

Records Management and Data Retention Policy

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Updates/revisions included:	Added Legal Framework, Data Retention Disposal and Monitoring and Review.
Academies to note: This is an OA template and should not be changed. Please contact OA's Data Protection Officer, Kuda Mika kuda.mika@oliveacademies.org.uk if you have any queries about the implementation of this policy.	

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Olive Academies Multi-Academy Trust (MAT) recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the trust and its academies. This document provides the policy framework through which this effective management can be achieved and audited.

Scope of the policy

This policy applies to all records created, received or maintained by staff at Olive Academies (OA) in the course of carrying out its functions.

Records are defined as all those documents which facilitate the business carried out by OA 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 electronically.

A small percentage of OA's records may be selected for permanent preservation as part of the institution's archives and for historical research.

Legal framework

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
- Guidance
- DfE (2023) 'Data protection in schools' [Data protection in schools – GOV.UK](#)
- DfE (2018) 'Data protection: a toolkit for schools' [Data protection: a toolkit for schools – Nottinghamshire County Council](#)
- DfE (2023) 'Careers guidance and access for education and training providers' [Careers guidance and access – GOV.UK](#)
- DfE (2025) 'Record keeping and retention information for academies and academy trusts' [Record keeping and retention – GOV.UK](#)
- IRMS (2019) 'Information Management Toolkit for Schools' [IRMS Schools Toolkit](#)
- IRMS (2019) 'Academies Toolkit' (*now merged with the Schools Toolkit*) [IRMS Academies Toolkit](#)
- ICO (2023) 'How do we document our processing activities?' [Documenting processing activities – ICO](#)
- ICO (2023) 'Controllers checklist' [Controllers checklist – ICO](#)

The policy will be implemented in accordance with the following school policies:

- Data Protection Policy
- Freedom of Information Policy
- ICT and Online Safety Policy
- Data Asset Register

Responsibilities

OA has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment.

- The Data Protection Officer (DPO), with the academy business and office managers, will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way.
- Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with these records management guidelines.
- All staff members will be 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.
- Staff will be responsible for ensuring that when pupils use personal data for projects or coursework, they do so appropriately. This includes being compliant when storing personal data.

Safe disposal of records

Where records have been identified for destruction ('SECURE DISPOSAL') they should be disposed of in an appropriate way and in accordance with this policy.

Confidential waste

Anything that contains personal information should be treated as confidential. Confidential waste should be disposed of via confidential waste bins or sacks located around within our academies and our training and development centre. Alternatively, it can be shredded using a crosscut shredder.

Automatic deletion

Certain information will be automatically archived by the computer systems. Should you want to retrieve any information, or prevent this happening, please contact your office manager in the first instance.

Transfer of information

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

Retention guidelines

The retention guidelines have been issued within the Information Management Toolkit for Schools. Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the General Data Protection Regulation 2018, the Data Retention Regulations 2009 and the Freedom of Information Act 2000. Managing records using these retention guidelines will be deemed to be 'normal processing' under the legislation mentioned above. If records are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented and the following considerations should be considered:

- Has the information come to the end of its useful life?
- Is there a legal requirement to keep this information or document for a set period? (Refer to the retention schedule for more information).

- Would the information be likely to be needed in the case of any legal proceedings? In particular, is it potentially relevant to an historic child abuse enquiry? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)
- Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
- Is the document of historic or statistical significance?

If the decision is made to keep the document for longer than the guidelines, this should be referred to the Data Protection Officer (DPO) and reasons given.

Information Audit

Annual information audits will be used to evaluate the information the Trust is holding to ensure it is correctly managed in accordance with the General Data Protection Regulations (GDPR). The DPO is responsible for completing the information audit. The audit 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

The information audit will include the following:

- The academy's data needs
- The information needed to meet those needs
- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

The DPO will consult with staff members involved in the information audit process to ensure that the information is accurate.

Data Retention and Disposal

Olive Academies retains personal data only as long as necessary for statutory, legal, or operational purposes. Retention periods are set out in our retention schedule, which is reviewed annually. Data is securely disposed of when no longer required, using shredding for paper records and secure deletion for electronic files. Staff receive regular training on data handling and retention.

Monitoring and Reviewing

The Data Protection Officer (DPO) will monitor adherence to this policy through regular audits of data storage and disposal procedures. The data retention schedule and this policy will be formally reviewed at least once a year, or sooner if there are changes to legislation, statutory guidance, or the school's operational needs. Any necessary updates will be approved by the Board of Trustees and promptly communicated to all staff. We welcome feedback from staff to help improve our processes and maintain high standards of data protection.

Retention Schedule

	Basic file description	Retention period	Action at the end of the administrative life of the record
1	CHILD PROTECTION		
1.1	Child Protection information held on pupil file	<p>Stored in a sealed envelope for the same length of time as the pupil file.</p> <p>*Child Protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (the information does not need to be sent to a university). Where a school uses CPOMS this should be done securely via secure electronic transfer.</p> <p>Where a child is removed from roll to be educated at home, the file should be copied to the Local Authority.</p>	SECURE DISPOSAL*
1.2	Child protection records held in a separate file	DOB of child + 25 years then review.	SECURE DISPOSAL NB if related to child sexual abuse, SHOULD NOT BE DESTROYED (current guidance)
1.3	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer then review. Note allegations that are found to be malicious should be removed from personnel files.	SECURE DISPOSAL

	Basic file description	Retention period	Action at the end of the administrative life of the record
2	STUDENTS		
2.1	Admission Registers	Date of last entry in the book (or file) + 3 years	REVIEW with DPO. Academies may wish to consider keeping the admission register permanently as often academies receive enquiries from past pupils to confirm the dates they attended the academy.
2.2	Admissions - if the admission is successful	Date of admission + 1 year	SECURE DISPOSAL
2.3	Admissions – if the appeal is unsuccessful	Resolution of case + 1 year	SECURE DISPOSAL
2.4	Attendance registers	Date of register + 3 years	SECURE DISPOSAL
2.5	Student's academic records and reports	DOB of the pupil + 25 Years (if NEET) OR to next school/college	SECURE DISPOSAL OR transfer to school/college
2.6	Special Educational Needs files, reviews and Individual Education Plans, EHCP documentation	DOB of the pupil + 25 years (if NEET) OR to next school/college	SECURE DISPOSAL OR transfer to school/college
2.7	Public examination results	Add to student's academic record	Unclaimed certificates may be destroyed (in a confidential manner) after 12 month retention period (starts from printed issue date)
2.8	Internal examination results	Add to student's academic record	
2.9	Any other records created in the course of contact with pupils	Current year + 3 years	Review at the end of 3 years and either allocate a further retention period or SECURE DISPOSAL

	Basic file description	Retention period	Action at the end of the administrative life of the record
2.12	Advice and information to parents regarding educational needs	DOB + 25 years [This would normally be retained on pupil file]	SECURE DISPOSAL unless document is subject to a legal hold
2.13	Accessibility Arrangements for pupils (examinations)	DOB + 3 years [This would normally be retained on pupil file]	SECURE DISPOSAL unless document is subject to a legal hold
2.14	Parental consent forms for academy trips – where there has been no major incident	Conclusion of the trip	SECURE DISPOSAL
2.15	Parental consent forms for academy trips – where there has been a major incident	DOB of the pupil involved in the incident + 25 years – on pupils' record (slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils)	SECURE DISPOSAL
2.16	Records created by academy to obtain approval to run an Educational Visit outside the classroom - secondary schools	Date of visit + 10 years	SECURE DISPOSAL
Personal identifiers, contacts and personal characteristics			
2.17	Images used for identification purposes	For the duration of the event/activity, or whilst the student remains at academy, whichever is less + 1 month	SECURE DISPOSAL
2.18	Images used in displays in schools	Whilst the student is at the academy	SECURE DISPOSAL
2.19	Images used for marketing purposes, or other	In line with the consent period	SECURE DISPOSAL
2.20	Biometric data	For the duration of the event/activity, or whilst the student remains at academy, whichever is less + 1 month	SECURE DISPOSAL
2.21	Postcodes, names and characteristics	Whilst the student is at academy + five years	SECURE DISPOSAL

	Basic file description	Retention period	Action at the end of the administrative life of the record
Family liaison officers and home-school liaison assistants			
2.24	Day books	Current academic year + 2 years	SECURE DISPOSAL
2.25	Reports for outside agencies	On pupil file – DOB + 25 years	SECURE DISPOSAL
2.26	Referral forms for successful applicants	Whilst the referral is current then add to child's file	SECURE DISPOSAL
2.27	Referral forms for pupils who do not attend/application not completed	Six months	SECURE DISPOSAL
2.27	Contact data sheets	Current academic year	SECURE DISPOSAL if contact is no longer active then destroy
2.28	Contact database entries	Current academic year	SECURE DISPOSAL if contact is no longer active then destroy
Medical information and administration			
2.30	Permission slips	For the duration of the period that medication is given + 1 month	SECURE DISPOSAL
2.31	Medical conditions - ongoing management	Added to the student's record and transferred to the next school. Copies held whilst the pupil is at the academy + 1 year	SECURE DISPOSAL
2.32	Medical incidents that have a behavioural or safeguarding influence	Added to the student's record and transferred to the next school/ academy. Copies held whilst the pupil is at the academy + 25 years	SECURE DISPOSAL
3	CURRICULUM MANAGEMENT		
3.1	Students' work	Current + one year or where possible students' work should be returned to the student at the end of the academic year	SECURE DISPOSAL
3.2	Examination results	Current year + 6 years	SECURE DISPOSAL
3.3	Examination papers	Until the appeals/validation process has been completed	SECURE DISPOSAL
3.4	SATS results	Retained within pupil's file (25 years after pupil's	SECURE DISPOSAL

	Basic file description	Retention period	Action at the end of the administrative life of the record
		DOB)	
3.5	Published Admission Number (PAN) reports	Current year + 6 years	SECURE DISPOSAL
3.6	Value added records and contextual data	Current year + 6 years	SECURE DISPOSAL
4	STAFF RECORDS		
4.1	Timesheets, sick pay	Current year + 6 years	SECURE DISPOSAL
4.2	Staff Personal files	Termination of employment + 6 years	SECURE DISPOSAL
4.3	Interview notes and recruitment records	Date of interview + 6 months	SECURE DISPOSAL
4.4	Pre-employment vetting information (including DBS checks)	The academy does not have to keep copies of DBS certificates. If the academy does so the copy must NOT be retained for more than 6 months	SECURE DISPOSAL
4.5	Disciplinary proceedings	Where the warning relates to child protection issues then retain until the person's normal retirement age, or 10 years from the date of the allegation, whichever is the longer. If the disciplinary proceedings relate to a child protection matter, please contact your safeguarding children officer for further advice.	SECURE DISPOSAL
	• oral warning	Date of warning + 6 months	SECURE DISPOSAL
	• written warning – level one	Date of warning + 6 months	SECURE DISPOSAL
	• written warning – level two	Date of warning + 12 months	SECURE DISPOSAL
	• final warning	Date of warning + 18 months	SECURE DISPOSAL
	• case not found	Conclusion of the case unless the incident is child protection related and is disposed of as above.	SECURE DISPOSAL
4.6	Records relating to accident/injury at work	Date of incident + 12 years. In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL
4.7	Annual appraisal/performance	Current year + 5 years	SECURE DISPOSAL

	Basic file description	Retention period	Action at the end of the administrative life of the record
	management records		
4.8	Maternity pay records	Current year + 3yrs	SECURE DISPOSAL
4.9	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current year + 6 years	SECURE DISPOSAL
4.10	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file.	
4.11	Recruitment documentation, including unsuccessful applications	6 months from completion of the recruitment process unless agreement obtained from applicant to keep it for longer. For successful candidates all relevant information should be added to the staff personal file.	SECURE DISPOSAL Delete records from recruitment site
5	HEALTH AND SAFETY		
5.1	Accessibility Plans	Current year + 6 years	SECURE DISPOSAL
5.2	Accident Reporting:		
	Adults	Date of incident + 6 years	SECURE DISPOSAL
	Children	DOB of child + 25 years	SECURE DISPOSAL
5.3	Control of Substances Hazardous to Health (COSHH)	Current year + 40 years	SECURE DISPOSAL
5.4	Incident reports	Date of incident + 12 years	SECURE DISPOSAL
5.5	Policy Statements	Life of policy + 3 years	SECURE DISPOSAL
5.6	Risk Assessments	Life of risk assessment + 3 years	SECURE DISPOSAL
5.7	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	Last action + 40 years	SECURE DISPOSAL

	Basic file description	Retention period	Action at the end of the administrative life of the record
5.8	Process of monitoring of areas where employees and persons are likely to have come in contact with radiation	Last action + 50 years	SECURE DISPOSAL
5.9	Fire Precautions log books	Current year + 6 years	SECURE DISPOSAL
5.10	Employer's Liability certificate	Closure of the school + 40 years	SECURE DISPOSAL
5.11	Visitors' book and signing in sheets	Current year + 2 years	SECURE DISPOSAL
5.12	Post log	Current year + 2 years	
6	FINANCE		
6.1	Annual Accounts	Current year + 6 years	Transfer to archives or STANDARD DISPOSAL
6.2	Loans and grants	Date of last payment on loan + 12 years then review	SECURE DISPOSAL
6.3	Contracts under seal	Last payment on contract + 12 years	SECURE DISPOSAL
6.4	Contracts under signature	Last payment on contract + 6 years	SECURE DISPOSAL
6.5	Contracts monitoring records	Current year + 2 years	SECURE DISPOSAL
6.6	Copy orders	Current year + 2 years	SECURE DISPOSAL
6.7	Budget reports, budget monitoring etc.	Life of the budget + 3 years	SECURE DISPOSAL
6.8	Invoices, receipts, order books and requisitions, delivery notices and other records covered by the Financial Regulations	Current financial year + 6 years	SECURE DISPOSAL
6.9	Annual Budget and background papers	Life of the budget + 3 years	SECURE DISPOSAL
6.10	Debtors' Records	Current financial year + 6 years	SECURE DISPOSAL
6.11	Academy – Cheque Books	Current year + 6 years	SECURE DISPOSAL
6.12	Academy – Paying in Books	Current year + 6 years	SECURE DISPOSAL
6.13	Academy – Ledger	Current year + 6 years	SECURE DISPOSAL
6.14	Academy – Invoices	Current year + 6 years	SECURE DISPOSAL
6.15	Academy – Receipts	Current year + 6 years	SECURE DISPOSAL

	Basic file description	Retention period	Action at the end of the administrative life of the record
6.16	Bank statements	Current year + 6 years	SECURE DISPOSAL
6.17	Free school meals registers	Current year + 6 years	SECURE DISPOSAL
6.18	Petty cash books	Current year + 6 years	SECURE DISPOSAL
7	PROPERTY		
7.1	Title Deeds	Permanent - these should follow the property unless the property has been registered with the Land Registry	Archive if the deeds are no longer needed
7.2	Maintenance and contractors	Current year + 6 years	SECURE DISPOSAL
7.3	Leases	Expiry of lease + 6 years	SECURE DISPOSAL
7.4	Lettings	Current year + 3 years	SECURE DISPOSAL
7.5	Burglary, theft and vandalism report forms	Current year + 6 years	SECURE DISPOSAL
7.6	Maintenance log books	Current year + 6 years	SECURE DISPOSAL
7.7	Contractors' reports	Current year + 6 years	SECURE DISPOSAL
7.8	CCTV footage	21 days (unless required for investigation purposes)	OVERRIDDEN AND REMOVED INVESTIGATION PURPOSES – RETAINED UNTIL INVESTIGATION COMPLETE
8	GOVERNANCE		
8.1	Board & Committee Minutes (signed by chair)	Permanent	Consider alternative archiving options
8.2	Agendas	One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL
8.3	Reports	Date of report + 6 years. However if minutes refer directly to individual reports then the reports should be kept permanently	SECURE DISPOSAL
8.4	Instruments of Government	Permanent	Retain in central office and transfer to archives when the academy has

	Basic file description	Retention period	Action at the end of the administrative life of the record
			closed.
8.5	Policy documents	Life of policy + 3 years	SECURE DISPOSAL
8.6	Complaints files	Date of resolution of complaint + a minimum of 6 years then review for further retention in the case of contentious disputes	SECURE DISPOSAL
8.7	Annual Reports required by the DfE	Date of report + 10 years	SECURE DISPOSAL
8.8	Proposals for schools to become, or be established as academies	Date proposal accepted or declined + 3 years	SECURE DISPOSAL
Strategic Leadership Group (OA central) and academy leadership			
8.9	Log books of activity in the academy maintained by the headteacher	Date of last entry + minimum of 6 years	Reviewed and SECURE DISPOSAL
8.10	Minutes of SLT meetings and other internal administrative bodies	Date of the meeting + 3 years	Reviewed and SECURE DISPOSAL
8.11	Reports created by the headteacher or SLT	Date of the report + minimum of 3 years	Reviewed and SECURE DISPOSAL
8.12	Records created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Current academic year + 6 years	Reviewed and SECURE DISPOSAL
8.13	Correspondence created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence + 3 years	Reviewed and SECURE DISPOSAL
8.14	Professional development plans	Duration of the plan + 6 years	SECURE DISPOSAL
8.15	Academy improvement plans and self-evaluation forms	Duration of the plan + 3 years	SECURE DISPOSAL