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<b>Published date</b>	<b>March 2026</b>	<b>Responsible Officer</b>	Trust Operations Manager

## Introduction and Principles

This policy sets out the principles adopted by LiFE Multi Academy Trust and associated schools and all other activities under the control of the Trust in respect of the retention and disposal of records that contain personal data or other confidential information.

Associated policies:

- LiFE Data Protection Policy

Management of records by a Public Authority is a legal obligation (Section 46 of the Freedom of Information Act 2000).

The Code issued on 15 July 2021 sets out key principles about records and their management. These are the:-

- Value of the information
- Integrity of the Information
- Accountability for the information

There are a range of statutory, regulatory and guidance that oblige us to accept, create, use, edit, store and dispose of records. It is necessary to establish clarity about records keeping systems.

## Aims

- To effectively manage the records that are created and are integral to the operation of the Trust and associated schools.
- To confirm a clear framework to manage records and information within the Trust and schools.
- To provide an environment where records are stored securely.
- To ensure that records are accessible to those who need them.
- To ensure that the Trust and schools workforce responsible for records management understand these obligations.
- To give effect to the s.46 Code of Practice our records management will take note of the principles it sets out.

## Scope

This schedule applies to the Trust and its schools workforce and to all school records, whether the records originate within the school or are shared with the school by other means.

Records that are shared with third parties as a result of consent, regulatory obligations or contractual agreements are within the scope of this schedule.

In the Trust the records that we access and hold originate and are stored in a variety of formats, that include physical, digital, electronic audio/visual records. Some are held locally in schools, some are stored virtually in cloud solutions others are hosted by third party providers.

All records are within the scope of this schedule, records are required to be stored and retained in accordance with the document retention schedule attached to this document.

Records may refer to individuals, financial planning tools, contracts, commercial organisations, public authorities or charitable organisations. Some records will contain personal data.

Record retention and storage will be reviewed from time to time to ensure that the aims of this schedule are met.

### **Responsibilities and Actions**

The LiFE Multi Academy Trust Trustees are ultimately responsible for this schedule, however on a daily basis operational management of the policy is delegated to the Headteachers, Senior and Executive Leadership Teams.

Management of the schedule will be reviewed by Trust Operations Manager and Data Protection Officer on at least an annual basis.

The Headteachers will be required to monitor compliance with this schedule by undertaking at least an annual check to determine if records are stored securely and can be accessed appropriately, in accordance with requirements in this document.

Within schools, responsibility for compliance with this schedule will be with Headteachers.

An active retention policy is applied to confirm what records are to be retained and set out a timeline for their secure disposal.

Individual school staff, Central Team staff, contractors, volunteers and employees have personal responsibility for records within their control and day to day handling by ensuring that:

- records are to be handled in accordance with the Trust policies and good practice for secure storage and usage
- keep accurate records as required
- Personal data contained in records is used in compliance with the UK GDPR and Trust Data Protection policies and protocols
- personal information is shared appropriately and with a proper legal basis with any third party;
- records are securely disposed in accordance with the Trusts's Records Retention Schedule

### **How long do we keep our records for?**

Records should be kept for as long as they are needed to meet and perform the operational duties of the Trust, together with the legal and regulatory requirements. Where records are likely to have

a historical value, or are worthy of permanent preservation, we may choose to archive them at the end of any statutory retention period as indicated in the attached schedule.

### **Child Abuse Records**

The Independent Inquiry into Child Sexual Abuse (Final Report 2022) recommends that any records that relate (or could relate) to sexual abuse should be retained for 75 years or 10 years past the retirement of a relevant member of staff, whichever is the longer term. We shall implement this and ensure that notification of the relevant records is made in the event of any transfer.

### **Relationship with existing policies and obligations**

This schedule has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- Privacy Notices
- Data Sharing Agreements
- Information Security policy
- IT security and use policies
- Records retention policy/guidelines
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the trust and schools.

