



Records Management Policy and Digital Continuity Statement

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1. Statement of Intent

Keystone Academy Trust recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the trust and its schools and provide evidence for demonstrating performance and accountability.

Keystone Academy Trust undertakes to manage records in relation to the three principles laid out in the Lord Chancellor's Code of Practice issued under Section 46 of the Freedom of Information Act 2000, published in July 2021.

This policy provides the framework to achieve effective management and audit of records. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

2. Scope of the Policy

- This policy applies to all records created, received or maintained by permanent and temporary staff of the school in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school.
- Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its

transactions or activities. These records may be created, received or maintained in hard copy or electronic format.

3. Responsibilities

- The governing body of a school / Academy Trust has a statutory responsibility to maintain the records and record keeping systems in accordance with the regulatory environment specific to the school. The responsibility is usually delegated to the headteacher of the school.
- The person responsible for day-to-day operational management in the school will give guidance on good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- Information will be managed in line with the Records Retention Schedule. This will help to ensure that it can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (Subject Access Requests 'SARS').
- Individual staff and employees must ensure, with respect to records for which they are responsible, that they:
 - Manage the school's records consistently in accordance with the school's policies and procedures;
 - Properly document their actions and decisions;
 - Hold personal information securely;
 - Only share personal information appropriately and do not disclose it to any unauthorised third party;
 - Dispose of records securely in accordance with the school's Records Retention Schedule.
- Information will be assessed and when it is no longer required, necessary or is to be destroyed or deleted in line with the retention schedule.
- The security of data and appropriate measures will be implemented to protect breach, loss or unauthorised sharing of the information.

4. Relationship with Existing Policies

This policy has been drawn up within the context of:

- IT and Devices Acceptable Use Policy
- Data Protection Policy

5. Records Retention Schedule

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
Postcodes, names and characteristics	Whilst the pupil is at school, plus five years	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
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 seven years and then review	Securely disposed of
Records relating to the management of exclusions	Date of birth of the pupil plus twenty-five years	Securely disposed of
Pupils' Educational Records		
Pupils' educational records	Whilst the pupil remains at the school	Transferred to the next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period The IRMS advises that information can be retained for a short period to allow for any queries or reports to be completed or where linked records in the school information management system have not yet reached the end of their retention period and deleting would cause problems
Public examination results	Added to the pupil's record and transferred to next school	
Behaviour records	Added to the pupil's record and transferred to the next school	Securely disposed of

	Copies are held whilst the pupil is at school, plus one year	
Exclusion 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
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 Inquiry into Child Sex Abuse (IICSA)	Securely disposed of – shredded
Child protection records held in a separate file	25 years after the pupil's date of birth, then review Records also subject to any instruction given by the IICSA	Securely disposed of – shredded
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 pupil at the end of current academic year If this is not possible, hold for the current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Attendance		
Attendance registers	Every entry is retained for a period of three years after the date on which the entry was made	Securely disposed of
Correspondence relating to any absence (authorised or unauthorised)	Current academic year, plus two years	Securely disposed of
Medical Information and Administration		
Permission slips for medication	For the duration of the period that medication is given, plus one month	Securely disposed of
Administration of medicine	For the duration of the period that medication is given, plus two years	Securely disposed of
Medical conditions – ongoing management	Added to the pupil's record and transferred to the next school Copies held whilst the pupil is at school, plus one year	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 twenty-five years. If subject to a legal hold, then retain for thirty-one years.	Securely disposed of
Accessibility Plan relating to individual pupils	The plan should be included on the pupil file	Securely disposed of
Child Protection		
Transfer of child protection records	Responsible: DSL. When a pupil moves school, the file should be transferred separately to the main file within 5 working days. The DSL may share information with the new setting prior to the child starting to ensure that the child receives appropriate support where necessary.	Transfer should be: Direct: ideally hand delivered or sent via secure electronic means Documented with confirmation of receipt by the receiving institution. A copy should not be retained unless there is a specific reason e.g. ongoing investigation.

