

Data Retention Policy & Schedule

Review Date	February 2024	Next Review by Date	February 2025
Reviewed By	Group Business Manager		
Approved by Governing Body	Chris Westbury		
Date Approved	13/03/2024 FGB		

The School recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the school. This document provides the policy framework through which this can be achieved and audited together with the retention schedule itself.

Scope of the policy

This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.

Records are defined as all those documents which facilitate the business carried out by the school 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 electronically.

Responsibilities

The School Board of Governors has a corporate responsibility to maintain School records and record keeping systems in accordance with the regulatory environment.

The School Headteacher is charged with day-to-day operational compliance and will assign any specific staff responsibilities as required in order to help fulfil the School's commitment to effective records management.

Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the school's Records Management Policy and Guidelines.

School Management

This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Headteacher and the Senior Leadership Team, the admissions process and operational administration.

Please note that Secure Disposal (referred to throughout the tables below) covers paper, CDs, hard drive information and data etc.

Governing Body

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of document life	Statutory Provisions
	Instruments of government, including Articles of Association	No	Permanent		

	Records for all full governing body,	Potentially Yes If agendas or minutes contain personal	Permanent	Permanent, or as below Single copy of signed minutes, agenda and	School Governance (England) Regulations (2013)
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Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of document life	Statutory Provisions
	committee and panel meetings, including: a) agendas b) any report, statutory policy (including Admissions Policy) or other paper considered at governing body meeting c) signed minutes	information (such as discussions about staff)		papers: retain in school for 6 years from date. Inspection copies: retain in school for current year + 3 then destroy as confidential waste or delete securely Additional copies: destroy as confidential waste or delete securely	
	Governors application forms - successful candidates	Yes	End of term of office + 1 year	Secure Disposal	
	Governors application forms - unsuccessful candidates	Yes	Date of election + 6 months	Secure Disposal	
	Governor Election voting forms	Yes	Date of election + 6 months	Secure Disposal	

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of document life	Statutory Provisions
	Meeting papers relating to the annual parents' meeting	No	Date of the meeting + a minimum of 6 years	Secure Disposal	Section 33 of the Education Act 2002
	Trusts and Endowments managed by the Governing Body	No	Permanent	Secure Disposal	
	Action plans created and administered by the Governing Body	No	Life of the action plan + 3 years	Secure Disposal	
	Policy documents created and administered by the Governing Body	No	Life of the policy + 3 years	Secure Disposal	
	Records relating to complaints dealt with by the Governing Body	Yes	Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	Secure Disposal	
	Annual Reports	Yes	Date of report + 10 years	Secure Disposal	Education (Governor's Annual Reports) (England)

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of document life	Statutory Provisions
					(Amendment) Regulations 2002

Head Teacher and Senior Leadership Team

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of document life	Statutory Provisions
	Minutes of Senior Leadership Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual students or members of staff	Date of the meeting + 3 years then review	Secure Disposal	
	Reports created by the Head Teacher or the Leadership Team	There may be data protection issues if the report refers to individual students or members of staff	Date of the report + a minimum of 3 years then review	Secure Disposal	

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of document life	Statutory Provisions
	Records created by the Head Teacher, Deputy Head Teachers, Heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual students or members of staff	Current academic year + 6 years then review	Secure Disposal	

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of document life	Statutory Provisions
	Correspondence 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 correspondence refers to individual students or members of staff	Date of correspondence + 3 years then review	Secure Disposal	
	Professional Development Plans	Yes	Life of the plan + 6 years	Secure Disposal	
	School Development Plans	No	Life of the plan + 3 years	Secure Disposal	

Operational Administration

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provisions
	General file series	No	Current year + 5 years then review	Secure Disposal	
	Records relating to the creation and publication of the school brochure or prospectus	No	Current year + 3 years	Standard Disposal	
	Records relating to the creation and distribution of circulars to staff, parents or students	No	Current year + 1 year	Standard Disposal	
	Newsletters and other items with a short operational use	No	Current year + 1 year	Standard Disposal	
	Visitors' Books and Signing in Sheets	Yes	3 years – limitation on personal injury	Secure Disposal	Limitation Act 1980
	Records relating to the creation and management of Parent Teacher Associations and/or Old Students Associations	No	Current year + 6 years then REVIEW	Secure Disposal	

Human Resources

This section includes staff employed by the school, contractors, and other school associates such as volunteers.

Recruitment

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provisions
	All records leading up to the appointment of a new Headteacher	Yes	Date of appointment + 6 years	Secure Disposal	
	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes	Date of appointment of successful candidate + 6 months	Secure Disposal	
	All records leading up to the appointment of a new member of staff – successful candidate	Yes	All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months	Secure Disposal	

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provisions
	Pre-employment vetting information – DBS Checks	No	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months	Secure Disposal	Keeping children safe in education Statutory guidance for schools and colleges
	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes	Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy of documentation then this should be placed on the member of staff’s personal file	Secure Disposal	
	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years	Secure Disposal	Immigration, Asylum and Nationality Act 2006

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provisions
	Pre-employment vetting - references	Yes	At least one year after the reference is given to meet the limitation period for defamation claims.	Secure Disposal	

Operational Staff Management

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provisions
	Staff Personal File	Yes	Termination of Employment + 6 years	Secure Disposal	
	Therapist records (including contracted therapists)	Yes	Termination of engagement + 25 years (in case of an investigation / enquiry about a student client)		
	Working time records including overtime, annual holiday, jury service, time off for dependents, etc	Yes	2 years from date on which they were made	Secure Disposal	The Working Time Regulations 1998

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provisions
	Annual appraisal/ assessment records	Yes	Current year + 6 years	Secure Disposal	
	Statutory Sick Pay records, calculations, certificates, self-certificates, occupational health reports	Yes	6 years after the employment ceases add to personnel file	Secure Disposal	No statutory requirement.
	Staff Training Records – that count to professional development	Yes	Length of time required by the professional body	Secure Disposal	
	Staff training – except where dealing with children, e.g. first aid or health and safety	Yes	Add to personnel file	Secure Disposal	
	Staff training – where the training relates to children (e.g. safeguarding or other child related training)	Yes	Date of the training + 40 years	Secure Disposal	
	Individual Contractor records	Yes	6 years following termination of engagement	Secure disposal	
	School associate personal records (volunteers etc)	Yes	6 years following termination of engagement		

Management of Disciplinary and Grievance Processes

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provisions
	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	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	Secure Disposal Paper copies (if any) of these records must be shredded	

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provisions
	Disciplinary Proceedings 1. Oral warning 2. Written warning – level 1 3. Written warning – level 2 4. Final Warning Case not found	Yes	1 and 2 - Date of warning + 6 months 3 - Date of warning + 12 months 4 - Date of warning + 18 months 5 - If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	Secure Disposal	

Health and Safety

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Health and Safety Policy Statements	No	Life of policy + 3 years	Secure Disposal	
	Health and Safety Risk Assessments	No	Life of risk assessment + 3 years	Secure Disposal	

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Records relating to accident/ injury at work	Yes	Date of incident + 3 years In the case of serious accidents, a further retention period will need to be applied	Secure Disposal	Social Security (Claims and Payments) Regulations (1979), Regulation 25
	Accident Reports - Adults	Yes	Date of the incident + 6 years	Secure Disposal	Social Security (Claims and Payments) Regulations (1979), Regulation 25
	Accident Reports - Children	Yes	DOB of the child + 25 years	Secure Disposal	
	Control of Substances Hazardous to Health (COSHH)	No	Current year + 40 years	Secure Disposal	Control of Substances Hazardous to Health Regulations (2002), Regulation 11
	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Last action + 40 years	Secure Disposal	Control of Asbestos at Work Regulations (20

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No	Last action + 50 years	Secure Disposal	Ionising Radiation Regulations 1999 (SI 1999/3232)
	Fire Precautions log books	No	Current year + 6 years	Secure Disposal	
	First aid training	Yes	6 years after employment	Secure disposal	Health and Safety (First Aid) Regulations 1981
	CCTV footage	Yes	30 days or 6 months following an investigated incident such as a crime or disciplinary event.	Delete images	

Payroll and Pensions

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Personal Bank Details	Yes	6 years from end of employment		

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Payroll wage/salary records (also overtime, bonuses, expenses)	Yes	6 years from the end of the tax year to which they relate	Secure Disposal	Taxes Management Act 1970
	Working time records including overtime, annual holiday, jury service, time off for dependents, etc	Yes	2 years from date on which they were made	Secure Disposal	The Working Time Regulations 1998
	Maternity pay records	Yes	Current year + 3 years	Secure Disposal	Maternity & Parental Leave Regulations 1999
	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Current year + 6 years	Secure Disposal	

Student Management

This section includes all records which are created during the time a student spends at the school. For information about accident reporting see under Health and Safety above.

