Records Management Policy and Retention Schedule

Last review date:	June 2026
Next Review date:	June 2027
Review Cycle:	Yearly
Statutory Policy:	Yes
Policy Owner	Data Protection Officer Head of IT Services

Date	Version	Reason for change	Source
September 2024	1.0	Revision of retention schedule and supporting appendices Update of links to legislation	DPO
June 2025	1.1	Review of retention periods in line with DfE data protection toolkit	DPO
June 2026	1.2	Update 2.3 to remove references to IRMS Update Appendix B – add new academic year tasks	DPO

Records Management Policy

Matrix Academy Trust recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution.

Records provide evidence for protecting the legal rights and interests of the Trust and its academies and provide evidence for demonstrating performance and accountability.

This document provides the policy framework through which this effective management can be achieved and audited. It covers:

- Scope
- Responsibilities
- Relationships with existing policies
- Retention

1. Scope of the policy

1.1 This policy applies to all records created, received or maintained by permanent and temporary staff of the Trust in the course of carrying out its functions. Also, by agents, contractors, consultants or third parties acting on behalf of the Trust or its academies.

1.2 Records are defined as all those documents which facilitate the business carried out by the Trust and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronic format e.g. paper documents, scanned documents, e-mails which document business activities and decisions, audio and video recordings, text messages, notes of telephone and video conferencing meetings, and any other information held in electronic documents.

2. Responsibilities

2.1 The Trust Board has a statutory responsibility to ensure academies maintain their records and record keeping systems in accordance with the regulatory environment. The individuals with overall responsibility for this policy are the Data Protection Officer and Head of IT Services.

2.2 The person responsible for day-to-day operational management in the academy will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

2.3 The academy will manage and document its records disposal process in line with guidance issued by the Information Commissioner's Office (ICO) and the DfE's Toolkit for schools and academies, which is adopted as the Trust's Retention Schedule. This will also help ensure that the Trust can meet Freedom of Information Requests and respond to requests to access personal data under data protection legislation subject access requests "SARS".

2.4 Individual staff and employees must ensure that records for which they are responsible, that they:

2.4.1 Manage academy records consistently in accordance with the Trust's policies and procedures;
2.4.2 Properly document their actions and decisions;
2.4.3 Hold personal information securely;
2.4.4 Only share personal information appropriately and do not disclose it to any unauthorised third party
2.4.5 Dispose of records securely in accordance with the Trust's Retention Schedule.

3. Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information Policy
- Data Protection Policy
- With other legislation, statutory guidance or regulations that the Trust is bound to comply with.

Matrix Academy Trust

Data Protection Documentation

Retention Schedule

Version: 1.2
Last Updated: June 2026

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Version control

1.0	Updated version - IRMS Academies Toolkit and modify to account for Trust processing	DPO
1.2	Updated version – DfE Toolkit for Schools and ICO guidance on retention	DPO

1 Governance Funding and Financial Management of the Trust

1.1 GOVERNANCE OF THE TRUST					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
1.1.1	Governance Statement	No		Life of governance statement + 6 years	SECURE DISPOSAL
1.1.2	Articles of Association	No		Life of the Academy	
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 of the Academy	
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 1986	Date of disqualification + 15 years	SECURE DISPOSAL
1.1.10	Directors – 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 Report and Accounts	No	*Companies Act 2006 section 355*	Date of report + 10 years	SECURE DISPOSAL
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 [also known as School Development Plans]	No		Life of plan + 6 years	SECURE DISPOSAL
1.1.19	Accessibility Plan	Where plans refer to specific pupils	Limitation Act 1980, s2	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**	**Action at Period End**
	Board of Directors				
1.2.1	Board Meeting Minutes	If minutes contain personal data	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	If minutes contain personal data		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
1.2.4	Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980, s2	Date procedures superseded + 6 years	SECURE DISPOSAL
	Committees [1]				
1.2.5	Minutes relating to any committees set up by the Board of Directors	If minutes contain personal data		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	If minutes contain personal data	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting[2]	OFFER TO ARCHIVES

[1] The board can establish any committee and determine the constitution, membership and proceedings that will apply.