### **Creation and Management of School Archives**

The school archives managed by the Trust and associated schools are maintained as a resource to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging and shared heritage; to prompt memories of school-life among many generations of former pupils; and to serve as a research resource for all interested in the history of our schools and the communities they serve.

## **Appendix 1**

LiFE Multi Academy Trust and associated schools keep a wide variety of records that may include (but are not limited to):

### Students

- Personal information
- Parent/carer contact information
- School reports
- Behaviour logs
- Exam and testing outcomes – internal and external
- Child protection information
- Allegations of a child protection nature made against a member of staff (including unfounded allegations)
- Attendance – attendance registers, authorised absence correspondence
- SEND – reviews, advice to parents/carers, accessibility strategy
- Pupil Premium / Sixth Form Bursary – evidence of eligibility
- Free School Meals eligibility
- Services and Pupil Premium eligibility
- LAC status
- Medical – Individual Health Plans, first aid records
- Biometric records

### Management of the school

- Governing Board records - agendas, minutes, resolutions, reports
- Governors personal details
- Declarations of Interests
- CPD and training
- Statutory Documents for Companies House (if applicable)
- Accounts and Trust Report (if applicable)
- School Development Plans and School Improvement plans
- Leadership meetings, minutes and actions
- Admission details
- School visitor logs
- Health and Safety Records
- Fire Risk Assessments
- Risk Assessments
- Social Media
- Newsletters and external communication records

### Human Resources

- Job Descriptions
- Application forms

- Personnel files for all staff – including personal contact details
- Appraisals
- Performance reviews
- Employment suitability checks
- Contracts of employment
- Records of Disciplinary and Grievances Process
- Allegations and LADO referrals
- Referrals to the TRA and/or DBS
- Payroll and pensions – maternity/paternity pay, family leave records,

#### Financial Management

- Budgets and Funding details as required by the Funding Agreement, Academies Financial Handbook and Company Law (if applicable)
- Risk Management and Insurance – employer’s liability insurance certificate
- Asset Management Records
- Asset Register
- All necessary financial records (invoices, bank records etc..)
- Contracts
- Contract Management and Procurement
- School Payment and Meals Management

#### Property Management

- Property Management
- Condition Surveys
- Hire agreements
- Maintenance – log books, warranties and contractor information
- Health and safety information

#### Curriculum & Attainment

- Teaching and learning planning
- Timetabling and resource planning
- Prospectus and Website
- Statistics and evidence of learning outcomes, targets
- Pupil work records
- Trip and visit record

#### External Records

- Central Government and Local Authority
- Local Authority – census returns, attendance returns
- Central Government – returns made to DfE/ESFA
- Ofsted
- Referrals to third party agencies

- Legal action involving the trust and schools
- ICO action
- Enquiries and investigations by external bodies

## Data Protection Retention Schedule



Basic file description	Who is responsible for managing this data?	Retention Period	Destruction Method	System	Additional Notes
<b>Pupil Management</b>					
<b>Admissions and Attendance</b>					
Admission Registers		Permanent			
Records relating to the admissions process – if the admission is successful		Admission + 1 year			
Admissions – if the appeal is unsuccessful		Resolution of case + 1 year			
Admissions – Secondary Schools – Casual		Current year + 1 year			
Exclusions & Suspension		DOB of the pupil + 25 years			

Pupil Educational Record			
Proofs of address supplied by parents as part of the admissions process	Current year + 1 year		
Attendance registers	Date of register + 6 years		
Medical and allergy information (including IHCP & PEEP)	DOB of pupil + 25 years then review unless legal action is pending. If so, it may be appropriate to add an additional retention period.		
Letters authorising absence	Date of absence + 2 years		
Pupil Files and/or record cards - Primary	Retain for the time which the pupil remains at the Primary School Transfer to the Secondary School (or other Primary School) when the child leaves the school		In the case of exclusion it may be appropriate to transfer the record to the Local Authority Behaviour Service. If the pupil has left the school and there is no information about which school that the pupil has moved onto, or they have moved onto elective home education, or the pupil has moved abroad or to an independent school, then a recorded conversation with the LA about where the records are to be stored must take place.