Curriculum Management		
SATs results	25 years after the pupil's date of birth (as stated on the pupil's record). Results should be recorded on the pupils MIS record. A composite of the whole year's results may be held for the current year plus six years, for comparative purposes	Securely disposed of
Examination papers	Until the appeals/validation process has been completed	Securely disposed of
Published Admission Number (PAN) reports	Current academic year, plus six years	Securely disposed of
Internal examination results	Add to pupil file	
Valued added and contextual data	Current academic year, plus six years	Securely disposed of
Self-evaluation forms (internal moderation)	Current academic year, plus one year	Securely disposed of
Self-evaluation forms (external moderation)	Retained until superseded	Securely disposed of
Pupils' work	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	Securely disposed of

Extra-curricular Activities		
Records created by schools to obtain approval to run an educational visit outside the classroom	Date of visit, plus fifteen years	Securely disposed of
Records relating to residential visits	Date of the youngest pupils involved, plus 25 years, or if there is a major incident, date of the incident, plus fifteen years, whichever is the longest	Securely disposed of
Trip packs – information taken on school trips	Until the end of the visit Where a minor incident occurs, files are added to the core system as appropriate	Shredded upon return to school
Financial information relating to school trips	Year of trip, plus six years	Securely disposed of
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip	Securely disposed of
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 or fifteen years, whichever is longer (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

Pupil Welfare		
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 database entries	Current academic year	Reviewed and securely destroyed if no longer required
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
School meal registers	Current year plus three years	Securely disposed of
Free school meal registers (where used as a basis for funding)	Current year plus six years	Securely disposed of
School meals summary sheets	Current year plus three years	Securely disposed of

6. Retention of Staff Records

The table below outlines the school'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		
School development plans	Life of the plan or until the plan is superseded, plus three years. If major changes are made to the plan, then an archive copy should be retained.	Securely disposed of
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 three years	Securely disposed of
Time sheets	Current academic year, plus three 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
Records relating to TUPE process	Date last member of staff transfers or leaves the organisation, 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
Policies and Documents		
Concerns and Complaints Policy	Life of the policy or policy superseded, plus three years. If major changes are made to the policy, then an archive copy of previous policies should be retained.	Securely disposed of
Data Protection Policy	Life of the policy or policy superseded, plus three years. If major changes are made to the policy, then an archive copy of previous policies should be retained.	Securely disposed of
Freedom of Information Policy	Life of the policy or policy superseded, plus three years. If major changes are made to the policy, then an archive copy of previous policies should be retained.	Securely disposed of
Data Breach Policy	Life of the policy or policy superseded, plus three years. If major changes are made to the policy, then an archive copy of previous policies should be retained.	Securely disposed of
Special Educational Needs Policy	Life of the policy or policy superseded, plus three years. If major changes are made to the policy, then an archive copy of previous policies should be retained.	Securely disposed of
Equality Information and Objectives Statement for publication	Life of the policy or policy superseded, plus three years. If major changes are made to the policy, then an	Securely disposed of

	archive copy of previous policies should be retained.	
Accessibility Plan	Life of the policy or policy superseded, plus three years. If major changes are made to the policy, then an archive copy of previous policies should be retained.	Securely disposed of
Ofsted reports and papers	Life of the report, then review	Securely disposed of
Recruitment		
Records relating to the appointment of a new headteacher (unsuccessful attempts)	Date of appointment, plus six months.	Securely disposed of
Records relating to the appointment of a new headteacher (successful appointments)	Added to personnel file and retained until the end of appointment, plus six years, except in cases of negligence or claims of child abuse, then records are retained for at least 15 years	Securely disposed of
Records relating to the appointment of new members of staff or governors (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of
Records relating to the appointment of new members of staff or governors (successful candidates)	All relevant information should to be added to the staff personal file, and all other information, retained for six months.	Securely disposed of
Pre-employment vetting information (successful candidates)	For the duration of the employee's employment, plus six years	Securely disposed of
Copy of DBS certificates	Up to six months, only if there is a valid reason. Details to be recorded on SCR.	Securely disposed of

Proof of identify as part of the portable DBS disclosure.	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/Overseas teachers	Added to staff personnel file or, if kept separately, termination of employment, plus no less 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, then review 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	If warnings are placed on personal files, then they must be weeded from the file. If the disciplinary proceedings relate to a child protection matter, please contact your LADO for further advice. Relevant to all disciplinary cases. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.	

	Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line and defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim. Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.	
First written warning	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file
Final written warning	Date of warning, plus 12 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

7. Retention of Governance Records

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

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

Type of file	Retention period	Action taken after retention period ends
Governance		
Agendas for governing board meetings	One copy alongside the original set of minutes – all others disposed of without retention	Local archives consulted before secure disposal
Original, signed copies of the minutes of governing/ /committee/ trustee board meetings	Permanent – or at least for 10 years from the date of the meeting	Shredded if they contain any sensitive or personal information, but the local archives will be consulted first
Reports presented or referred to the governing board, referred to in the minutes	Date of meeting, plus ten years	Local archives consulted and then securely disposed of
Meeting papers relating to the Annual General Meeting	Date of meeting, plus a minimum of ten years	Securely disposed of, but the local archives will be consulted first
Instruments of government	Permanent	Local archives consulted and then securely disposed of
Trusts and endowments managed by the governing board	Permanent	Local archives consulted and then securely disposed of
Action plans created and administered by the governing board	Until superseded or whilst relevant	Securely disposed of
Policy documents created and administered by the governing board	Until superseded. The school should consider keeping all policies in relation to safeguarding, child protection or other pupils related issues e.g. exclusion until the	Securely disposed of

	government and ICO have published guidance about the implementation of the recommendations made in the IICSA report	
Records relating to complaints dealt with by the governing board or headteacher	Date of resolution of complaint, plus three years, then review If the complaint relates to negligence or safeguarding is involved, the date resolved, plus 15 years If the complaint relates to child sexual abuse, the date resolved, plus 75 years	Securely disposed of
Returns required by the DfE	Date of report, plus six years	Securely disposed of
Census returns	Date of report, plus five years	Securely disposed of
Proposals concerning changing the status of the school	Date proposal accepted or declined, plus three years	Securely disposed of
Records relating to the appointment of co-opted governors	Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office, except where there have been allegations concerning children. In this case, retain for 25 years.	Securely disposed of
Records relating to the election of parent and staff governors not appointed by the governors	Date of the election, plus six months	Securely disposed of
Records relating to the election of the chair of the governing board and the vice chair	Destroyed after the decision has been recorded in the minutes	Securely disposed of

Scheme of delegation and terms of reference for committees	Until superseded or whilst relevant	Schools may wish to retain these records for reference purposes in case decisions need to be justified
Meeting schedule	Current academic year	Standard disposal
Register of attendance at full governing board meetings	Date of last meeting in the book, plus six years	Securely disposed of
Records relating to governor monitoring visits	Date of the visit, plus three years	Securely disposed of
All records relating to the conversion of the school to academy status	Permanent- for the life of the organisation	Local archives are consulted before disposal
Correspondence sent and received by the governing board or headteacher	Current academic year, plus three years	Securely disposed of
Records relating to the appointment of the clerk to the governing board	Date on which the clerk's appointment ends, plus six years	Securely disposed of
Records relating to the terms of office of serving governors, including evidence of appointment	Date on which the governor's appointment ends, plus six years, except where there have been allegations concerning children. In this case, retain for 25 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 – one copy of each version should be kept for the life of the organisation. Kept permanently	Securely disposed of
Records relating to the training required and received by governors	Date the governor steps down, plus six years	Securely disposed of

Records relating to the induction programme for new governors	Date on which the governor's appointment ends, plus six years	Securely disposed of
Records relating to DBS checks carried out on the clerk and members of the governing board	Date of the DBS check, plus six months	Securely disposed of
Governor personnel files	Date on which the governor's appointment ends, plus six years, except where there have been allegations concerning children. In this case, retain for 25 years.	Securely disposed of
Trust Governance		
Governance statement	Life of governance statement, plus six years	Securely disposed of One copy of each iteration may need to be retained for archive purposes
Articles of association	Life of the academy	Securely disposed of
Memorandum of association	Can be disposed of once the academy has been incorporated	Securely disposed of
Memorandum of understanding of shared governance among schools	Life of memorandum of understanding, plus six years	Securely disposed of
Constitution	Date constitution superseded, plus ten years	Securely disposed of
Special resolutions to amend the constitution	Date constitution superseded, plus ten years	Securely disposed of One copy of each constitution may need to be retained for archive purposes
Written scheme of delegation	Life of the scheme of delegation, plus 10 years	Securely disposed of
Members – appointment	Life of appointment, plus six years	Securely disposed of
Trustees – disqualification	Date 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
Annual reports created under the requirements of the education (Governors Annual Reports) (Amended) Regulations 2002	Date of report, plus 10 years	Securely disposed of
Annual return	Date of report, plus 10 years	Securely disposed of
Appointment of trustees and governors	Life of appointment, plus six years	Securely disposed of
Statement of trustees' responsibilities	Life of appointment, plus six years	Securely disposed of
Appointment and removal of members	Life of appointment, plus six years	Securely disposed of
Strategic review	Life of the review, or review superseded, plus three years. If major changes are made to the review, then an archive copy should be retained.	Securely disposed of
Register of trustees	Date trustee resigns, plus 10 years	Securely disposed of
Register of trustees' interests	Date trustee resigns, plus ten years	Securely disposed of
Register of trustees' residential addresses	Date trustee resigns, plus six years	Securely disposed of
Register of gift, hospitality and entertainments	Date of donation, plus six years	Securely disposed of
Register of members	Date member resigns, plus ten years	Securely disposed of
Register of secretaries	Date of resignation plus six years	Securely disposed of
Declaration of interests	Date of resignation, plus ten years	Securely disposed of
Governor Monitoring Visits	Date of the visit, plus three years	Securely disposed of

