



St Chad's
Academies Trust

Information and Records Retention Policy

Children first; in the footsteps of St. Chad

As we follow Christ in the footsteps of St. Chad, we seek to be servant leaders who have a desire to see all those, within our Trust family, truly flourish both spiritually and academically.

Document information

Document title	Information and Records Retention Policy		
Owner	Data Protection Officer DPO		
Version	2.0	Status	FINAL
Last updated	01 September 2026	Last updated by	Trust Compliance Officer
Approved on	01 September 2026	Effective from	01 September 2026
Review date	01 September 2028		
Purpose	To set out the structured approach to reviewing and destroying records at St Chad's Academies Trust (the 'Trust').		
The policy has been implemented following consultation, in line with statutory practice, with the Trust DPO and Chief of Operations, and the Trust Finance, Risk and Audit Committee ('the Committee'), and may be amended from time to time, following further consultation with the Committee and/or Trust Board.			
This policy links to:	St Chad's GDPR Policy		

If you would like this information in another language or format, please speak to the Trust.

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Table of substantive changes from previous versions

This table explains where we have made substantive changes, or your ease of reference and assurance.

Date	Section Amended
19.08.2025	Appendix 1 - academy archiving flowchart added to document.
19.08.2025	Appendix 2 – Trust central team archiving process added to document.
04.06.2026	Section 5.10 amendment from SIMS to Bromcom following the implementation of the new MIS
04.06.2026	Section 14 added to reflect retention of AI generated information.

1.0 Introduction

- 1.1 St Chad's Academies Trust ('the Trust') is committed to ensuring that it provides a strong infrastructure to enable our academies to flourish and improve. The Trust recognises that its leaders and colleagues are central to this success and greatly values their commitment and contribution.
- 1.2 The core values of the Trust form the basis of all discussions with colleagues. We expect all colleagues of St. Chad's Academies Trust to respect and model these values.



This policy sets out a structured approach to reviewing and destroying records at the Trust. For the purpose of this document any reference to the Trust includes all associated academies.

- 1.2 The retention period for each type of record is shown in the table below. In addition, data protection legislation makes it unlawful to keep the information when it is no longer needed for the purpose for which it is held. This requirement allows discretion and may vary according to the circumstances, but in practice it means that the Trust should promptly destroy the record once the retention period in the table below has been reached (subject to the paragraphs below).
- 1.3 Occasionally there may be special circumstances which mean that a record should be kept for longer, for example, where there is a risk of litigation, a guarantee (finance) or a request from an outside body. The Trust will refer to its insurance policies and legal advice may be sought in these circumstances.

2.0 Run off period

- 2.1 The Trust uses a six month "run off" period to help ensure that a record is not deleted if it needs to be kept for longer. This means that the Trust keeps information for six months after the retention period set out in the table has come to an end. In addition, the Trust carries out a data cleanse of its files every three to six months. In practice therefore, a three-year retention period means three and a half years plus up to six months to allow the Trust to securely dispose of the information.

3.0 Emails and other forms of electronic communication

3.1 Emails and other electronic communications (such as Teams messages) should be filed in the right place as soon as is reasonable to help ensure that the appropriate retention period is applied. Communications and the attachments should be filed in their correct folders as follows:

- Safeguarding
- Finance
- Compliance
- Governance
- Human Resources
- Estates
- Payroll

3.2 The following platforms are authorised by the Trust for use in addition to Trust email:

- Microsoft Teams messages
- Zoom
- Cintra Cloud portal
- CPOMS

3.3 Please see the Trust's Acceptable Use Policy for further information about the Trust's approach to colleagues' use of these platforms.

4.0 Safeguarding, the Independent Inquiry into Child Sexual Abuse (IICSA) and insurer requirements:

4.1 Although IICSA has now concluded, the Trust has decided to cease the routine destruction of records that are known to relate to allegations or cases of child sexual abuse in accordance with IICSA's recommendation or that otherwise relate to safeguarding concerns. The Trust has decided that this will mean retaining the following categories of document indefinitely:

- Child Protection Records
- Risk assessments carried out for the purposes of determining a person's suitability to work with children
- Child Care Disqualification Checks
- Documents relevant to IICSA

4.2 Please note the position outlined in clause 4.1 remains under periodic review and intends to recommence controlled document destruction at the appropriate time.