Pupil Files and/or record cards - Secondary	DOB of the pupil + 25 years		See above
Examination results - Public	Year of examinations + 6 years		Any certificates left unclaimed should be returned to the appropriate Examination Board.
Examination results - Internal examination results	Current year + 5 years If these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary		
Any other records created in the course of contact with pupils	Current year + 3 years then review		
Images held of pupils together with any consents and permissions to publish	All records relating to the image should be retained for the life of the image. The length of time the image is to be retained should be included on the privacy statement		

<b>Special Educational Needs</b>				
Special Educational Needs files, reviews and Individual Education Plans		DOB of the pupil + 35 years		
Statement of Special Educational Needs or EHCP		DOB + 35 years Unless legal action is pending		
Proposed EHCP or Draft Plan		DOB + 35 years Unless legal action is pending		
Advice and information to parents regarding educational needs		DOB + 35 years Unless legal action is pending		
Pupil SEN Files		DOB of pupil + 35 years then review unless legal action is pending. If so, it may be appropriate to add an additional retention period.		

<b>School Trips and Extra Curricular Activities</b>			
<b>Educational Visits outside the Classroom</b>			
<b>Day Trips</b>			
Parental permission slips for school trips – where there has been no major incident		Conclusion of the trip	
Parental permission slips for school trips – where there has been a major incident. Major incident e.g. reportable to HSC, potential claim injury.		DOB of the pupil involved in the incident + 25 years The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils	
<b>Residential Trips</b>			
All records relating to the organization of school residential trips		Date of the residential visit + a minimum of 6 years then review	
<b>Walking Bus</b>			
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

<b>Management of School - Safeguarding</b>			
<b>Adults</b>			
Records of allegations about workers who have been investigated and found to be without substance	These records should not normally be retained once an investigation has been completed.	-	There are some exceptions to this where for its own protection the employer has to keep a limited record that an allegation was received and investigated, for example where the allegation relates to abuse and the worker is employed to work with children or other vulnerable adults
Outcome of an allegation made against a staff member	Until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer		
<b>Children</b>			
Child abuse records (IISCA)	retained for 75 years		any record that relate or could relate to sexual abuse
<b>Local Authority</b>			
Secondary transfer sheets (Primary)	Current year + 2 years		

<b>School Management - Teaching and Curriculum</b>				
<b>Senior Management Team</b>				
Minutes of the Senior Management Team and other internal administrative bodies	Date of meeting + 5 years			
Reports made by the Head Teacher or the management team	Date of report + 3 years			
Records created by Head Teachers, Deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities	Closure of file + 6 years			
Correspondence created by Head Teachers, Deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities	Date of correspondence + 3 years			
Professional development plans	Closure + 6 years			
<b>Curriculum Management</b>				
SATS records including examination results. Exam papers should only be retained if they are required to evidence the results	Current year + 6 years			

School Management - HR, Administration, Finance, Premises and Health & Safety			
Personnel Management			
Staff Personal files	Termination + 6 years		This includes online recruitment checks.
Interview notes and recruitment records (successful candidates)	Termination + 6 years		These should be kept in staff personnel files and also include online recruitment check.
Interview notes and recruitment records (unsuccessful candidates)	Date of interview + 6 months		This includes online recruitment checks.
Pre-employment vetting information (including DBS checks). Retain DBS certificate number on SCR. (successful candidates)	Date of check + 6 years		Please note that schools must not keep copies of the documents which are checked for DBS purposes.
Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's personal file.		
Online presence pre-employment check	Termination of employment + 2 years		Please note this will not be conducted for every employee.
Right to Work in the UK checks	Termination of employment + 2 years		