[2] The signed minutes must be kept securely together with the notice and agenda for the meeting and supporting documentation provided for consideration at the meeting. Documentation is generally filed in a dedicated minute book, which is usually in the form of a loose-leaf binder to which additional pages can be easily added.

1.2.7	Records relating to the management of the Annual General Meeting[3]	If minutes contain personal data	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting[4]	OFFER TO ARCHIVES
	Local Governors				
1.2.8	Agendas for Governing Body meetings	May be data protection issues, 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[5]
1.2.9	Minutes of, and papers considered at, meetings of the Governing Body and its committees	May be data protection issues, if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)			Life of Academy	
	Inspection Copies[6]			Date of meeting + 3 years	SECURE DISPOSAL

[3] Not all Academies are required to hold an Annual General Meeting for the Members – the requirement will be stated in the Constitution.
[4] The signed minutes must be kept securely together with the notice and agenda for the meeting and any supporting documentation provided for consideration at the meeting.
[5] In this context, SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, contracted shredding services, or if the school has the facility, shredding using a cross-cut shredder.
[6] These are the copies which the clerk to the Governor may wish to retain, so that requestors can view all the relevant information, without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

1.2.10	Reports presented to the Governing Body	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. However, if the minutes refer directly to individual reports, then the reports should be kept for the life of the Academy	SECURE DISPOSAL or retain with the signed set of minutes
1.2.11	Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
1.2.12	Trusts and Endowments managed by the Governing Body	No		PERMANENT	
1.2.13	Records relating to complaints dealt with by the Governing Body	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
1.2.14	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
1.2.15	Action plans created and administered by Local Boards	No		Life of action plan + 3 YEARS	SECURE DISPOSAL
1.2.16	Policy documents created and administered by Local Boards	No		Life of policy + 3 YEARS	SECURE DISPOSAL
	Statutory Registers[7]				

[7] Academies are required by law to keep specific records, collectively known as statutory registers or the statutory books. The registers record information relating to the Academy's

1.2.17	Register of Directors		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.18	Register of Directors' interests [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.19	Register of Directors' residential addresses		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.20	Register of gifts, hospitality and entertainments		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.21	Register of members		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.22	Register of secretaries		Companies Act 2006	Life of the Academy + 6 years	SECURE DISPOSAL
1.2.23	Register of Trustees interests			Life of the Academy + 6 years	SECURE DISPOSAL
1.2.24	Declaration of Interests Statements [Governors] [this is not a statutory register]			Life of the Academy + 6 years	SECURE DISPOSAL

operations and structure, such as the current directors. Records should be kept up-to-date to reflect any changes that take place.

1.3 FUNDING AND FINANCE					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
	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 of 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	SECURE DISPOSAL
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 agreements8	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.13	Funding Agreement – Termination of the funding agreement[9]			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[10]	No		Date of last payment of funding + 6 years	SECURE DISPOSAL
1.3.19	Funding records[11]	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				

8 Where there is multi-Academy governance.

9 Either party may give not less than 7 financial years' written notice to terminate the Agreement, such notice to expire on 31 August. Or, where the Academy has significant financial issues or is insolvent, the Agreement can be terminated by the Secretary of State to take effect on the date of the notice.

10 The Academy can enter into an arrangement with a Local Authority (LA), so that payment will flow between the Academy and the LA, in the same way as it would do were the Academy a maintained school.

[11] Funding agreement which says that the Academy can receive donations and can only charge where the law allows maintained schools to charge [see Charging and Remission Policy].

