WESSEX
MULTI-ACADEMY TRUST

Data Retention Policy

Adopted By:	**Board of Trustees**
Date:	**July 2025**
Review Date:	**July 2026**

Data Retention Policy

Date of Issue:	September 2025
Policy applies to:	**All staff employed by the Wessex Multi-School Trust.**
Policy Version Number:	3
Purpose of the document:	To outline how records are stored, retained and disposed of to meet statutory requirements
Summary of the main points:	The document provides: 1. Guidance on the retention of school records 2. Guidance on the disposal of data
Approved by:	This policy has been approved by the WMAT Board of Trustees
Reviewer:	Sophia Radford – Data Protection Officer
Summary of amendments:	(i) Governing Board changed to Governance Committee (ii) Academies changed to Schools
Next review due:	September 2026

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Statement of intent

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

The Trust has created this policy to outline how records are stored, retained and disposed of to meet statutory requirements.
This document complies with the requirements set out in the UK GDPR and Data Protection Act 2018.

Schools within the Trust should understand that there is not a sector wide data retention policy that prescribes how long data should be retained for. The retention periods outlined in this policy are good practice guidelines only, and schools should ensure that they consider requirements specific to their school when implementing these timeframes. The tables for retention periods are based on information provided by the Information Records Management Society (IRMS) and the DfE and are not an exhaustive list of records that may be kept by individual schools.

IRMS retention periods should only be used as a guide.

1. Legal framework

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

- UK General Data Protection Regulation (GDPR)
- EU GDPR
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- Data Protection Act 2018

2. Roles and responsibilities

2.1. The whole Trust has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements. Each headteacher/head of school holds the overall responsibility for this policy within their school and for ensuring it is implemented correctly.

2.2. The Data Protection Lead (DPL) within each school is responsible for:

- The management of records at the school.
- Promoting compliance with this policy.
- Ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy and are disposed of safely and correctly.

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

3. Management of pupil records

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

3.2. Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in a securely locked filing cabinet in …… [school to insert] – a note indicating this is marked on the pupil's file.

3.3. Hard copies of complaints made by parents or pupils are stored in a file in …… [school to insert] – a note indicating this is marked on the pupil's file.

3.4. Actual copies of accident and incident information are stored separately on the school's management information system and held in line with the retention

periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.

3.5. The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend. The only exception is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, the DPL will remove these records. Electronic records relating to a pupil's record will also be transferred to the pupils' next school.

[Primary schools] The school will not keep any copies of information stored within a pupil's record unless there is ongoing legal action at the time during which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.

[Secondary schools and sixth-form colleges] If any pupil attends the school until statutory school leaving age, the school will keep the pupil's records until the pupil reaches the age of 25 years.

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

4. Retention of pupil records and other pupil-related information

4.1. The table below outlines the Trust's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will be destroyed in line with the retention periods below:

Type of file	Retention period	Action taken after retention period ends
Personal identifiers, contacts and personal characteristics		
Images used for identification purposes	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month	Securely disposed of
Images used in displays	Whilst the pupil is at school	Securely disposed of

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

Pupils' educational records		
[Primary schools] Pupils' educational records	Whilst the pupil remains at the school	Transferred to the next destination – if this is an independent school, home-school or outside of the UK, the file will be kept by the LA and retained for the statutory period
[Secondary schools and sixth forms] Pupils' educational records	25 years after the pupil's date of birth	Reviewed and securely disposed of if no longer needed
Public examination results	Added to the pupil's record and transferred to next school	All uncollected certificates returned to the examination board
Internal examination results	Added to the pupil's record and transferred to next school;	Transferred to the next school
Behaviour records	Added to the pupil's record and transferred to the next school Copies are held whilst the pupil is at school, plus one year	Securely disposed of
Exclusion records	Added to the pupil's record and transferred to the next school Copies are held whilst the pupil is at the school, plus one year	Securely disposed of
Child protection information held on a pupil's record	Stored in a sealed envelope for the same length of time as the pupil's record Records also subject to any instruction given by the Independent	Securely disposed of – shredded