5.0 Secure destruction

5.1 Personal data will be securely deleted or destroyed at the end of the relevant retention period. The Trust has allocated responsibility for the secure disposal of records containing

personal data to the academy Exec-/Trust Headteacher as Academy Data manager, who will liaise with all departments to ensure that the records are disposed of appropriately.

- 5.2 The Academy Data Manager will be responsible for the monitoring and maintenance of the Data retention schedule within the academy and the secure destruction of data in line with the Data Retention policy guidelines.
- 5.3 The Data Manager must notify the Trust Data Protection Officer DPO. The Trust will keep a record of what personal data has been deleted and when the deletion took place.
- 5.4 The Trust and its academies will ensure that any electronic devices are wiped securely before they are disposed of or recycled.
- 5.5 Paper records are disposed of through secure shredding services procured through service level agreements at local levels.
- 5.6 For papers that do not need to be retained in accordance with this policy, the Trust and academies has placed locked and confidential waste bins around the Trust sites which are regularly emptied securely.
- 5.7 The Trust may hire contractors to delete or dispose of personal data, for example, by wiping and disposing of electronic devices or by shredding paper. In these cases, the Trust carries out appropriate due diligence on its contractors to check that they are complying with their obligations and ensure that there is a suitable written agreement in place. All destruction certificates should be added to Smartlog.
- 5.8 The Trust has measures in place to halt the deletion of information promptly should it need to be retained beyond the normal retention period. For example, if information may be required in relation to a legal claim.
- 5.9 Colleagues are allowed to use their personal devices for Trust work with permission from their line manager and so long as such use complies with the Trust's requirements as set out in the Information Security Policy.
- 5.10 The Trust uses contractors to process personal data on its behalf (called processors under data protection law). Examples of the processors used by the Trust include
 - CINTRA - Payroll system
 - Smartlog - Compliance System
 - CPOMS – Pupil and Staff Data
 - Bromcom – Pupil and Staff Data
 - IMP/Access dimensions (Hoge)
- 5.11 The Trust has adopted the following process to ensure that any Trust personal data held by a processor is also securely destroyed in line with the Information Security Policy.

