



The Societas Trust

Data Retention Policy

Date of Policy	2026
Reviewed and Agreed by	The Directors' Board
Last Review Date	8 July 2026
Next Review Date	Summer 2027

This policy provides the framework the school/trust will follow to achieve effective management and audit of records.

The role of data retention management

The Societas Trust and xxxxx Primary Academy recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Data/Records provide evidence for protecting the legal rights and interests of the school/trust and provide evidence for demonstrating performance and accountability.

Our approach and commitment to records management

The Societas Trust and xxxxx Primary Academy undertakes to manage records in relation to the three principles of value, integrity and accountability laid out in the Lord Chancellor's Code of Practice issued under Section 46 of the Freedom of Information Act 2000, published in July 2021.

Related policies and documents

- Data Protection policy
- Freedom of Information policy
- Data breach process
- Third party request for data process
- Other related legislation and regulations such as equal opportunities and ethics which apply to the school/trust

Roles and responsibilities

The CEO is responsible for monitoring the effectiveness of this policy. The Trust have appointed SBM Serviced UK Limited as the Data Protection Officer who will advise and update the Trust on Data Protection laws

The Trust Board will:

- Establish and maintain a positive data management culture.
- Approve a Data Retention policy for adoption by each Academy governing body and to review and monitor the effectiveness of the policy annually.
- Allocate sufficient resources for data retention, e.g. in respect of training for staff.
- Monitor and review data retention issues.
- Ensure that the trust and each Academy provides adequate training, information, instruction, induction and supervision to enable everyone to comply with their responsibilities.

The Headteacher will:

- Promote a data management culture.
- Ensure that all staff co-operate with the policy.
- Ensure that staff are competent to undertake the tasks required of them and have been provided with appropriate training.
- Provide staff with equipment and resources to enable them to undertake the tasks required of them.

- Ensure that those who have delegated responsibilities are competent, their responsibilities are clearly defined, and they have received appropriate training.

The Academy Business Manager will:

- Provide guidance to staff on good records management practice
- Promote compliance with this policy so that information can be retrieved easily, appropriately and in a timely way
- Check that records are stored securely and can be accessed appropriately at least annually

All Trust/Academy Staff will:

- Familiarise themselves and comply with the Data Retention policy
- Properly document their actions and decisions
- Hold personal information securely
- Only share personal information appropriately and will not disclose it to any unauthorised third party
- Dispose of records securely in accordance with the Trust Retention Schedule

What constitutes a record?

A record is any document created, received or maintained by permanent and temporary staff of the Trust/Academy in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school/trust.

Records are defined as all those documents which facilitate the business carried out by the Trust/Academy and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronic format.

Storage of records: digital data

Back Up System: Each Academy will undertake regular back-ups of all information held electronically to enable restoration of the data in the event of an environmental or data corruption incident. (see Information Security Policy for extended details)

Each Academy tests that data can be restored from a back-up on a regular basis.

Controlling the Storage of Digital Data: Personal information is not to be stored on the hard drive of any laptop or PC unless the device is running encryption software.

Password Control: Each Academy will ensure that data is subject to a robust password protection regime. Password sharing is not encouraged. Staff are required to lock their devices when they are away from them to prevent unauthorised use.

Location of Server Equipment: Each Academy will ensure that the server environment is managed to prevent access by unauthorised people.

Storage of records: emails

Email accounts are not designed to be a records storage system, and therefore emails should not be retained indefinitely. Where an email contains a message or attachment which relates to a pupil, member of staff or

contains information that needs to be retained for future reference, the academy/trust requires that this is moved from the individual's email account to the relevant area within the official hard copy or digital data storage system. This content will then fall within the relevant section of the Data Retention Schedule.

Where emails do not contain information that needs to be retained, they should be deleted at the earliest opportunity and by no later than 2 years and in line with the process outlined within the 'Disposal of Records' section of this policy.

