STOUR VALE ACADEMY TRUST

DATA RETENTION POLICY

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Legal Obligations

Article 5 of the UK General Data Protection Regulation (UK GDPR) defines the principles relating to the processing of personal data. Article 5(1)(e) states:

'*Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the applied UK GDPR subject to implementation of the appropriate technical and organisational measures required by the applied UK GDPR in order to safeguard the rights and freedoms of the data subject ('storage limitation').'*

Data Protection Act 2018, Chapter 2, Section 90 sets out the fifth data protection principle (*requirement that personal data be kept for no longer than is necessary*).

To this end, Stour Vale Academy Trust ('the Trust'), comprising the member schools and settings, and the central team, has adopted the Policy as specified below.

Purpose

The purpose of this policy is to provide a statement of intent on how the Trust intends to manage its data in terms of retention.

The policy is underpinned by the UK GDPR Article 5(1)(e) and Data Protection Act 2018 'storage limitation' and 'data minimisation' principle, in respect of hard copy and electronic information.

Scope

The Trust is aware that at present there is not a sector-wide data retention policy guidance document. However, there are examples of best practice which the Trust follows, including the Information and Records Management Society (Information Management Toolkit for Academies) (the schools have a link from their Pupil Privacy Notice to the Toolkit).

It is the intention of Stour Vale Academy Trust to ensure that all records and the information contained therein are:

Accurate - records are always reviewed to ensure that they are a full and accurate representation of the transactions, activities or practices that they document.

Accessible - records are always made available and accessible when required (*with additional security permissions for selected staff where the document content requires it).*

Complete - records have integrity in terms of content, context and structure.

Compliant - records always comply with any legal and regulatory record keeping requirements.

Monitored - staff and system compliance with this Data Retention Policy is regularly monitored to ensure that the objectives and principles are being complied with and that all legal and regulatory requirements are being adhered to.

Data Retention

The Trust recognises that data retention is based on justification, i.e. if the Trust can justify it, it can keep it.

The Trust also recognises the following:

1. why it is holding the data in the first instance (please refer to the Trust's Privacy Notice);

2. the legal duty to retain the information for a set period of time;

3. the need to transfer data from one school to another, and between schools and the central team, and in doing so whether there is still a requirement to keep the information;

4. its actual responsibility, i.e. whether appropriate long-term retention is someone else's job, such as the receiving institution or local authority;

5. expectations of Ofsted in terms of the length of time schools can perform detailed reporting;

6. in some instances, the use of aggregated data (counts of pupils) or de-personalised data (individual rows but with names and other identifiers removed).

Data Retention Housekeeping

For all data and records obtained, used and stored within the Trust, we:

1. carry out periodical reviews of the data retained, checking purpose, continued validity, accuracy and requirement to retain;

2. establish and verify retention periods for the data;

3. have processes in place to ensure that records pending audit, litigation or investigation are not destroyed or altered;

4. transfer paper-based records and data to an alternative media format in instances of long retention periods (*with the lifespan of the media and the ability to migrate data, where necessary, always being considered*);

5. ensure that, where any paper-based records have been transferred to an alternative format, the new copy is verified as being identical to the original (complete and accurate) and appearing in back-ups before the original is destroyed. The paper-based records will be securely destroyed after a period of up to six months.

Information Asset Register

All data assets have designated owners to ensure accountability and a systematic approach to data retention and destruction. The Information Asset Owners are identified in the Trust's Information Asset Registers.

The Information Asset Register identifies the data asset, data asset owner, lawful basis for processing personal data, access and security, format, retention periods, risks/impacts, data protection impact assessments undertaken and whether a privacy notice is in place. It also records any data breaches against the information asset.

Data Retention Schedule

Data Protection Law does not impose specific limits or prescriptions on periods of retention for any data. Nevertheless, the Trust recognises the importance of putting in place a Data Retention Policy to demonstrate compliance with the 'storage limitation' principle. It also recognises that the retention of data varies greatly with the different area of administration of school life.

The Data Retention Schedule (Appendix 1) which forms part of this policy has been arranged into the following data retention categories:

1.0 Governance, Funding and Financial Management of the Multi-Academy Trust
- 1.1 Governance of the Multi-Academy Trust
- 1.2 Board of Trustees, Members' Meetings and Committees
- 1.3 Funding and Finance
- 1.4 Policies, Frameworks and Overarching Requirements

2.0 Human Resources
- 2.1 Recruitment
- 2.2 Operational Staff Management
- 2.3 Management of Disciplinary and Grievance Processes
- 2.4 Health and Safety

3.0 Management of the School or Setting
- 3.1 Admissions
- 3.2 Headteacher and Senior Management Team

4.0 Property Management
- 4.1 Property Management
- 4.2 Maintenance
- 4.3 Fleet Management

5.0 Pupil Management
- 5.1 Pupil Educational Record
- 5.2 Attendance
- 5.3 Special Educational Needs

6.0 Curriculum Management
- 6.1 Statistics and Management Information
- 6.2 Implementation of Curriculum

7.0 Extracurricular Activities
- 7.1 Educational Visits outside the Classroom
- 7.2 Walking Bus

8.0 Central Government and Local Authority
- 8.1 Local Authority
- 8.2 Central Government

9.0 Internal Correspondence and General Memoranda

9.1 Internal Correspondence and General Memoranda

10.0 ICT

10.1 ICT Incident Reports

11.0 Teaching School (pre-September 2021)

11.1 Trainees on ITT Programme and Newly Qualified Teachers

12.0 Covid-19 Data

12.1 Covid-19 Data and Data in the School Life App

Whilst the Data Retention Schedule draws on recommended 'best practice' retention periods from the IRMS Toolkit for Academies, the IRMS Schools Toolkit and the Department for Education Data Protection Toolkit for Schools, it recognises that there is not a definitive standard across the sector. It also uses other best practice retention guidelines from within the sector.

Where there is any ambiguity or doubt over the retention period of records, the Trust has sought legal advice.