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 (SI 1995/3103)	From the end of the year in which the accounts were signed for a minimum of 6 years	SECURE DISPOSAL
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 school + 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	

	Accounts and Statements				
1.3.32	Annual accounts	No		Current year + 6 years	STANDARD DISPOSAL
1.3.33	Loans and grants managed by the school	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
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, s2	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, s2	Last payment on the contract + 6 years	SECURE DISPOSAL
1.3.41	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 + 6 years	SECURE DISPOSAL
1.3.49	Transfer 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[12]				
1.3.58	Free school meals registers	Yes		Current year + 6 years	SECURE DISPOSAL
1.3.59	School meals registers	Yes		Current year + 3 years	SECURE DISPOSAL
1.3.60	School meals summary sheets	No		Current year + 3 years	SECURE DISPOSAL

[12] Unless it would be unreasonable to do so, school lunches should be provided when they are requested by, or on behalf of, any pupil. A school lunch must be provided free of charge to any pupil entitled to free school lunches. From September 2014, free school lunches must be provided to all KS1 pupils.

1.4 POLICIES FRAMEWORKS AND OVERARCHING REQUIREMENTS					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
1.4.1	Data Protection Policy	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	CCTV 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
1.4.9	Home School Agreements[13]	No		Date agreement revised + 6 years	SECURE DISPOSAL
1.4.10	Equality Information and Objectives (public sector equality duty) Statement for publication	No		Date of statement + 6 years	SECURE DISPOSAL

[13] This should be drawn up in consultation with parents and should apply to all pupils.

2 Human Resources

2.1 RECRUITMENT[14]					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
2.1.1	All records leading up to the appointment of a new Head Teacher	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 Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks[15]	No	DBS Update Service Employer Guide Keeping children safe in education	The organisation should take a copy of the DBS certificate when it is shown to them by the individual and should be added to the Staff Personal File	SECURE DISPOSAL
2.1.5	Proofs 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	SECURE DISPOSAL

[14] Academies do not necessarily have to employ people with qualified teacher status; only the SEN and designated LAC teacher must be qualified.
[15] Academies are bound by the legislation that applies to independent schools NOT maintained schools.

				documentation, then this should be added to the Staff Personal File	
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom[16]	Yes	An employer's guide to right to work checks	Where possible, these documents should be added to the Staff Personal File, 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	SECURE DISPOSAL
2.1.7	Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff Personal File, 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	SECURE DISPOSAL
2.1.8	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL

2.2 OPERATIONAL STAFF MANAGEMENT

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at Period End
2.2.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980, s2	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

[16] Employers are required to take a "clear copy" of the documents which they are shown as part of this process.

2.2.5	Training needs analysis	No		Current year + 1 year	SECURE DISPOSAL

2.3 MANAGEMENT OF DISCIPLINARY AND GREIVANCE PROCESS					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded	Yes	Keeping children safe in education	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	Disciplinary Proceedings	Yes			
	Oral warning			Date of warning[17] + 6 months	SECURE DISPOSAL[18]
	Written warning – level 1			Date of warning + 6 months	SECURE DISPOSAL[19]
	Written warning – level 2			Date of warning + 12 months	SECURE DISPOSAL[20]
	Final warning			Date of warning + 18 months	SECURE DISPOSAL[21]
	Case not found			If the incident is child protection related, then see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL

[17] 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.
[18] If warnings are placed on personal files, then they must be weeded from the file.
[19] If warnings are placed on personal files, then they must be weeded from the file.
[20] If warnings are placed on personal files, then they must be weeded from the file.
[21] If warnings are placed on personal files, then they must be weeded from the file.

2.4 HEALTH AND SAFETY					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
2.4.1	Health and Safety policy statements	No		Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety risk assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL
2.4.4	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25 Social Security Administration Act 1992 s8 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 + 6 years	SECURE DISPOSAL
	Children			Date of birth of the child + 25 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002 SI 2002 No 2677 Regulation 11. Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations	Current year + 10 years then REVIEW	SECURE DISPOSAL

			had not been made. Regulation 18 (2).		
2.4.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
2.4.7	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
2.4.8	Fire precautions log books	No		Current year + 6 years	SECURE DISPOSAL
2.4.9	Fire risk assessments	No	Fire Service Order 2005	Life of the risk assessment + 6 years	SECURE DISPOSAL
2.4.10	Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL

3 Management of the Academy

3.1 ADMISSIONS					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
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	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,	Date of admission + 1 year	SECURE DISPOSAL

			governing bodies, local authorities, schools' adjudicators and admission appeals panels		
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	Resolution of 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[22]	REVIEW Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates they attended the school
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	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

[22] School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities p6.