Where emails need to be retained, they will be retained for a maximum of 2 years. Emails will be automatically or manually deleted.

Staff members are to be made aware that the emails they could send could be required to fulfil a SAR or FOI request.

Staff leavers will have access to their email accounts removed immediately and an auto-reply generated saying the staff member has left and to whom emails should be directed.

Access to the staff leavers account will be maintained for 3 months after the date of leaving and then the account will be permanently deleted. (For headteachers and heads of school this should be after 6 months).

Storage of records: hard copy data

Storage of Physical Records: The Academy/Trust requires that all physical records are stored in filing cabinets, drawers or cupboards. Sensitive physical records should be kept in a lockable storage area. This is to prevent unauthorised access but also to protect against the risk of fire and flooding.

Unauthorised Access, Theft or Loss: Staff are encouraged not to take personal data on staff or students out of the Academy/Trust unless there is no alternative.

Clear Desk Policy: In order to avoid unauthorised access to physical records which contain sensitive or personal information and to protect physical records from fire and/or flood damage, the Trust operates a clear desk policy. This involves the removal of the physical records to a cupboard or drawer (lockable where appropriate). It does not mean that the desk has to be cleared of all contents.

Retention of records

The Trust has documented how long it will retain specific records within its Retention Schedule. This schedule contains recommended retention periods for the different records created and maintained by educational settings in the course of their business. The schedule refers to all information regardless of the media in which it is stored.

Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of data protection legislation.

Managing records using these retention guidelines will be deemed to be 'normal processing' under data protection legislation. If records are to be kept for longer or shorter periods than laid out in the schedule then the reasons for this need to be documented.

Disposal of records

Records should not be kept for any longer than is necessary in relation to the purpose for which they were originally collected/processed. The Retention Schedule sets out the retention periods for all records held.

All records containing personal information or sensitive policy information should be made either unreadable or unreconstructable.

- Physical records should be shredded or collected by an appropriate waste paper merchant.
- Electronic records should be permanently deleted.
- Emails should be permanently deleted within 2 years.
- Hardware containing personal information should be dismantled on site or a Certificate of Destruction should be provided when a 3rd party disposal company is used.

If an external company is used for any part of the disposal process, the company must provide a Certificate of Destruction to evidence secure disposal of the record.

The Trust and Academies therein maintain a record of documents on the Trust Data Destruction Log which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in this list at least: -

- Description of data Format of data Method of Destruction
- Who the data was destroyed by.

Monitoring compliance

The Academy Business Manager will check that records are stored securely, in line with the retention schedule and that they can be accessed appropriately.

Other

In the event of an incident involving the loss of information or records held by the Academy/Trust, the Data Breach process should be followed.

If the Academy/Trust receives a request for information from a third party, then the process outlined in the Third Party Requests for Information process should be followed.

RETENTION SCHEDULE

Section 1: Management of the School

1.1 Governance					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
1.1.1	Agendas for Governing Body	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of.	SECURE DISPOSAL
1.1.2	Minutes of Governing Body Meetings (principal set – signed)	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		PERMANENT Although generally kept for life of organisation, Local Authority only required to make available for 10 years from date of meeting.	If the school is unable to store these then they should be offered to the County Archives Service.
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the report is dealing with confidential issues relating to staff		Although generally kept for life of organisation, Local Authority only required to make available for 10 years from date of meeting.	SECURE DISPOSAL or retain with the signed set of minutes
1.1.4	Meeting papers relating to annual parents' meeting held under section 33 of the Education Act 2002	Yes	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
1.1.5	Instruments Of Government, including articles of association	No		Life of the Academy	
1.1.6	Trusts and Endowments managed by the Governing Board	No		PERMANENT	