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
1	Pupils			
1.1	Admission registers (however held)	Three years from the date of the last entry	Review for further retention in the case of contentious dispute SHRED / DELETE	Yes
1.2	Attendance registers (however held)	Three years from the date of the last entry	Review for further retention in the case of contentious dispute SHRED / DELETE	Yes
1.3	Child protection records	Indefinite retention	Notes Child protection information must be transferred separately from the pupil's main educational file to the Designated Safeguarding Lead (DSL) at the new school whilst the child is still under 18 in accordance with the requirements set out in KCSIE. Ensure secure transit and confirmation of receipt should be obtained. Check local requirements as to whether the academy should send the original or a copy, practice varies from local authority to local authority on this. KCSIE is silent on whether the original or a copy must be sent. (A copy of the information, whether the original or a copy of the original, should be retained by the Trust). Where a child is removed from roll to be educated at home, the file should be sent to the Local Authority (LA), with a copy being retained by the Trust. In accordance with recommendations of the Independent Inquiry into Child Sexual Abuse all schools should retain information which relates to allegations (substantiated or not) of organisations and	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
			individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; and institutional failures to protect children from sexual abuse or other exploitation.	
1.4	Biometric information (e.g. fingerprints to be used as part of an automated biometric recognition system)	For as long as the Trust requires the information for the automated biometric recognition system	This information must not be kept for longer than it is needed. The information must be destroyed if the pupil no longer uses the system including when they leave the Trust, where the parent or pupil withdraws consent or the pupil objects to its use	No
1.5	Consents for using pupils' biometric data	For as long as the data is being processed and up to six years afterwards	SHRED / DELETE	No
1.6	Medical records held by the Trust	DOB of the pupil + 24 years	Review for further retention in the case of contentious disputes SHRED / DELETE	No
1.7	Counselling records held by the Trust	DOB of the pupil + 24 years	Review for further retention in the case of contentious disputes SHRED / DELETE	No
2	Pupil files			
2.1	Pupil files (including	DOB of the pupil +24 years	Review for further retention in the case of contentious disputes, for	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	public examination scripts, marks and results)		example, parental complaints, disciplinary matters, pupil exclusions, bullying incidents and subject access requests SHRED / DELETE Notes • When reviewing pupil files, the Trust should have regard to other applicable sections of this policy • Any examination certificates left unclaimed should be returned to the appropriate Examination Board If the child moves school then the Trust must retain a copy of the file sent to the new school.	
2.2	Internal examination scripts, marks and results	Scripts: Scripts from weekly or monthly tests: Keep until the end of the next term. Scripts from termly or yearly tests: Keep until the end of the next academic year. Marks and results: If the purpose of the test is to progress the child (either internally or externally) then keep marks and results in accordance with the retention periods and guidance set out in row 2.1 above. If the purpose of the test is for general	Keep for longer in accordance with the retention periods and guidance set out in row 2.1 above if risk of contentious disputes, for example, parental complaints, disciplinary matters, pupil exclusions, bullying incidents and subject access requests.	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		internal assessment of academic performance, then keep marks and results for the same period as the scripts themselves.		
2.3	Individual Education Plans	DOB of the pupil + 24 years	Review for further retention in the case of contentious disputes SHRED / DELETE	No
2.4	Education and Health Care (EHC) Plans	DOB of the pupil + 24 years	SHRED / DELETE unless legal action pending The Plan belongs to the LA which makes and maintains the Plan	Yes
2.5	Letters authorising absence	Three years from the date of the last entry on the attendance register	SHRED / DELETE	No
3	Permissions			
3.1	Parental permission slips for school trips – where there has been no major incident, accident, injury or near miss involving anyone on the trip	Conclusion of the trip + six years	Review for further retention in the case of contentious disputes otherwise SHRED / DELETE	No
3.2	Parental permission slips for school trips – where there has been a major	DOB of the pupil involved in the incident + 24 years The permission slips for all pupils on	Review for further retention in the case of relevance to contentious disputes or relevance to safeguarding. SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	incident, accident, injury or near miss involving anyone on the trip	the trip may need to be retained to show that the rules had been followed for all pupils		
4	Admission department and financial records			
4.1	Admission documents including enrolment forms.	Six years from date of leaving the Trust	Review for further retention in the case of contentious disputes SHRED / DELETE	No
4.2	Admissions documents relating to applicants who did not join the Trust	One year	SHRED / DELETE	No
4.3	Financial information in respect of school trips	Seven years for audit purposes.	Review for further retention in the case of contentious disputes SHRED / DELETE	No
5	Employment			