	For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL

3.2 HEADTEACHER AND SENIOR MANAGEMENT					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
3.2.1	Formal annual records or logs of activities undertaken and maintained solely by the Head Teacher	Where records refer to individual pupils or members of staff		Date of last entry for that academic year + a minimum of 6 years then REVIEW	SECURE DISPOSAL. Where a "Headteacher Journal" is maintained, these could be of permanent historical value and should be offered to the County Archives Service, if appropriate
3.2.2	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then REVIEW	SECURE DISPOSAL
3.2.3	Formal reports created by the Head Teacher or the Management Team for internal use or intended for external publication. (excluding Headteacher reports for Governance Boards or committees)	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL
3.2.4	Formal records created by Head Teachers, Deputy Head Teachers, heads of year and other members of SLT. Where records are no stored as part of a central pupil or employee file.	There may be data protection issues 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 Head Teachers, Deputy Head Teachers, heads of	There may be data protection issues if the		Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL

	year and other members of staff intended for internal/external publication (intended for whole school, all parents, all staff)	correspondence refers to individual pupils or members of staff			
3.2.6	Performance Management and Appraisal Plans for staff	Yes		Life of the plan + 3 years	SECURE DISPOSAL

3.3 OPERATIONAL ADMINISTRATION					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
3.3.1	Management of complaints	Yes		Date complaint resolved + 3 years	SECURE DISPOSAL
3.3.2	CCTV footage	Yes	Regulation of Investigatory Powers Act 2000	Date of recording + 1 MONTH, then REVIEW for further retention Footage exported as evidence for another process should be retained for a period of time relevant to the new purpose	SECURE DISPOSAL
3.3.3	Phone call recordings	Yes	Regulation of Investigatory Powers Act 2000	Date of recording + 1 MONTH, then REVIEW for further retention	SECURE DISPOSAL
3.3.4	Records relating to the management of contracts with external providers	No		Date of last payment on contract + 6 years	SECURE DISPOSAL
3.3.5	Records relating to the management of software licences	No		Date licence expires + 6 years	SECURE DISPOSAL
3.3.6	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
3.3.7	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
3.3.8	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
3.3.9	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
3.3.10	Visitors' books and signing in sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL

3.3.11	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**	**Action at Period End**
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	Business 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**	**Action at Period End**
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	No		Current year + 6 years	SECURE DISPOSAL

	employees, including maintenance log books				

4.3 FLEET MANAGEMENT					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	N	Limitation Act 1980, s2	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	N	Limitation Act 1980, s2	Disposal of the vehicle + 6 years	SECURE DISPOSAL
4.3.3	Service logs and vehicle logs	N	Limitation Act 1980, s2	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	SECURE DISPOSAL
4.3.4	GPS tracking data relating to the vehicles	N	Limitation Act 1980, s2	Date of journey + 6 years	SECURE DISPOSAL

5 Learner Management

This section includes all records which are created during the time a learner spends at the academy. For information about accident reporting, see under Health and Safety above.

5.1 LEARNERS EDUCATIONAL RECORD					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005		
	Primary			Retain whilst the child remains at the primary school	The file should follow the pupil when they leave the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the LA to be retained for the statutory retention period. Primary schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the LA, as it is more likely that the pupil will request the record from the LA
	Secondary		Limitation Act 1980, s2	Date of birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	SECURE DISPOSAL

5.1.3	Management of examination registrations	Yes		The examination board will usually mandate how long these records need to be retained	
5.1.4	Examination results – pupil copies	Yes			
	Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board after Current year + 1 YEAR
	Internal			This information should be added to the pupil file	
5.1.5	Child protection information held on pupil file	Yes	Keeping children safe in education	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file	SECURE DISPOSAL – these records MUST be shredded
5.1.6	Child protection information held in separate files	Yes	Keeping children safe in education	Date of birth of the 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 LA Social Services record	SECURE DISPOSAL – these records MUST be shredded

