

# FOOTSTEPS TRUST DATA, RECORDS, DOCUMENT STORAGE AND RETENTION POLICY

## 1. Policy Statement

Footsteps Trust Academy is committed to maintaining accurate, secure and accessible records in accordance with:

- UK GDPR
- Data Protection Act 2018
- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children
- Independent School Standards
- Freedom of Information Act 2000
- Limitation Act 1980

The Academy recognises that effective records management supports:

- Safeguarding
- Educational provision
- Accountability
- Regulatory compliance
- Business continuity
- Risk management

The Academy will ensure that records are retained for no longer than necessary, unless legal, safeguarding or operational requirements justify longer retention.

## 2. Aims

The aims of this policy are to:

- Maintain secure and accurate records.
- Ensure compliance with legal retention requirements.
- Protect sensitive and confidential information.
- Support safeguarding responsibilities.
- Facilitate lawful information sharing.
- Ensure records can be retrieved efficiently when required.
- Support secure destruction of records at the end of retention periods.

### 3. Roles and Responsibilities

#### Trustees/Proprietor

Will:

- Oversee compliance with data protection and safeguarding obligations.
- Ensure appropriate record management systems are in place.

#### Principal

Will:

- Ensure implementation of this policy.
- Authorise disposal processes where appropriate.
- Monitor compliance.

#### Data Protection Officer (DPO)

Will:

- Advise on retention periods.
- Support compliance with UK GDPR.
- Review records management processes.

#### Designated Safeguarding Lead (DSL)

Will:

- Ensure safeguarding records are maintained appropriately.
- Monitor safeguarding file transfers.
- Review child protection record retention.

#### All Staff

Will:

- Create accurate and professional records.
- Retain records securely.
- Follow disposal procedures.
- Report data protection concerns promptly.

### 4. Record Management Principles

All records must be:

- **Accurate** - Records should be factual, objective and contemporaneous.
- **Relevant** - Only information necessary for legitimate purposes should be retained.
- **Secure** - Access should be restricted to authorised individuals.
- **Accessible** - Records should be available when needed for educational, safeguarding or legal purposes.

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- **Retained Appropriately** - Retention periods should reflect legal, safeguarding and operational requirements.
- **Disposed of Securely** - Records should be destroyed in accordance with this policy.

## 5. Safeguarding Records

In line with KCSIE 2026, safeguarding records require enhanced protection.

The Academy will:

- Maintain separate child protection records where appropriate.
- Preserve safeguarding chronologies.
- Restrict access to authorised safeguarding staff.
- Store records securely in electronic safeguarding systems or locked physical storage.
- Transfer safeguarding files securely when students move schools.
- Retain records where future safeguarding claims may arise.

### Child Protection Files

Where a pupil has:

- Been subject to social care involvement;
- Been subject to a child protection plan;
- Been named in multi-agency safeguarding proceedings; or
- Been involved in a serious safeguarding concern,

records should normally be retained indefinitely unless legal advice indicates otherwise.

## 6. Low-Level Concerns Records

Low-level concern records regarding staff should:

- Be managed separately from personnel records where appropriate.
- Be reviewed periodically.
- Be retained in accordance with safeguarding guidance.
- Be retained longer where linked to wider safeguarding concerns.

Records that become relevant to future safeguarding investigations should be preserved.

## 7. Digital Record Storage

The Academy increasingly operates digital systems.

Electronic information may include:

- Student records.

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- Staff records.
- Safeguarding records.
- Email communications.
- Assessment information.
- Monitoring records.

Digital records must:

- Be password protected.
- Be stored within approved systems.
- Be encrypted where appropriate.
- Be subject to regular backups.
- Be protected by cyber security controls.

Cloud-based systems must comply with UK GDPR and contractual security requirements.

## 8. Filtering and Monitoring Records

To align with KCSIE 2026 and cyber-security requirements, the Academy will retain records relating to:

- Filtering systems.
- Monitoring alerts.
- Cyber security incidents.
- Internet misuse investigations.
- Online safety concerns.

Retention should normally be:

- Minimum 12 months for routine system logs.
- Longer where safeguarding, disciplinary, legal or security investigations exist.

## 9. Data Breach Records

The Academy will maintain records of:

- Data breaches.
- Security incidents.
- Near misses.
- ICO correspondence.
- Remedial actions taken.