	Inquiry into Child Sex Abuse (IICSA)	
Child protection records held in a separate file	25 years after the pupil's date of birth Records also subject to any instruction given by the IICSA	Securely disposed of – shredded
Curriculum returns	Current academic year, plus three years	Securely disposed of
Schemes of work	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Timetable	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Class record books	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Mark books	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Record of homework set	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Pupils' work	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Education, training or employment destinations data	Whilst the pupil is at the school, plus three years or from the end of KS4, whichever is earliest	Securely disposed of
Attendance		
Attendance registers	Every entry is retained for a period of three years after the date on	Securely disposed of

	which the entry was made	
Correspondence relating to any absence (authorised or unauthorised)	Current academic year, plus two years	Securely disposed of
Medical information and administration		
Permission slips	For the duration of the period that medication is given, plus one month	Securely disposed of
Medical records	Added to the pupil's record and transferred to the next school Copies held whilst the pupil is at school, plus 25 years	Securely disposed of
Medical incidents that have a behavioural or safeguarding influence	Added to the pupil's record and transferred to the next school Copies held whilst the pupil is at school, plus 25 years	Securely disposed of
SEND		
SEND files, reviews and EHC plans, including advice and information provided to parents regarding educational needs and accessibility strategy	The pupil's date of birth, plus 31 years	Securely disposed of
Curriculum management		
SATs results	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of
Examination papers	Until the appeals/validation process has been completed	Securely disposed of

Published Admission Number (PAN) reports	Current academic year, plus six years	Securely disposed of
Valued added and contextual data	Current academic year, plus six years	Securely disposed of
Self-evaluation forms (external and internal moderation)	Current academic year, plus 6 years	Securely disposed of
Extra-curricular activities		
Field file – information taken on school trips	Until the conclusion of the trip, plus one month Where a minor incident occurs, field files are added to the core system as appropriate	Securely disposed of
Financial information relating to school trips	Whilst the pupil remains at school, plus one year	Securely disposed of
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip	Securely disposed of – shredded
Parental consent forms for school trips where a major incident occurred	25 years after the pupil's date of birth on the pupil's record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils)	Securely disposed of – shredded
Educational visitors in school – sharing of personal information	Until the conclusion of the visit, plus one month	Securely disposed of
Family liaison officers and home-school liaison assistants		
Day books	Current academic year, plus two years	Reviewed and securely destroyed if no longer required
Reports for outside agencies	Duration of the pupil's time at school	Securely disposed of
Referral forms	Whilst the referral is current	Securely disposed of

Contact data sheets	Current academic year	Reviewed and securely destroyed if no longer active
Contact database entries	Current academic year	Reviewed and securely destroyed if no longer required
Group registers	Current academic year, plus two years	Securely disposed of
Catering and free school meal management		
Meal administration	Whilst the pupil is at school, plus one year	Securely disposed of
Meal eligibility	Whilst the pupil is at school, plus five years	Securely disposed of

5. **Retention of staff records**

5.1. The table below outlines the Trust's retention period for staff records and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will also be destroyed in line with the retention periods below:

Type of file	Retention period	Action taken after retention period ends
Operational		
Staff members' personnel file	Termination of employment, plus six years, unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file will be retained until the IICSA enquiries are complete	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus six years	Securely disposed of
Sickness absence monitoring (where sickness pay is not paid)	Current academic year, plus three years	Securely disposed of
Sickness absence monitoring (where sickness pay is paid)	Current academic year, plus six years	Securely disposed of

Staff training (where training leads to CPD)	Length of time required by the CPD professional body	Securely disposed of
Staff training (except where the training relates to dealing with pupils, e.g. first aid or health and safety)	Retained in the personnel file	Securely disposed of
Staff training (where the training relates to pupils, e.g. safeguarding or other pupil-related training)	Date of the training, plus 40 years	Securely disposed of
Recruitment		
Records relating to the appointment of new members of staff (unsuccessful attempts)	Date of appointment, plus six months.	Securely disposed of
Records relating to the appointment of new members of staff (successful appointments)	Added to personnel file and retained until the end of appointment, plus six years, except in cases of negligence or claims of child abuse, then records are retained for at least 15 years	Securely disposed of
Pre-employment vetting information (successful candidates)	For the duration of the employee's employment, plus six years	Securely disposed of
DBS certificates	Up to six months	Securely disposed of
Proof of identify as part of the enhanced DBS check	If it is necessary to keep a copy, it will be placed in the staff member's personnel file	Securely disposed of
Evidence of right to work in the UK	Added to staff personnel file or, if kept separately, termination of employment, plus no longer than two years	Securely disposed of
Disciplinary and grievance procedures		

