (Section 2)*	Date of birth of the pupil + 25 years	Secure disposal If the pupil dies whilst at the secondary school, is electively home educated (EHE) or leaves the country the Trust will archive their files for the statutory retention period.

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
5.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil + 25 years	Secure disposal
5.1.3	Management of examination registrations	Yes		The examination board will mandate how long these records need to be retained	Secure disposal
5.1.4	Examination results – pupil copies	Yes			Secure disposal
	Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	Internal			This information should be added to the pupil file	Secure disposal
5.1.5	Child protection information held in separate child protection file	Yes	*Keeping children safe in education* *Working together to safeguard children. A guide to inter-agency working to safeguarding and promote the welfare of children*	Date of birth of the child + 25 years, or for 10 years after the case was received, whichever is longer Then REVIEW If the file relates to child sexual abuse, retain until the child's 75th birthday	Secure disposal
5.1.6	Records relating to a child that is looked after by the Local Authority	Yes	*DfE Retention Schedule*	Date of birth of the child + 75 years	Secure disposal

5.2 Attendance

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
5.2.1	Attendance registers	Yes	*School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities*	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
5.2.2	Correspondence relating to authorised absence		*Education act 1996 Section 7*	Current academic year + 2 years	Secure disposal

5.3 Special Educational Needs

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	*Limitation Act 1980*	Date of birth of the pupil + 25 years	REVIEW This is the minimum retention period that any pupil file should be kept.
5.3.2	EHCP maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	*Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1*	Date of birth of the pupil + 25 years	Secure disposal unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	*Special Educational Needs and Disability Act 2001 Section 2*	Date of birth of the pupil + 25 years	Secure disposal unless the document is subject to a legal hold
5.3.4	Accessibility strategy	Yes	*Special Educational Needs and Disability Act 2001 Section 14*	Date of birth of the pupil + 25 years	Secure disposal unless the document is subject to a legal hold

6 Curriculum Management

6.1 Statistics and Management Information

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
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			Secure disposal
	Results			The SATs results should be recorded on the pupil's educational file. The school may wish to keep a composite record of all the whole year SATs results. This could be kept for the current year + 6 years to allow suitable comparison	Secure disposal
	Examination papers			The examination papers should be kept until any appeals/validation process is complete	Secure disposal
6.1.3	Publish 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

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
6.2.1	Schemes of work	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
6.2.2	Timetable	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
6.2.3	Class record books	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
6.2.4	Mark books	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
6.2.5	Record of homework set	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
6.2.6	Pupils' work	No		Where possible, should be returned to the pupil at the end of the academic year. If not, then 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

7 Extracurricular Activities

7.1 Educational Visits outside the Classroom

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
7.1.1	Records created by academies in order to obtain approval to run an educational visit outside the classroom – Primary settings	No	*Outdoor Education Advisors' Panel National Guidance website, specifically Section 3 – "Legal Framework and Employer Systems" and Section 2 – "Good Practice"*	Date of visit + 14 years	Secure disposal
7.1.2	Records created by academies in order to obtain approval to run an educational visit outside the classroom – Secondary settings	No	*Outdoor Education Advisors' Panel National Guidance website, specifically Section 3 – "Legal Framework and Employer Systems" and Section 2 – "Good Practice"*	Date of visit + 10 years	Secure disposal
7.1.3	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Secure disposal
7.1.3	Parental consent forms for school trips where there has been a major incident	Yes	*Limitation Act 1980 (Section 2)*	Date of birth of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	Secure disposal
7.1.5	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	Secure disposal
7.1.6	Images, photographs and video footage relating to visit	Yes		Date of visit + 7 years	Secure disposal

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
				Where photographs, images or videos are used in publications the content will exist for the life of the publication	

7.2 Walking Bus

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
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

8 Central Government and Local Authority (LA)

8.1 Local Authority

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
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

8.2 Central Government

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
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 Early Years Provision