5.2 ATTENDANCE					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
5.2.1	Attendance registers	Yes	School attendance: guidance	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, s7	Current academic year + 2 years	SECURE DISPOSAL

5.3 SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (SEND)					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980, s2	Date of birth of the pupil + 25 years	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time in order to defend themselves in a "failure to provide a 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 – this should be documented
5.3.2	Statement 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, s1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Education Act 1996	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL, unless the document is subject to a legal hold

			Special Educational Needs and Disability Act 2001, s1		
5.3.4	Accessibility strategy	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001, s1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	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**	**Action at Period End**
6.1.1	Statutory DfE returns, including signed copies of School Census reports, School Workforce Census (if produced at academy level), Key stage result submissions and other statutory test submissions	No		Current year + 6 years	SECURE DISPOSAL
6.1.2	Examination results (schools copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	SATs records –	Yes			
	Results			The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years The school may wish to keep a composite record of all the whole year SATs results.	SECURE DISPOSAL

				These could be kept for current year + 6 years to allow suitable comparison	
	Examination papers			The 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	Whole school self-evaluation forms (SEF)	Yes		Current year + 6 years	SECURE DISPOSAL

6.2 IMPLEMENTATION OF THE CURRICULUM					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
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, work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	SECURE DISPOSAL

7 Extracurricular Activities

7.1 EDUCATIONAL VISITS OUTSIDE THE CLASSROOM					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
7.1.1	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Primary schools	No	Outdoor Education Advisers' Panel National Guidance website, especially s3: Legal Framework and Employer Systems and s4: Good Practice.	Date of visit + 14 years	SECURE DISPOSAL
7.1.2	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Secondary schools	No	Outdoor Education Advisers' Panel National Guidance website, especially s3: Legal Framework and Employer Systems and s4: 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[23]	Yes		Conclusion of the trip	Although the consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low

[23] One-off or blanket consent: The Department for Education (DfE) has prepared a one-off consent form to be signed by the parent on enrolment of their child in a school. This form is intended to cover all types of visits and activities where parental consent is required. The form is available on the DfE website for establishments to adopt and adapt,

					and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time
7.1.4	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980, s2	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	
7.1.5	Records relating to residential trips	Yes		Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL

7.2 BREAKFAST / AFTER SCHOOL PROVISION AND WALKING BUS

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at Period End
7.2.1	Breakfast Club and Afterschool club 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 [If these records are retained electronically any back up copies should be destroyed at the same time]
7.2.2	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 [If these records are retained electronically any back up copies should be destroyed at the same time]

7.3 FAMILY LIAISON OFFICERS AND HOME SCHOOL LIAISON ASSISTANTS

as appropriate, at www.gov.uk/government/publications/consent-for-school-trips-and-other-off-site-activities. A similar form could be used for other establishments, such as Early Years Foundation Stage (EYFS) providers and youth groups, or at the start of programmes for young people.

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period	Action at Period End
7.3.1	Daily recording of intervention and casework notes, where not recorded in safeguarding systems	Yes		While child is attending school	
7.3.2	Reports for outside agencies – where the report has been included on the case file created by the agency	Yes		While child is attending school	
7.3.3	Referral forms	Yes		While the referral is current	
7.3.4	Contact data sheets	Yes		Current year, then REVIEW If contact inactive, destroy	
7.3.5	Contact database entries	Yes		Current year, then REVIEW If contact inactive, destroy	
7.3.6	Group registers	Yes		Current year + 2 YEARS	

8 Central Government and Local Authorities

8.1 CENTRAL GOVERNMENT					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
8.1.1	OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
8.1.2	Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL
8.1.3	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL

8.2 LOCAL AUTHORITIES					
	Basic File Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at Period End**
8.2.1	Secondary transfer sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
8.2.2	Attendance returns	Yes		Current year + 1 year	SECURE DISPOSAL
8.2.3	School census returns	No		Current year + 5 years	SECURE DISPOSAL

Appendix A: The pupil educational record

The following information should be included in the pupil educational record:

