

Data Retention and Protection Policy



STATUTORY / NON-STATUTORY	STATUTORY
MEMBER OF STAFF RESPONSIBLE	DHT
DATE APPROVED BY Head/SLT	June 2025
GOVERNING BODY OR COMMITTEE RESPONSIBLE	GP
DATE OF FULL GOVERNING BODY APPROVAL	June 2025
REVISION DUE DATE	June 2028

Change History Record

Version	Description of Change	Date of Policy Release
1	Initial issue	06.05.2018
2	Updated to include references to UK GDPR	
3	Updated with statutory references for certain retention periods	
4	Changed retention period for accident records for under 18s to age of 21 and added explanatory note	November 2021
5	Comprehensive rewrite for clarity, structure, and consistency; no change to core retention periods	09.09.2025

1. Purpose and Scope

This Policy sets out the School's approach to retaining, reviewing, archiving, and securely disposing of records and information (in any format). It applies to all staff, governors, contractors and volunteers who create, access, or manage School information.

2. Principles

- **Efficiency and effectiveness:** Records must be stored in a way that supports efficient access and use.
- **Confidentiality and security:** Records containing personal or sensitive data must be protected by appropriate technical and organisational measures.
- **Privacy and disclosure:** Retention and disposal must comply with UK data protection law and freedom of information requirements.
- **Accessibility and integrity:** Records must remain accurate, complete, and accessible for as long as required.

3. Data Protection Compliance

The School will retain and process personal data only for as long as necessary for the purposes for which it was collected and in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The School's Data Protection Policy outlines duties and obligations under UK data protection law.

4. Roles and Responsibilities

- **Deputy Headteacher (DHT):** Owns this Policy and ensures periodic review and implementation.
- **Data Protection Officer (DPO):** Monitors compliance, advises on interpretation, and recommends improvements.
- **Headteacher's PA:** Maintains the retention, archiving and destruction logs and undertakes routine monitoring.
- **All Staff and Governors:** Follow this Policy, classify and file records appropriately, and ensure emails/documents are stored in the correct case/file location.

5. Retention Schedule (Overview)

The following schedule sets the minimum retention periods for common School records. Retention applies to records regardless of format (e.g., paper, electronic, email). Where statutory periods apply, they are indicated. Where periods reflect best practice, they may be adapted where justified. All retention should be supported by regular review.

6. Destruction of Records

Where records have reached the end of their retention period, they must be destroyed in a secure and appropriate manner. Prior to destruction, records should be checked for any reason

to delay deletion (e.g., ongoing or potential litigation, complaints, grievances, investigations, or statutory holds). Paper records containing personal or sensitive information must be cross-shredded (or securely destroyed by approved contractors). Electronic records must be permanently deleted from systems and back-ups in line with IT procedures.

A destruction log must be maintained, recording: file reference/unique ID, title/description, number of files, authorising officer, date destroyed/deleted, and person(s) who undertook destruction.

7. Retention of Safeguarding and Allegation Records

Malicious allegations must not be retained on personnel files. For all other allegations, a summary of the allegation, how it was investigated, the outcome, and decisions reached must be retained on the individual's personnel file. Records of allegations of sexual abuse must be preserved for the duration of any relevant inquiry. Other records should be retained until the accused reaches normal pension age or for 10 years from the date of the allegation, whichever is longer (subject to ongoing review).

8. Archiving

Records identified for permanent or long-term preservation should be transferred to the School archives. The Headteacher's PA will maintain an archive register recording the file reference, title/description, number of files, and authorising officer.

9. Converting/Transferring Information to Other Media

Where lengthy retention periods apply, staff may convert paper records to other media (e.g., digital or secure cloud storage). Media lifespan, readability, and the ability to migrate data must be considered to ensure continued accessibility.

10. Transferring Information to Another School

The School retains a pupil's educational record while the pupil remains on roll. When a pupil transfers, the file should be sent to the next school; responsibility for further retention then sits with the receiving school. The School will retain a copy or handover record for one year following transfer in case issues arise from the transfer. (Independent schools should adapt this section to reflect their specific obligations.)

11. Emails

Email accounts are not a case management system. Emails must be filed within the appropriate record or case area so that the correct retention period can be applied based on content. Staff should routinely review and file/delete emails in accordance with this Policy.