Admissions Process

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of document life	Statutory Provision
	All records relating to the creation and implementation of the School Admissions' Policy	No	Life of the policy + 3 years then review	Secure Disposal	School Admissions Code (2014) – not applicable to SSS – assume as best practice
	Admissions forms – if the admission is successful	Yes	Transfer to student record and destroy the forms	Secure Disposal	As above
	Admissions forms – if the appeal is unsuccessful (including supplementary information e.g. proof of address, religion, medical conditions etc.)	Yes	Resolution of case + 1 year	Secure Disposal	As above
	Register of Admissions	Yes	Keep permanently as past students often query the dates they attended the school	Review	The Education (Student Registration) (England) Regulations 2006

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of document life	Statutory Provision
	Proofs of address supplied by parents as part of the admissions process	Yes	Current year + 1 year	Secure Disposal	
	Supplementary Information form including additional information such as religion, medical conditions etc <ul style="list-style-type: none"> • For successful admissions • For unsuccessful admissions 	Yes	Successful - This information should be added to the student file Unsuccessful - Until appeals process completed	Secure Disposal	

Student's Educational Record

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	<p>Student's Educational Record - Students with Special Educational Needs Includes but not limited to :</p> <p>Education Health Care Plan (Statement of Education)</p> <p>SEN reviews</p> <p>Any other relevant reports from therapists, OT's</p> <p>Any additional reports from teachers</p> <p>Parental Consent forms</p> <p>Records of Medicines</p> <p>Individual Education Plans</p> <p>Work experience agreements (secondary)</p>	Yes	<p>Move with child to next educational setting, then delete after one year.</p> <p>If SSS is the last school retain until child is 25 years old + 6 years</p> <p>(Agreed by Cindy Harnett, Nick Ridley, Emma Crabb Sept 2020)</p>	Secure Disposal	<p>Special Educational Needs and Disability Act 2001 Section 1</p> <p>Limitation Act 1980 (Section 2)</p>
	Internal and external examination papers (completed)	Yes	Current academic year + 6 years or until any appeals /		

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
			validation process is complete		
	Examination Results – Public Exams	Yes	This information should be added to the student file	All uncollected certificates should be returned to the examination board.	
	Examination Results – Internal Record	Yes	This information should be added to the student file		
	Examination results - summaries or other statistical information created by the school	Yes	Current academic year + 6 years		
	Child Protection Information	Yes	This information is given to the school by the former educational setting/social services. It is kept in a locked cabinet in a locked room	This information is passed on to the next educational setting when the student leaves the school	
	Child protection information held in separate files	Yes	DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group	If the child transfers to another educational setting the child protection should also be transferred – but separately to the educational	

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
			on the understanding that the principal copy of this information will be found on the Local Authority Social Services record.	record. Transfer may be electronically via CPOMs Secure Disposal – if any paper records they MUST be shredded	

Attendance and Events

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Attendance Registers	Yes	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	School attendance - Guidance for maintained schools, academies, independent schools and local authorities, July 2019

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Correspondence relating to authorised absence		Current academic year + 2 years	Secure Disposal	As above and - Education Act 1996 Section 7
	Images of students - signed consent forms by parent / guardian	Yes	Date of signing + 3 years; or at end of project; or when student leaves the school	Secure Disposal	

Special Educational Needs and Health

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Advice and information to parents regarding educational needs	Yes	Closure + 12 years	Secure Disposal	Special Educational Needs and Disability Act 2001 Section 2
	Individual Healthcare Plan	Yes	Refer "Educational Record" above	Secure Disposal	
	Parental medical consent forms	Yes	Refer "Educational Record" above	Secure Disposal	

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Therapist and medical notes / records	Yes	DOB + 25 years Need to keep records available for external therapists to access if required	Secure Disposal	
	Data from monitoring internet access (e.g. from Smoothwall) and key logging (eg Netsupport DNA)	Yes Browsing history and key logging records	12 months and then delete	Secure disposal - systems set to automatically delete	

Curriculum Management

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Curriculum returns	No	Current year + 3 years	Disposal	
	Schemes of Work	No	Current year + 1 year	Review these records at the end of each year and allocate a further retention period or Secure Disposal	

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Timetable	No	Current year + 1 year		
	Class Record Books	No	Current year + 1 year		
	Mark Books	No	Current year + 1 year		
	Record homework set	No	Current year + 1 year		
	Students' Work	No	Where possible students' work should be returned to the student at the end of the academic year if this is not the school's policy then current year + 1 year	Secure Disposal	

Extra Curriculum Management

Educational Visits outside the Classroom

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Records created by the school to obtain approval to run an Educational Visit outside the Classroom	No	Date of visit + 3 years	Secure Disposal	
	Parental consent forms for school trips where there has been no major incident	Yes	Conclusion of the trip	.	
	Parental permission slips for school trips – where there has been a major incident	Yes	DOB of the student involved in the incident + 25 years The permission record for all the students on the trip need to be retained to show that the rules had been followed for all students.		