5.1	Employment or personnel records including recruitment information,	For at least six years after date of termination of employment For at least 12 years after date of termination if any of the documents	If on a date no earlier than six years after the termination date (or 12 years if any of the documents are a deed) there has been no recent contact from the relevant individual and no apparent breach of contract claim, dispose securely of documentation unless any child protection concerns. Records of anyone with child protection	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	application forms, (data gathered from online searches on shortlisted candidates), contracts of employment, changes to terms and condition, disciplinary matters, grievance procedures.	were signed as a deed	concerns (even if not proved) should be retained indefinitely. Also review guidance available at the time of planned destruction, in case that guidance suggests a need to retain for longer.	
5.2	Risk assessments carried out for the purposes of determining a person's suitability to work with children and records relating to any formal or informal process concerning a matter of a safeguarding nature (including low level concerns)	Indefinitely	N/A	No
5.3	Single central register (SCR)	3 Months	Review whether further retention is necessary. If so, these reasons must be documented. If not SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
			If the entry is destroyed once the staff member has left, the Trust should keep a record of the fact that vetting was carried out, the result and the recruitment decision taken.	
5.4	Childcare disqualification declarations	Keep indefinitely if relevant to a safeguarding issue (see section 6 in the introductory notes above).	SHRED / DELETE in so far as it contains information in relation to the household of a member of staff. In cases relating to safeguarding, keep indefinitely. If the record concerns a safeguarding matter and relates to the member of staff and/or the household of a member of staff, retain indefinitely.	Yes
5.5	Records and documents relating to membership of and contributions to the Teachers' Pension Scheme.	Retain for at least three years after employment ends. However, given their potential relevance to pay disputes they should be retained for the longer period of six years after employment ends.	Review whether further retention is necessary. Decisions in relation to the Teachers' Pension Scheme may have ramifications beyond six years and may be queried at any time by members and the Teachers' Pension Scheme.	No
5.6	Employment references received and provided where concerns were raised about an individual in relation to safeguarding, an	Until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. However, the Trust has decided to keep these records indefinitely.	If none, SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	individual's employment ended for a safeguarding reason or where a safeguarding concern was outstanding at the time of termination			
5.7	Employment references received and references provided (where no safeguarding concerns have arisen or are known)	While employment continues and at least up to six years after employment terminates.	Consider whether any recent reference requests for the relevant individual have been received. If any concerns are / have been raised by social services or other agencies see 5.6 above. If none, SHRED / DELETE	No
5.8	Working time opt-out forms	Two years from the date on which they were entered into. However, given their potential relevance to disputes they should be retained for three years from the date on which they were entered into.	SHRED / DELETE	Yes
5.9	Records to show compliance with the Working Time Regulations	Two years from the creation of the record. However, given their potential relevance to disputes they should be retained for three years from the creation of the record.	SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
5.10	Payroll and wage records These include records of: • Details on overtime. • Bonuses. • Expenses. • Benefits in kind.	To comply with the relevant statutory requirements, retain for at least three years after employment ends. However, given their potential relevance to pay disputes they should be retained for the longer period of six years after employment ends.	SHRED / DELETE	Yes
5.11	PAYE Records	Three years after the end of the tax year to which they relate. However, given their potential relevance to pay disputes they should be retained for six years after employment ends.	SHRED / DELETE	Yes
5.12	Maternity / paternity records These include: • Records regarding Maternity payments made save for where those include payroll records.	Three years after the end of the tax year in which the maternity pay period ends. However, given their potential relevance to disputes they should be retained for four years after the end of the tax year in which the maternity pay period ends.	SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	- Dates of maternity leave. - Period without maternity payment. - Maternity certificates showing the expected week of confinement			
5.13	Sickness records required for the purposes of Statutory Sick Pay (SSP) These include: - The dates the employee was off sick. - Which of those days were qualifying days. - The reason they said they were off work.	Three years after the end of the tax year to which they relate. Employers may be required by HMRC to maintain records for PAYE purposes and to show they are meeting their SSP obligations.	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	The employee's National Insurance number.			
5.14	Records in relation to hours worked and payments made to workers	For a period of six years beginning with the last day of the following month to which the records relate.	SHRED / DELETE	Yes
5.15	Consents for the processing of personal data and sensitive personal data (known as special category personal data under the UK GDPR)	For as long as the data is being processed and up to six years afterwards For consent to be valid it must be "freely given". This is often difficult to evidence in an employment context owing to the imbalance in the relationship between the Trust and the employee. Therefore, the Trust should be very careful before asking employees to consent to their data being used in a particular way. In the vast majority of cases it is not necessary to obtain the employee's consent before using their personal data.	SHRED / DELETE	Yes
5.16	Disclosure and Barring Service (DBS) checks	Dispose of/return to the subject of check once the individual has been deemed suitable for appointment unless the Trust can justify a longer	Enter DBS certificate number, date, initials on Single Central Register. Make a note that the applicant has been deemed suitable for appointment.	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		retention period in an individual case.	SHRED / DELETE	
