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Author/Owner (Name and Title)	Leader of ICT and Data Protection
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Policy Category	1	Trust/Academies to use without amendment
	2	Academy specific appendices
(Please Indicate)	3	Academy personalisation required (in highlighted fields)

Summary of Changes from Previous Version

Version	Date	Author	Note/Summary of Revisions
V2	20.02.23	EPR	Legal Frameworks, Retention of Emails, Retention of Governance records, School closures and record keeping
V3	11.09.25	JHE	Cross referenced against the DfE guidance (March 2025), minor wording amendments

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Maltby Learning Trust is committed to maintaining the confidentiality of its information and ensuring that all records within the Trust are only accessible by the appropriate individuals. In line with the requirements of the UK GDPR, the Trust also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The Trust has created this policy to outline how records are stored, accessed, monitored, retained and disposed of in order to meet its statutory requirements.

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

LEGAL FRAMEWORK

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

- UK General Data Protection Regulation (UK GDPR)
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- Data Protection Act 2018.
- Data Access and Use Act (DUAA) 2025

This policy also has due regard to the following guidance:

- DfE (2023) 'Data protection: a toolkit for schools'
- DfE (2023) 'Careers guidance and access for education and training providers'
- ESFA (2022) 'Record keeping and retention information for Academies and Academy Trusts'
- Information Records Management Society (IRMS) (2019) 'Information Management Toolkit for Schools'
- IRMS (2019) 'Academies Toolkit'.

This policy will be implemented in accordance with the following Academy policies and procedures:

- Data Protection Policy
- Freedom of Information Policy
- Cyber-security Policy
- Disposal of Records Log
- Data Asset Register
- Archived Files Log.

ROLES AND RESPONSIBILITIES

The Trust has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.

The Chief Executive Officer holds overall responsibility for this policy and for ensuring it is implemented correctly.

The Trust Data Protection Officer and Trust leads are responsible for:

- The management of records at Maltby Learning Trust.
- Promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the Chief Executive Officer and Leader of ICT and Data Protection.
- Ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy and are disposed of correctly.

All staff members are responsible for ensuring that any records they are responsible for are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

MANAGEMENT OF STUDENT RECORDS

Student records are specific documents that are used throughout a student's time in the education system – they are passed to each Academy that a student attends and include all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievements.

The following information is stored on a student record and will be easily accessible:

- Forename, surname, gender and date of birth
- Unique student number
- Note of the date when the file was opened.

The following information is stored as part of a student record:

- Ethnic origin, religion and first language (if not English)
- Any preferred names
- Emergency contact details and the name of the student's doctor
- Any allergies or other medical conditions that are important to be aware of
- Names of people with parental responsibility, including their home address(es) and telephone number(s)
- Any other agency involvement, e.g. speech and language therapist
- Reference to any other linked files.

The following information is stored in a student record and will be easily accessible:

- Admissions form
- Details of any Special Educational Needs and Disabilities
- If the student has attended an early years setting, the record of transfer
- Data collection or data checking form
- Annual written reports to parents/carers
- National curriculum and agreed syllabus record sheets
- Notes relating to major incidents and accidents involving the student
- Any information about an Educational Health Care Plan (EHCP) and support offered in relation to the EHCP
- Medical information relevant to the student's on-going education and behaviour
- Any notes indicating child protection disclosures and reports
- Any information relating to exclusions

- Any correspondence with parents/carers or external agencies relating to major issues, e.g. mental health
- Notes indicating that records of complaints made by parents/carers or the student
- Examination results – student copy
- SATs results.

The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the student in the Academy office:

- Attendance registers and information
- Absence notes and correspondence
- Parental and, where appropriate, student consent forms for educational visits, photographs and videos, etc.
- Accident forms – forms about major accidents will be recorded on the student record
- Consent to administer medication and administration records
- Copies of student birth certificates, passports etc.
- Correspondence with parents/carers about minor issues, e.g. behaviour
- Student work
- Previous data collection forms that have been superseded.

Hard copies of disclosures and reports relating to child protection are stored in a securely locked filing cabinet in the Trust/Academy office – a note indicating this is marked on the student's file.

Hard copies of complaints made by parents/carers or students are stored in a file in the PA to Principal's or Principal's office – a note indicating this is marked on the student's file.

Actual copies of accident and incident information are stored separately on the Trust/Academy's management information system and held in line with the retention periods outlined in this policy – a note indicating this is marked on the student's file. An additional copy may be placed in the student's file in the event of a major accident or incident.

The Trust/Academy will ensure that no student records are altered or amended before transferring them to the next school that the student will attend. The only exception is if any records placed on the student's file have a shorter retention period and may need to be removed. In such cases, the Trust will remove these records.

Electronic records relating to a student's record will also be transferred to the student's next school. If any student attends the school until statutory school leaving age, the school will keep the student's records until the student reaches the age of 25 years.

The Academy will, wherever possible, avoid sending a student record by post. Where a student record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the school.