1.1.7	Register of attendance at full governing board meetings	Yes		Date of the last meeting in the book + 6 years	SECURE DISPOSAL
1.1.8	Records relating to Governor monitoring visits	Yes		Date of the visit + 3 years	SECURE DISPOSAL
1.1.9	Annual reports required by the DfE	No		Date of report + 10 years	SECURE DISPOSAL
1.1.10	All records relating to the conversion of schools to Academy status	No		For the life of the academy	Consult local archives before disposal
1.1.11	Records relating to complaints made to and investigated by the governing body or head teacher	Yes		Major complaints: current year + 6 years. If negligence involved, then: current year + 15 years. If child protection or safeguarding issues are involved, then: current year + 40 years	SECURE DISPOSAL
1.1.12	Correspondence sent and received by the governing body or head teacher	Potential		General correspondence should be retained current + 3 years	SECURE DISPOSAL
1.1.13	Action plans created and administered by the governing body			Until superseded or whilst relevant	SECURE DISPOSAL
1.1.14	Policy documents created and administered by the governing body			Until superseded (the school should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the IICSA has issued its recommendations)	

1.1.15	Records relating to the appointment of a clerk to the governing body	Yes		Date on which clerk appointment ceases + 6 years	SECURE DISPOSAL
1.1.16	Records relating to the terms of office of serving governors, including evidence of appointment	Yes		Date appointment ceases + 6 years	
1.1.17	Records relating to the appointment of Governors	Yes		Life of appointment + 6 years	SECURE DISPOSAL
1.1.18	Records relating to governor declaration against disqualification criteria	Yes		Date appointment ceases + 6 years	SECURE DISPOSAL
1.1.19	Register of Business Interests	Yes		Date appointment ceases + 6 years	SECURE DISPOSAL
1.1.20	Governors Code of Conduct			This is expected to be a dynamic document; one copy of each version should be kept for the life of the organisation	
1.1.21	Records relating to the training required and received by Governors	Yes		Date Governor steps down + 6 years	SECURE DISPOSAL
1.1.22	Records relating to the induction programme for new governors	Yes		Date appointment ceases + 6 years	SECURE DISPOSAL
1.1.23	Records relating to DBS checks carried out on clerk and members of the governing body	Yes		Date of DBS check + 6 months	SECURE DISPOSAL
1.1.24	Governor personnel files	Yes		Date appointment ceases + 6 years	SECURE DISPOSAL

1.1.25	Scheme of Delegation and Terms of Reference for committees	Yes		Until superseded + 10 years	SECURE DISPOSAL
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1.2 Senior Leadership Team

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
1.2.1	Logbooks of activity in the school maintained by the Head Teacher	There may be data protection issues if the logbook refers to individual members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate.
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then review	SECURE DISPOSAL
1.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + 3 years then review	SECURE DISPOSAL
1.2.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the report refers to individual pupils or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL
1.2.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with	There may be data protection issues if the report refers to individual pupils or members of staff		Date of correspondence + 3 years then review	SECURE DISPOSAL

	administrative responsibilities				
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
1.2.7	School Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL

1.3 Admissions

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
1.3.1	All records relating to the creation and implementation of the School Admissions Policy	No	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Life of the policy + 7 years then review	SECURE DISPOSAL
1.3.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL
1.3.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission	Resolution of case + 1 year	SECURE DISPOSAL

			appeals panels December 2014		
1.3.4	Register of Admissions	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made	REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school Or Transfer to the appropriate County Archives Service
1.3.5	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL
1.3.6	Supplementary Information form including additional information such as religion, medical conditions etc.	Yes			
	For successful admissions			The information should be added to the pupil file	SECURE DISPOSAL
	For unsuccessful admissions			Until appeals process completed (GDPR)	SECURE DISPOSAL