Child protection allegations, including where the allegation is unproven	Added to staff personnel file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer If allegations are malicious, they are removed from personal files If allegations are found, they are kept on the personnel file and a copy is provided to the person concerned unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file is retained until IICSA enquiries are complete	Reviewed and securely disposed of – shredded
Oral warnings	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file
Written warning – level 1	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file
Written warning – level 2	Date of warning, plus 12 months	Securely disposed of – if placed on staff personnel file, removed from file
Final warning	Date of warning, plus 18 months	Securely disposed of – if placed on staff personnel file, removed from file
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related, then it is disposed of as above	Securely disposed of

6. Retention of governance records

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

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

Type of file	Retention period	Action taken after retention period ends
Governance		
Agendas for governance committee meetings	One copy alongside the original set of minutes – all others disposed of without retention	Local archives consulted before secure disposal
Original, signed copies of the minutes of governance committee meetings	Permanent – or at least for 10 years from the date of the meeting	Shredded if they contain any sensitive or personal information, but the local archives will be consulted first
Reports presented to the governance committee that are referred to in the minutes	Permanent – all others disposed of without retention	Local archives consulted and then securely disposed of
Meeting papers relating to the annual parents' meeting	Date of meeting, plus a minimum of six years	Securely disposed of
Instruments of government	Permanent	Local archives consulted and then securely disposed of
Trusts and endowments managed by the governance committee	Permanent	Local archives consulted and then securely disposed of
Action plans created and administered by the governance committee	Until superseded or whilst relevant	Securely disposed of
Policy documents created and administered by the governance committee	Until superseded or whilst relevant	Securely disposed of
Records relating to complaints dealt with by the governance committee or headteacher/head of school	Date of resolution of complaint, plus six years If negligence is involved, records are retained for the current academic year, plus 15 years If child protection or safeguarding issues are involved, the records are retained for the current	Reviewed for further retention in case of contentious disputes, then securely disposed of

	academic year, plus 40 years	
Annual reports required by the DfE	Date of report, plus 10 years	Securely disposed of
Proposals concerning changing the status of the school	Date proposal accepted or declined, plus three years	Securely disposed of
Records relating to the appointment of governors	Date of election, plus six months	Securely disposed of
Records relating to the election of the chair of the governance committee and the vice chair	Destroyed after the decision has been recorded in the minutes	Securely disposed of
Terms of reference for committees	Until superseded or whilst relevant	Reviewed and offered to the local archives if appropriate
Meeting schedule	Current academic year	Standard disposal
Register of attendance at full governance committee meetings	Date of last meeting in the book, plus six years	Securely disposed of
Records relating to governor monitoring visits	Date of the visit, plus three years	Securely disposed of
All records relating to the conversion of the school to school status	Permanent	Local archives are consulted before disposal
Correspondence sent and received by the governance committee or headteacher/head of school	Current academic year, plus three years	Securely disposed of
Records relating to the appointment of the clerk to the governance committee	Date on which the clerk's appointment ends, plus six years	Securely disposed of
Records relating to the terms of office of serving governors, including evidence of appointment	Date on which the governor's appointment ends, plus six years	Securely disposed of
Records relating to governor declaration against disqualification criteria	Date on which the governor's appointment ends, plus six years	Securely disposed of
Register of business interests	Date the governor's appointment ends, plus six years	Securely disposed of