Erasure

The Trust recognises that data subjects have the right to request the erasure of their personal data, but that this is not an absolute right to be forgotten. Data subjects may request the erasure of their personal data only where one of the following grounds applies:

1. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

2. the data subject withdraws consent on which the processing is based according to UK GDPR Article 6(1)(a), or UK GDPR Article 9(2)(a), and where there is no other legal ground for the processing;

3. the data subject objects to the processing under UK GDPR Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing under UK GDPR Article 21(2);

4. the personal data have been unlawfully processed;

5. the personal data have to be erased for compliance with a legal obligation;

6. the personal data have been collected in relation to the offer of information society services directly to a child (UK GDPR Article 8(1).

Data Destruction

All information of a confidential or sensitive nature will be destroyed in a secure way. This ensures that the Trust is compliant with Data Protection Law and recognises the duty of confidentiality.

The Trust is committed to the secure and safe disposal of any confidential waste and information assets in accordance with its contractual and legal obligations and to disposal carried out in an ethical and compliant manner.

The Trust confirms that its approach and procedures comply with the laws and provisions made in the UK GDPR and that staff are trained and advised accordingly on the procedures and controls in place.

The Trust will maintain a record of disposal of information assets.

Appendix 2 of this policy provides a record of disposal used by the Trust.

Outcomes

By implementing the Data Retention Policy, the Trust will:

1. support the efficient and effective use of its infrastructure through appropriate data storage;

2. minimise the risk to personal data by practising data minimisation;

3. avoid inaccurate or duplicate data;

4. meet legislative and regulatory requirements for the deletion of data;

5. meet the requirements of Data Protection Law.

Appendix 1: Data Retention Schedule

For ease of use and to ensure appropriate retention of data, the following colour-coding system has been used:

Blue = Data retained at **Central** level only

Yellow = Data retained at **School or Setting** level only

Green = Data retained at **Central** and at **School or Setting** level

1.0 Governance, Funding and Financial Management of the Multi-Academy Trust								
1.1 Governance of the Multi Academy Trust								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
1.1.1	Governance Statement			Life of governance statement + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.2	Articles of Association			Life of the MAT		Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.3	Memorandum of Association			This can be disposed of once the MAT has been incorporated	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.4	Memorandum of Understanding of Shared Governance among Schools		*Companies Act 2006 section 355*	Life of Memorandum of Understanding + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.5	Constitution			Life of the MAT		Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.6	Special Resolutions to amend the Constitution			Life of the MAT		Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.7	Written Scheme of Delegation		*Companies Act 2006 section 355*			Company Secretary		

1.1 Governance of the Multi Academy Trust								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
1.1.8	Trustees – Appointment	Data capture sheets, Declarations of Acceptance of the Responsibilities of Directors, Online searches, References, Ordinary Members' Resolutions, Companies House filings, Right to Work document, DBS details		Life of appointment + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.9	Trustees – Disqualification	Companies House filings	*Company Directors Disqualification Act 1986*	Date of disqualification + 15 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.10	Trustees – Termination of Office	Companies House filings		Date of termination + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.11	Annual Report – Trustees' Report	Part of annual accounts	*Companies Act 2006 section 355*	Date of report + 10 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.12	Annual Report and Accounts		*Companies Act 2006 section 355*	Date of report + 10 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	

1.1 Governance of the Multi Academy Trust								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
1.1.13	Annual Return		*Companies Act 2006 section 355*	Date of report + 10 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.14	Statement of Trustees' Responsibilities			Life of appointment + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.15	Appointment and Removal of Members	Special Resolutions, Consent Forms for Company Membership, Online searches and References, Right to Work document, DBS details		Life of appointment + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.16	Strategic Review	End-of-year accounts report		Date of the review + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.1.17	Strategic Plan [also known as School Development Plans]			Life of plan + 6 years	SECURE DISPOSAL	CEO	IRMS Toolkit for Academies (2019)	
1.1.18	Accessibility Plan		*Limitation Act 1980 (Section 2)*	Life of plan + 6 years	SECURE DISPOSAL	Central – Proprietor of premises School/Setting – Named officer	IRMS Toolkit for Academies (2019)	

	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
1.1.19	Terms of Reference			Date document superseded + 6 years	STANDARD DISPOSAL	Company Secretary		
1.1.20	Appointment and Removal of members of committees [Local Governing Bodies]	Application forms, Online searches, References, Right to Work document, DBS details		Life of appointment + 6 years	SECURE DISPOSAL	Central – Company Secretary School – Named officer		

1.2 Board of Trustees, Members' Meetings and Committees								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
	Board of Trustees							
1.2.1	Board Meeting Minutes and Agendas		*Companies Act 2006 section 248*	Minutes must be kept for at least 10 years from the date of the meeting (master copy)	OFFER TO ARCHIVES OR SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.2.2	Board Decisions			Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES OR SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.2.3	Board Meeting: Annual Schedule of Business	Agendas		One copy should be retained with the master set of minutes for at least 10 years from the date of the meeting (master copy). All other copies can be disposed of	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.2.4	Board Meeting: Procedures for conduct of meeting	Cf. Articles of Association	*Limitation Act 1980 (Section 2)*	Date procedures superseded + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	

1.2 Board of Trustees, Members' Meetings and Committees								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
	Committees							
1.2.5	Minutes and agendas relating to any committees set up by the Board of Trustees	Finance and Resources Committee, Audit and Risk Committee, CEO Performance Management Committee, Executive Pay Committee, Local Governing Bodies, Headteacher Performance Management Committees, Pay Committees		Date of the meeting + a minimum of 10 years	OFFER TO ARCHIVES OR SECURE DISPOSAL	Central - Company Secretary School – Named officer	IRMS Toolkit for Academies (2019)	
	General Members' Meetings							
1.2.6	Records relating to the management of General Members' Meetings		*Companies Act 2006 section 248*	Minutes must be kept for at least 10 years from the date of the meetings	OFFER TO ARCHIVES OR SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.2.7	Records relating to the management of the Annual General Meetings		*Companies Act 2006 section 248*	Minutes must be kept for at least 20 years from the date of the meeting	OFFER TO ARCHIVES OR SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	