8. Retention of Senior Leadership and Management Records

The table below outlines the school'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		
Log books of activity in the school maintained by the headteacher	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, then review	Securely disposed of
Reports created by the headteacher or SLT	Date of the report, plus a minimum of three years, then review	Securely disposed of
Records created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Current academic year, plus six years, then review	Securely disposed of
Correspondence created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years, then review	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

9. Retention of Health and Safety Records

The table below outlines the school'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	Life of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years	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
Control of substances hazardous to health (COSHH)	COSHH sheets should be kept whilst the substance is in use, plus six years. COSHH policy documents should be kept until the policy is superseded, plus six years	Securely disposed of
Records relating to accident/injury at work, including incident reports	Date of incident, plus six years, unless the injury is serious- broken limb, more than three in hospital etc, then date of incident, plus 15 years (negligence)	Securely disposed of
Accident reporting – adults	Three years after the last entry in the accident reporting book. If there is a possibility of negligence allegation, then date of incident plus 15 years, or date of settlement, plus six years.	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
Fire precautions logbooks	Current year, plus six years	Securely disposed of
Fire risk assessments	Life of the risk assessment, 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

10.Retention of Financial Records

The table below outlines the school'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		
Records relating to the agreement of pay and conditions	Date, pay and conditions superseded plus 6 years	Securely disposed of
Maternity pay records	Current year, plus three years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	From the end of the year in which the accounts were signed, for a minimum of six years	Securely disposed of
Records relating to pension registrations	Date of last payment on the pension, plus six years	Securely disposed of
Management of teachers' pension scheme	Date of last payment on the pension, plus six years	Securely disposed of
Timesheets and flexitime records	Current year, plus three years	Securely disposed of
Absence record	Current year, plus three years	Securely disposed of
Bonus sheets	Current year, plus three years	Securely disposed of

Car allowance claims	Current year, plus three years	Securely disposed of
Car mileage outputs	Current year, plus six years	Securely disposed of
Income tax form P60	Current year, plus six years. Employees should retain records for 22 months from the end of the tax year they relate to. The tax year runs from 6 th April, to the following 5 th April, so keep paperwork until at least 31 st January, nearly two years later.	Securely disposed of
Insurance	Current year, plus six years	Securely disposed of
Members allowance register	Current year, plus six years	Securely disposed of
National insurance – schedule of payments	Current year, plus six years	Securely disposed of
Overtime	Current year, plus three years	Securely disposed of
Part-time fee claims	Current year, plus six years	Securely disposed of
Payroll awards	Current year, plus six years	Securely disposed of

Payroll records	Date of payroll run, plus six years	Securely disposed of
Payroll (gross/net weekly or monthly)	Current financial year, plus six years	Securely disposed of
Payroll reports	Current financial year, plus six years	Securely disposed of
Payslips (copies)	Current academic year, plus six years	Securely disposed of
Pension payroll	Current year, plus six years	Securely disposed of
Personal bank details	Until superseded, plus three years	Securely disposed of
Sickness records	Current year, plus three years	Securely disposed of
Staff returns	Current year, plus three years	Securely disposed of
Superannuation adjustments	Current year, plus six years	Securely disposed of
Superannuation reports	Current year, plus six years	Securely disposed of