RETENTION OF STUDENT RECORDS AND OTHER STUDENT-RELATED INFORMATION

The table below outlines the Trust/Academy retention periods for individual student records and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will be destroyed in line with the retention periods below.

TYPE OF FILE	RETENTION PERIOD	ACTION TAKEN AFTER RETENTION PERIOD ENDS
PERSONAL IDENTIFIERS, CONTACTS AND PERSONAL CHARACTERISTICS		
Images used for identification purposes	For the duration of the event/activity, or whilst the student remains at school, whichever is less, plus one month	Securely disposed of
Images used in displays in schools	Whilst the student is at school	Securely disposed of
Images used for marketing purposes or other	In line with the consent period	Securely disposed of
Biometric data	For the duration of the event/activity, or whilst the student remains at school, whichever is less, plus one month	Securely disposed of
Postcodes, names and characteristics	Whilst the student is at school, plus five years	Securely disposed of
House number and road	For the duration of the event/activity, plus one month	Securely disposed of
ADMISSIONS		
Register of admissions	Every entry in the admissions register will be preserved for a period of three years after the date on which the entry was made	Information is reviewed and the register may be kept permanently
Admissions (where the admission is successful)	Add to student file	Securely disposed of
Admissions appeals (where the appeal is unsuccessful)	Resolution of the case, plus one year	Securely disposed of
In-year secondary school admissions	Whilst the student remains at the school, plus one year	Securely disposed of
Proof of address (supplied as part of the admissions process)	Current academic year, plus one year	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Information added to the student file.	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was not successful)	Retained until the appeals process is complete	Securely disposed of
All records relating to the creation and implementation of the Admissions Policy	Life of the policy, plus three years and then review	Securely disposed of

STUDENTS' EDUCATIONAL RECORDS		
[Primary schools only] Students' educational records	Whilst the student remains at the school	Transferred to the next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period. The IRMS advises to retain the information for a short period to allow for any queries or reports to be completed or where linked records in the school information management system have not yet reached the end of their retention period and deleting would cause problems
[Secondary schools only] Students' educational records	25 years after the students' date of birth	Reviewed and securely disposed of if no longer needed
Student examination results	Added to the student's record and transferred to next school	All uncollected certificates returned to the examination board
Internal examination results	Added to the student's record and transferred to next school	Reviewed and securely disposed of if no longer needed
Behaviour records	Added to the student's record and transferred to the next school Copies are held whilst the student is at school, plus one year	Securely disposed of
Exclusion records	Added to the student's record and transferred to the next school Copies are held whilst the student is at school, plus one year	Securely disposed of
Child protection information held on a student's record	Stored for the same length of time as the student's record For records known to relate to child sexual abuse hold for 75 years from date of birth	Securely disposed of
Child protection records held in a separate file such as CPOMs	25 years after the student's date of birth For records known to relate to child sexual	Securely disposed of

	abuse hold for 75 years from date of birth	
Curriculum returns	Current academic year, plus three years	Review and allocate a further retention period or securely dispose of
Schemes of work	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Timetable	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Class record books	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Mark books	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Record of homework set	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Students' work	Returned to student at the end of current academic year If this is not possible, hold for the current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Careers advice and subsequent agreed decisions	Whilst the student is at the school, plus three years	Securely disposed of
Education, training or employment destinations data	Whilst the student is at the school, plus at least three years or from the end of KS4, whichever is earliest	Securely disposed of
ATTENDANCE		
Attendance registers	Every entry is retained for a period of six years after the date on which the entry was made	Securely disposed of [DfE guidance changed 2024]
Correspondence relating to any absence (authorised or unauthorised)	Current academic year, plus two years	Securely disposed of
MEDICAL INFORMATION AND ADMINISTRATION		
Permission slips	For the duration of the period that medication is given, plus one month	Securely disposed of

Medical conditions – ongoing management	Added to the student's record and transferred to the next school Copies held whilst the student is at school, plus one year	Securely disposed of
Medical incidents that have a behavioural or safeguarding influence	Added to the student's record and transferred to the next school Copies held whilst the student is at school, plus 25 years	Securely disposed of
SEND		
SEND files, reviews and EHC plans, including advice and information provided to parents/carers regarding educational needs and accessibility strategy	The student's date of birth, plus 32 years	Securely disposed of
CURRICULUM MANAGEMENT		
SATs results	25 years after the student's date of birth (as stated on the student's record) A composite of the whole year's results may be held for the current year plus six years, for comparative purposes	Securely disposed of
Examination papers	Until the appeals/validation process has been completed	Securely disposed of
Published Admission Number (PAN) reports	Current academic year, plus six years	Securely disposed of
Valued added and contextual data	Current academic year, plus six years	Securely disposed of
Self-evaluation forms (internal moderation)	Current academic year, plus one year	Securely disposed of
Self-evaluation forms (external moderation)	Retained until superseded	Securely disposed of
Students' work	Returned to students at the end of the academic year, or retained for the current academic year, plus one year	Securely disposed of
EXTRA-CURRICULAR ACTIVITIES		

