



Tudhoe Learning Trust

Records Management and Retention of Schedule

Approved by:	Trust Chief Executive Officer
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Introduction

The 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 school and provide evidence for demonstrating performance and accountability.

The 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

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.

Responsibilities

The governing body of an Academy Trust has a statutory responsibility to maintain the records and record keeping systems in accordance with the regulatory environment specific to the schools within the trust. The responsibility is usually delegated to the headteacher of the schools.

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 information.

Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- Information Governance Policy and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

The Retention Schedule:

Introduction & Purpose

Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose.

The retention schedule below sets out the minimum periods of retention of personal data and information Tudhoe Learning Trust hold and process. The retention periods are based on business needs and legal requirements.

Some of the retention periods are governed by statute, and the policy specifically states the relevant statutory provision where applicable. When the law is silent, retention periods outlined below are recommended as best practice.

Members of staff are expected to adhere to the retention schedule and to take account of the different retention periods. The retention schedule refers to all information, regardless of the media in which they are stored.

Data Protection

The schedule sets out how long pupil data, employment related data and financial data will normally be held before it is either destroyed, archived or transferred to other storage media in compliance with the terms of the UK General Data Protection Regulation (UKGDPR) and the Freedom of Information Act 2000 and the Companies Act 2006.

This schedule has used the DfE Data Protection in Schools Guidance which was updated 3 April 2024 and the Retention Guidelines for Schools (RGS) as prescribed by the Information Records Management Society of Great Britain. The RGS outlines recommended retention periods for a diverse class of records created by schools during their operations. Both the DfE and the NGA advise the use of the Retention Guidelines for Schools (RGS) as prescribed by the Information Records Management Society of Great Britain.

Following the guidelines set out in this schedule ensures we are compliant with the Data Protection Act 2018, UKGDPR and the Freedom of Information Act 2000.

Information (hard copy or electronic) will be retained for at least the period specified in the attached retention schedule.

What to do with records once they have reached the end of their administrative life:

Destruction of Records

Where records have been identified for destruction, they should be disposed of in an appropriate way. All information should be reviewed prior to destruction to identify whether special factors mean that destruction should be delayed e.g. potential litigation, grievances. All records containing personal information should either be shredded or collected using an agreed confidential waste disposal company. The school should maintain a destruction record (example contained in Appendix 1). The destruction record should include; File reference, File title/description, Number of files, Name of Authorising Officer, Date destroyed or deleted from system, Person who undertook destruction.

Transfer of records to the Archives.

Where records have been identified as being worthy of permanent preservation, arrangements should be made to transfer them to an appropriate archive facility. The school should maintain an Archive record which should include as a minimum; File reference, File title/description, Number of files, Name of Authorising Officer, Date archived.

Transfer of information to other media

Where lengthy retention periods have been allocated to records, serious consideration should be given to converting paper records to digital media or virtual storage centres e.g. Cloud based storage. The lifespan of the media used and ability to migrate data where necessary should be considered before paper copies of data are permanently destroyed.

Pupil Records (including transfer of pupil data/information to another school)

Pupil's educational records should be retained whilst the child remains in the school. Once a pupil leaves the school the data/files should be sent to their next school and full responsibility for retention moves to that school.

Nursery - Transfer to Primary school or in year to new nursery provision or retain until pupil reaches 25 years of age for pupils missing in education or moved abroad.

Primary - Transfer to Secondary school or in year to new primary school or retain until pupil reaches 25 years of age for pupils missing in education or moved abroad.

Authorising Officer The destruction of records should only be authorised by Headteacher, CEO or DBFD of Tudhoe Learning Trust.

Retention Schedule

Contents

For ease of use the list of documents has been broken down into sections, where possible this has been split between schools and central team, however in some cases documents will be stored in a variety of places. Whilst the list is intended to be as comprehensive as possible it is not practical to list every possible document within a policy such as this, staff are encouraged to operate within the guidelines of the policy where documents are not specifically listed. Where significant doubt exists questions should be directed to the Office Manager in the first instance.