Tax forms- P6, P11, P11D, P35, P45, P46, P48	Current year, plus six years	Securely disposed of
Risk Management and Insurance		
Employer's liability insurance certificate	Year of issue, plus 40 years	Securely disposed of Passed to the LA if the school closes
Insurance policies	Date the policy expires, plus six years, except, public liability insurance- day of issue, plus 40 years	Securely disposed of
Records relating to the settlement of insurance claims	Date claim settled, plus six years	Securely disposed of
Burglary, theft and vandalism report forms	Current year, plus six years	Securely disposed of
Audit committee and appointment of responsible officers	As long as necessary (life of academy). Under the Companies Act, members can have their details removed after a certain time. Details should be removed on request.	Securely disposed of
Risk and Control Register	Life of register or register superseded, plus three years. If major changes are made to the register, then an archive copy should be retained.	Securely disposed of
Asset Management		
Inventories of furniture and equipment	Life of equipment, plus six years. Equipment will have write-down value over several years	Securely disposed of
Disposal of assets	Date asset disposed of, plus six years	Securely disposed of

Accounts and Statements including Budget Management		
Annual accounts	Current year, plus six years	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 or right-off of debt, 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 or end of contract plus 12 years, whichever is longer	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract, plus six years, or end of contract plus 6 years, whichever is longer	Securely disposed of
Records relating to the management of contracts with external providers	End of contract plus 6 years, or date of last payment on contract plus 6 years, whichever is the longer	Securely disposed of
All records relating to the monitoring of contracts	End of contract, or until the final payment is being made, whichever is the longer	Securely disposed of
All records relating to the maintenance of the school carried put by contractors	Current year plus 6 years. This may vary on the type of maintenance. Records to relating to rewiring, major alternations etc must ne retained in the Health and	Securely disposed of

	Safety file whilst the building belongs to the school and must be passed on to any new owners if the building is leased or sold.	
All records relating to the maintenance of the school carried out by school employees, including maintenance log books	Life of equipment plus 6 years. Alterations to wiring and major modifications must be entered in the Health and Safety file.	Securely disposed of
Records relating to the management of software licenses	Date license expires plus 6 years.	Securely disposed of
School Fund		
paying in books, ledgers, invoices, receipts, bank statements and journey books	Current financial year, plus six years	Securely disposed of
Cheque books,	Current financial year plus 1 year	
School Meals		
FSM registers (where the register is used as a basis for funding)	Current financial year, plus three years	Securely disposed of
School meals registers	Current financial year, plus three years	Securely disposed of
School meals summary sheets	Current financial year, plus six years	Securely disposed of
Pupil Finance		
Student grant applications	Current 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
Borrowing powers	Until superseded, plus six years	Securely disposed of
Budget plan	Current financial year, plus six years	Securely disposed of
Charging and remissions policy	Date policy superseded, plus three years	Securely disposed of
Independent auditor's report on regularity	Financial year report relates to, plus six years	Securely disposed of
Independent auditor's report on financial statements	Financial year report relates to, plus six years	Securely disposed of
Funding agreement with Secretary of State and supplemental funding agreement	Date of last payment of funding, plus six years	Securely disposed of
Funding agreement- termination 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
Funding records – earmarked annual grant	Date of last payment of funding, plus six years	Securely disposed of
Per-pupil funding records	Date of last payment of funding, plus six years	Securely disposed of
Exclusions agreements	Date of last payment of funding, plus six years	Securely disposed of
Funding records	Date of last payment of funding, plus six years	Securely disposed of

Gift aid and tax relief	Date of last payment of funding, plus six years	Securely disposed of
Records relating to loans	Date of last payment of loan, plus six years if the loan is under £10,000 or date of last payment of loan, plus 12 years if the loan is over £10,000	Securely disposed of
Management of endowment funds	Life of the fund, plus six years	Securely disposed of
Investment policies	Life of the investment, plus six years	Securely disposed of