These records should normally be retained for a minimum of 6 years from closure of the incident.

| TYPE OF RECORD/DOCUMENT                                              | RETENTION PERIOD                                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SCHOOL SPECIFIC RECORDS</b>                                       |                                                                                                                                                                                                                                                                   |
| Registration Documents of School                                     | Permanent or until closure of the school                                                                                                                                                                                                                          |
| Attendance Register                                                  | 6 years from last date of entry, then archive.                                                                                                                                                                                                                    |
| Minutes of Governors Meeting                                         | 6 years from date of meeting                                                                                                                                                                                                                                      |
| Annual Curriculum                                                    | From end of year: 3 years (or 1 year for other class records: e.g. marks / timetables / assignments)                                                                                                                                                              |
| <b>INDIVIDUAL PUPIL RECORDS</b>                                      | <i>NB – This will generally be personal data</i>                                                                                                                                                                                                                  |
| Admissions: application forms, assessments, records of decisions     | 25 years from date of birth (or up to 7 years from the pupil leaving).                                                                                                                                                                                            |
| Examination results (external or internal)                           | 7 years from pupil leaving school                                                                                                                                                                                                                                 |
| Pupil reports, Pupil performance records and Pupil medical records   | 25 years from date of birth (subject to where relevant to safeguarding considerations: any material which may be relevant to potential claims should be kept for the lifetime of the pupil).                                                                      |
| Special educational needs records (to be risk assessed individually) | Date of birth plus up to 35 years (allowing for special extensions to statutory limitation period)                                                                                                                                                                |
| Behavioural and Academic meeting notes                               | 7 years from pupil leaving school, unless held as part of safeguarding evidence file 7 years                                                                                                                                                                      |
| Trip letters and consents                                            | Current academic year                                                                                                                                                                                                                                             |
| <b>SAFEGUARDING</b>                                                  |                                                                                                                                                                                                                                                                   |
| Policies and procedures                                              | Keep a permanent record of historic policies                                                                                                                                                                                                                      |
| DBS disclosure certificates (if held)                                | No longer than 6 months from decision on recruitment, unless DBS specifically consulted. A record of the checks being made must be kept, if not the certificate itself.                                                                                           |
| Accident / Incident reporting                                        | Keep on record for as long as any living victim may bring a claim (NB civil claim limitation periods can be set aside in cases of abuse). Ideally, files to be reviewed from time to time if resources allow and a suitably qualified person is available.        |
| Child Protection files                                               | If a referral has been made / social care have been involved; or child has been subject of a multi-agency plan; or there is a risk of future claims – indefinitely.<br><br>(If the school operates a low level concerns policy, if there has been no multi-agency |

|                                                                                                                                                                                               |                                                                                                                                                          |
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|                                                                                                                                                                                               | action, consider whether or not the child needs to be named in any record concerning an adult, or if a copy should be kept on the child protection file) |
| <b>CORPORATE RECORDS</b> <i>(where applicable)</i>                                                                                                                                            |                                                                                                                                                          |
| Certificates of Incorporation                                                                                                                                                                 | Permanent (or until dissolution of the school)                                                                                                           |
| Minutes, Notes and resolutions of Boards of Management                                                                                                                                        | Minimum 10 years                                                                                                                                         |
| Trustee resolutions                                                                                                                                                                           | Minimum 10 years                                                                                                                                         |
| Register of Trustees                                                                                                                                                                          | Permanent (minimum of 10 years for ex-trustees)                                                                                                          |
| Annual reports                                                                                                                                                                                | Minimum – 6 years                                                                                                                                        |
| <b>ACCOUNTING RECORDS</b>                                                                                                                                                                     |                                                                                                                                                          |
| Accounting records (normally taken to mean records which enable a company's accurate financial position to be ascertained & which give a true and fair view of the company's financial state) | Minimum – 6 years for UK charities (and public companies) from the end of the financial year in which the transaction took place                         |
| Tax Returns                                                                                                                                                                                   | Minimum – 6 years                                                                                                                                        |
| VAT Returns                                                                                                                                                                                   | Minimum – 6 years                                                                                                                                        |
| Budget and internal financial reports                                                                                                                                                         | Minimum 3 years                                                                                                                                          |
| <b>CONTRACTS AND AGREEMENTS</b>                                                                                                                                                               |                                                                                                                                                          |
| Signed or final/concluded agreements (plus any signed or final/concluded variations or amendments)                                                                                            | Minimum – 7 years from completion of contractual obligations or term of agreement, whichever is the later                                                |
| Deeds/Leases (or contracts under seal)                                                                                                                                                        | Minimum – 13 years from completion of contractual obligation or term of agreement                                                                        |
| <b>INTELLECTUAL PROPERTY RECORDS</b>                                                                                                                                                          |                                                                                                                                                          |
| Formal documents of title (trade mark or registered design certificates; patent or utility model certificates)                                                                                | Permanent (in the case of any right which can be permanently extended, e.g. trade marks); otherwise expiry of right plus minimum of 7 years.             |
| Assignments of intellectual property to or from the school                                                                                                                                    | As above in relation to contracts (7 years) or, where applicable, deeds (13 years).                                                                      |
| <b>IP/IT</b>                                                                                                                                                                                  |                                                                                                                                                          |
| IP / IT agreements (including software licences and ancillary agreements e.g. maintenance; storage; development; coexistence agreements; consents)                                            | Minimum – 7 years from completion of contractual obligation concerned or term of agreement                                                               |