Records of educational visits	10 years from the date of the visit. (DfE 2025)	Securely disposed of
Field file – information taken on school trips	Until the conclusion of the trip, plus one month Where a minor incident occurs, field files are added to the core system as appropriate	Securely disposed of
Trip packs – information taken on school trips	Until the end of the visit Where a minor incident occurs, files are added to the core system as appropriate	Shredded upon return to school
Financial information relating to school trips	Whilst the student remains at school, plus one year	Securely disposed of
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip, unless a school risk assessment decides the forms are likely to be required for any reason, in which case they should be retained for 22 years after the student's date of birth	Securely disposed of – shredded
Parental consent forms for school trips where a major incident occurred	25 years after the student's date of birth on the student's record (permission slips of all students on the trip will also be held to show that the rules had been followed for all students)	Securely disposed of – shredded
Educational visitors in school – sharing of personal information	Until the conclusion of the visit, plus one month	Securely disposed of
Walking bus registers	Date of the register being taken plus six years	Securely disposed of If held electronically, all copies should be destroyed at the same time.
FAMILY LIAISON OFFICERS AND HOME-SCHOOL LIAISON ASSISTANTS		
Day books	Current academic year, plus two years	Reviewed and securely destroyed if no longer required
Reports for outside agencies	Duration of the student's time at school	Securely disposed of
Referral forms	Whilst the referral is current	Securely disposed of

Contact data sheets	Current academic year	Reviewed and securely destroyed if no longer active
Contact database entries	Current academic year	Reviewed and securely destroyed if no longer required
Group registers	Current academic year, plus two years	Securely disposed of
CATERING AND FREE SCHOOL MEAL MANAGEMENT		
Meal administration	Whilst the student is at school, plus one year	Securely disposed of
Meal eligibility	Whilst the student is at school, plus one years	Securely disposed of
School meal registers	Current year plus three years	Securely disposed of
Free school meal registers (where used as a basis for funding)	Current year plus six years	Securely disposed of
School meals summary sheets	Current year plus three years	Securely disposed of

RETENTION OF STAFF RECORDS

The table below outlines the Trust/Academy`s retention period for staff records and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

TYPE OF FILE	RETENTION PERIOD	ACTION TAKEN AFTER RETENTION PERIOD ENDS
OPERATIONAL		
Staff members' personnel file	Termination of employment, plus six years	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus six years	Securely disposed of
Sickness absence monitoring (where sickness pay is not paid)	Current academic year, plus three years	Securely disposed of
Sickness absence monitoring (where sickness pay is paid)	Current academic year, plus six years	Securely disposed of
Staff training (where training leads to CPD)	Length of time required by the CPD professional body	Securely disposed of
Staff training (except where the training relates to dealing with students, e.g. first aid or health and safety)	Retained in the personnel file	Securely disposed of
RECRUITMENT		

Records relating to the appointment of a new Principal (unsuccessful attempts)	Date of appointment, plus six months.	Securely disposed of
Records relating to the appointment of a new Principal (successful appointments)	Added to personnel file and retained until the end of appointment, plus six years, except in cases of negligence or claims of child abuse, then records are retained for at least 15 years	Securely disposed of
Records relating to the appointment of new members of staff or governors (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of
Pre-employment vetting information (successful candidates)	For the duration of the employee's employment, plus six years	Securely disposed of
DBS certificates	Up to six months	Securely disposed of
Proof of identify as part of the enhanced DBS check	If it is necessary to keep a copy, it will be placed in the staff member's personnel file	Securely disposed of
Evidence of right to work in the UK	Added to staff personnel file or, if kept separately, termination of employment, plus at least two years	Securely disposed of
DISCIPLINARY AND GRIEVANCE PROCEDURES		
Child protection allegations, including where the allegation is unproven	Added to staff personnel file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer. If allegations are malicious, they are removed from personal files. If allegations are found, they are kept on the personnel file and a copy is provided to the person concerned. Information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse	Reviewed and securely disposed of – shredded
Oral warnings	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file

	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file
Written warning – level 1	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file
Written warning – level 2	Date of warning, plus 12 months	Securely disposed of – if placed on staff personnel file, removed from file
Final warning	Date of warning, plus 18 months	Securely disposed of – if placed on staff personnel file, removed from file
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related, then it is disposed of as above	Securely disposed of

RETENTION OF GOVERNANCE RECORDS

The table below outlines the Trust/Academy`s retention periods for governance records, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