12. Pupil Records

All schools—other than independent schools—have a duty to maintain a pupil record for each pupil. If a child changes schools, the responsibility for maintaining the pupil record transfers to the receiving school. The School will retain a handover record for one year following transfer.

Appendix A – Detailed Retention Schedule

Employment Records

File Description	Retention Period
Job applications and interview records of unsuccessful candidates	6 months after notifying applicants unless consent obtained to retain for future roles.
Job applications and interview records of successful candidates	6 years after employment ceases.
Written particulars/contracts of employment and changes to terms	6 years after employment ceases.
Right to work documentation (including identification)	6 years after employment ceases.
Immigration checks	2 years after termination of employment.
DBS checks and disclosures	Delete as soon as outcome recorded; retain no longer than 6 months in exceptional circumstances.
Change of personal details notifications	Delete when superseded and no later than 6 months after update.
Emergency contact details	Destroy on termination.
Personnel records	While employment continues and up to 6 years after employment ceases.
Annual leave records	6 years after the end of the tax year to which they relate.
Consents for processing personal/special category data	For as long as data is processed and up to 6 years thereafter.
Working Time Regulations – opt-out forms	2 years from the date entered into.
Working Time Regulations – records of compliance	2 years after the relevant period.
Disciplinary records	6 years after employment ceases.
Training records	6 years after employment ceases or per professional body requirements.
Staff safeguarding/child-related training	Date of training + 40 years.
Annual appraisal/assessment records	Current year + 6 years.
Professional Development Plans	6 years from the life of the plan.
Allegations of a child protection nature against a member of staff (where substantiated)	10 years from the date of allegation or until normal retirement age, whichever is longer (keep under review). Malicious allegations should be removed.

Financial and Payroll Records

File Description	Retention Period
Pension records	12 years.
Retirement benefits schemes – notifiable events	6 years from the end of the scheme year in which the event took place.

Payroll and wage records	6 years after end of tax year to which they relate.
Maternity/Adoption/Paternity Leave records	3 years after end of the tax year to which they relate.
Statutory Sick Pay records	3 years after the end of the tax year to which they relate.
Current bank details	Until updated + 3 years.
Bonus sheets	Current year + 3 years.
Time sheets/clock cards/flexitime	Current year + 3 years.
Pupil Premium Fund records	Date pupil leaves the provision + 6 years.
National Insurance (schedule of payments)	Current year + 6 years.
Insurance	Current year + 6 years.
Overtime records	Current year + 3 years.
Annual accounts	Current year + 6 years.
Loans and grants managed by the School	Date of last payment + 12 years.
Budget creation and management records	Life of the budget + 3 years.
Invoices, receipts, order books, requisitions, delivery notices	Current financial year + 6 years.
Student Grant applications	Current year + 3 years.
School fund documentation (e.g., invoices, cheque books, bank statements)	Current year + 6 years.
Free school meals registers (used as basis for funding)	Current year + 6 years.
School meal registers and summary sheets	Current year + 3 years.

Agreements and Administration

File Description	Retention Period
Collective workforce agreements and past agreements that could affect present employees	Permanent.
Trade union agreements	10 years after ceasing to be effective.
School Development Plans	3 years from the life of the plan.
Visitors book and signing-in sheets	6 years.
Newsletters and circulars to staff, parents and pupils	1 year (archive one copy if desired).
Minutes of Senior Management Team meetings	Date of meeting + 3 years (or as required).
Reports created by the Headteacher or Senior Management Team	Date of report + minimum 3 years (or as required).
Records relating to creation and publication of the school prospectus	Current academic year + 3 years.

Health and Safety Records

File Description	Retention Period
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Health and Safety consultations	Permanent.
Health and Safety risk assessments	Life of the risk assessment + 3 years.
Health and Safety policy statements	Life of policy + 3 years.
Records relating to a reportable death, injury, disease or dangerous occurrence	Date of incident + 3 years (provided all records relating to the incident are held on personnel file).
Accident records – individuals under 18 at time of incident	Until the child reaches age 21.
Accident book (adults)	3 years after the last entry.
Fire precaution log books	Current year + 3 years.
Medical records and details (e.g., control of lead, asbestos, COSHH)	40 years from the date of last entry.
Records of tests/examinations of control systems and protection equipment under COSHH	5 years from the date the record was made.