5.17	Immigration/Right to Work checks	Throughout employment and then retained for two years after the termination of employment	SHRED / DELETE	Yes
5.18	Documents that are required to be retained for each worker sponsored by the Trust under the Tier 2 (General), Skilled Worker or Temporary Worker immigration categories	Throughout the period of sponsorship and for whichever is the shorter period of either: i. one year from the date that the sponsorship of the migrant worker ends; or ii. if the migrant worker is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents	SHRED / DELETE	Yes
5.19	Recruitment records of unsuccessful candidates (including data gathered from online searches on shortlisted candidates)	Six months after notifying unsuccessful candidates in order to demonstrate, if required, the fairness and transparency of the recruitment process. If the successful candidate was sponsored by the Trust before 1 December 2020 under the Tier 2 (General) immigration category, for	SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		the period specified in 0 above.		
5.20	Personnel and training records	Whilst employment continues and up to six years after employment ceases	SHRED / DELETE	No
5.21	Annual leave records	While employment continues and for six years after employment ends.	SHRED / DELETE	No
5.22	Collective / workforce agreements	Whilst employment continues and for six years after employment ceases	SHRED / DELETE	No
5.23	An employee's bank details	As soon after the end of employment as possible once last payments have been made	SHRED / DELETE	No
5.24	Travel and subsistence claims.	Whilst employment continues and up to six years after employment ends	SHRED / DELETE	No
5.25	Records of advances for season tickets and loans to employees	Whilst employment continues and up to six years after employment ends	SHRED / DELETE	No
5.26	Death Benefit Nomination and Revocation Forms	Whilst employment continues and up to six years after employment ends	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
6	Health and safety information - employees			
6.1	Reportable injuries, diseases and dangerous occurrences (RIDDOR) reports or own record	Three years from the date of record If disease - indefinitely (recommended)	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes
6.2	First aid / accident book entry	Three years from the date of injury or last record in the book If disease - indefinitely	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes
6.3	Records of maintenance, examination and test control measures relating to substances hazardous to health under the Control of Substances Hazardous to Health (COSHH) regime	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED / DELETE	Yes
6.4	Health records for	At least 40 years from the date of the	Review for further retention in the case of enforcement action	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	licensable asbestos work	last entry	contentious disputes SHRED / DELETE	
6.5	Medical surveillance certificate for licensable asbestos work	At least four years from the date it was issued	Review for further retention in the case of enforcement action contentious disputes SHRED / DELETE	Yes
6.6	Records of air monitoring for asbestos	Where a health record is required at least 40 years from the date if the last entry In other cases at least five years from the date of the last entry		Yes
6.7	Records of examinations, tests and repairs carried out in respect of exhaust or respiratory protective equipment under the Control of Asbestos Regulations 2012 (CAR)	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED / DELETE	Yes
6.8	Examination / report of defect	Two years	Review for further retention in the case of enforcement action or contentious disputes	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	for power presses		SHRED / DELETE	
6.9	Records of water monitoring, inspection, testing, checks and control measures for legionellosis	Five years from the date of the last entry	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes
7	Health and safety information - pupils			
7.1	Accident reports including first aid / accident book	DOB of the pupil involved in the incident + 21 years	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	No
7.2	Reportable injuries, diseases and dangerous occurrences (RIDDOR) reports or own record	DOB of the pupil involved in the incident + 21 years	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes
7.3	Incident investigations and reports, risk assessments and other relevant documents where there has been an	DOB of the pupil involved in the incident + 21 years	Review for further retention in the case of enforcement action or civil claims for personal injury SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	accident or incident			
8	Generic health and safety records			
8.1	Risk assessments, records of health and safety arrangements, copies of policies and procedures General records of health and safety auditing and monitoring including fire risk assessments, electrical testing, PAT testing and gas appliance testing Training records and copies of instructions or information Maintenance logs and / or records of plant and / or equipment plus safety manuals / notices /	3 Years	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	instructions Records of emergency evacuations and fire drills, fire safety risk assessments and fire safety policy / fire arrangements			
8.2	Copies of documents, including health and safety files, prepared pursuant to the Construction (Design and Management) Regulations 2015	<i>To be decided by the Trust - records should be retained as long as is reasonably necessary to inform on future construction projects at the Trust site</i>	SHRED / DELETE	N / A
9	Insurance			
9.1	Insurance certificates and schedules of cover	Indefinitely	N/A	No
9.2	Correspondence with insurers related to specific accidents or	Three years generally If the incident involved a pupil - DOB of the pupil involved in the incident + 21 years	Review for further retention in the case of civil claims for disease or personal injury SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	incidents	Disease claims or where there have been allegations of abuse - indefinitely		
10	Investigations, reviews and inquiries			
10.1	Documents relevant to IICSA	Indefinitely	Review periodically.	No - unless the Trust has received a formal notice from IICSA
10.2	Internal reports and investigations into accidents / incidents Copies of reports submitted to external agencies / regulators such as Ofsted, Health and Safety Executive, Local Authority, ESFA etc External reports, reviews, investigations and inquiries for example inquests and public inquiries	Where the investigation / inquiry / report has been necessitated as a result of a specific incident, we recommend that these documents are stored centrally for at least three years. Where there is a risk of enforcement action and / or criminal prosecution and / or a civil claim where this relates to pupil DOB + 21 years	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
10.3	Former pupils should be treated as employees for the purposes and safety requirements relating to employees do not apply to former pupils), treating them the same can be considered good practice and may be more straightforward to implement in practice of health and safety records. Although this is not strictly necessary, (some of the health	As set out in section 6 above	As set out in section 6 above	No
10.4	Gift aid information	Six years from the end of the tax year in which the claim to HMRC is made.	N / A	No
11	Keeping information for longer			
11.1	Records which do not contain personal data, for example, old photos	Can be kept indefinitely	N / A	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	of Trust buildings, title deeds etc			
11.2	Records kept for reasons of archiving in the public interest. For example, such as old class photos, lists of pupils attending the Trust in any given year, old Trust prospectuses, newspaper cuttings etc	Will be kept indefinitely.	N / A	No
11.3	Former staff and pupil lists showing name, DoB and years attending kept as evidence of their attendance at the trust.	Indefinitely	N/A	No
12	CCTV, videos and photos			
12.1	CCTV footage	90 days (Recommended)	DELETE Review for further retention if the recording may be required for any reason such as in relation to an incident or accident involving any	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
			person. CCTV footage may also be needed in relation to parental complaints, disciplinary matters, pupil exclusions, bullying incidents or health and safety matters. If a subject access request has been made for the footage it must be retained. The Trust should consider the relevant limitation periods for claims being brought against the Trust and seek advice as necessary.	
12.2	Photos of pupils for internal administration purposes e.g. to identify the pupil or photos used on security passes	These photos should be retained for as long as they are required for the purpose for which they were taken. If the Trust would like to retain the images for archiving reasons please see the comments in the introduction.	SHRED / DELETE Review for further retention in the case of relevance to contentious disputes.	No
12.3	Photos or videos of pupils taken for marketing reasons e.g. photos for use in the Trust prospectus or a video of pupils on the Trust's website	DOB of the pupils captured in the recording + 24 years	SHRED / DELETE Review for further retention in the case of relevance to contentious disputes.	No
12.4	Photos or videos of pupils used as part	These photos and videos should be retained for as long as they are	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	of the curriculum e.g. a video of a lesson / performance or as part of a school project	required for the purpose for which they were taken. If the Trust would like to retain the images for archiving reasons, please see the comments in the introduction.	Review for further retention in the case of relevance to contentious disputes.	
13	Governance Records			
13.1	Minutes of trustees' and members' meetings and copies of written resolutions	10 years from the date of the meeting or date resolution was passed.	Review for further retention where the minutes relate to matters where there is a risk of enforcement action, contentious disputes or where content might be relevant to safeguarding.	Yes
13.2	Memorandum and Articles of Association	Indefinitely	N / A	No
13.3	Copies of any material correspondence with the Education and Skills Funding Agency including serious incident reports	Indefinitely	N / A	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
14	AI Generated Information			
14.1	System Generated information	90 days	AI chat histories and user logs are classified as transitory administrative records and should be deleted after 90 days.	No
14.2	AI generated reports	See pupil and colleague retention periods	Any AI-generated content, assessments, or data that substantively contributes to an official pupil or employment decision (such as grading, evaluations, or disciplinary actions) must be retained for the same duration as the final action record.	Yes
14.3	AI System inputs	See pupil and colleague retention periods	Colleagues shall not input confidential data or pupil Identifiable Information into any AI system unless explicitly approved by the Data Protection Officer (please refer to the AI policy). Approved prompts containing pupil data are subject to the above pupil retention periods and must be managed under this policy.	Yes
15	Financial Records (non-personal data)			
15.1	Annual Accounts	Six years from the end of the financial period to which they relate.	Review for further retention if the accounts relate to a period to which enforcement action or contentious disputes may relate or where content might be relevant to IICSA or safeguarding.	Yes N.B. The requirement passes to the last trustees in the event the Trust ceases to exist
15.2	Tax records and corporation tax returns	Six years from the end of the period for which a tax return is required, or if an enquiry is opened, until the conclusion of the enquiry.	Review for further retention if the accounts relate to a period to which enforcement action or contentious disputes may relate.	Yes N.B. The requirement passes to the last