1.2 Board of Trustees, Members' Meetings and Committees								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
1.2.8	Inspection Copies	Copies which the clerk 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		Date of meeting + 3 years	SECURE DISPOSAL	Central – Company Secretary School – Named officer	IRMS Toolkit for Academies (2019)	
1.2.9	Reports presented to the Board of Trustees and its committees			Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to the individual reports, then the reports should be kept for the life of the School	SECURE DISPOSAL or retain with the signed set of minutes	Central - Company Secretary School - Named officer	IRMS Toolkit for Academies (2019)	
1.2.10	Meeting papers relating to the annual parents' meeting held under Section 33 of the Education Act 2002		*Education Act 2002 section 33*	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

1.2 Board of Trustees, Members' Meetings and Committees								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
1.2.11	Trusts and Endowments managed by the Governing Body				PERMANENT	Named officer	IRMS Toolkit for Academies (2019)	
1.2.12	Records relating to complaints dealt with by headteachers, the CEO and/or the Complaints Committee	Meeting notes and Reports		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL	Central - Complaints Administrator School/Setting - Headteacher	IRMS Toolkit for Academies (2019)	
1.2.13	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 [Optional]		*Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171*	Date of report + 10 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

1.2 Board of Trustees, Members' Meetings and Committees								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
	Statutory Registers							
1.2.14	Register of Trustees		*Companies Act 2006*	Life of the MAT + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.2.15	Register of Trustees' interests [this is not a statutory register]			Life of the MAT + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.2.16	Register of Trustees' residential addresses		*Companies Act 2006*	Life of the MAT + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.2.17	Register of gifts, hospitality and entertainments		*Companies Act 2006*	Life of the MAT + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.2.18	Register of Members		*Companies Act 2006*	Life of the MAT + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.2.19	Register of Secretaries		*Companies Act 2006*	Life of the MAT + 6 years	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.2.20	Declaration of Interests Statements [Governors] [this is not a statutory register]	Business and Pecuniary Interests		Life of the MAT + 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

1.3 Funding and Finance	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
	Strategic Finance							
1.3.1	Statement of financial activities for the year			Current financial year + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.3.2	Financial planning			Current financial year + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
1.3.3	Value for money statement			Current financial year +6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.3.4	Records relating to the management of VAT			Current financial year + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
1.3.5	Whole of government accounts returns			Current financial year + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.3.6	Borrowing powers			Current financial year + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.3.7	Budget plan			Current financial year + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
1.3.8	Charging and remissions policy			Date policy superseded + 3 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	
	Audit Arrangements							
1.3.9	Finance and Resources Committee and Audit and Risk Committee, and appointment of responsible officers			Life of the MAT	SECURE DISPOSAL	Company Secretary	IRMS Toolkit for Academies (2019)	
1.3.10	Independent Auditor's report on regularity			Financial year report relates to + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	

1.3 Funding and Finance								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
1.3.11	Independent Auditor's report on financial statements			Financial year report relates to + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
	Funding Agreements							
1.3.12	Funding Agreement with Secretary of State and supplemental funding agreements			Date of last payment of funding + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.3.13	Funding Agreement – Termination of the funding agreement			Date of last payment of funding + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.3.14	Funding Records – Capital Grant			Date of last payment of funding + 6 years	SECURE DISPOSAL	Central – CFO School – SBM	IRMS Toolkit for Academies (2019)	
1.3.15	Funding Records – Earmarked Annual Grant (EAG)			Date of last payment of funding + 6 years	SECURE DISPOSAL	Central – CFO School – SBM	IRMS Toolkit for Academies (2019)	
1.3.16	Funding Records – General Annual Grant (GAG)			Date of last payment of funding + 6 years	SECURE DISPOSAL	Central – CFO School – SBM	IRMS Toolkit for Academies (2019)	
1.3.17	Per pupil funding records			Date of last payment of funding + 6 years	SECURE DISPOSAL	Central – CFO School – SBM	IRMS Toolkit for Academies (2019)	
1.3.18	Exclusions agreement			Date of payment of last funding + 6 years	SECURE DISPOSAL	Central – CFO School – SBM	IRMS Toolkit for Academies (2019)	
1.3.19	Funding records			Date of last payment of funding + 6 years	SECURE DISPOSAL	Central – CFO School – SBM	IRMS Toolkit for Academies (2019)	

1.3 Funding and Finance	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
	Funding Agreements							
1.3.20	Gift Aid and Tax Relief			Date of last payment + 6 years	SECURE DISPOSAL	Central – CFO School – SBM	IRMS Toolkit for Academies (2019)	
1.3.21	Records relating to loans			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	CFO	IRMS Toolkit for Academies (2019)	
1.3.22	Maternity pay records		*Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)*	Current year + 3 years	SECURE DISPOSAL	Payroll provider	IRMS Toolkit for Academies (2019)	
1.3.23	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995		*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	Payroll provider	IRMS Toolkit for Academies (2019)	
1.3.24	Management of the Teachers' Pension Scheme			Date of last payment on the pension + 6 years	SECURE DISPOSAL	Payroll provider	IRMS Toolkit for Academies (2019)	

1.3 Funding and Finance								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
1.3.25	Records relating to pension registrations			Date of last payment on the pension + 6 years	SECURE DISPOSAL	Payroll provider	IRMS Toolkit for Academies (2019)	
1.3.26	Payroll records			Date payroll run + 6 years	SECURE DISPOSAL	Payroll provider	IRMS Toolkit for Academies (2019)	
	Risk Management and Insurance							
1.3.27	Insurance policies			Date the policy expires + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.3.28	Records relating to the settlement of insurance claims			Date claim settled + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
1.3.29	Employer's Liability Insurance Certificate			Closure of the MAT + 40 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
	Endowment Funds and Investments							
1.3.30	Investment policies			Life of the investment + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.3.31	Management of Endowment Funds			Life of the fund + 6 years	SECURE DISPOSAL	Central – CFO School – SBM	IRMS Toolkit for Academies (2019)	
	Accounts and Statements							
1.3.32	Annual accounts			Current year + 6 years	STANDARD DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.3.33	Grants managed by the school			Minimum of current year + 6 years or longer as per grant schedule	SECURE DISPOSAL	SBM		

1.3 Funding and Finance								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
1.3.34	Student Grant applications			Current year + 3 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	
1.3.35	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers			Life of the budget + 3 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
1.3.36	Invoices, receipts, order books and requisitions, delivery notices			Current financial year + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
1.3.37	Records relating to the collection and banking of monies			Current financial year + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
1.3.38	Records relating to the identification and collection of debt			Current financial year + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
	Contract Management							
1.3.39	All records relating to the management of contracts under seal		*Limitation Act 1980*	Last payment on the contract + 12 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
1.3.40	All records relating to the management of contracts under signature		*Limitation Act 1980*	Last payment on the contract + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
1.3.41	Records relating to the monitoring of contracts			Current year + 2 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
	Asset Management							
1.3.42	Inventories of furniture and equipment			Current year + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	

1.3 Funding and Finance	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
	Asset Management							
1.3.43	Burglary, theft and vandalism report forms			Current year + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
1.3.44	Records relating to the leasing of shared facilities, such as sports centres			Current year + 6 years	SECURE DISPOSAL	Central – CFO School – SBM	IRMS Toolkit for Academies (2019)	
1.3.45	Land and building valuations			Date valuation superseded + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
1.3.46	Disposal of assets			Date asset disposed of + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – SBM	IRMS Toolkit for Academies (2019)	
1.3.47	Community School leases for land			Date lease expires + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.3.48	Commercial transfer arrangements			Date of transfer + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.3.49	Transfer of land to the Academy Trust			Life of land ownership then transfer to new owner	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.3.50	Transfers of freehold land			Life of land ownership then transfer to new owner	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
	School Fund							
1.3.51	School Fund – Cheque books			Current year + 6 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	

1.3 Funding and Finance								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
1.3.52	School Fund – Paying in books			Current year + 6 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	
1.3.53	School Fund – Ledger			Current year + 6 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	
1.3.54	School Fund – Invoices			Current year + 6 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	
1.3.55	School Fund – Receipts			Current year + 6 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	
1.3.56	School Fund – Bank statements			Current year + 6 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	
1.3.57	School Fund – Journey books			Current year + 6 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	
	School Meals							
1.3.58	Free school meals registers	Pupil information (where registers are used as a basis for funding)		Current year + 6 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	
1.3.59	School meals registers			Current year + 3 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	
1.3.60	School meals summary sheets			Current Year + 3 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	

1.3 Funding and Finance								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
1.3.61	Pupil Premium Fund Records	Pupil Premium fund details		Date pupil leaves + 6 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Schools	

1.4 Policies, Frameworks and Overarching Requirements								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
1.4.1	Data Protection Policy, including data protection notification			Date policy superseded + 6 years	SECURE DISPOSAL	Operations Manager	IRMS Toolkit for Academies (2019)	
1.4.2	Freedom of Information Policy			Date policy superseded + 6 years	SECURE DISPOSAL	Operations Manager	IRMS Toolkit for Academies (2019)	
1.4.3	Information Security Breach Policy			Date policy superseded + 6 years	SECURE DISPOSAL	Operations Manager	IRMS Toolkit for Academies (2019)	
1.4.4	Special Educational Needs Policy			Date policy superseded + 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
1.4.5	Complaints Policy			Date policy superseded + 6 years	SECURE DISPOSAL	Operations Manager	IRMS Toolkit for Academies (2019)	
1.4.6	Risk and Control Framework	Financial Scheme of Delegation		Life of framework + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
1.4.7	Home School Agreements			Date agreement revised + 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
1.4.8	Equality Information and Objectives (public sector equality duty) Statement for publication			Date of statement + 6 years	SECURE DISPOSAL	Central – HR Officer School/Setting – Named officer	IRMS Toolkit for Academies (2019)	

2.0 Human Resources

2.1 Recruitment

	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
2.1.1	All records leading up to the appointment of a new headteacher	Application forms, Candidate assessment/shortlisting notes and Interview notes, online searches		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL	HR Manager	IRMS Toolkit for Academies (2019)	
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Application forms, online searches and Interview notes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL	Central – HR Manager School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Application forms, Candidate assessment/shortlisting notes and Interview notes, online searches		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	SECURE DISPOSAL	Central – HR Manager School/Setting – Named officer	IRMS Toolkit for Academies (2019)	

2.1 Recruitment	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
2.1.4	Pre-employment vetting information – DBS Checks		*Keeping children safe in education Statutory guidance for schools and colleges September 2025*	Copies of DBS certificates should not be kept (this includes DBS snapshots; where the DBS Update Service is used, a printout of the online check should be retained on file). If certificate information is required to allow for the consideration and resolution of any disputes or complaints, or for the purpose of completing safeguarding audits, it should be securely disposed of after 6 months				
2.1.5	Proofs of identity			These should be checked and a copy added to the Staff Personal File	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
2.1.6	Compliance checks document/letter of assurance	e.g. supply staff and contractors		These documents should be retained for no more than 12 months after the person ceases to work in the school	SECURE DISPOSAL	Named officer		

2.1 Recruitment	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
2.1.7	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Includes additional documents required for non-UK citizens (e.g. share code document, certificate of good conduct, letter from official body confirming the person's identity)		These documents should be added to the Staff Personal File. Copies should be taken only for candidates who have been successfully appointed	SECURE DISPOSAL	Central – HR Manager School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.1.8	Records relating to the employment of overseas staff			These documents should be added to the Staff Personal File	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
2.1.9	Records relating to the TUPE process			Date last member of staff transfers or leaves the organisation + 6 years	SECURE DISPOSAL	HR Manager	IRMS Toolkit for Academies (2019)	
2.1.10	Single central record	Personal and sensitive data; DBS checks		Entry kept to reflect current workforce. If someone leaves, they should be deleted from the record	NOT APPLICABLE	Central – HR Officer School/Setting – Named officer		

2.2 Operational Staff Management								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
2.2.1	Staff Personal File, including employment contract and staff training records	Personal and sensitive data	*Limitation Act 1980 (Section 2)*	Termination of employment + 6 years	SECURE DISPOSAL	Central – HR Manager School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.2.2	Photo consent forms	Images used for the purposes listed in the photo consent form		To reflect retention of images (termination of employment + no more than 2 years)	SECURE DISPOSAL	Central – Operations Manager School/Setting – Named officer	Data Controller to consider the lawful basis for retaining beyond this point	
2.2.3	Timesheets	Record of staff onsite (logging in and out)		Current year + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.2.4	Annual performance development records	Personal development records and promotion/ regrading		Current year + 5 years	SECURE DISPOSAL	Central – CEO School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.2.5	Records relating to the agreement of pay and conditions			Date pay and conditions superseded + 6 years	SECURE DISPOSAL	Central – CFO School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.2.6	Training needs analysis			Current year + 1 year	SECURE DISPOSAL	Central – CEO School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.2.7	Staff absence and attendance	Annual leave record; absence record; sickness record		Termination of employment + 6 years	SECURE DISPOSAL	Central – HR Manager School/Setting – Named officer	IRMS Toolkit for Schools	

2.2 Operational Staff Management								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
2.2.8	Occupational Health reports			Termination of employment + 6 years	SECURE DISPOSAL	Central – HR Manager School/Setting – Named officer		
2.2.9	Risk assessments	Individual circumstances, including for medical conditions		Termination of employment + 6 years	SECURE DISPOSAL	Central – HR Manager School/Setting – Named officer		
2.2.10	0365 user accounts (leavers)	Email and OneDrive		Termination of employment + 1-3 months	DELETED ELECTRONICALLY	Central – HR Manager School/Setting – Named officer		

2.3 Management of Disciplinary and Grievance Processes								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
2.3.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded		*Keeping children safe in education Statutory guidance for schools and colleges September 2025; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2023*	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	Central – CEO School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.3.2	Disciplinary Proceedings	Letters, reports and meeting notes relating to cases		Where the document relates to child protection issues, see 2.3.1. Contact Designated Safeguarding Officer for further advice		Central – HR Manager School/Setting – Named officer		
	• Oral warning			For duration of warning Designated Safeguarding Officer for further advice	If warnings are placed on personal files, they must be weeded from the file and then ARCHIVED			

2.3 Management of Disciplinary and Grievance Processes								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
	• Written warning – level 1			For duration of warning	If warnings are placed on personal files, they must be weeded from the file and then ARCHIVED			
	• Written warning – level 2			For duration of warning	If warnings are placed on personal files, they must be weeded from the file and then ARCHIVED			
	• Final warning			For duration of warning	If warnings are placed on personal files, they must be weeded from the file and then ARCHIVED			
	• Termination of employment			Termination of employment + 6 years	SECURE DISPOSAL			
	• Case not found			If the incident is child protection related, see above; otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL		IRMS Toolkit for Academies (2019)	

2.3 Management of Disciplinary and Grievance Processes								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
2.3.3	Low-level Concerns	Written records	*Keeping children safe in education Statutory guidance for schools and colleges September 2025*	Termination of employment then review	SECURE DISPOSAL	Central – HR Manager School/Setting – Named officer		
2.3.4	Grievance Proceedings							
	• Grievance Form/Grievance Appeal Form			Documents should be added to the staff personal file	SECURE DISPOSAL	Central – HR Manager School/Setting – Named officer		
	• Hearing documents			For duration of grievance	SECURE DISPOSAL	Central – HR Manager School/Setting – Named officer		
	• Decision letter			Document should be added to the staff personal file	SECURE DISPOSAL	Central – HR Manager School/Setting – Named officer		

2.3 Management of Disciplinary and Grievance Processes								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
2.3.5	Employment Tribunal Case Records (Heard and Determined)			Cases sent to appeal: • Where an appeal has been lodged and accepted by the Employment Appeal Tribunal, keep for 30 months from the date that the decision was sent to parties or the appeal process has been completed (that may include further appeals from the EAT) (whichever is the longest), and then DESTROY • If the appeal has not been accepted, keep for 12 months from the decision was sent to the parties and then DESTROY All other cases: Keep for 12 months from the date the decision	SECURE DISPOSAL	Central – HR Manager School/Setting – Named officer	Employment Tribunal	

2.4 Health and Safety								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
2.4.1	Health and Safety policy statements			Life of policy + 3 years	SECURE DISPOSAL	Central – Operations Manager School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.4.2	Health and Safety risk assessments			Life of risk assessment + 3 years	SECURE DISPOSAL	Central – CFO School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.4.3	Daily health and safety checklists	Room checks in nursery setting		3 years then DELETE		School/setting – Named officer		
2.4.4	Records relating to accident/injury at work			Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL	Central – CFO School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.4.5	Accident reporting (including near misses)	Information relating to individuals	*Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980*	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below		Central – Trust Business Leader School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
	• Adults			Date of incident + 3 years	SECURE DISPOSAL		IRMS Toolkit for Academies (2019)	

2.4 Health and Safety								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
	• Children			Date of birth of the child + 25 years	SECURE DISPOSAL		IRMS Toolkit for Academies (2019)	
2.4.6	Control of Substances Hazardous to Health (COSHH)			Current year + 10 years then REVIEW	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	Asbestos register		Last action + 40 years	SECURE DISPOSAL	Central – Proprietor of premises School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.4.8	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation			Last action + 50 years	SECURE DISPOSAL	Central – Proprietor of premises School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.4.9	Fire precautions log books			Current year + 6 years	SECURE DISPOSAL	Central – Proprietor of premises School/Setting – Named officer	IRMS Toolkit for Academies (2019)	

2.4 Health and Safety								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
2.4.10	Fire risk assessments		*Fire Service Order 2005*	Life of the risk assessment + 6 years	SECURE DISPOSAL	Central – Proprietor of premises School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.4.11	Incident reports			Current year + 20 years	SECURE DISPOSAL	Central – Proprietor of premises School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
2.4.12	CCTV	Images of pupils, workforce, governors/trustees, visitors		Images retained for 30 days unless requested as part of an incident and then stored and archived for 12 months	DELETED ELECTRONICALLY	Central – Proprietor of premises School/Setting – Named officer	Considered good practice within the industry	
2.4.13	Visitor books and signing-in sheets	Name of individual, company, time of entry and departure and vehicle registration		Current year + 6 years then review	SECURE DISPOSAL	Central – Proprietor of premises School/Setting – Named officer	IRMS Toolkit for Schools	

3.0 Management of the School or Setting

3.1 Admissions	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
3.1.1	All records relating to the creation and implementation of the School Admissions Policy		*School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels September 2021*	Life of the policy + 3 years then REVIEW	SECURE DISPOSAL	Central – Operations Manager School – Named officer	IRMS Toolkit for Academies (2019)	
3.1.2	Admissions – if the admission is successful	Pupil data received and used at point of enrolment and Data used in MIS as a core record	*School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels September 2021*	Date of admission + 1 year	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
3.1.3	Admissions – if the appeal is unsuccessful	Pupil data	*School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels September 2021*	Resolution of case + 1 year	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

3.1 Admissions								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
3.1.4	Register of admissions		*Working together to improve school attendance: Guidance to help schools, academy trusts, governing bodies, and local authorities maintain high levels of school attendance including roles and responsibilities May 2022*	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	REVIEW Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates the attended the school	Named officer	IRMS Toolkit for Academies (2019)	
3.1.5	Admissions – Secondary Schools – Casual			Current year + 1 year	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
3.1.6	Proofs of address supplied by parents as part of the admissions process		*School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels September 2021*	Current year + 1 year	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

3.2 Headteacher and Senior Management Team								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
3.2.1	Log books of activity in the school maintained by the headteacher			Date of last entry in the book + a minimum of 6 years then REVIEW	These could be of permanent historical value and should be offered to the County Archives Service, if appropriate	Named officer	IRMS Toolkit for Academies (2019)	
3.2.2	Minutes of meetings of MAT Headteachers, Senior Management Teams and other internal administrative bodies			Date of the meeting + 3 years then REVIEW annually, or as required if not destroyed	SECURE DISPOSAL	Central – Trust Administrator School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
3.2.3	Reports created by the headteacher or the management team			Date of the report + a minimum of 3 years then REVIEW	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
3.2.4	Records created by headteachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities			Current academic year + 6 years then REVIEW	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

3.2 Headteacher and Senior Management Team								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
3.2.5	Correspondence created by headteachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities			Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
3.2.6	Professional Development Plans	Courses and training		Life of the plan + 6 years	SECURE DISPOSAL	Central – CEO School/Setting – Named officer	IRMS Toolkit for Academies (2019)	
3.2.7	Reports and papers from Quality Reviews and other evaluations of the school/setting			Life of the report then REVIEW	SECURE DISPOSAL	Central – CEO School/Setting – Named officer	IRMS Toolkit for Schools	
3.2.8	Copies of FOI and SAR responses and associated documents			Date of correspondence + 3 years then REVIEW	SECURE DISPOSAL	Central – Operations Manager School/Setting – Named officer		

4.0 Property Management

4.1 Property Management	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
4.1.1	Title deeds of properties belonging to the MAT			These should follow the property, unless the property has been registered with the Land Registry		CFO	IRMS Toolkit for Academies (2019)	
4.1.2	Plans of property belonging to the MAT			These should be retained whilst the building belongs to the MAT and should be passed on to any new owners if the building is leased or sold		CFO	IRMS Toolkit for Academies (2019)	
4.1.3	Leases of property leased by or to the MAT			Expiry of lease + 6 years	SECURE DISPOSAL	CFO	IRMS Toolkit for Academies (2019)	
4.1.4	Records relating to the letting of MAT premises			Current financial year + 6 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	
4.1.5	Business continuity and disaster recovery plans			Date the plan superseded + 3 years	SECURE DISPOSAL	Central – CFO School/Setting – Named officer	IRMS Toolkit for Academies (2019)	

4.2 Maintenance								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
4.2.1	All records relating to the maintenance of a school carried out by contractors			Current year + 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
4.2.2	All records relating to the maintenance of a school carried out by school employees, including maintenance log books			Current year + 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

4.3 Fleet Management								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
4.3.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g. contracts/leases, quotes, approvals		*Limitation Act 1980 (Section 2)*	Disposal of the vehicle + 6 years	SECURE DISPOSAL	SBM	IRMS Toolkit for Academies (2019)	
4.3.2	The process of managing allocation and maintenance of vehicles, e.g. lists of who was driving the vehicles and when, maintenance		*Limitation Act 1980 (Section 2)*	Disposal of the vehicle + 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
4.3.3	Service logs and vehicle logs		*Limitation Act 1980 (Section 2)*	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
4.3.4	GPS tracking data relating to the vehicles		*Limitation Act 1980 (Section 2)*	Date of journey + 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

5.0 Pupil Management

5.1 Pupil Educational Record								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
5.1.1	Pupil Education Record required by The Education (Pupil Information) (England) Regulations 2005		*The Education (Pupil Information) (England) Regulations 2005 SI 2005 No 1437*			Named officer		
	• Primary			Retain whilst the child remains at the primary school. Transfer to receiving school when child leaves the school. Record transferred from primary school to receiving school. Retained by receiving school from DOB of the child + 25 years	Common Transfer File by the Data Controller. Data at source will need to be disposed of in line with the appropriate retention period. SECURE DISPOSAL by the Data Controller (receiving 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		IRMS Toolkit for Academies (2019)	
	• Primary	MIS data		Pupil leave date + 6 years				
	• Secondary		*Limitation Act 1980 (Section 2)*	Date of birth of the pupil + 25 years	SECURE DISPOSAL		IRMS Toolkit for Academies (2019)	