TYPE OF FILE	RETENTION PERIOD	ACTION TAKEN AFTER RETENTION PERIOD ENDS
GOVERNANCE		
Agendas for governing board meetings	One copy alongside the original set of minutes – all others disposed of without retention	Local archives consulted before secure disposal
Original, signed copies of the minutes of governing board meetings	Permanent – or at least for 10 years from the date of the meeting	Shredded if they contain any sensitive or personal information, but the local archives will be consulted first
Reports presented to the governing board that are referred to in the minutes	Permanent – all others disposed of without retention	Local archives consulted and then securely disposed of
Meeting papers relating to the annual parents' meeting	Date of meeting, plus a minimum of six years	Securely disposed of
Instruments of government	Permanent	Local archives consulted and then securely disposed of
Trusts and endowments managed by the governing board	Permanent	Local archives consulted and then securely disposed of
Action plans created and administered by the governing board	Until superseded or whilst relevant	Securely disposed of
Policy documents created and administered by the governing board	Until superseded or whilst relevant	Securely disposed of

	Date of resolution of complaint, plus six years	
Records relating to complaints dealt with by the governing board or headteacher	If negligence is involved, records are retained for the current academic year, plus 15 years If child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years	Reviewed for further retention in case of contentious disputes, then securely disposed of
Annual reports required by the DfE	Date of report, plus 10 years	Securely disposed of
Proposals concerning changing the status of the school	Date proposal accepted or declined, plus three years	Securely disposed of
Records relating to the appointment of co-opted governors	Date of election, plus six months	Securely disposed of
Records relating to the election of the chair of the governing board and the vice chair	Destroyed after the decision has been recorded in the minutes	Securely disposed of
Scheme of delegation and terms of reference for committees	Until superseded or whilst relevant	Reviewed and offered to the local archives if appropriate
Meeting schedule	Current academic year	Standard disposal
Register of attendance at full governing board meetings	Date of last meeting in the book, plus six years	Securely disposed of
Records relating to Governor monitoring visits	Date of the visit, plus three years	Securely disposed of
All records relating to the conversion of the school to academy status	Permanent	Local archives are consulted before disposal
Correspondence sent and received by the governing board or Principal	Current academic year, plus three years	Securely disposed of
Records relating to the appointment of the clerk to the governing board	Date on which the clerk's appointment ends, plus six years	Securely disposed of
Records relating to the terms of office of serving governors, including evidence of appointment	Date on which the governor's appointment ends, plus six years	Securely disposed of
Records relating to governor declaration against disqualification criteria	Date on which the governor's appointment ends, plus six years	Securely disposed of
Register of business interests	Date the governor's appointment ends, plus six years	Securely disposed of

Governor code of conduct	Dynamic document – kept permanently	Securely disposed of
Records relating to the training required and received by governors	Date the governor steps down, plus six years	Securely disposed of
Records relating to the induction programme for new governors	Date on which the governor's appointment ends, plus six years	Securely disposed of
Records relating to DBS checks carried out on the clerk and members of the governing board	Date of the DBS check, plus six months	Securely disposed of
Governor personnel files	Date on which the governor's appointment ends, plus six years	Securely disposed of
TRUST GOVERNANCE		
Governance statement	Life of governance statement, plus six years	Securely disposed of
Articles of association	Life of the Academy	Securely disposed of
Memorandum of understanding	Can be disposed of once the academy has been incorporated	Securely disposed of
Memorandum of understanding of shared governance among schools	Life of memorandum of understanding, plus six years	Securely disposed of
Constitution	Life of the Academy	Securely disposed of
Special resolutions to amend the constitution	Life of the Academy	Securely disposed of
Written scheme of delegation	Life of the scheme of delegation, plus 10 years	Securely disposed of
Directors – appointment	Life of appointment, plus six years	Securely disposed of
Directors – disqualification	Data of disqualification, plus 15 years	Securely disposed of
Directors – termination of office	Date of appointment, plus six years	Securely disposed of
Annual Trustee report	Date of report, plus 10 years	Securely disposed of
Annual report and accounts	Date of report, plus 10 years	Securely disposed of
Annual return	Date of report, plus 10 years	Securely disposed of

Appointment of trustees and governors and directors	Life of appointment, plus six years	Securely disposed of
Statement of trustees' responsibilities	Life of appointment, plus six years	Securely disposed of
Appointment and removal of members	Life of appointment, plus six years	Securely disposed of
Strategic review	Date of review, plus six years	Securely disposed of
Register of directors	Life of Academy, plus six years	Securely disposed of
Register of directors' interests	Life of Academy, plus six years	Securely disposed of
Register of directors' residential addresses	Life of Academy, plus six years	Securely disposed of
Register of gift, hospitality and entertainment	Life of Academy, plus six years	Securely disposed of
Register of Members	Life of Academy, plus six years	Securely disposed of
Register of secretaries	Life of Academy, plus six years	Securely disposed of
Register of Trustees' interests	Life of Academy, plus six years	Securely disposed of
Declaration of interests	Life of Academy, plus six years	Securely disposed of

RETENTION OF SENIOR LEADERSHIP AND MANAGEMENT RECORDS

The table below outlines the Trust/Academy`s retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