Family Liaison Officers and Home School Liaison Assistants

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes	Will be added to CPOMs and treated as per other safeguarding information	Secure Disposal	
	Referral forms	Yes	Will be added to CPOMs and treated as per other safeguarding information	Secure Disposal	
	Contact data sheets	Yes	Current year then review, if contact is no longer active then destroy	Secure Disposal	
	Contact database entries	Yes	Current year then review, if contact is no longer active then destroy	Secure Disposal	
	Group Registers	Yes	Current year + 2 years	Secure Disposal	

Financial Management of the School

This section deals with all aspects of the financial management of the school including the administration of school meals

Risk Management and Insurance

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Employer's Liability Insurance Certificate	No	Closure of the school + 40 years	Secure Disposal	

Asset Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the document life	Statutory Provisions
	Inventories of furniture and equipment	No	Current year + 6 years	Secure Disposal	
	Burglary, theft and vandalism report forms	No	Current year + 6 years	Secure Disposal	

Accounts and Statements including Budget Management

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provisions
	Annual Accounts	No	Current year + 6 years	STANDARD DISPOSAL	
	Loans and grants managed by the school	No	Date of last payment on the loan + 12 years then REVIEW	Secure Disposal	
	Student Grant applications	Yes	Current year + 3 years	Secure Disposal	
	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No	Life of the budget + 3 years	Secure Disposal	
	Invoices, receipts, order books and requisitions, delivery notices	No	Current financial year + 6 years	Secure Disposal	
	Records relating to the collection and banking of monies	No	Current financial year + 6 years	Secure Disposal	

	Records relating to the identification and collection of debt	No	Current financial year + 6 years	Secure Disposal	
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Contract Management

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	All records relating to the management of contracts under seal	No	Last payment on the contract + 12 years	Secure Disposal	
	All records relating to the management of contracts under signature	No	Last payment on the contract + 6 years	Secure Disposal	
	Records relating to the monitoring of contracts	No	Current year + 2 years	Secure Disposal	

School Funds

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	School Fund - Cheque books	No	Current year + 6 years	Secure Disposal	
	School Fund - Paying in books	No	Current year + 6 years	Secure Disposal	
	School Fund – Ledger	No	Current year + 6 years	Secure Disposal	
	School Fund – Invoices	No	Current year + 6 years	Secure Disposal	
	School Fund – Receipts	No	Current year + 6 years	Secure Disposal	
	School Fund - Bank statements	No	Current year + 6 years	Secure Disposal	
	School Fund – Journey Books	No	Current year + 6 years	Secure Disposal	

School Meals

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Free School Meals Registers				
	School Meals Registers				

	School Meals Summary Sheets				
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Property Management

This section covers the management of buildings and property.

Property Management

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	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		
	Plans of property belong 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.		

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Leases of property leased by or to the school	No	Expiry of lease + 6 years	Secure Disposal	
	Records relating to the letting of school premises	No	Current financial year + 6 years	Secure Disposal	

Maintenance

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provisions
	All records relating to the maintenance of the school carried out by contractors	No	Current year + 6 years	Secure Disposal	
	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No	Current year + 6 years	Secure Disposal	

Central Government and Local Authority

Local Authority

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	Secondary Transfer Sheets (Primary)	Yes	Current year + 2 years	Secure Disposal	
	Attendance Returns	Yes	Current year + 1 year	Secure Disposal	
	School Census Returns	No	Current year + 5 years	Secure Disposal	
	Circulars and other information sent from the Local Authority	No	Operational use	Secure Disposal	

Central Government

Ref	Basic file description	Data Protection Issues	Retention Period	Action at the end of the document life	Statutory Provision
	OFSTED reports and papers	No	Life of the report then REVIEW	Secure Disposal	

	Returns made to central government	No	Current year + 6 years	Secure Disposal	
	Circulars and other information sent from central government	No	Operational use	Secure Disposal	