



The STAR Multi Academy Trust

Records Management Policy

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Introduction and Scope

The STAR Multi Academy Trust recognises records management as a core corporate function that supports the effective management of the Trust. A records management programme ensures that authoritative evidence of our work is created, captured, managed and made accessible within the scope of our information governance policy framework. This allows for improved accountability, transparency, continuity, decision-making, and better compliance with relevant legislation and regulations, as well as protecting the rights and interests of ourselves and our pupils.

A record is defined as information created, received and maintained as evidence and as an asset by the school in pursuit of legal obligations or in the transaction of business. Records are retained as evidence for a set period determined by legal, regulatory and functional requirements.

The Records Management policy and retention schedule applies to all records created, received or maintained by the Trust in the course of carrying out its functions, regardless of whether it is in paper or electronic format.

This policy applies to all employees, governors or Trustees, contractors, agents and representatives, volunteers and temporary staff working for, or on behalf of, the school. It should be read alongside the other policies within our information governance policy framework, including the Data Protection policy, Information Security policy and Acceptable Use policies.

Roles and Responsibilities

Overall responsibility for ensuring that the school meets the statutory requirements of any legislation lies with the Board of Trustees. The following roles have day to day responsibility for records management compliance and provide the necessary assurance to the Board.

Senior Information Risk Owner (SIRO)

The SIRO is responsible for overseeing the implementation of this policy and ensuring that effective records management practices are in place across the Trust. They are ultimately responsible for the day-to-day operational management of the Trust and will ensure that staff are appropriately trained in relation to records management, supported by the SPOC and IAOs. In our organisation this role lies with the **CEO or appropriate member of the senior leadership team**.

Single Point of Contact (SPOC)

The SPOC will support the SIRO in the day-to-day operational management of the school, providing guidance on good records management practices and promoting compliance with this policy so that information can be retrieved easily, appropriately and in a timely way. They will help develop and carry out regular reviews of the records management programme, at least annually, to ensure compliance and to check that records are stored securely and can be accessed appropriately. In our organisation this role lies with **the Headteacher or appropriate delegate (DHT, AHT, SBM)**.

Information Asset Owner (IAO)

The IAO is responsible for the security and maintenance of a particular record during its lifecycle. They need to understand how information is created, amended or

added to over time, and know who has access to the records and why. They are responsible for the appropriate disposal of information when it is no longer required. In our organisation this role lies with the Headteacher.

All staff

All staff, including governors or Trustees, contractors, agents and representatives, volunteers and temporary staff working for, or on behalf of, the school are responsible for managing records consistently in accordance with this policy. They must keep complete and accurate records which adequately document their work.

Records Management

We have a robust programme in place for managing our records throughout their lifecycle. This includes using methods such as version control and file plans to ensure that records can be easily searched and accessed in the event of an information request. We also include records and information management as a risk on our corporate risk register.

Information Asset Register (IAR)

In accordance with Article 30 of UK GDPR, we have in place an Information Asset Register (IAR) which maintains a record of our processing activities. The IAR documents exactly what records we hold, where they are stored, who has access to the information and the retention periods in place. This is reviewed, at least annually, to ensure it remains accurate.

Email management

We have a process in place to ensure that emails are also managed in line with this policy and our retention schedule. Emails discussing school business or reflecting significant actions or decisions concerning school business will not be stored in personal email inboxes but will be removed and stored securely in the appropriate filing system.

Personal email inboxes are regularly reviewed by staff to ensure any unnecessary emails are deleted.

Pupil Records

Schools are under a duty to maintain a record for each pupil which serves as the core record of an individual's progress through the education system and should accompany them throughout their school career. The information within the pupil record must be easy to find, accurately and objectively recorded, and expressed in a professional manner.

Pupil records are held electronically within our management information system (MIS). Some information, not forming part of the core record, will be held outside the MIS in either electronic or paper format. This includes information which has shorter retention periods such as attendance registers, consent forms, medical forms, accident forms, absence notes and pupil work.

Safeguarding files

Records relating to pupils involved with child protection or safeguarding are held securely in a designated system accessible to the Designated Safeguarding Leads

(DSLs). This is stored separately to the core pupil record to ensure confidentiality and restricted accessibility.

Staff Records

Records relating to the school workforce will be held securely, either electronically or in paper format, with appropriate measures in place to ensure accessibility is restricted.

Storage and Security

All records, especially where containing personal data, will be stored securely to maintain confidentiality, whilst also keeping information accessible to those authorised to see it. Electronic records will have appropriate security and access controls in place, and systems will have robust audit functions in place wherever possible.

Paper records will be stored in secure, lockable storage areas with restricted access.

When sharing or transferring records containing personal information, we will ensure appropriate transmission security controls are in place, in line with our Information Security Policy.

Retention and Disposal

Retention is the period a record is kept for after it stops being actively used, but before it is destroyed. Retention is a vital part of records management as it allows organisations to retain records only for as long as needed, and discourages records being kept for long periods 'just in case'.

The retention period for particular types of records is determined by legal, regulatory or functional requirements. We have implemented a Retention Schedule which sets out our specified retention periods (Appendix X).

We will ensure that any records containing personal or confidential information are disposed of appropriately and securely when they have reached the end of their retention period, in line with our retention schedule.

Records held in databases or electronic management systems with the functionality for automatic destruction of records after a specified period of time will be used wherever possible. A review of the records will be carried out prior to destruction, where practical.

Where automatic disposal is not in place, for example for paper records, we will carry out a manual review, at least annually, to ensure they are deleted in line with retention guidelines.

The disposal of all information is documented to ensure that we maintain a record of when it has been deleted and by whom. This allows us to evidence that a record no longer exists, or has been transferred to another institution, in the event of a subject access or Freedom of Information request being received.

Archiving

A small percentage of our records will be selected for preservation as part of The STAR Multi Academy Trust's wish to create and preserve an organisational memory of its history, including its pupils and staff. This organisational memory is expected to contribute to the wider social memory of the community which the school serves.

Records containing personal information will only be selected for archive with appropriate safeguards in place to protect the rights and freedoms of individuals. This will include anonymisation or pseudonymisation wherever possible.

Training

Since all employees are involved in creating, maintaining and using records, it is vital that everyone understands their record management responsibilities as set out in this policy. We will ensure that staff are appropriately trained or experienced and that they understand the need for effective record keeping.

When we introduce new technology or ICT systems we ensure that users are appropriately trained to use these systems and can manage records within them effectively.

Appendix X - Retention Schedule (statutory retention periods)

The following records have statutory retention periods.

This list has been taken from the DfE's Record Keeping and Management guidance: <https://www.gov.uk/guidance/data-protection-in-schools/record-keeping-and-management> (dated December 2024)

Pupil records

Document type	Retention period	Action at end of retention period	Further information
Primary school pupil records	Until the pupil leaves the school.	Transfer to secondary school or other primary school when the pupil leaves.	See The Education (Pupil Information) (England) Regulations 2005 for details of what to keep in the pupil record. There is guidance on how to transfer information to another school.
Secondary school pupil records	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.	See The Education (Pupil Information) (England) Regulations 2005 for details of what to keep in the education

Document type	Retention period	Action at end of retention period	Further information
		There is guidance on what to do if the school closes before the end of the retention period.	record. Retain as detailed in section 2 of the Limitation Act 1980 .
Special educational needs and disabilities (SEND), including SEND statements and accessibility plans	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.	SEND code of practice: 0 to 25 years . Retain as detailed in section 2 of the Limitation Act 1980 .
Attendance and absence	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.	SEND code of practice: 0 to 25 years . Retain as detailed in section 2 of the Limitation Act 1980 .

Child protection records

Document type	Retention period	Action at end of retention period	Further information
Child protection files	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 transferred separately from the main pupil file.	Should be stored in a separate child protection file. Keeping children safe in education sections 66, 67, 121 and 122. The Report of the Independent Inquiry into Child Sexual Abuse (IICSA), recommendation on access to records .
Allegations of child protection against a member of staff, including unfounded allegations	Until the staff member's normal retirement age, or 10 years from the date of the allegation, whichever is later.	Dispose of records securely.	Keeping children safe in education . Working together to safeguard children .

Finance records

Document type	Retention period	Action at end of retention period	Further information
Contracts	6 years from the last payment on the contract.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
Debtor's records	6 years from the end of the financial year.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
VAT records	6 years from the end of the financial year.	Dispose of records securely.	May include invoices, budgets, bank statements and annual accounts. Record keeping (VAT Notice 700/21) .

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.	Working together to improve school attendance.
Attendance registers	3 years from the date of entry.	Dispose of records securely.	Regulation 14 of the Education (Pupil Registration) (England) Regulations 2006.
Annual governors report	10 years.	Dispose of records securely.	The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002. Retain as detailed in section 2 of the Limitation Act 1980.

Document type	Retention period	Action at end of retention period	Further information
Curricular record	At least one year.	Dispose of records securely.	The Education (School Records) Regulations 1989. Regulation 3 of the Education (Pupil Information) (England) Regulations 2005.
Directors – disqualification	15 years from the date of disqualification.	Dispose of records securely.	The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England) Regulations 2004
Records of educational visits	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 pupil record , or until the pupil	Dispose of records securely.	Health and safety on educational visits. Retain as detailed in section 2 of the Limitation Act 1980 .

Document type	Retention period	Action at end of retention period	Further information
	reaches the age of 25.		
School vehicles	6 years from the disposal of the vehicle.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
Statutory registers and compliance	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	Dispose of records securely.	May include annual reports and governance records. Companies Act 2006 contains information on which statutory registers to keep. Compliance guidance in the maintained schools governance guide . Compliance guidance in the academy trust governance guide . Academy trust handbook .

Document type	Retention period	Action at end of retention period	Further information
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records should be retained for 10 years from the date of the meeting.

Health and safety records

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

Document type	Retention period	Action at end of retention period	Further information
Other health records of staff	While the worker is employed in your school.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002. Health surveillance - Record keeping.
Fire assessments	Life of the risk assessment plus 6 years.	Dispose of records securely.	Fire Service Order 2005. Retain as detailed in section 2 of the Limitation Act 1980.

Property records

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

Staff records

Document type	Retention period	Action at end of retention period	Further information
Copies of DBS certificates	6 months from the date of recruitment.	Dispose of records securely.	Keeping children safe in education.
Maternity pay records	3 years after the end of the tax year in which the maternity pay period ends.	Dispose of records securely.	The Statutory Maternity Pay (General) Regulations 1986.
Pay records	3 years from the end of the tax year they relate to.	Dispose of records securely.	PAYE and payroll for employers: Keeping records.

Document type	Retention period	Action at end of retention period	Further information
Personnel files	6 years from termination of employment.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
Retirement benefits	A minimum of 6 years from the end of the year in which the accounts were signed.	Dispose of records securely.	Regulation 15 of the Retirement Benefits Schemes (Information Powers) Regulations 1995 .

Please contact the Head of Governance or the Operations and Compliance Manager for advice regarding non-statutory retention periods.