TYPE OF FILE	RETENTION PERIOD	ACTION TAKEN AFTER RETENTION PERIOD ENDS
PRINCIPAL AND SENIOR LEADERSHIP TEAM (SLT)		
Log books of activity in the school maintained by the Principal	Date of last entry, plus a minimum of six years	Reviewed and offered to the local archives if appropriate

Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus three years	Reviewed annually and securely disposed of if not needed
Reports created by the Principal or SLT	Date of the report, plus a minimum of three years	Reviewed annually and securely disposed of if not needed
Records created by the Principal, Deputy Principal, Heads of Year and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed annually and securely disposed of if not needed
Correspondence created by the Principal, Deputy Principal, Heads of Year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Securely disposed of
Professional development plan	Held on the individual's personnel record. If not, then it is retained for the duration of the plan, plus six years	Securely disposed of
SDP	Duration of the plan, plus three years	Securely disposed of

RETENTION OF HEALTH AND SAFETY RECORDS

The table below outlines the Trust/Academy`s retention periods for Health and Safety records, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

TYPE OF FILE	RETENTION PERIOD	ACTION TAKEN AFTER RETENTION PERIOD ENDS
HEALTH AND SAFETY		
Health and Safety Policy statements	Duration of policy, plus three years	Securely disposed of
Health and Safety risk assessments	Duration of risk assessment, plus three years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred	Securely disposed of
Records relating to any reportable death, injury, disease or dangerous occurrence under RIDDOR	Date of incident, plus three years provided that all records relating to the incident are held on the personnel file	Securely disposed of

Accident reporting – adults	Three years after the last entry in the accident reporting book	Securely disposed of
Accident reporting – students	Three years after the last entry in the accident reporting book	Securely disposed of
Records kept under the Control of Substances Hazardous to Health Regulations	Date of incident, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation (maintenance records or controls, safety features and PPE)	Two years from the date on which the examination was made	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation (dose assessment and recording)	Until the person to whom the record relates would have reached 75-years-old, but in any event for at least 30 years from when the record was made	Securely disposed of
Fire precautions log books	Current academic year, plus three years	Securely disposed of
Health and Safety file to show current state of buildings, including all alterations (wiring, plumbing, building works etc.) to be passed on in the case of change of ownership	Permanent	Passed to new owner on sale or transfer of building

RETENTION OF FINANCIAL RECORDS

The table below outlines the Trust/Academy`s retention periods for financial records and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

TYPE OF FILE	RETENTION PERIOD	ACTION TAKEN AFTER RETENTION PERIOD ENDS
PAYROLL AND PENSIONS		

Maternity pay records	Current academic year, plus three years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year, plus six years	Securely disposed of
Timesheets, clock cards and flexitime records	Current academic year, plus three years	Securely disposed of
Absence record	Current academic year, plus three years	Securely disposed of
Batches	Current academic year, plus six years	Securely disposed of
Bonus sheets	Current academic year, plus three years	Securely disposed of
Car allowance claims	Current academic year, plus three years	Securely disposed of
Car loans	Current academic year, plus three years	Securely disposed of
Car mileage outputs	Current academic year, plus six years	Securely disposed of
Elements	Current academic year, plus two years	Securely disposed of
Income tax form P60	Current academic year, plus six years	Securely disposed of
Insurance	Current academic year, plus six years	Securely disposed of
Members allowance register	Current academic year, plus six years	Securely disposed of
National insurance – schedule of payments	Current academic year, plus six years	Securely disposed of
Overtime	Current academic year, plus three years	Securely disposed of
Part-time fee claims	Current academic year, plus six years	Securely disposed of

Pay packet receipt by employee	Current academic year, plus two years	Securely disposed of
Payroll awards	Current academic year, plus six years	Securely disposed of
Payroll (gross/net weekly or monthly)	Current academic year, plus six years	Securely disposed of
Payroll reports	Current academic year, plus six years	Securely disposed of
Payslips (copies)	Current academic year, plus six years	Securely disposed of
Pension payroll	Current academic year, plus six years	Securely disposed of
Personal bank details	Until superseded, plus three years	Securely disposed of
Sickness records	Current academic year, plus three years	Securely disposed of
Staff returns	Current academic year, plus three years	Securely disposed of
Superannuation adjustments	Current academic year, plus six years	Securely disposed of
Superannuation reports	Current academic year, plus six years	Securely disposed of
Tax forms	Current academic year, plus six years	Securely disposed of
RISK MANAGEMENT AND INSURANCE		
Employer's liability insurance certificate	Closure of the school, plus 40 years	Securely disposed of Passed to the LA if the school closes
ASSET MANAGEMENT		
Inventories of furniture and equipment	Current academic year, plus six years	Securely disposed of
Burglary, theft and vandalism report forms	Current academic year, plus six years	Securely disposed of