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| <b>EMPLOYEE/PERSONNEL RECORDS</b>                                         | <i>NB This will contain personal data</i>                                                                                                                                                                   |
| Single Central Record of employees                                        | Keep a permanent record that mandatory checks have been undertaken (but do not keep DBS certificate information itself: 6 months as above)                                                                  |
| Contracts of employment                                                   | 7 years from effective date of end of contract                                                                                                                                                              |
| Employee appraisals or reviews                                            | Duration of employment plus minimum of 7 years                                                                                                                                                              |
| Staff personnel file                                                      | As above, but do not delete any information which may be relevant to historic safeguarding claims.                                                                                                          |
| Payroll, salary, maternity pay records                                    | Minimum – 6 years                                                                                                                                                                                           |
| Pension or other benefit schedule records                                 | Possibly permanent, depending on nature of scheme                                                                                                                                                           |
| Job application and interview/rejection records (unsuccessful applicants) | Minimum 3 months but no more than 1 year                                                                                                                                                                    |
| Immigration records                                                       | Minimum – 4 years                                                                                                                                                                                           |
| Health records relating to employees                                      | 7 years from end of contract of employment                                                                                                                                                                  |
| Low-level concerns about employees                                        | 7 years from end of contract of employment unless forming part of a safeguarding file                                                                                                                       |
| Insurance policies (will vary – private, public, professional indemnity)  | Duration of policy (or as required by policy) plus a period for any run-off arrangement and coverage of insured risks: ideally, until it is possible to calculate that no living person could make a claim. |
| Correspondence related to claims/ renewals/ notification re: insurance    | Minimum – 7 years                                                                                                                                                                                           |
| <b>ENVIRONMENTAL, HEALTH DATA</b>                                         |                                                                                                                                                                                                             |
| Maintenance logs                                                          | 10 years from date of last entry                                                                                                                                                                            |
| Accidents to children                                                     | 25 years from birth. Indefinite for safeguarding<br>Minimum – 4 years from date of accident, but review case-by-case where possible                                                                         |
| Accident at work records (staff)                                          | Minimum – 7 years from end of date of use                                                                                                                                                                   |
| Risk assessments (carried out in respect of above)                        | 7 years from completion of relevant project, incident, event or activity.                                                                                                                                   |
| Data protection records documenting processing activity, data breaches    | No limit: as long as up-to-date and relevant (as long as no personal data held)                                                                                                                             |
| <b>OTHER</b>                                                              |                                                                                                                                                                                                             |
| Online safety incidents                                                   | Minimum 7 years after closure                                                                                                                                                                               |
| Cyber security incidents                                                  | Minimum 6 years                                                                                                                                                                                             |
| Filtering and monitoring reports                                          | Minimum 12 months                                                                                                                                                                                           |
| Data breach records                                                       | Minimum 6 years                                                                                                                                                                                             |
| DSL safeguarding training records                                         | Duration of employment + 7 years                                                                                                                                                                            |

|                                                     |                                                                             |
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| Prevent referrals                                   | In line with safeguarding file retention                                    |
| Mental health support records                       | As part of pupil file unless safeguarding concerns require longer retention |
| Remote learning and online behaviour investigations | Minimum 7 years where disciplinary action occurred                          |

## 11. Secure Disposal

When retention periods expire, records must be destroyed securely.

### Paper Records

Must be:

- Cross-cut shredded.
- Confidentially disposed of.
- Destroyed to prevent reconstruction.

### Electronic Records

Must be:

- Permanently deleted.
- Removed from backup systems where appropriate.
- Disposed of using secure deletion methods.

Third-party contractors must provide assurance regarding secure destruction.

## 12. Litigation Hold Procedure

Where litigation, safeguarding investigations, complaints, disciplinary proceedings or regulatory investigations are ongoing or anticipated, destruction of relevant records must cease immediately.

Records must be retained until:

- Proceedings conclude; and
- Legal advice confirms disposal is appropriate.

This overrides standard retention schedules.

## 13. Training

All staff will receive training appropriate to their role regarding:

- Data protection.
- Records management.
- Safeguarding record keeping.
- Information security.
- Secure disposal procedures.

Staff with specialist responsibilities will receive enhanced training.

## 14. Monitoring and Review

The Principal, DSL and DPO will review:

- Record retention compliance.
- Secure disposal practices.
- Safeguarding record management.
- Storage arrangements.
- Cyber-security-related records.
- Audit findings.

Formal reviews will take place annually.