1.4 Operational Administration					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
1.4.1	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
1.4.2	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	SECURE DISPOSAL
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	SECURE DISPOSAL
1.4.4	Newsletters and other items with a short operational use	No		Current year + 1 year	SECURE DISPOSAL
1.4.5	Visitors' Books and Signing in Sheets, electronic visitors' management systems.	Yes		Last entry + 1 years then REVIEW	SECURE DISPOSAL
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL
1.4.7	School Privacy Notice which is sent to parents as of GDPR compliance			Until superseded + 6 years	
1.4.8	Consents relating to school activities as part of GDPR compliance (for example consent to be sent circulars or mailings)	Yes		Consent will last whilst the pupil attends the school it can therefore be destroyed when the pupil leaves	SECURE DISPOSAL

Section 2: HR Management of the School

2.1 Recruitment					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
2.1.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records (including application forms, Online search checks and interview records) leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months (Unless the academy has applicants consent to keep CV for future reference)	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate (including application forms, Online search checks and interview records)	Yes		All the relevant information should be added to the staff personal file (see below) All other information retained for 6 months.	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS checks	Yes	DBS Update Service Employer Guide June 2014: keeping children safe in education 2019 (Statutory Guidance from Dept. of Education) Sections 73, 74	The school does not have to keep copies of DBS certificates. If the school does so (for example to allow consideration and resolution of any dispute or complaints) the copy must NOT be retained for more than 6 months	SECURE DISPOSAL

2.1.5	Proofs of identity collected as part of the DBS process	Yes		Where possible these should be checked, and a note kept of what has been checked. If it is felt necessary to keep copy documentation, then this should be placed on the member of staff's personal file	
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	An employer's guide to right to work checks [Home Office May 2015]	Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately the Home Office requires that the documents are kept for termination of Employment + 2 years	SECURE DISPOSAL
2.1.8	Records relating to the employment of overseas teachers			Where possible these records should be kept in the staff personnel file, but if they are kept separately then the home office requires that the documentation are kept for termination of employment plus not less than two years	SECURE DISPOSAL

2.2 Operational Staff Management

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
2.2.1	Staff Personal File	Yes	Limitation Act 1980 (section 2)	Termination of Employment + 6 years	SECURE DISPOSAL

	(including Written particulars of employment, contracts of employment and changes to terms and conditions)			Unless the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case, then the file will need to be retained until IICSA enquiries are complete.	
2.2.2	Annual appraisal/assessment records	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Sickness Absence Monitoring	Yes		Keep Separate from accident records. Where sickness pay is not paid then current year + 3 is acceptable. Where sickness pay is paid, becomes a financial record so current year + 6 applies.	SECURE DISPOSAL
2.2.4	Staff Training – where training leads to continuing professional development	Yes		Length of time required by the professional body	SECURE DISPOSAL
2.2.5	Staff Training – except where dealing with children e.g. first aid or health and safety	Yes		Retained on the personnel file (Termination of employment + 6 years)	SECURE DISPOSAL
2.2.6	Staff Training - where the training relates to children e.g. safeguarding or other child related training.	Yes		Date of the training + 40years. The IICSA may wish to see training records as part of an investigation	SECURE DISPOSAL
2.2.7	Emergency contact details	Yes		Destroyed on termination of employment	SECURE DISPOSAL
2.2.8	Annual Leave records	No		6 years after the end of the tax year they relate or possibly longer if leave can	SECURE DISPOSAL

				be carried over from year to year	
2.2.9	Consent for the processing of personal and sensitive data	Yes		For as long as the data is being processed and up to 6 years afterwards	SECURE DISPOSAL

2.3 Management of Disciplinary & Grievance Process

Note:

The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.

Any disciplinary proceedings data will be a record on an important event in the course of the employer's relationship with the employee. Should the same employee be accused on similar misconduct five years down the line, and then defend him or herself by saying 'I would never do something like that', reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence then claim at tribunal that he or she had 'fifteen years of unblemished service' the record of the disciplinary proceedings would be effective evidence to counter this claim.