ACCOUNTS AND STATEMENTS INCLUDING BUDGET MANAGEMENT		
Annual accounts	Current academic year, plus six years	Disposed of against common standards
Loans and grants managed by the school	Date of last payment, plus 12 years	Information is reviewed then securely disposed of
All records relating to the creation and management of budgets	Duration of the budget, plus three years	Securely disposed of
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus six years	Securely disposed of
Records relating to the collection and banking of monies	Current financial year, plus six years	Securely disposed of
Records relating to the identification and collection of debt	Final payment, plus six years	Securely disposed of
CONTRACT MANAGEMENT		
All records relating to the management of contracts under seal	Last payment on the contract, plus 12 years	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract, plus six years	Securely disposed of
All records relating to the monitoring of contracts	Life of the contract, plus six or 12 years	Securely disposed of
SCHOOL FUND		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
SCHOOL MEALS		
FSM registers (where the register is used as a basis for funding)	Current academic year, plus six years	Securely disposed of
School meals registers	Current academic year, plus three years	Securely disposed of
School meals summary sheets	Current academic year, plus three years	Securely disposed of
STUDENT FINANCE		
Student grant applications	Current academic year, plus three years	Securely disposed of
Pupil premium fund records	Date the student leaves the school, plus six years	Securely disposed of

ACADEMIES TRUST FINANCE RECORDS		
Statement of financial activities for the year	Current financial year, plus six years	Securely disposed of
Financial planning	Current financial year, plus six years	Securely disposed of
Value for money statement	Current financial year, plus six years	Securely disposed of
Records relating to the management of VAT	Current financial year, plus six years	Securely disposed of
Whole of government accounts return	Current financial year, plus six years	Securely disposed of
Borrowing powers	Current financial year, plus six years	Securely disposed of
Budget plan	Current financial year, plus six years	Securely disposed of
Charging and Remissions Policy	Date policy superseded, plus three years	Securely disposed of
Independent auditor's report on regularity	Financial year report relates to, plus six years	Securely disposed of
Independent auditor's report on financial statements	Financial year report relates to, plus six years	Securely disposed of
Funding agreement	Date of last payment of funding, plus six years	Securely disposed of
Funding records – capital grant	Date of last payment of funding, plus six years	Securely disposed of
Funding records – general annual grant	Date of last payment of funding, plus six years	Securely disposed of
Per-pupil funding records	Date of last payment of funding, plus six years	Securely disposed of
Exclusions agreements	Date of last payment of funding, plus six years	Securely disposed of
Funding records	Date of last payment of funding, plus six years	Securely disposed of
Gift aid and tax relief	Date of last payment of funding, plus six years	Securely disposed of
Records relating to loans	Date of last payment of loan, plus six years if the loan is under £10,000 or date of last payment of	Securely disposed of

| | loan, plus 12 years if the loan is over £10,000 | |

RETENTION OF OTHER SCHOOL RECORDS

The table below outlines the Trust/Academy`s retention periods for any other records held by the school, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

TYPE OF FILE	RETENTION PERIOD	ACTION TAKEN AFTER RETENTION PERIOD ENDS
PROPERTY MANAGEMENT		
Title deeds of properties belonging to the school	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the school	For as long as the building belongs to the school	Transferred to new owners if the building is leased or sold
Leases of property leased by or to the school	Expiry of lease, plus six years	Securely disposed of
Records relating to the letting of school premises	Current financial year, plus six years	Securely disposed of
MAINTENANCE		
All records relating to the maintenance of the school carried out by contractors	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of
All records relating to the maintenance of the school carried out by school employees	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of
OPERATIONAL ADMINISTRATION		
General file series	Current academic year, plus five years	Reviewed and securely disposed of
Records relating to the creation and publication of the school brochure and/or prospectus	Current academic year, plus three years	If a copy is not preserved by the school, standard disposal
Records relating to the creation and distribution of circulars to staff, parents/carers or students	Current academic year, plus one year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year, plus one year	One copy archived, other copies standard disposal

Visitors' books and signing-in sheets	Last entry in the electronic signing in system, plus six years	Reviewed then securely disposed of
Records relating to the creation and management of parent-teacher associations and/or old student associations	Current academic year, plus six years	Reviewed then securely disposed of
Walking bus registers	Date of register, plus six years	Securely disposed of
School privacy notice which is sent to parents/carers	Until superseded, plus six years	Standard disposal
Consents relating to school activities	While student attends the school	Secure disposal

RETENTION OF EMAILS

Group email addresses will have an assigned member of staff who takes responsibility for managing the account and ensuring the correct disposal of all sent and received emails. All staff members with an email account will be responsible for managing their inbox.

Emails can act as evidence of the Trust/Academy's activities, i.e. in business and fulfilling statutory duties, so all relevant emails, e.g. invoices, will be retained for at least 12 months. Invoices received and sent in emails will be printed off and retained in accordance with Section 8 of this policy.

The Trust/Academy's expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in the Trust's Safe Use of ICT Policy.

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

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

Staff members will not, under any circumstances, create their own email archives, e.g. saving emails on to personal hard drives. Staff members will be aware that the emails they send could be required to fulfil a SAR or Freedom Of Information (FOI) request. Emails will be drafted carefully, and staff members will review the content before sending.