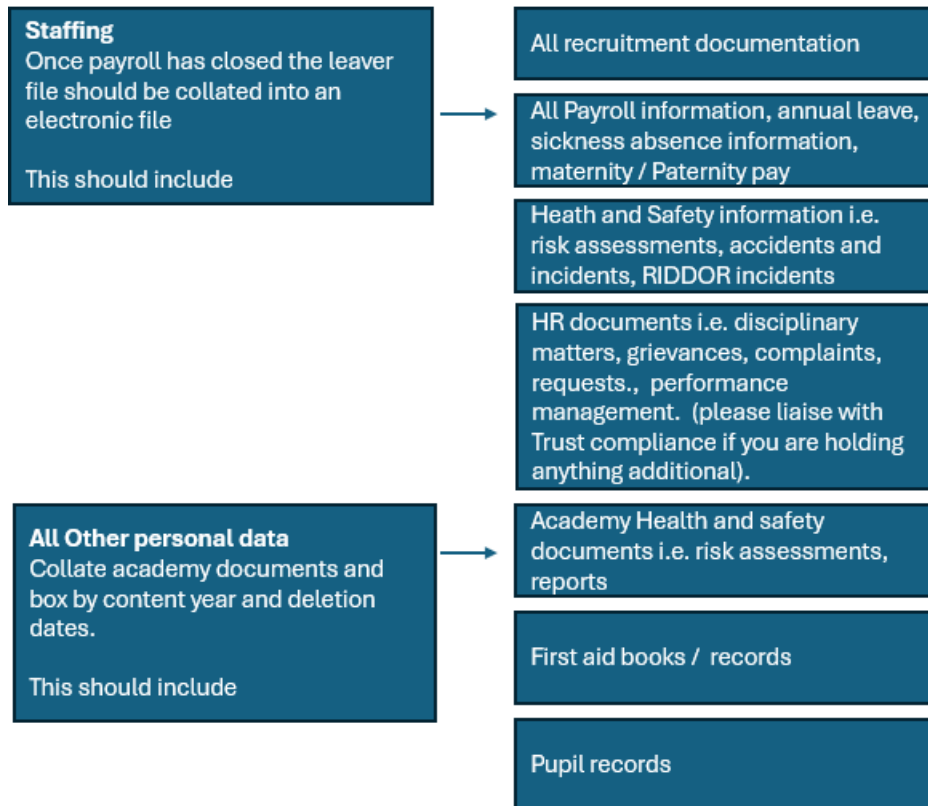
	Record	Retention period	Action at the end of the retention period	Retention period required by law?
				trustees in the event that the Trust ceases to exist.
15.3	Financial reports and accounting information	Six years from the end of the financial period to which they relate.	Review for further retention if the accounts relate to a period to which enforcement action or contentious disputes may relate or where content might be relevant to IICSA or safeguarding.	Yes N.B. The requirement passes to the last trustees in the event the Trust ceases to exist
15.4	Trustees' annual report	Six years from the end of the financial period to which it relates.	Review for further retention if the accounts relate to a period to which enforcement action or contentious disputes may relate or where content might be relevant to IICSA or safeguarding.	No (provided it has been filed with the ESFA)
15.5	VAT records and VAT returns	Six years from the end of the accounting period to which the VAT return relates. Some records will need to be kept for longer. This includes where a property has been opted to tax, or an asset is subject to the Capital Goods Scheme. There are different retention periods applicable to certain special VAT schemes that a taxable person may	Review for further retention if the records relate to a period to which enforcement action or contentious disputes may relate.	Yes N.B. The requirement passes to the last trustees in the event that the Trust ceases to exist.