Education	
Education Casework	Until the pupils' 25 th birthday
Admissions and Transfers Processing	Until the pupils' 25 th birthday
Attainment	3-5 years for identification of trends only. Individuals are not identifiable. Where kept on pupil record this will be retained under pupil reaches 25 th birthday
Attendance	Indefinitely
Appeals Administration	Until pupil's 25 th birthday
Behaviour	Until the pupils' 25 th birthday
Complaints/Allegations	7 years after resolution or action unless it relates to employees working with children and it will be destroyed after 25 years
Exclusions	Until the pupils' 25 th birthday
Free School Meal Registers	Current academic year + 6 years
Medical Information	Until the pupils' 25 th birthday
Progress/End of Year Reports	Until the pupils' 25 th birthday
Pupil Images/Characteristics	Up to 3 years after leaving
Safeguarding/Child Protection/Looked after Children	Until pupil's 75 th birthday

SEND Assessment and Support	Until pupil's 75 th birthday
School Capacity Planning	7 years after review
Statutory Returns	25 years
Trips and activities	7 Years after trip. Incident records will be kept until the youngest child is 25 years old
Finance	
Accounting and Reporting	6 years after end of financial year
Banking Administration	6 years after end of financial year
Budgets Management	6 years after end of financial year
Charities and Trusts Administration (Administrative records)	6 years after end of financial year
Charities and Trusts Administration (Deeds)	Transfer after wound-up
Financial Planning	6 years after end of planning period or strategy superseded
External Funding Acquisition	Minimum 6 years after end of funding period
Grant Funding Administration	Minimum 6 years after end of funding period
Income Processing	6 years after end of financial year
Invoices	6 years after end of financial year
Loans and Leasing Administration	6 years after settlement or end of
Payroll Administration	6 years after end of financial year
Pension Fund Management	6 years after end of scheme
Pension Scheme Administration	6 years after death of last known beneficiary
Procurement (Unsuccessful tenders)	1 year after contract awarded

Procurement (Awarded contracts)	6 / 12 / 15 years after end of contract
Purchasing and Payment Processing	6 years after end financial year
Statutory Returns	6 years after submission
Taxes Management	6 years after end of tax year
Governance	
Minutes and reports presented at Directors meetings	Minimum of 6 years. If they refer directly to individual reports, then they must be kept permanently.
Minutes and reports presented at Governor meetings	Minimum of 6 years. If they refer directly to individual reports, then they must be kept permanently.
Health and Safety	
Accident and Incident Reporting and Investigation (Adults)	3 years after investigation
Accident and Incident Reporting and Investigation (Children)	21 years after date of birth
Advice Provision	6 years after date created
Hazardous Substances Management	100 years after date created
Health Surveillance and Exposure Monitoring (identifiable individuals)	Until 75 th birthday or 50 years after last medical assessment
Health Assessment	Duration of employment and 6 years after leaving

Pre-employment health screening	Duration of employment and 6 years after leaving
Risk Assessment	Duration of employment and 6 years after leaving
Human Resources	
Apprenticeship Programme	Duration of employment and 7 years after leaving
Disciplinary Files	Duration of employment and 25 years after leaving
Employee Appraisals	Appraisal cycle +6 years
Grievance Files	Duration of employment and 7 years after leaving
Members Records	Destroy 5 years after leaving date
Personnel Record	Duration of employment and 25 years after leaving
Records of Service	Indefinitely
Research and Project Materials	Destroy after 1 year
Information and Communication Technology (ICT)	
Licensing	6 years after date terminated
Web Content	7 years after date created
System Specifications	2 years after date created
Information Management	
Call Recording	1 year after date created

CCTV Recording	30 days after recording
Subject Access Requests	3 years after date created
Records Storage Management	Lifetime of organisation
Management	
Consultation and Engagement	6 years after date created
Policy and Procedures Development	6 years after superseded
Research and Analysis (Raw data)	Out of date and/or no longer required
Strategic Planning, Transformation and Change Management	6 years after created
Physical Assets and Property	
Inventories of furniture and equipment	Current year +6 years
Land, Premises and structure management	Indefinitely or 15 years after disposal of land or premises
Risk Management and Insurance Administration	
Audit	6 years after audit or investigation or legal
Business Continuity Planning	6 years after superseded
Insurance Claims Administration	6 years after settlement or repudiation but not before claimant reaches age of 25