Individuals, including children, have the right to submit an SAR to gain access to their personal data to verify the lawfulness of the processing – this includes accessing emails.

All SARs will be handled in accordance with the Trust's Data Protection Policy. FOI requests will be handled in accordance with the school's Freedom of Information Policy.

When handling a request for information, the data leads will speak to the requester to clarify the scope of the request and whether emails will be required to fulfil the SAR or FOI request. Where an SAR has been made electronically, the information will be provided in a commonly used electronic format. All requests will be responded to without delay and at the latest, within one month of receipt.

If a request is manifestly unfounded, excessive or repetitive, a fee may be charged. All fees will be based on the administrative cost of providing the information.

Where a request is manifestly unfounded or excessive, the Trust holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

Staff members will discuss any queries regarding email retention with the Data Leads or Data Protection Officer.

IDENTIFYING INFORMATION

Under the UK GDPR, all individuals have the right to data minimisation and data protection by design and default – as the data controller, the Trust ensures appropriate measures are in place for individuals to exercise this right.

Wherever possible, the Trust/Academies use pseudonymisation, also known as the 'blurring technique', to reduce the risk of identification.

Once an individual has left the Trust/Academy, if identifiers such as names and dates of birth are no longer required, these are removed or less specific personal data is used, e.g. the month of birth rather than specific date – the data is blurred slightly.

Where data is required to be retained over time, e.g. attendance data, the Trust/Academy removes any personal data not required and keeps only the data needed – in this example, the statistics of attendance rather than personal information.

STORING AND PROTECTING INFORMATION

The Trust Data Leads will undertake a business impact assessment to identify which records are vital to school management and these records will be stored in the most secure manner. The Trust Data Leads will conduct a back-up of information on a termly basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.

Where possible, backed-up information will be stored off the Trust/Academy's premises, using a central back-up cloud service. The Trust will ensure that the location of the cloud storage and the security offered is appropriate for the information and records stored on it.

Confidential paper records should be kept in a locked filing cabinet, drawer or safe, with restricted access. Any room or area where personal or sensitive data is stored will be locked when unattended. Confidential paper records are not left unattended or in clear view when held in a location with general access.

Digital data encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site.

All electronic devices are password-protected to protect the information on the device in case of theft. Where possible, the Trust enables electronic devices to allow the remote blocking or deletion

of data in case of theft. Staff and Governors do not use their personal laptops or computers for Trust purposes. All members of staff are provided with their own secure login and password and have to agree to our Acceptable Use Policy before logging on.

Emails containing sensitive or confidential information are password-protected or sent via a secure encrypted or data transfer system to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email. Personal information is never put in the subject line of an email. Circular emails to parents/carers are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the UK GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the Trust/Academy premises accepts full responsibility for the security of the data.

If documents that have been taken off the Trust/Academy premises will be left unattended, the staff member will leave the documents in the locked boot of a car or keep them on their person. A record will be kept of any document that is taken off the Trust/Academy premises that logs the location of the document and when it is returned to the school site, this includes records that are digitally remotely accessed.

Before sharing data, staff always ensure that:

- They have consent from data subjects to share it.
- Adequate security is in place to protect it.
- The data recipient has been outlined in a privacy notice.

The Trust has data sharing agreements with data processors and third parties with whom data is shared. These agreements are reviewed by the Data Protection Officer and cover information about issues such as access controls and permissions.

A record is kept of what level of access each staff member has to data. This record details information including:

- What level of access each staff member has.
- Limits on how staff members access data.
- What actions staff members can perform.
- What level of access is changed or retained when a staff member changes role within the Academy.
- Who is able to authorise requests to change permissions and access.

All staff members implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information is stored in a securely locked filing cabinet, drawer or safe with restricted access.

Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.

Staff are required to use their school login details to use photocopiers and printers.

The physical security of the Trust/Academy's buildings and storage systems, and access to them, is reviewed termly by the Site Management team. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the Chief Executive Officer/Principal and extra measures to secure data storage will be put in place.

All systems that allow staff and students to remotely access information from the Trust/Academy networks whilst they are not physically on site have strong security controls in place.

The Data Protection Officer and Trust IT team decides what restrictions are necessary to prevent information or records being downloaded, transferred or printed while the user is not on the site.

The Trust takes its duties under the UK GDPR seriously and any unauthorised disclosures may result in disciplinary action.

The Trust IT team is responsible for ensuring continuity and recovery measures are in place to ensure the security of protected data. Any damage to or theft of data will be managed in accordance with the school's Data and Cyber-security Breach Prevention and Management Plan.

As a result of the UK's exit of the EU data controllers and processors follow the UK GDPR, and the Data Protection Act 2018, where:

- As UK data controllers, they collect, store or process the personal data of individuals residing in the UK.
- As non-UK data controllers, they offer goods or services to, or monitor the behaviour of, UK residents.