Governor code of conduct	Dynamic document – kept permanently	Securely disposed of
Records relating to the training required and received by governors	Date the governor steps down, plus six years	Securely disposed of
Records relating to the induction programme for new governors	Date on which the governor's appointment ends, plus six years	Securely disposed of
Records relating to DBS checks carried out on the clerk and members of the governance committee	Date of the DBS check, plus six months	Securely disposed of
Governor personnel files	Date on which the governor's appointment ends, plus six years	Securely disposed of
Trust governance		
Articles of association	Life of the Trust	Securely disposed of
Memorandum of understanding	Life of the Trust	Securely disposed of
Constitution	Life of the Trust	Securely disposed of
Special resolutions to amend the constitution	Life of the Trust	Securely disposed of
Written scheme of delegation	Life of the scheme of delegation, plus 10 years	Securely disposed of
Trustees – appointment	Life of appointment, plus six years	Securely disposed of
Trustees – disqualification	Data of disqualification, plus 15 years	Securely disposed of
Trustees – termination of office	Date of appointment, plus six years	Securely disposed of
Annual Trustee report	Date of report, plus 10 years	Securely disposed of
Annual report and accounts	Date of report, plus 10 years	Securely disposed of
Statement of Trustees' responsibilities	Life of appointment, plus six years	Securely disposed of
Appointment and removal of Members	Life of appointment, plus six years	Securely disposed of

Strategic review	Date of review, plus six years	Securely disposed of
Register of Members, Trustees and governors	Life of the Trust/school, plus six years	Securely disposed of
Register of Members, Trustees and governors' business interests	Life of Trust/school, plus six years	Securely disposed of
Register of members, Trustees and governors' residential addresses	Life of Trust/school, plus six years	Securely disposed of
Register of gift, hospitality and entertainments	Life of school, plus six years	Securely disposed of
Declaration of interests	Life of school, plus six years	Securely disposed of

7. Retention of senior leadership and management records

7.1. The table below outlines the Trust's retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will also be destroyed in line with the retention periods below:

Type of file	Retention period	Action taken after retention period ends
Headteacher and SLT		
Logbooks of activity in the school maintained by the headteacher/head of school	Date of last entry, plus a minimum of six years	Reviewed and offered to the local archives if appropriate
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus three years	Reviewed annually and securely disposed of if not needed
Reports created by the headteacher/head of school or SLT	Date of the report, plus a minimum of three years	Reviewed annually and securely disposed of if not needed
Records created by the headteacher/head of school, deputy headteacher/head of school, heads of year and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed annually and securely disposed of if not needed

Correspondence created by the headteacher/head of school, deputy headteacher/head of school, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Securely disposed of
Professional development plan	Held on the individual's personnel record. If not, then it is retained for the duration of the plan, plus six years	Securely disposed of
SDP	Duration of the plan, plus three years	Securely disposed of

8. Retention of health and safety records

8.1. The table below outlines the Trust's retention periods for health and safety records, and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will also be destroyed in line with the retention periods below:

Type of file	Retention period	Action taken after retention period ends
Health and safety		
Health and safety policy statements	Duration of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred	Securely disposed of
Records relating to any reportable death, injury, disease or dangerous occurrence under RIDDOR	Date of incident, plus three years provided that all records relating to the incident are held on the personnel file	Securely disposed of
Accident reporting – adults	Three years after the last entry in the accident reporting book	Securely disposed of
Accident reporting – pupils	Three years after the last entry in the accident reporting book	Securely disposed of

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

9. Retention of financial records

9.1. The table below outlines the Trust's retention periods for financial records and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will also be destroyed in line with the retention periods below:

Type of file	Retention period	Action taken after retention period ends
Payroll and pensions		
Maternity pay records	Current academic year, plus three years	Securely disposed of

Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year, plus six years	Securely disposed of
Timesheets and flexitime records	Current academic year, plus three years	Securely disposed of
Absence record	Current academic year, plus three years	Securely disposed of
Insurance	Current academic year, plus six years	Securely disposed of
Payroll awards	Current academic year, plus six years	Securely disposed of
Payroll (gross/net weekly or monthly)	Current academic year, plus six years	Securely disposed of
Payroll reports	Current academic year, plus six years	Securely disposed of
Pension payroll	Current academic year, plus six years	Securely disposed of
Staff returns	Current academic year, plus three years	Securely disposed of
Risk management and insurance		
Employer's liability insurance certificate	Closure of the Trust, plus 40 years	Securely disposed of Passed to the LA if the Trust closes
Asset management		
Inventories of furniture and equipment	Current academic year, plus six years	Securely disposed of
Burglary, theft and vandalism report forms	Current academic year, plus six years	Securely disposed of
Accounts and statements including budget management		
Annual accounts	Current academic year, plus six years	Disposed of against common standards