- The record of transfer if the pupil attended an early years setting
- Admission and application forms
- The most recent privacy notice
- Photography consent forms
- Annual written reports to parents
- Record sheets for the National Curriculum and the agreed religious education syllabus
- Any information about a major incident or accident involving the pupil
- Any reports written about the pupil
- Any information about a special educational needs statement or an education, health and care plan, including support offered in relation to it
- Any relevant medical information, which should be stored in a clearly marked envelope
- Any child protection reports or disclosures, which should be stored in a clearly marked envelope
- Any information relating to fixed or permanent exclusions
- Any correspondence with parents or outside agencies relating to major issues
- Details of any complaints made by the parents or the pupil

The following information should not be included in the pupil record:

- Absence notes
- Consent forms for trips/outings – in the event of a major incident, these should be retained with the incident report rather than the pupil record
- Correspondence with parents about minor issues
- Accident forms – in the event of a major incident, a copy should be placed on the pupil file

When transferring the pupil record to another organisation:

- The record should not be weeded unless any files have already reached the end of their retention period
- Avoid sending files by post unless absolutely necessary, in which case they should be sent by registered post
- A list of files should be included for the receiving organisation to sign and return as confirmation of receipt

Appendix B: Records management activities and disposal checklist

This section is to be updated with relevant tasks by the Trust and Data Protection Officer in collaboration with Office Managers to establish common records management activities for academies:

Prior to the Termly School Census, academies will:

- Conduct a pupil/parent data collection exercise
- check and resolve any suspected duplicate records on SIMS;
- apply the retention period to pupil records on SIMS; and
- apply the retention period to staff records on SIMS.

Prior to the Workforce Census, academies will:

- Conduct a staff data collection exercise
- Ensure leaving dates have been marked appropriately in SIMS

Prior to the end of the academic year, academies will:

- Identify and collate any education, SEND or Safeguarding records for leavers in readiness for secure transfer
- Move any paper leavers files (staff and pupils) to archive storage marked with disposal dates
- Remove files from archive storage that are due for disposal and complete disposal log

At the beginning of the academic year, academies will:

- Confirm the destinations of leavers who are of statutory education age and arrange for the secure transfer of SEND and safeguarding records
- Conduct a student data collection exercise

Appendix C: Indexing and Labelling Procedure

Records that are no longer required to be held in live storage should be transferred to a secure archive storage space as soon as possible.
Prior to transfer sets of records should be labelled and indexed to support easy identification and help in the management of retention and disposal.

Individual sets of records should be grouped and bound by type for easy identification and retrieval (i.e. personnel, pupil, finance, first aid). Records will typically be collated and grouped by common dates/years and/or document type with a file name linked to the Trust Retention schedule.

Sets of records should then be labelled to include –

- File reference or other unique identifier e.g. Record title and date range
- Record type / File title
- Description e.g. personnel file names, visit names
- Number of files if necessary (Where this is practical to do so)
- Date range, e.g. Sept-Aug 20XX/XX Academic, April-Mar 20XX/XX Financial
- Date of disposal / destruction (relevant date from date of close of record and applied retention period)

Archive boxes or stores containing multiple records should be –

- Labelled by year of disposal
- Then the file type, description and date range
- Records to be partitioned accordingly

Record Set Label

Name of school	
File reference	
File type	
Description	
No. of files	
Date range	
Date of destruction	

Archive Box Label

Name of School	
Year of destruction	
File type	
Description	
Date range	
File type	
Description	
Date range	
File type	
Description	
Date range	

Appendix D: Disposal Log

Ref Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of destruction	**Confirm** **(i) Safely destroyed** **(ii) In accordance with Data Retention Guidelines** **Tick (ü)**
e.g.	*School Invoices*	*Copies of purchase invoices dated 2011/12*	*Folders marked "Purchase Invoices 2011/12" 1 to 3*	*3 Folders*	*Shredding*	✓
1						
2						
3						
4						
5						
6						
7						
8						

Ref Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of destruction	**Confirm** **(i) Safely destroyed** **(ii) In accordance with Data Retention Guidelines** **Tick (ü)**
9						
10						
11						
12						
13						
14						