Temporary and Casual Workers

File Description	Retention Period
Temporary and casual workers – hours worked and payments	3 years.

Governing Body Documents

File Description	Retention Period
Instruments of government	For the life of the School.
Meetings schedule	Current year.
Minutes – principal signed set	Generally retained for the life of the organisation.
Agendas – principal copy	Store with the principal set of minutes where possible.
Agendas – additional copies	Date of meeting (then dispose).
Policy documents created/administered by the governing body	Until replaced.
Register of attendance at full governing board meetings	Date of last meeting in the book + 6 years.
Annual reports required by the Department for Education	Date of report + 10 years.
Complaints investigated by the governing body or headteacher	Major complaints: current year + 6 years; if negligence involved: current year + 15 years; if safeguarding/child protection: current year + 40 years.
Correspondence sent/received by the governing body or headteacher	General correspondence: current year + 3 years.
Terms of office of serving governors, including evidence of appointment	Date appointment ceases + 6 years.
Register of business interests	Date appointment ceases + 6 years.

Training required and received by governors	Date appointment ceases + 6 years.
Records relating to the appointment of a clerk to the governing body	Date clerk appointment ceases + 6 years.
Governor personnel files	Date appointment ceases + 6 years.

Pupil Records

File Description	Retention Period
Admissions – outcome (successful/unsuccessful)	1 year from date of admission/non-admission.
Proof of address supplied by parents as part of admissions	Current year + 1 year.
Admissions register	Preserve entries for 3 years from date of entry.
Pupil record (secondary)	Until the child reaches age 25.
Attendance registers	3 years from date of entry.
Correspondence relating to absence (authorised/unauthorised)	Current academic year + 2 years.
Special Educational Needs (SEN) files, reviews and EHC Plan; advice/information to parents and accessibility strategy	Date of birth of the pupil + 31 years.
Child protection information (held separately)	Date of birth of the child + 25 years (then review).
Exam results (pupil copy)	1–3 years from the date results are released.
Examination results (school copy)	Current year + 6 years.
Allegations of sexual abuse	Retain for the period of any relevant inquiry.
Records relating to allegations of a child protection nature against a member of staff	Until the accused reaches normal retirement age or 10 years from the date of allegation (whichever is longer).
GDPR consents for school activities (e.g., circulars/mailings)	While the pupil attends the School (or until withdrawn).
Pupil's work	Return to pupil at end of academic year where possible; otherwise current year + 1 year.
Mark books, schemes of work, timetables, class record books, records of homework set	Current year + 1 year.
Photographs of pupils	For the time the child is at the School and a short period after; selected images may be kept longer to illustrate the School's history.
Parental consent forms for trips – no major incident	End of the trip/end of the academic year (subject to risk assessment).
Parental permission slips for trips – major incident	Date of birth of the pupil involved + 25 years (retain slips for all pupils on the trip).

Other Records

File Description	Retention Period
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Emails (not filed elsewhere)	Current year + 3 years (ensure important emails are filed in the relevant record).
CCTV	1 calendar month.
Privacy notices	Until replaced + 6 years.
Inventories of furniture and equipment	Current year + 6 years.
Records relating to maintenance carried out by contractors or employees	While the building belongs to the School.
Lettings of school premises – records	Current financial year + 6 years.
Parent Teacher Associations / Old Pupils Associations – records	Current year + 6 years, then review.
Referral forms	While the referral is current.
Contact data sheets	Current year then review; destroy if contact is no longer active.

13. Responsibility and Monitoring

The Deputy Headteacher has primary responsibility for implementing this Policy. The Data Protection Officer, in conjunction with the School, is responsible for monitoring its use and effectiveness and for advising on interpretation. Internal controls and procedures will be subject to regular audits to provide assurance that records are created, maintained, and removed appropriately. Managers must ensure their teams understand and follow this Policy and receive adequate training.

14. Review

This Policy will be reviewed at least every three years or earlier if there are significant changes in legislation, guidance, or organisational needs.