11.Retention of Other School Records

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

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

Type of file	Retention period	Action taken after retention period ends
Property Management		
Title deeds of properties belonging to the school	These should follow the property unless the property has been registered with the Land Registry	Transferred to new owners
Plans of property belonging to the school, including any alterations. This is also a Health and Safety requirements and includes requiring diagrams and additional fire safety features.	For as long as the building belongs to the school	Transferred to new owners if the building is leased or sold
Leases of property leased by or to the school	Expiry of lease, plus six years	Securely disposed of
Commercial transfer arrangements	Date of transfer, plus six years	Securely disposed of
Transfer of land to the academy trust	Life on land ownership, then transfer to new owner	Securely disposed of
Transfer of free hold land	Life on land ownership, then transfer to new owner	Securely disposed of
Records relating to the letting of school premises	Current financial year, plus six years	Securely disposed of
Land and building valuations	Date of valuation superseded, plus six years	Securely disposed of
Records relating to the leasing of shared facilities	End of lease, plus six years	Securely disposed of
Business continuity and disaster recovery plans	These are dynamic documents which should be kept up to date	Securely disposed of old plans

Maintenance		
All records relating to the maintenance of the school carried out by contractors	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of
All records relating to the maintenance of the school carried out by school employees	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of
Operational Administration		
General file series	Current academic year, plus five years	Reviewed and securely disposed of
Records relating to the creation and publication of the school brochure and/or prospectus	Current year, plus three years	Consider retaining one copy for historical reasons. Standard disposal.
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current year, plus one year	Disposed of against common standards. School should decide whether if items published on the school website are retained as an archive or whether they should be deleted at the same time as the master copy.
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 systems	Academic year, plus one year	Securely disposed of
Records relating to the creation and management of parent-teacher associations and/or old pupil associations	Current year, plus six years	Reviewed then securely disposed of
Walking bus registers	Date of register, plus three years	Securely disposed of

School privacy notice which is sent to parents	Until superseded, plus six years	Securely disposed of
Consents relating to school activities as part of GDPR compliance e.g. consent to be send circulars or mailings	Consent should be retained for as long as the consent is relied upon	Securely disposed of

12. Disposal of Data

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.

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. Schools will keep a record of all files that have been destroyed.

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

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

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

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

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

13.Digital Continuity Statement

The purpose and requirements for keeping the data

Keystone Academy Trust is committed to the protection and security of all data it is required to keep – in some cases this may be beyond a pupil's, staff member's or governor's tenancy at the school. In light of this, the school has developed a digital continuity statement pertaining to computerised data that needs to be kept for six or more years.

Should the school fail to retain this data, legal action may result in financial penalisation and/or negative press; it is for this reason that the school will retain relevant data for as long as it is required.

The information assets to be covered by the statement

The school understands the sensitivity of some data it is required to keep and ensures measures are in place to secure this data, in accordance with the school's Data Protection Policy and the UK GDPR.

The school's data security measures are outlined in full in the Cyber Security Policy.

The individuals responsible for the data preservation

Data retention will be overseen by the following personnel:

- Headteacher, Trust Chief Finance Officer, Trust Chief Operations Manager and CEO
- Information asset owners e.g. School administrators, Deputy CFO and Governance Lead

Should the any of the above personnel change, appropriate updates will be made to this and other affected policies and correspondence.

The appropriate supported file formats for long-term preservation, and when they need to be transferred

Microsoft Word documents will be converted into PDF files, to ensure the longevity of their accessibility – file formats should be converted as soon as possible, or within six months, to ensure their compatibility. Further specifications of file conversion are listed below:

Type of file	To be converted to
Microsoft Word document	PDF
Microsoft PowerPoint document	PDF
Microsoft Excel document	PDF
Images	JPEG
Videos and film, including CCTV	MOV/MP4

The retention of all software specification information and licence information

If it is not possible for the data created by an unsupported computer system to be converted to the supported file formats, the system itself should be ‘mothballed’ (i.e. usage of the system should be stopped, but it should be kept in good condition) to preserve the files it has stored. If this is the case with any data, the school will list the complete system specification for the software that has been used and any licence information which will allow the system to be retained in its entirety.

Data will be stored on password protected external hard drives, which will be kept in a locked filing cabinet – only the information asset owners and the headteacher, CEO, CFO, or COM will have knowledge of these passwords.

How access to the information asset is to be managed in accordance with the UK GDPR

To ensure the data’s relevance to the school, and that recent files have been correctly converted, names of information asset owners will undertake regular archive checks of the data – timeframes are listed in the table below. In accordance with principle five of the UK GDPR, personal data should be “kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed”. The school is committed to ensuring all data is checked regularly to ensure its relevance.

Timeframe	Type of check
Biannually	Relevance check
Annually	Compatibility check and, if required, back-up files created
At the end of the data’s lifecycle (at least every six years)	Check to ensure data is securely disposed of