Disciplinary proceedings: case not found	Take advice from HR Team if the proceedings were child protection related otherwise destroy immediately at the conclusion of the case		
Disciplinary proceedings: written warnings	The duration of the warning	-	If this information has been added to an individual's personnel file, it must be weeded from the file once the retention period has elapsed
Annual appraisal or assessment records	Current year + 5 years		
Low level concerns	Dependant on the nature of the incident - minimum 24 months of the record		
Images held of members of staff together with any consents and permissions to publish	Specify in Privacy Notice how photos of members of staff will be used and duration of use.	When no longer in use.	
Staff personal information - e.g. medical appointments	Review in line with HR guidance and school policy		
<b>Health and Safety</b>			
Accessibility Plans	Current year + 6 years		
Records relating to accident/injury at work	Date of incident + 12 years		
Accident Reporting – Children	Date of birth + 22 years where the injured person is a minor at the time of the accident. Severity of incident needs to be considered.		

Accident Reporting – Adults	Date of the accident + 4 years where the injured person is an adult at the time of the accident;			
Incident reports	Current year + 20 years			
<b>Payroll and Pensions</b>				
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current year + 6 years			
Maternity pay records	Current year + 3yrs			
Timesheets, sick pay	Current year + 6 years			
<b>Financial Records</b>				
Debtors' Records	Current year + 6 years			
Applications for free school meals, travel, uniforms etc	Whilst child is at school			
Other financial records	Current year + 6 years			
Student grant applications	Current year + 3 years			
<b>School Meals</b>				
Dinner Register	Current year + 3 years			
Free school meals registers	Current year + 6 years			
Visitors book	Current year + 2 years			
Images held of pupils together with any consents and permissions to publish	Part of pupil record. Duration of pupil's attendance at school, if SEN or safeguarding duration of that whole record.			
Records relating to the management of PTA/Old Pupils Associations	Current year + 6 years			

Records relating to the management of data subject access requests	Completion date + 1 year then review		If request is of a contentious nature, keep the record for a further year then review.
Records relating to the management of freedom of information requests	Completion date + 1 year then review		If request is of a contentious nature, keep the record for a further year then review.

<b>Governing Board</b>				
<b>Governance Documents</b>				
Records relating to the appointment of foundation directors or governors	Permanent			
Records relating to the election of parent governors	Date of election + 6 months			
Records relating to the election of chair and vice chair	Once the decision has been recorded in the minutes, the records relating to the election can be destroyed			
Trust and LGB Minutes - Principal set (signed)	Permanent			
Reports made to the Trust/LGB Meeting which are referred to in the minutes	Permanent			
Register of attendance at Trust and LGB meetings	Date of last meeting in the book + 6 years			
Minutes - Inspection copies	Date of meeting + 3 years			
Records relating to Governor Monitoring Visits	Date of the visit + 3 years			
Records relating to complaints made to and investigated by the Governing Body (ie stage 3 complaints)	Date of resolution of complaint + 6 years then review for further retention in the case of contentious disputes			
Correspondence sent and received by the Governing Body	Current year + 6 years			

Appointment and termination of Trustees/Directors/Governors	Maintain all records from date of termination + 6 years			
Records relating to the appointment of a clerk to the Trust/Governing Body	Date appointment as clerk ceases + 6 years			
Records relating to the terms of office of serving directors/governors including evidence of appointment	PERMANENT			
Records relating to Director/Governor Declaration against disqualification criteria	Until the Governor steps down			
Register of Business Interests	PERMANENT			
Director/Governors Code of Conduct signed	This is expected to be a dynamic document, one copy of each version should be kept permanently			
Records relating to the training required and received by Director/ Governors	Until the Governor steps down			
Records relating to the induction programme for new directors/governors	Until the Governor steps down			

Records relating to DBS checks carried out on clerk, directors and members of the governing body (certificate number to be retained)	Date of DBS check + 6 months			
<b>School Social Media</b>				
Twitter, Facebook & Instagram (or similar)	Rolling delete every 24 months			A school use of social media policy is required