Data controllers and processors follow the EU GDPR where:

- They collect, store or process the personal data of individuals residing in the EU.
- As non-EU data controllers, they offer goods or services to, or monitor the behaviour of, EU residents.

ACCESSING INFORMATION

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

All members of staff, parents/carers of registered students and other users of the Trust/Academy, e.g. visitors and third-party clubs, are entitled to:

- Know what information the Trust/Academy's holds and processes about them or their child and why.
- Understand how to gain access to it.
- Understand how to provide and withdraw consent to information being held.
- Understand what the school is doing to comply with its obligations under the UK GDPR.

All members of staff, parents/carers of registered students and other users of the Trust/Academy's and its facilities have the right, under the UK GDPR, to access certain personal data being held about them or their child.

Personal information can be shared with students once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents/carers. Students who are considered by the Trust/Academy to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

The Trust/Academy will adhere to the provisions outlined in the Trusts Data Protection Policy when responding to requests seeking access to personal information.

INFORMATION AUDIT

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

- Paper documents and records
- Electronic documents and records
- Databases
- Video and photographic records
- Hybrid files, containing both paper and electronic information.

The information audit may be completed in a number of ways, including, but not limited to:

- Interviews with staff members with key responsibilities – to identify information and information flows, etc.
- Questionnaires to key staff members to identify information and information flows, etc.
- A mixture of the above.

The Data Protection Officer is responsible for overseeing the completion of the information audit.

The information audit will include the following:

- The Trusts data needs
- The information needed to meet those needs
- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document.

The Data Protection Officer will consult with staff members involved in the information audit process to ensure that the information is accurate.

Once it has been confirmed that the information is accurate, the Trust will record all details on the school's Data Asset Register.

An information asset owner is assigned to each asset or group of assets. They will be responsible for managing the asset appropriately, ensuring it meets the school's requirements, and for monitoring risks and opportunities.

The information displayed on the Data Asset Register will be shared with the Chief Executive Officer/Principal to gain their approval.

DISPOSAL OF DATA

Where disposal of information is outlined as standard disposal, this will be recycled appropriately to the form of the information, e.g. paper recycling, electronic recycling.

All records containing personal or sensitive information will be made either unreadable or unreconstructedly.

Where disposal of information is outlined as secure disposal, this will be shredded or pulped.

Electronic information will be scrubbed clean and, where possible, cut, archived or digitalised. The Trust will keep a record of all files that have been destroyed.

Where the disposal action is indicated as reviewed before it is disposed, the Trust will review the information against its administrative value – if the information should be kept for administrative value, the Trust will keep a record of this.

If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

Where information has been kept for administrative purposes, the Trust will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.

Where information must be kept permanently, this information is exempt from the normal review procedures.

Records and information that might be of relevant to the Independent Inquiry into Child Sexual Abuse (IICSA) will be held for 75 years from date of birth of the data subject.

SCHOOL CLOSURES AND RECORD KEEPING

ACADEMY CLOSURE

If the Trust/Academy is closing, the Trust will follow the DfE's guidance on what should happen to records retained by the Trust, which can be found in the DfE's 'Record keeping and retention information for academies and academy trusts' guidance.

SALE OR RE-USE OF THE SITE

If the Trust/Academy site is being sold or re-allocated to another use, the Local Authority will take responsibility for the records from the date the Trust/Academy closes.

MERGER OF SCHOOLS

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

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

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

MANAGING RECORDS

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

The Data Leads will notify the other organisations as soon as possible so that necessary disposal, storage and transfer arrangements can be made.

When sorting records, the Trust Data Protection Officer and the Data Leads will:

- Review all records held within the Trust/Academy's as soon as notification of closure is received, including paper and electronic records.
- Use the retention periods outlined in this policy to categorise the records into those to be destroyed and those that need to be transferred.
- Contact the relevant body to make arrangements for the safe and secure transfer of records.
- Sort, list and box the records in preparation for the transfer, ensuring records are stored in a safe environment whilst awaiting collection.
- Plan how the disposal of records will be undertaken.
- Sort expired records in readiness for confidential disposal, ensuring they are stored securely whilst awaiting disposal.

All forms of storage will be completely emptied before the building is vacated or before disposal. Records awaiting transfer will be held in a secure area. The identity of any third parties collecting or disposing of records will be checked and a collection receipt will be obtained.

Records will be disposed of in line with the 'Disposal of data' section of this policy. Electronic records will be either transferred to the new body or deleted. All ICT equipment will be decommissioned in accordance with the Trust Safe Use of ICT Policy.

No records will be left behind once the Trust/Academy's building is vacated.

MONITORING AND REVIEW

This policy will be reviewed every two years by the Leader of ICT and Data Protection in conjunction with the Chief Executive Officer and Trust Data Protection Officer – the next scheduled review date for this policy is Autumn 2026.

Any changes made to this policy will be communicated to all members of staff and the Trust Board/Local Governance Committee.