5.1 Pupil Educational Record								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
5.1.2	Records relating to the management of exclusions			Date of birth of the pupil + 25 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
5.1.3	Management of examination registrations			The examination board will usually mandate how long these records need to be retained		Named officer	IRMS Toolkit for Academies (2019)	
5.1.4	Examination results – pupil copies					Named officer		
	• Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board		IRMS Toolkit for Academies (2019)	
	• Internal			This information should be added to the pupil file			IRMS Toolkit for Academies (2019)	
5.1.5	• Child protection information held on pupil file		*Keeping children safe in education Statutory guidance for schools and colleges September 2025; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2023*	Record transferred from primary school to receiving school. Copy of record may be kept at primary school for up to 6 years (document reasons). Secondary school to retain from DOB of the child + 25 years as part of Student Education Record	SECURE DISPOSAL These records MUST be shredded	Designated Safeguarding Lead	IRMS Toolkit for Schools (in consultation with Safeguarding Children Group)	

5.1 Pupil Educational Record								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
5.1.6	Child protection information held in separate files		*Keeping children safe in education Statutory guidance for schools and colleges September 2025; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2023*	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 Copy of record may be kept at primary school for up to 6 years (document reasons)	SECURE DISPOSAL These records MUST be shredded	Designated Safeguarding Lead	IRMS Toolkit for Academies (2019)	
5.1.7	EYFS	Pupil information and Nursery register		Records should be retained for a reasonable period of time after children have left the provision (e.g. 3 years) or until the next Ofsted inspection after the child has left the setting (whichever is the soonest)	COMMON TRANSFER FILE or SECURE DISPOSAL	Named officer	Childcare Act 2006	

5.1 Pupil Educational Record								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
5.1.8	EYFS	Sleep charts, nappy/toileting charts		Current term	SECURE DISPOSAL	Named officer		
5.1.9	Photo consent forms	Name of parental responsibility and Signature		To reflect retention of photographs (duration of the pupil's time at school + no more than 2 years). Separate consent should be collected if pupils are photographed at events not organised by the school/setting or Trust (third-party events)	SECURE DISPOSAL	Central – Operations Manager (Trust website) School/Setting – Named officer	Data Controller to consider the lawful basis for retaining beyond this point	
5.1.10	Pupil behaviour			Pupil at school + 1 year	SECURE DISPOSAL	Named officer	DfE Data Protection Toolkit for Schools	
5.1.11	Record of restraint			Date of birth of the pupil + 25 years	SECURE DISPOSAL	Named officer		

5.2 Attendance								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
5.2.1	Attendance registers		*Working together to improve school attendance: Guidance to help schools, academy trusts, governing bodies, and local authorities maintain high levels of school attendance including roles and responsibilities May 2022*	Every entry in the attendance register must be preserved for a period of 3 year after the date on which the entry was made	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
5.2.2	Correspondence relating to authorised absence		*Education Act 1996 Section 7*	Current academic year + 2 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

5.3 Special Educational Needs								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
5.3.1	Special Educational Needs files, reviews and Individual Education Plans		*Limitation Act 1980 (Section 2)*	Record transferred from primary school to receiving school. DOB of pupil + 31 years (EHCP is valid until individual reaches age of 25 + 6 years from end of plan in line with Limitation Act)	REVIEW	SENCo	IRMS Toolkit for Schools	
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement		*Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1*	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	SENCo	IRMS Toolkit for Academies (2019)	
5.3.3	Advice and information provided to parents regarding educational needs		*Special Educational Needs and Disability Act 2001 Section 2*	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	SENCo	IRMS Toolkit for Academies (2019)	
5.3.4	Accessibility strategy		*Special Educational Needs and Disability Act 2001 Section 14*	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	SENCo	IRMS Toolkit for Academies (2019)	

6.0 Curriculum Management

6.1 Statistics and Management Information

	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
6.1.1	Curriculum returns			Current year + 3 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
6.1.2	Examination results (school copy)			Current year + 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
	SATs records	Pupil information						
	• 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 – applicable to secondary and special school pupils. The primary school should keep a composite record of all the whole year SATs results. These should be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL		IRMS Toolkit for Academies (2019)	
	• Examination papers			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL		IRMS Toolkit for Academies (2019)	

6.1 Statistics and Management Information								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
	• Year 1 and 2 Phonics Screening Results	Pupil information		Retain while the child is at the primary school	SECURE DISPOSAL			
	• Year 4 Multiplication Tables Check results	Pupil information		Retain while the child is at primary school	SECURE DISPOSAL			
6.1.3	Published Admission Number (PAN) reports			Current year + 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
6.1.4	Value added and contextual data			Current year + 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
6.1.5	Self-evaluation forms			Current year + 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

6.2 Implementation of Curriculum								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/ Date)
6.2.1	Schemes of work			Current year + 1 year	SECURE DISPOSAL or review records at the end of each year and allocate a further retention period	Named officer	IRMS Toolkit for Academies (2019)	
6.2.2	Timetable			Current year + 1 year	SECURE DISPOSAL or review records at the end of each year and allocate a further retention period	Named officer	IRMS Toolkit for Academies (2019)	
6.2.3	Class record books			Current year + 1 year	SECURE DISPOSAL or review records at the end of each year and allocate a further retention period	Named officer	IRMS Toolkit for Academies (2019)	
6.2.4	Mark books			Current year + 1 year	SECURE DISPOSAL or review records at the end of each year and allocate a further retention period	Named officer	IRMS Toolkit for Academies (2019)	
6.2.5	Record of homework set			Current year + 1 year	SECURE DISPOSAL or review records at the end of each year and allocate a further retention period	Named officer	IRMS Toolkit for Academies (2019)	
6.2.6	Pupils' work			Where possible, work should be returned to the pupil at the end of the academic year. Otherwise, current year + 1 year	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
6.2.7	Information Society Services apps, e.g. Purple Mash, Tapestry	Name of pupil and Class		Duration of pupil's time at school	DELETED ELECTRONICALLY	Named officer	Data Controller to consider the lawful basis for retaining beyond this point	
6.2.8	Text/messaging apps for communication between parents and school	Name and contact details of those with parental responsibility		Duration of pupil's time at school	DELETED ELECTRONICALLY	Named officer	Data Controller to consider the lawful basis for retaining beyond this point	