Loans and grants managed by the school	Date of last payment, plus 12 years	Information is reviewed then securely disposed of
All records relating to the creation and management of budgets	Duration of the budget, plus three years	Securely disposed of
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus six years	Securely disposed of
Records relating to the collection and banking of monies	Current financial year, plus six years	Securely disposed of
Records relating to the identification and collection of debt	Final payment, plus six years	Securely disposed of
Contract management		
All records relating to the management of contracts under seal	Last payment on the contract, plus 12 years	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract, plus six years	Securely disposed of
All records relating to the monitoring of contracts	Life of the contract, plus six or 12 years	Securely disposed of
School meals		
FSM registers (where the register is used as a basis for funding)	Current academic year, plus six years	Securely disposed of
School meals registers	Current academic year, plus three years	Securely disposed of
School meals summary sheets	Current academic year, plus three years	Securely disposed of
Pupil finance		
Student grant applications	Current academic year, plus three years	Securely disposed of
Pupil premium fund records	Date the pupil leaves the school, plus six years	Securely disposed of
Trust finance records		
Statement of financial activities for the year	Current financial year, plus six years	Securely disposed of

Financial planning	Current financial year, plus six years	Securely disposed of
Value for money statement	Current financial year, plus six years	Securely disposed of
Records relating to the management of VAT	Current financial year, plus six years	Securely disposed of
Whole of government accounts return	Current financial year, plus six years	Securely disposed of
Budget plan	Current financial year, plus six years	Securely disposed of
Charging and remissions policy	Date policy superseded, plus three years	Securely disposed of
Audit and risk committee and appointment of responsible officers	Life of the Trust	Securely disposed of
Independent auditor's report on regularity	Financial year report relates to, plus six years	Securely disposed of
Independent auditor's report on financial statements	Financial year report relates to, plus six years	Securely disposed of
Funding agreement	Date of last payment of funding, plus six years	Securely disposed of
Funding records – capital grant	Date of last payment of funding, plus six years	Securely disposed of
Funding records – general annual grant	Date of last payment of funding, plus six years	Securely disposed of
Per-pupil funding records	Date of last payment of funding, plus six years	Securely disposed of
Exclusions agreements	Date of last payment of funding, plus six years	Securely disposed of
Funding records	Date of last payment of funding, plus six years	Securely disposed of

10. Retention of other Trust records

10.1. The table below outlines the Trust's retention periods for any other records held by its schools, and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will also be destroyed in line with the retention periods below:

Type of file	Retention period	Action taken after retention period ends
Property management		
Title deeds of properties belonging to the Trust	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the Trust	For as long as the building belongs to the school	Transferred to new owners if the building is leased or sold
Leases of property leased by or to the Trust	Expiry of lease, plus six years	Securely disposed of
Records relating to the letting of Trust/school premises	Current financial year, plus six years	Securely disposed of
Maintenance		
All records relating to the maintenance of the Trust/schools carried out by contractors or Trust employees	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of
Operational administration		
General files	Current academic year, plus five years	Reviewed and securely disposed of
Records relating to the creation and publication of the school brochure and/or prospectus	Current academic year, plus three years	If a copy is not preserved by the school, standard disposal
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus one year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year, plus one year	One copy archived, other copies standard disposal
Visitors' books and signing-in sheets	Last entry in the logbook, plus six years	Reviewed then securely disposed of
Records relating to the creation and management of parent-teacher associations and/or old pupil associations	Current academic year, plus six years	Reviewed then securely disposed of
Walking bus registers	Date of register, plus six years	Securely disposed of

MAT privacy notice which is sent to parents	Until superseded, plus six years	Standard disposal
Consents relating to school activities	While pupil attends the school	Secure disposal

11. Retention of emails

11.1. Group email addresses will have an assigned member of staff who takes responsibility for managing the account and ensuring the correct disposal of all sent and received emails. All staff members with an email account will be responsible for managing their inbox. Emails can act as evidence of the Trust/school's activities, i.e. in business and fulfilling statutory duties, so all relevant emails, e.g. invoices, will be retained for at least 12 months. Invoices received and sent in emails will be printed off and retained in accordance with Section 8 of this policy.

11.2. The Trust expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in the Data Protection Policies and training. All emails will be automatically deleted after 12 months, unless stated otherwise.

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

11.4. Personal emails, i.e. emails that do not relate to work matters or are from family members, will be deleted as soon as they are no longer needed. Staff members must review and delete any emails they no longer require at the end of every term.

11.5. Staff members will not, under any circumstances, create their own email archives, e.g. saving emails on to personal hard drives. Staff members will be aware that the emails they send could be required to fulfil a SAR or freedom of information (FOI) request. Emails will be drafted carefully, and staff members will review the content before sending. Individuals, including children, have the right to submit a SAR to gain access to their personal data– this includes accessing emails.

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

11.7. When handling a request for information, the DPL will speak to the requestor to clarify the cope of the request and whether emails will be required to fulfil the SAR or FOI request.

11.8. Where a SAR has been made electronically, the information will be provided in a commonly used electronic format. All requests will be responded to without delay and at the latest, within one month of receipt. Should the DPL require an extension of time to respond to the SAR (up to maximum of 2 further calendar months) this will be communicated to the requestor as soon as possible.

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

11.10. Where a request is manifestly unfounded or excessive, the Trust/school holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal. Staff members will discuss any queries regarding email retention with the DPL.

12. **Storing and protecting information**

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

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

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

12.4. Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site. Where data is saved on removable storage or a portable device, the device is kept in a locked and fireproof filing cabinet, drawer or safe when not in use. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.

12.5. All electronic devices are password-protected to protect the information on the device in case of theft. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

12.6. Emails containing sensitive or confidential information are password-protected or sent via a secure encrypted or data transfer system to ensure that only the recipient is able to access the information. The password will be shared with the

recipient in a separate email. Personal information is never put in the subject line of an email. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

12.7. When sending confidential information by fax, members of staff always check that the recipient is correct before sending.

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

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

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

12.11. The physical security of the Trust/school's buildings and storage systems, and access to them, is reviewed termly by the site manager in conjunction with the DPL. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the headteacher/head of school and extra measures to secure data storage will be put in place.

13. **Accessing information**

13.1. We are transparent with data subjects about the information we hold and how it can be accessed. All members of staff, parents of registered pupils and other users of the Trust and its schools, e.g. visitors and third-party clubs, are entitled to:

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

13.2. All members of staff, parents of registered pupils and other users of the Trust and its schools and its facilities have the right, under the UK GDPR, to access certain personal data being held about them or their child. Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents. Pupils who are considered by the school to be at an appropriate age to make decisions for themselves are entitled to have their personal information

handled in accordance with their rights. The Trust/school will adhere to the provisions outlined in the Trust's Data Protection Policy when responding to requests seeking access to personal information.

14. **Information audit**

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

- Paper documents and records
- Electronic documents and records
- Databases
- Microfilm or microfiche
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information
- Knowledge
- Apps and portals

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

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

15. **Disposal of data**

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

15.2. All records containing personal or sensitive information will be made either unreadable or unreconstructable. Where disposal of information is outlined as secure disposal, this will be shredded or pulped. Electronic information will be scrubbed clean and, where possible, cut, archived or digitalised. The DPL will keep a record of all files that have been destroyed.

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

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

15.5. Where information has been kept for administrative purposes, the DPL will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined

in this policy. If any information is kept, the information will be reviewed every three subsequent years. Where information must be kept permanently, this information is exempt from the normal review procedures.

15.6. Records and information that might be of relevant to the Independent Inquiry into Child Sexual Abuse (IICSA) will not be disposed of or destroyed.

16. **Monitoring and review**

16.1. This policy will be reviewed on an annual basis by the DPO – the next scheduled review date for this policy is May 2025. Any changes made to this policy will be communicated to all members of staff and the governance committee.