9.1 Records

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
9.1.1	The name, home address and date of birth of each child who is looked after on the premises	Yes		Closure of setting + 50 years (these could be required to show whether or not an individual child attended the setting in a child protection investigation)	Secure disposal
9.1.2	The name, home address and telephone number of a parent of each child who is looked after on the premises	Yes		If this information is kept in the same book or on the same form as in 9.1.1 then the same retention period should be used as 9.1.1. If the information is stored separately, then destroy once the child has left the setting (unless the information is collected for anything other than emergency contact)	Secure disposal
9.1.3	The name, address and telephone number of any person who will be looking after children on the premises	Yes		Termination of employment + 6 years	Secure disposal
9.1.4	A daily record of the names of children looked after on the premises, their hours of attendance and the names of the persons who looked after them	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003	The regulations say that these records should be kept for 2 years. If these records are likely to be needed in a child protection setting (see 9.1.1) then the records should be retained for	Secure disposal

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
				closure of the setting + 50 years	
9.1.5	A record of accidents occurring on the premises and the incident books relating to other incidents	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003	Date of birth of the child involved in the accident or the incident + 25 years. If an adult is injured then the accident book must be kept for 7 years from the date of the incident	Secure disposal
9.1.6	A record of any medicinal product administered to any child on the premises, including the date and circumstances of its administration, by whom it was administered, including medicinal products which the child is permitted to administer to himself, together with a record of parent's consent	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003	Date of birth of the child being given/taking the medicine + 25 years	Secure disposal
9.1.7	Record of transfer	Yes		One copy is to be given to the parents, one copy transferred to the Primary School where the child is going	Secure disposal
9.1.8	Portfolio of work, observations and so on	Yes		To be sent home with the child	Secure disposal
9.1.9	Birth certificates	Yes		Once the setting has had sight of the birth certificate and recorded the necessary information the original can be returned to the parents. There is no requirement to keep a copy of the birth certificate	Secure disposal

9.2 Child Protection

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
9.2.1	The name and address and telephone number of the registered person and every other person living or employed on the premises	Yes		Termination of employment + 6 years	Secure Disposal
9.2.2	A statement of the procedure to be followed in the event of a fire or accident	No		Procedure superseded + 7 years	Secure Disposal
9.2.3	A statement of the procedure to be followed in the event of a child being lost or not collected	No		Procedure superseded + 7 years	Secure disposal
9.2.4	A statement of the procedure to be followed where a parent has a complaint about the service being provided by the registered person	No		Until superseded	Secure disposal
9.2.5	A statement of the arrangements in place for the protection of children, including arrangements to safeguard the children from abuse or neglect and procedures to be followed in the event of allegations of abuse or neglect	No		Closure of settings + 50 years (these could be required to show whether or not an individual child attended the setting in a child protection investigation)	Secure disposal

9.3 Admission Information

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
3.3.1	Emergency contact details for appropriate adult to collect the child if necessary	Yes		Destroy once the child has left the setting (unless the information is collected for anything other than emergency contract)	Secure Disposal
3.3.2	Contract, signed by the parent, stating all the relevant details regarding the child and their care, including the name of the emergency contact and confirmation of their agreement to collect the child during the night.	Yes		Date of birth of the child who is the subject of the contract + 25 years	Secure Disposal

In this context secure disposal should be taken to mean disposal using confidential waste bins, or if the setting has the facility, shredding using cross cut shredder.

10 Miscellaneous

	Basic file description	Data protection issues	Statutory provisions	Retention period (operational)	Action at the end of the administrative life of the record
10.1	Emails	Yes		Date sent + 2 years or 10 days after the member of staff leaves employment with the Trust and their User Account is deleted – whichever is sooner.	Secure disposal
10.2	User account	Yes		10 days after the member of staff leaves employment with the Trust.	Secure disposal
10.3	Videos, images and photographs containing staff and/or students	Yes	Data Protection Act 2018	Date captured + 7 years	Secure disposal
10.4	Closed circuit television (CCTV)	Yes		Date captured + 7 days	Secure disposal
10.5	AI prompts, responses and chat conversations	Yes		Date sent + 30 days or 10 days after the member of staff leaves employment with the Trust and their User Account is deleted – whichever is sooner.	Secure disposal
10.6	Instant Messages	Yes		Date sent + 30 days or 10 days after the member of staff leaves employment with the Trust and their User Account is deleted – whichever is sooner.	Secure disposal