



# Records Management Policy

Policy type	Business management (non-statutory)
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Last updated	July 2025
Reviewed	Adrian Ball
Approved by	Adrian Ball
Release date	February 2026
Review cycle	EVERY TWO YEARS Policies will be reviewed in line with DEMAT's internal policy schedule and/or updated when new legislation comes into force
Description of changes	Incorporating section in table on data retention requirements re unsuccessful applicants for roles within DEMAT



## 1. Application

The policy is applicable to all employees (permanent and temporary) of DEMAT. Where applicable, it is also applicable to all Volunteers supporting DEMAT.

## 2. Relationship with DEMAT Values

The application of this policy must be always applied in a way that reflects the values of DEMAT and its Christian Ethos:

### Vision

To Learn. To Know. To Lead Out. "I can do all things through Christ who strengthens me"  
(Philippians 4:13)

### Values

Love – We engender love and tolerance between and for our staff, pupils, and others to foster an inspiring atmosphere of mutual support.

Community – We are committed to ensuring our academies are a living part of the community and contribute positively to its needs.

Trust – We acknowledge accountability and responsibility for our actions and ensure that we encourage each other to make brave decisions and then learn from any mistakes.

Ambition – We are determined that our academies offer a place for the joy of learning, enabling those of all abilities to thrive and go on to lead rewarding lives.

Respect – We do everything to provide a caring, safe, and secure place for our staff and pupils to be happy and respected in our academies so they may achieve their potential.



### 3. Policy Statement

The Trustees of the Diocese of Ely Multi-Academy Trust (“DEMAT”) aim to ensure that all personal data collected about staff, pupils, parents, Governors, Trustees, visitors and other individuals, is collected, stored and processed in accordance with UK General Data Protection Regulation (UK GDPR).

### 4. Overview

- 4.1 The Trustees are committed to retaining personal data (which may be held on paper, electronically, or otherwise) about all of its stakeholders for no longer than necessary for the purpose or purposes for which they were collected. All steps will be reasonably taken to securely destroy or erase from systems, all data which is no longer required. The Trustees recognise the need to process data in an appropriate and lawful manner, in accordance with the UK General Data Protection Regulation (GDPR). The purpose of this policy is to set out the principles by which we will retain your personal data.
- 4.2 Data users are obliged to comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary action, including dismissal.
- 4.3 Adam Downing is the Data Protection Officer responsible for ensuring compliance with the GDPR and this policy at Trust Level. Headteachers of DEMAT academies are responsible for ensuring compliance with the GDPR and this policy at academy level.
- 4.4 Any questions about the operation of this policy or concerns that there has been a breach of this policy should be referred in the first instance to [dpo@demat.org.uk](mailto:dpo@demat.org.uk).

### 5. Responsibilities

The Trustees understand their legal responsibility to comply with the law, including the UK General Data Protection Regulation. The individual with overall responsibility for this policy is the Data Protection Officer.



## 6. Retention of data

The Board of Trustees have agreed that DEMAT and its academies will apply the statutory retention periods as specified by the Department for Education (DfE). Where no retention period is included in the DfE schedule, DEMAT will apply the Retention Guidance for Schools (also suitable for the use of Academies and Multi-Academy Trusts), which has been issued by the Information and Records Management Society (IRMS).

## 7. Associated Policies and Documents

This Policy should be read in conjunction with the following DEMAT Policies:

Data Protection Policy



## Appendix 1

### Retention schedule for DEMAT and Academies within the Trust

The statutory retention periods applied by DEMAT are set out below. Where a category of data is not included below, please refer to the Data Protection Officer at [dpo@demat.org.uk](mailto:dpo@demat.org.uk) for clarification on the retention period to apply.

#### 1. Pupil records

Document type	Retention period	Action at end of retention period	Further information
<b>Primary school pupil records</b>	Until the pupil leaves the school.	Transfer to secondary school or other primary school when the pupil leaves.	See <a href="#">The Education (Pupil Information) (England) Regulations 2005</a> for details of what to keep in the pupil record. There is guidance on <a href="#">how to transfer information</a> to another school.
<b>Secondary school pupil records</b>	Until the pupil's 25th birthday.	Dispose of records securely. If the pupil leaves to go to another school, transfer the records to that school. There is guidance on <a href="#">what to do if the school closes</a> before the end of the retention period.	See <a href="#">The Education (Pupil Information) (England) Regulations 2005</a> for details of what to keep in the education record. Retain as detailed in section 2 of the <a href="#">Limitation Act 1980</a> .



Document type	Retention period	Action at end of retention period	Further information
<b>Special educational needs and disabilities (SEND), including SEND statements and accessibility plans</b>	Until the pupil's 30th birthday.	Dispose of records securely, unless the document is subject to a legal hold. If the pupil leaves to go to another school, transfer the records to that school.	<a href="#">SEND code of practice: 0 to 25 years</a> . Retain as detailed in section 2 of the <a href="#">Limitation Act 1980</a> .
<b>Attendance and absence</b>	Until the pupil's 30th birthday.	Dispose of records securely, unless the document is subject to a legal hold. If the pupil leaves to go to another school, transfer the records to that school.	<a href="#">SEND code of practice: 0 to 25 years</a> . Retain as detailed in section 2 of the <a href="#">Limitation Act 1980</a> .

## 2. Child protection records

Document type	Retention period	Action at end of retention period	Further information
<b>Child protection files</b>	Until the child's 25th birthday. If the file relates to child sexual abuse, retain until the child's 75th birthday.	Dispose of records securely. Child protection files should be passed on to any new school a child attends. This should be	Should be stored in a separate child protection file. <a href="#">Keeping children safe in education</a> sections 66, 67, 121 and 122. The Report of the Independent Inquiry into Child Sexual Abuse



Document type	Retention period	Action at end of retention period	Further information
		transferred separately from the main pupil file.	(IICSA), <a href="#">recommendation on access to records</a> .
<b>Allegations of child protection against a member of staff, including unfounded allegations</b>	Until the staff member's normal retirement age, or 10 years from the date of the allegation, whichever is later.	Dispose of records securely.	<a href="#">Keeping children safe in education</a> . <a href="#">Working together to safeguard children</a> .

### 3. Finance records

Document type	Retention period	Action at end of retention period	Further information
<b>Contracts</b>	6 years from the last payment on the contract.	Dispose of records securely.	Section 2 of the <a href="#">Limitation Act 1980</a> .
<b>Debtor's records</b>	6 years from the end of the financial year.	Dispose of records securely.	Section 2 of the <a href="#">Limitation Act 1980</a> .



Document type	Retention period	Action at end of retention period	Further information
VAT records	6 years from the end of the financial year.	Dispose of records securely.	May include invoices, budgets, bank statements and annual accounts. <a href="#">Record keeping (VAT Notice 700/21).</a>

#### 4. Governance records

Document type	Retention period	Action at end of retention period	Further information
Admissions	3 years from the admission date.	Dispose of records securely.	<a href="#">Working together to improve school attendance.</a>
Attendance registers	3 years from the date of entry.	Dispose of records securely.	<a href="#">Regulation 14 of the Education (Pupil Registration) (England) Regulations 2006.</a>
Annual governors report	10 years.	Dispose of records securely.	<a href="#">The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.</a> Retain as detailed in section 2 of



Document type	Retention period	Action at end of retention period	Further information
			the <a href="#">Limitation Act 1980</a> .
<b>Curricular record</b>	At least one year.	Dispose of records securely.	<a href="#">The Education (School Records) Regulations 1989</a> . <a href="#">Regulation 3 of the Education (Pupil Information) (England) Regulations 2005</a> .
<b>Directors – disqualification</b>	15 years from the date of disqualification.	Dispose of records securely.	<a href="#">The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England) Regulations 2004</a>
<b>Records of educational visits</b>	10 years from the date of the visit. If there was an incident on the visit, retain the permission slips for all pupils and the incident report in the <a href="#">pupil record</a> , or until the pupil reaches the age of 25.	Dispose of records securely.	<a href="#">Health and safety on educational visits</a> . Retain as detailed in section 2 of the <a href="#">Limitation Act 1980</a> .



Document type	Retention period	Action at end of retention period	Further information
<b>School vehicles</b>	6 years from the disposal of the vehicle.	Dispose of records securely.	Section 2 of the <a href="#">Limitation Act 1980</a> .
<b>Statutory registers and compliance</b>	Retention periods vary, for example: Memorandums of understanding should be retained for the life of the academy plus 6 years. Annual reports should be retained for 10 years from the date of the report. Board meeting records should be retained for 10 years from the date of the meeting.	Dispose of records securely.	May include annual reports and governance records. <a href="#">Companies Act 2006</a> contains information on which statutory registers to keep. <a href="#">Compliance guidance in the maintained schools governance guide</a> . <a href="#">Compliance guidance in the academy trust governance guide</a> . <a href="#">Academy trust handbook</a> .

**Health and safety records**



Document type	Retention period	Action at end of retention period	Further information
<b>Accessibility plans</b>	Life of plan plus 6 years.	Dispose of records securely.	Retain as detailed in section 2 of the <a href="#">Limitation Act 1980</a> .
<b>Accident records</b>	3 years from the date of the accident.	Dispose of records securely.	Accidents involving pupils should be retained in the <a href="#">pupil record</a> . <a href="#">Regulation 25 of the Social Security (Claims and Payments) Regulations 1979</a> .
<b>Monitoring exposure to substances hazardous to health, including asbestos</b>	5 years.	Dispose of records securely.	<a href="#">The Control of Substances Hazardous to Health Regulations 2002</a> .
<b>Health surveillance records</b>	40 years.	Dispose of records securely.	<a href="#">The Control of Substances Hazardous to Health Regulations 2002</a> . <a href="#">Health surveillance - Record keeping</a> .
<b>Other health records of staff</b>	While the worker is employed in your school.	Dispose of records securely.	<a href="#">The Control of Substances Hazardous to Health Regulations 2002</a> .



Document type	Retention period	Action at end of retention period	Further information
			<a href="#">Health surveillance - Record keeping.</a>
<b>Fire assessments</b>	Life of the risk assessment plus 6 years.	Dispose of records securely.	<a href="#">Fire Service Order 2005.</a> Retain as detailed in section 2 of the <a href="#">Limitation Act 1980.</a>

**5. Property records**

Document type	Retention period	Action at end of retention period	Further information
<b>Maintenance records</b>	6 years from the end of the financial year.	Dispose of records securely.	<a href="#">Record keeping (VAT Notice 700/21).</a>
<b>Title deeds</b>	12 years from the end of the deed.	Dispose of records securely.	Section 2 of the <a href="#">Limitation Act 1980.</a>



## 6. Staff records

Document type	Retention period	Action at end of retention period	Further information
All records leading up to the appointment of a member of staff – unsuccessful candidates	12 months after notifying the unsuccessful candidate of the outcome of the recruitment exercise.	Disposal of records securely	<p>The Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR) do not expressly set out specific minimum or maximum retention periods for recruitment files. However, it is generally recommended that recruitment records should be retained for no longer than six months. This recommendation aligns with the limitation period for bringing a discrimination claim arising from the recruitment process, which is three months, although this may be extended in certain circumstances. Retaining careful notes and a full paper trail is considered best practice as it can help employers defend discrimination claims under the Equality Act 2010 from disappointed candidates.</p> <p>CIPD.org.uk</p>
<b>Copies of DBS certificates</b>	6 months from the date of recruitment.	Dispose of records securely.	<a href="#">Keeping children safe in education.</a>
<b>Maternity pay records</b>	3 years after the end of the tax year in which the	Dispose of records securely.	<a href="#">The Statutory Maternity Pay (General) Regulations 1986.</a>



Document type	Retention period	Action at end of retention period	Further information
	maternity pay period ends.		
<b>Pay records</b>	3 years from the end of the tax year they relate to.	Dispose of records securely.	<a href="#">PAYE and payroll for employers: Keeping records.</a>
<b>Personnel files</b>	6 years from termination of employment.	Dispose of records securely.	Section 2 of the <a href="#">Limitation Act 1980</a> .
<b>Retirement benefits</b>	A minimum of 6 years from the end of the year in which the accounts were signed.	Dispose of records securely.	<a href="#">Regulation 15 of the Retirement Benefits Schemes (Information Powers) Regulations 1995.</a>

Source: (<https://www.gov.uk/guidance/data-protection-in-schools/record-keeping-and-management>)