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2019"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018"	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned UNLESS the member of staff is part of any case which falls under	SECURE DISPOSAL These records must be shredded

				the terms of reference of IICSA, then the files will need to be retained until IICSA enquiries are complete.	
2.3.2	Disciplinary Proceedings	Yes			
	Oral warning			Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file]
	Written warning – level 1			Date of warning + 6 months	
	Written warning – level 2			Date of warning + 12 months	
	Final warning			Date of warning + 18 months	
	Case not found			If the incident is child protection related, then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL

2.4 Payroll and Pensions

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
2.4.1	Maternity/Adoption/Paternity records/payment	Yes		Current year + 3 years	SECURE DISPOSAL
2.4.2	National Insurance schedule of payments	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.3	Retirement Benefit Schemes – notifiable events (for example relating to incapacity)	Yes		Current academic year + 6 years from the end of the scheme year in which the event took place	SECURE DISPOSAL
2.4.4	Payroll and Salary awards	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.5	Payroll records/ reports, Payslips, Pensions and	Yes		Current year + 6 years	SECURE DISPOSAL

	Superannuation Reports and Adjustments				
2.4.6	Personal bank details	Yes		Until superseded + 3 years If employment ceases then end of employment + 6 years	SECURE DISPOSAL
2.4.7	Sickness Records	Yes		Current year + 3 years (not paid) Current year + 6 years (paid)	SECURE DISPOSAL
2.4.8	Staff returns	Yes		Current year + 3 years	SECURE DISPOSAL
2.4.9	Income tax form P60	Yes		Current year + 6 years	SECURE DISPOSAL
2.4.10	Tax forms P6, P11, P11D, P35, P45, P46, P48	Yes		Corporate decision to retain for current + 6 years	SECURE DISPOSAL
2.4.11	Time sheets, overtime, flexitime, bonus sheets and car allowance claims	Yes		Current year + 3 years	SECURE DISPOSAL

2.5 Other Personnel Records

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
2.5.1	Volunteer Personnel Records	Yes		Any relevant papers relating to the engagement of volunteers can be retained (as per 2.1) but only for as long as their engagement with the school lasts.	SECURE DISPOSAL

2.5.2	Governor / Trustee Records	Yes		Any relevant papers relating to the engagement of governors can be retained (as per 2.1) but only for their term of office + 1 year.	SECURE DISPOSAL
2.5.3	Third party workers, supply staff etc	Yes		The school should r see evidence that all checks have been undertaken, but not take copies of the evidence.. Where copies of such documents are received, they must not be retained by the school. The school may retain a copy of the identification documents, but these documents must be destroyed when the individual ceases working at the school.	SECURE DISPOSAL

Section 3: Financial Management of the School

3.1 Risk Management & Insurance

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.1.1	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years. Passed to the LA if academy closes	SECURE DISPOSAL

3.2 Asset Management

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL

3.3 Accounts & Statements including Budget Management

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.3.1	Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
3.3.2	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
3.3.3	All records relating to the creation and management of budgets including the Annual Budget statements and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL

3.3.4	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.5	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.6	Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL

3.4 Pupil Finance

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.4.1	Pupil Premium Grant records	Yes		Date pupil leaves the provision + 6 years	SECURE DISPOSAL

3.5 Contract Management

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.5.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on contract + 12 years	SECURE DISPOSAL
3.5.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on contract + 6 years	SECURE DISPOSAL
3.5.3	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL

3.56 School Fund					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.6.1	School fund - Cheque books	No		Current year + 6 years	SECURE DISPOSAL
3.6.2	School fund - Paying in books	No		Current year + 6 years	SECURE DISPOSAL
3.6.3	School fund - Ledger	No		Current year + 6 years	SECURE DISPOSAL
3.6.4	School fund - Invoices	No		Current year + 6 years	SECURE DISPOSAL
3.6.5	School fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
3.6.6	School fund – Bank statements	No		Current year + 6 years	SECURE DISPOSAL
3.6.7	School fund – Journey Books	No		Current year + 6 years	SECURE DISPOSAL