7.0 Extracurricular Activities

7.1 Educational Visits outside the Classroom

	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
7.1.1	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Primary schools		*Outdoor Education Advisers' Panel National Guidance http://oeapng.info specifically Section 3 – 'Legal Framework and Employer Systems' and Section 4 – 'Good Practice'*	Date of visit + 14 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
7.1.2	Records created by schools in order to obtain approval to run an educational visit outside the classroom – Secondary schools		*Outdoor Education Advisers' Panel National Guidance http://oeapng.info specifically Section 3 – 'Legal Framework and Employer Systems' and Section 4 – 'Good Practice'*	Date of visit + 10 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
7.1.3	Parental consent forms for school trips where there has been no major incident	Pupil name and next of kin contact details		Conclusion of the trip (or at the end of the academic year). If in doubt the school should seek legal advice	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

7.1 Educational Visits outside the Classroom								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
7.1.4	Parental permission slips for school trips where there has been a major incident	Pupil name and next of kin contact details	*Limitation Act 1980 (Section 2)*	Date of birth of the pupil involved in the incident + 25 years. Record transferred from primary school to receiving school. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)/DfE Data Protection Toolkit for Schools	
7.1.5	Records relating to residential trips			Date of birth of youngest pupil involved + 25 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

7.2 Walking Bus								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
7.2.1	Walking bus registers			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]	Named officer	IRMS Toolkit for Academies (2019)	

8.0 Central Government and Local Authority								
8.1 Local Authority								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
8.1.1	Secondary transfer sheets (Primary)			Current year + 2 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
8.1.2	Attendance returns			Current year + 1 year	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
8.1.3	School census returns			Current year + 5 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

8.2 Central Government								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
8.2.1	OFSTED reports and papers			Life of the report then REVIEW	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
8.2.2	Returns made to central government			Current year + 6 years	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	
8.2.3	Circulars and other information sent from central government			Operational use	SECURE DISPOSAL	Named officer	IRMS Toolkit for Academies (2019)	

9.0 Internal Correspondence and General Memoranda								
9.1 Internal Correspondence and General Memoranda								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
9.1.1	Internal emails; non-statutory meeting notes and agendas; general enquiries and replies; letters, notes or emails of inconsequential subject matter			Retain for the same period as the document to which they relate or support and save in an appropriate location outside of the email system. Correspondence or memoranda that do not relate to any documents that have already been assigned a retention period should be deleted or shredded once their content is no longer considered to be necessary or useful, or after a maximum period of two years	DELETED ELECTRONICALLY/ STANDARD DISPOSAL OF PAPER FILES (NON-CONFIDENTIAL)	All users		

10.0 ICT								
10.1 ICT Incident Reports								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
10.1.1	ICT Incident Reports			Date of incident + 60 months. Records should be reviewed biannually	SECURE DISPOSAL	Central – Operations Manager School/Setting – Named officer		

11.0 Teaching School (pre-September 2021)

11.1 Trainees on ITT Programme and Newly Qualified Teachers (pre-September 2021)								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
11.1.1	ITT interview paperwork	Interview task, degree transcripts, interview notes		Current year for NEWMAN and HAYBRIDGE trainees. Paperwork for applicants who do not become trainees should be destroyed at the end of the application (previous) year	SECURE DISPOSAL	Trust Administrator		
11.1.2	ITT progress data	School observations and reports		Previous and current year (once QTS achieved) + 1 year	SECURE DISPOSAL	Trust Administrator		
11.1.3	NQT assessment forms			Completion of induction + 6 years	SECURE DISPOSAL	Trust Administrator	DfE publication: Induction for newly qualified teachers (NQTs)	
11.1.4	ITT marketing materials	Photographs and associated consent forms		Current year + 2 years	SECURE DISPOSAL	Trust Administrator		
11.1.5	Registered interest in ITT events	Names/email addresses of prospective trainees		Current year + 1 year (delete tab)	SECURE DISPOSAL	Trust Administrator		
11.1.6	Emergency contacts	Trainees' emergency phone numbers and email addresses		Current year	SECURE DISPOSAL	Trust Administrator		

12.0 Covid-19 Data								
12.1 Covid-19 Data and Data in the School Life App								
	Basic file description	Content	Statutory Provisions	Retention Period [Operational]	Action at end of administrative life of the record	Information Asset Owner	Good Practice	Annual Review Completed (Initials/Date)
12.1.1	'Documents' that may be required for HM Government's UK Covid-19 Inquiry	Information of any description that schools have been asked to process/hold with regard to Covid-19 activities. The information may be in paper or electronic form, and includes, but is not limited to, reports, reviews, board/committee minutes, meeting/attendance notes, manuscript notes, memoranda, circulars, governing/constitutional documents, contract documents, legislation, letters/emails (internal and external), WhatsApp messages, information from websites, guides/codes of conduct, policy documents/statements, articles, photographs, video and audio recordings, physical evidence, witness statements and their exhibits		Until further informed by HM Government that it is appropriate to destroy/close accounts	SECURE DISPOSAL	Central – Operations Manager School – Named officer		

Appendix 2: Record of Information Asset Disposal					
Basic File Description	**Number Of Files and Date Range**	**Data Retention Period**	**Destruction Method**	**Date of Destruction**	**Information Asset Owner/Name of Authorising Officer**
[e.g. Visitor Books and Signing in sheets]	**[e.g. 1 file; 1/9/2020-21/8/2021]**	**[e.g. Current + 6 years then review]**	**[e.g. Secure waste disposal contract with certificate of disposal obtained]**	**[e.g. DD/MM/YYYY]**	**[e.g. School Business Manager]**