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		use e.g. the Annual Accounting Scheme, the Flat Rate Scheme, the Cash Accounting Scheme, and Margin Schemes. VAT registered businesses must keep some VAT records digitally in compliance with the rules for Making Tax Digital.		

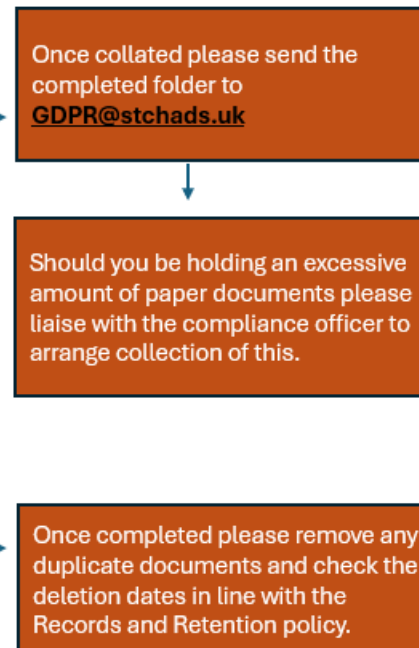
Appendix 1

Academy Archiving Process

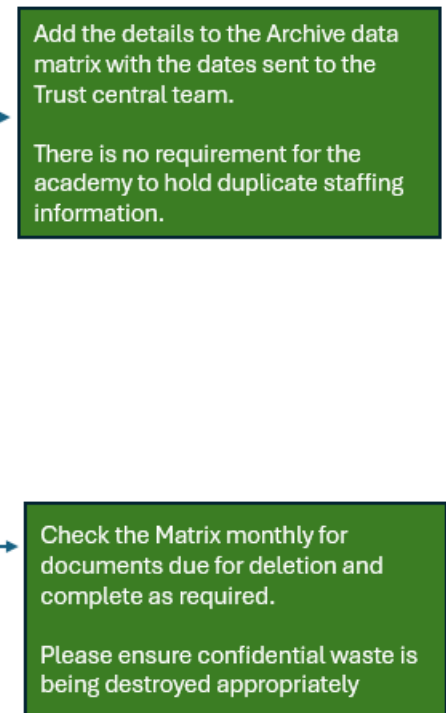
Stage 1



Stage 2



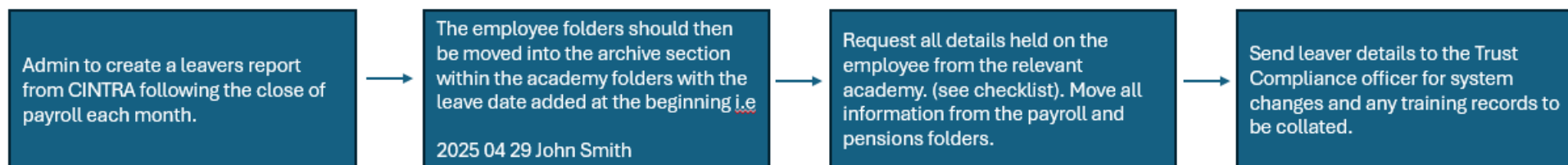
Stage 3



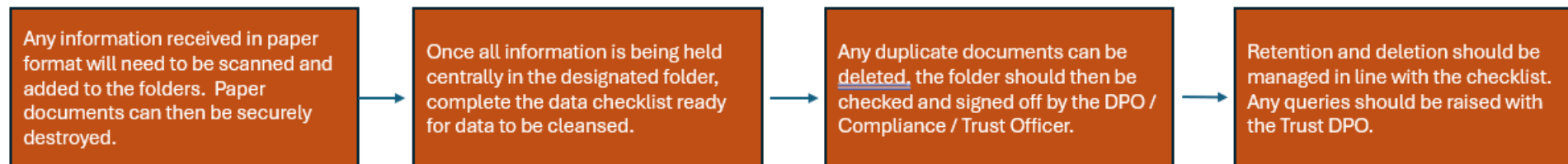
Appendix 2

HR Operations Archiving process

Stage 1



Stage 2



Stage 3