3.7 School Meals Management					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
3.7.1	Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.7.2	School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
3.7.3	School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL

Section 4: Property Management

4.1 Health & Safety					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
4.1.1	Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL
4.1.2	Health and Safety Risk Assessments	No		Life of Risk assessment + 3 years	SECURE DISPOSAL
4.1.3	Accident Reporting (Adults and Children detailed separately below)	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 Allows the information to be kept electronically		
	Adults (Over 18 years of age at time of incident)	Yes		Due to the possibility of negligence allegations reports should be kept for date of incident + 15 years or date of settlement + 6 years.	SECURE DISPOSAL
	Children (Under 18 years of age at time of incident)	Yes		The Accident Book – 3 years after last entry.	SECURE DISPOSAL

				Due to the possibility of negligence allegations, where a further incident report has been completed following a visit to a walk in centre/hospital, the report should be kept until the child reaches the age of 21	
4.1.4	Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see http://www.hse.gov.uk/RIDDOR/	Yes	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12 (2)	Adults - Due to the possibility of negligence allegations reports should be kept for date of incident + 15 years or date of settlement + 6 years. Child - Due to the possibility of negligence allegations reports should be kept until the child reaches the age of 21	
4.1.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations	COSHH sheets should be kept whilst the substance is in use + 6 years COSHH policy documents should be kept until the policy is superseded + 6 years.	SECURE DISPOSAL

			had not been made. Regulation 18(2)		
4.1.6	Process of monitoring of areas where employees and persons are likely to have come in to contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
4.1.7	Process of monitoring of areas where employees and persons are likely to have come in to contact with radiation	No	The Ionising Radiation Regulations 2017	2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. To keep the records made and maintained or a copy of these records until the person to whom the record relates has or would have attained the age of 75 years but in any event for at least 30 years from when the record was made.	SECURE DISPOSAL
4.1.8	Fire precautions logbooks			Current year + 6 years	SECURE DISPOSAL
4.1.9	Health and safety file to show current state of building including all alterations (wiring, plumbing, building works etc), to be passed on in the case of change of ownership	No		Pass to new owner on sale or transfer of building	
4.1.10	Medication Permission slips	Yes		For the duration of the period that medication is	SECURE DISPOSAL

				given plus one month or at the end of the academic year	
4.1.11	Medical Incidents that have a behavioural or safeguarding influence	Yes		Added to pupil's record and transferred to next school.	

4.2 Property Management					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
4.2.1	Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry	
4.2.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold	
4.2.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.2.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.2.5	Property Valuations	No		Date valuation superseded + 6 years	SECURE DISPOSAL

4.2.6	Business Continuity and disaster recovery plans	No		Date the plan superseded plus 3 years	SECURE DISPOSAL
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4.3 Maintenance					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
4.3.1	All records relating to the maintenance of the school carried out by contractors	No		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold	SECURE DISPOSAL
4.3.2	All records relating to the maintenance of the school carried out by school employees including maintenance logbooks	No		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold	SECURE DISPOSAL

Section 5: Pupil Management

Please note that any record containing pupil information may be subject to the requirements of IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.

5.1 Pupil's Educational Record					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 As amended by SI 2018 No 688		
	Primary			Retain whilst the child remains at primary school Electronic Records on Academy MIS (Arbor)	The files should follow the pupil when he/she leaves the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit For those pupils moving to an independent school, home schooling or moving abroad the file should be returned to the LA. Electronic Record on MIS (Arbor) should be deleted

				As per data retention period on Arbor. After the greater of: • (a) 6 years after the student's leaving date from the school, or • (b) if relating to a child, the 24th birthday of the child, or • (c) if relating to more than one child, the 24th birthday of the youngest child.	once Arbor has flagged for deletion
5.1.2	Examination Results	Yes		This information should be added to the pupil file & transferred to next school	
5.1.3	Child Protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges 2018"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period as the pupil file. Note: these records will be subject to any instruction given by IICSA	The files should follow the pupil when he/she leaves the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit

					Secondary schools - SECURE DISPOSAL – these records MUST be shredded
5.1.4	Child Protection information held in separate files	Yes	“Keeping children safe in education Statutory guidance for schools and colleges 2018”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018	Primary schools - Retain whilst the child remains at primary school Secondary schools- DOB of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record. Note: These records will be subject to any instruction given by IICSA	The files should follow the pupil when he/she leaves the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit Secondary schools -SECURE DISPOSAL – these records MUST be shredded
5.1.5	Behaviour and Exclusions Records	Yes		Added to the pupil's record and transferred to the next school. Copies are held whilst the pupil is a school + 1 year	SECURE DISPOSAL

5.2 Attendance					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
5.2.1	Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL
5.2.2	Correspondence relating to any absence (authorised or unauthorised)	Potential	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL

5.3 Special Educational Needs					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
5.3.1	Special Educational Needs files, reviews and Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Yes	Children and Family's Act 2014: Special Educational Needs and Disability Act 2001 Section 14	Primary schools - Retain whilst the child remains at primary school	The files should follow the pupil when he/she leaves the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit

				Secondary schools - Date of birth of the pupil + 31 years (Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act	Secondary schools - SECURE DISPOSAL
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Section 6: Curriculum Management

6.1 Statistics and Management Information					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	SATS records	Yes			
	SATS Results			The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SAT's results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL
	SATS Papers			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self-Evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.6	Internal Moderation	Yes		Academic year + 1 academic year	SECURE DISPOSAL
6.1.7	External Moderation	Yes		Until superseded	SECURE DISPOSAL

6.2 Implementation of Curriculum					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
6.2.1	Schemes of Work	No		Current Year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL
6.2.2	Timetable	No		Current Year + 1 year	
6.2.3	Class Record Books	No		Current Year + 1 year	
6.2.4	Mark Books	No		Current Year + 1 year	
6.2.5	Record of Homework set	No		Current Year + 1 year	
6.2.6	Pupil's Work	No		Where possible pupil's work should be returned to the pupil at the end of the academic year or retained for the current academic year + 1 year	SECURE DISPOSAL

Section 7: Extra Curricular Activities

7.1 Educational Visits outside the Classroom

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
7.1.1	Parental consent forms for school trips where there has been no major incident	Yes		At the end of the trip or at the end of the academic year.	SECURE DISPOSAL
7.1.2	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years. The permission slips for all the pupils on the trip need to be retained to show the rules had been followed for all pupils	
7.1.3	Records created to obtain approval to run an outside classroom	No		Date of visit + 14 years	SECURE DISPOSAL
7.1.4	Records relating to residential trips	Yes		DOB of youngest pupil + 25 years	SECURE DISPOSAL

7.2 Family Liaison Officers and Home School Liaison Assistants

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
7.2.1	Day Books	Yes		Current year + 2 years then review	SECURE DISPOSAL

7.2.2	Reports for outside agencies – where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	SECURE DISPOSAL
7.2.3	Referral Forms	Yes		While the referral is current	SECURE DISPOSAL
7.2.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
7.2.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL
7.2.6	Group Registers	Yes		Current year + 2 years	SECURE DISPOSAL

7.3 Parent Teacher Associations

	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
7.3.1	Records relating the creation and management of Parent Teacher Associations			Current year + 6 years then review	SECURE DISPOSAL

Section 8: Central Government & Local Authority

8.1 Local Authority					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
8.1.2	Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
8.1.3	School Census Returns	No		Current year + 5 years	SECURE DISPOSAL
8.1.4	Circulars and other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL

8.2 Central Government					
	Record Type	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the records life
8.2.1	OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
8.2.2	Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL
8.2.3	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL

