Data Retention Policy

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1.0 Policy statement

The School has a responsibility to maintain its records and record keeping systems. When doing this, the School will take account of the following factors:

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Their accessibility.

This policy is not intended to have contractual effect. It does, however, reflect the School's current practice, the requirements of current legislation and best practice and guidance.

It may be amended by the School from time to time and any changes will be notified to employees, parents and pupils within one month of the date on which the change is intended to take effect. The School may also vary any parts of this procedure, including any time limits, as appropriate in any case.

2.0 Data Protection

This policy sets out how long employment-related, parent and pupil data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the Data Protection Act 2018 (the UK's implementation of the General Data Protection Regulations (GDPR)) and the Freedom of Information Act 2000.

This policy sets out how long employment-related, parent and pupil data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the **UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025,** and the Freedom of Information Act 2000.

This policy should be read in conjunction with the School's Data Protection Policy, which sets out our broader obligations under data protection legislation."

3.0 Retention Schedule

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the School will adhere to the standard retention times listed within that schedule. We may delay destruction for a further period where there are special factors such as potential litigation.

Paper records and electronic records will be regularly monitored by the Data Protection Officer.

The schedule is a relatively lengthy document listing the many types of records used by the school and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

4.0 Destruction of Records

Where records have been identified for destruction they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information, or sensitive policy information should be shredded before disposal where possible. All electronic information will be deleted.

5.0 Record Keeping of Safeguarding

Record Keeping of Safeguarding

Malicious allegations

Any allegations made that are found to be **malicious must be removed** from personnel records. They should not be retained.

Other allegations (substantiated, unsubstantiated, unfounded)

For all other allegations made against staff, the School must keep a **clear and comprehensive summary** of:

- The allegation made
- Details of how the allegation was followed up and resolved
- Any action taken, decisions reached, and the rationale for them
- The outcome (whether substantiated, unsubstantiated, or unfounded)

This information must be kept on the **personnel file of the accused** until the person reaches **normal pension age**, or for **10 years from the date of the allegation** if that is longer.

Information to be provided to the individual. For the purposes of this policy, 'normal pension age' means age 65, or the age at which the individual is entitled to receive their occupational or state pension, whichever is later."

4. Add Guidance on Retention During Litigation

A copy of this summary should be provided to the person concerned, where agreed by the local authority children's social care or the police. The record should include a declaration on whether the information will be referred to in any future reference.

Special considerations

Where an allegation relates to a volunteer, the same retention periods apply to their volunteer records.

The School will review retention of safeguarding records regularly to ensure compliance with any changes in statutory guidance or legal requirements.

4.1 Litigation Hold

Where the School becomes aware of actual or potential litigation, complaint, investigation, or regulatory action, a "litigation hold" may be placed on relevant records. This means:

- Records that would normally be destroyed must be retained until the matter is resolved
- The Data Protection Officer will maintain a register of litigation holds
- Staff must not destroy any records subject to a litigation hold
- The litigation hold will be reviewed regularly and lifted when appropriate

6.0 Transferring Information to Other Media

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

When transferring information to cloud storage or other digital media, the School must ensure:

- The storage provider complies with UK data protection laws (UK GDPR, Data Protection Act 2018, Data (Use and Access) Act 2025)
- Appropriate security measures are in place (encryption, access controls, backup procedures)
- A Data Protection Impact Assessment (DPIA) is completed if required
- The storage location is documented and accessible to authorised staff
- The Data Protection Officer is consulted before implementing new storage solutions

7.0 Transferring Information to Another School

We retain the Pupil's educational records in accordance with the attached schedule. We provide annual written reports to parents who may provide copies for the child's next school. If a child leaves to join another school, we will seek parental consent before completing a reference for the child.

8.0 Responsibility and Monitoring

The Data Protection Officer has primary and day-to-day responsibility for implementing this policy. The Data Protection Officer, in conjunction with all staff is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The Data Protection Officer will consider the suitability and adequacy of this policy and report improvements directly to the Head of School.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

All senior staff are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

9.0 Emails

Email accounts are not a case management tool in itself. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email, and it is important that staff file those emails in the relevant areas to avoid the data becoming lost. Staff are responsible for ensuring emails are filed appropriately in the relevant record-keeping systems (e.g., safeguarding management system, HR files, pupil records) to ensure correct retention periods are applied. Emails should not be relied upon as the sole record-keeping system.

10.0 Pupil Records

All Schools with the exception of independent schools, are under a duty to maintain a pupil record for each pupil. (Early Years will have their own separate record keeping requirements). If a child changes schools, the responsibility for maintaining the pupil record moves to the next school.

Retention Schedule

File Description	Retention Period
Employment Records	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference. In this case, application forms will give applicants the opportunity to object to their details being retained
Job applications and interview records of successful candidates	Greater of 6 years post termination of employment and 30 Years
Written particulars of employment, contracts of employment and changes to terms and conditions	Greater of 6 years post termination of employment and 30 Years
Right to work documentation including identification documents	Greater of 6 years post termination of employment and 30 Years
Immigration checks	Two years after the termination of employment
DBS checks and disclosures of criminal records forms	In relation to the certificate, as soon as practicable after the check has been completed and the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months. Retain date of issue, name of subject, type of disclosure/check, position for which disclosure was requested, unique reference number and recruitment decision taken after destruction of certificate for 30 Years
Change of personal details notifications	No longer than 6 months after receiving this notification
Emergency contact details	Destroyed on termination
Personnel records	While employment continues and up to 30 years after employment ceases
Annual leave records	Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards
Working Time Regulations: • Opt out forms • Records of compliance with WTR Disciplinary records	• Two years from the date on which they were entered into • Two years after the relevant period 6 years after employment ceases
Training	6 years after employment ceases or length of time required by the professional body or insurances (at least 30 years for Safeguarding training)
Records relating to the training required and received by volunteers	Date appointment ceases plus 6 years or length of time required by insurances (30 Years for Safeguarding training)
Staff training where it relates to safeguarding or other child related training	**6 years after employment ceases**, or longer if the training record forms part of a specific safeguarding case file (in which case, DOB of child plus 25 years)."
Annual appraisal/assessment records	Current year plus 6 years
Professional Development Plans	6 years from the life of the plan

Allegations of a child protection nature against a member of staff including where the allegation is founded	10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed.
Volunteer records (including DBS checks for volunteers in regulated activity)	Date appointment ceases plus 6 years, or 30 years if safeguarding allegations are involved
Financial and Payroll Records	
Pension records	12 years
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	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 they relate to
Maternity/Adoption/Paternity Leave records	3 years after end of tax year they relate to
Statutory Sick Pay	3 years after the end of the tax year they relate to
Current bank details	Until updated plus 3 years
Time sheets/clock cards/flexitime	Current year plus 3 years
Pupil Premium Fund records	Date pupil leaves the provision plus 6 years
FEE Declaration Forms	7 Years from end of Academic Year
National Insurance (schedule of payments)	Current year plus 6 years
Redundancy details and calculations	6 years after employment ends
Insurance	Current year plus 6 years
Overtime	Current year plus 3 years
Annual accounts	Current year plus 6 years
Loans and grants managed by the School	Date of last payment on the loan plus 12 years
All records relating to the creation and management of budgets	Life of the budget plus 3 years
Invoices, receipts, order books and requisitions, delivery notices	Current financial year plus 6 years
Debt Collection records	1 year from date of recovery then review
Bursary applications and awards	Current year plus 3 years
School funding documentation (including but not limited to invoices, cheque books, receipts, bank statements etc.)	Current year plus 6 years
Agreements and Administration Paperwork	
Collective workforce agreements and past agreements that could affect present employees	Permanently
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 (and the School may decide to archive one copy)
Minutes of Team meetings	Date of the meeting plus 3 years or as required
Reports created by the Head Teacher or the Senior Management Team.	Date of the report plus a minimum of 3 years or as required
Records relating to the creation and publication of the school prospectus	Current academic year plus 3 years
Ad-hoc child collection door records	End of academic year plus 1year
Daily Opening, Closing and Garden checklists	End of academic year plus 1year
Health and Safety Records	
Health and Safety consultations	Permanently
Health and Safety Risk Assessments	Life of the risk assessment plus 3 years
Health and safety Policy Statements	Life of policy plus 3 years
Any records relating to any reportable death, injury, disease or dangerous occurrence	Date of incident plus 3 years provided that all records relating to the incident are held on personnel file

Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	Until child reaches 24 to comply with Limitation Act or longer to comply with Insurance requirements
Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	Accident book should be retained 3 years after last entry in the book or 6 years if personal injury was caused deliberately.
Fire precaution log books	Current year plus 3 years
Medical records and details of: - • control of lead at work • employees exposed to asbestos dust • records specified by the Control of Substances Hazardous to Health Regulations (COSHH)	40 years from the date of the last entry made in the record
Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made
Records of COVID Lateral Flow testing results	2 Years after test results as per government guidelines.
Filtering and monitoring system review records	Current year plus 6 years. Reviews must be conducted at least once per academic year and include evidence of SLT oversight, DSL input, and IT support involvement.
Temporary and Casual Workers	
Records relating to hours worked and payments made to workers	3 years
Management Information	
Annual reports required by the Department of Education	Date of report plus 10 years
Records relating to complaints made to and investigated by the governing body or head teacher	Major complaints: current year plus 6 years. If negligence involved: current year plus 15 years. If child protection or safeguarding issues are involved then: current year plus 40 years.
Correspondence sent and received by Head of School	General correspondence should be retained for current year plus 3 years.
Records relating to the terms of office of serving senior advisers, including evidence of appointment	Date appointment ceases plus 6 years
Pupil Records	
Details of whether admission is successful/unsuccessful	1 year from the date of non-admission or in line with pupil records in the case of admission
Proof of address supplied by parents as part of the admissions process	Current year plus 1 year
Admissions register	Entries to be preserved for at least later of three years from date of entry or one year after child leaves school
Pupil Records including New Starter forms, daily observations, reports, assessments, records of discussions with parents, correspondence to/from parents, routine intimate care records, ad-hoc collection consent records, welfare observation records unless transferred to Child Protection record.	Whilst the child attends the School plus 1 year unless included in another category requiring longer retention
Attendance Registers	3 years from the date of entry
Correspondence relating to any absence (authorised or unauthorised)	Current academic year plus 2 years
Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Date of birth of the pupil plus 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). Any third party reports not produced by the school are retained only until the child leaves the school.

Child protection information (to be held in a separate file).	Generally passed onto child's next school DOB of the child plus 25 years then review Note: These records will be subject to any instruction given by IICSA
Allegations of sexual abuse	For the time period of an inquiry by the Independent Inquiry into Child Sexual Abuse.
Records relating to any allegation of a child protection nature against a member of staff	Until the accused normal retirement age or 10 years from the date of the allegation (whichever is the longer)
Consents relating to school activities as part of GDPR compliance (for example, consent to be sent circulars or mailings)	Consent will last whilst the pupil attends the school.
Pupil's work	Where possible, returned to pupil at the end of the academic year (provided the School has retained sufficient evidence for its assessment needs)
Schemes of Work	While current year plus 1 year
Timetable	Current year plus 1 year
Photographs and videos of pupils	For the time any child in the photograph/video is at the School and 1 years after. Please note select images may also be kept for longer (for example to illustrate history of the school).
Parental consent forms for school trips where there has been no major incident	End of the trip or end of the academic year
Parental permission slips for school trips where there has been a major incident	Date of birth of the pupil involved in the incident plus 25 years. Permission slips for all the pupils on the trip should be retained to demonstrate the rules had been followed for all pupils
Records relating to child-on-child sexual harassment, sexual violence, or harmful sexual behaviour	DOB of the child(ren) involved plus 25 years. These records should be kept separately from the main pupil file and transferred to the child's next school where appropriate, following guidance from the Designated Safeguarding Lead and local safeguarding partners.
Records relating to incidents of making or sharing of nudes or semi-nudes (including AI-generated or altered images)	DOB of the child(ren) involved plus 25 years. All such incidents mandate a safeguarding response and must be recorded appropriately
Records relating to requests for social transition, including parental consent, risk assessments, and decisions made	DOB of the child plus 25 years. These records should be kept separately and treated as sensitive safeguarding information.
Records of a child's biological sex	Must be maintained accurately for the duration of the child's time at the school and transferred to the next school. Biological sex must be recorded wherever sex is recorded.
Other Records	
Emails	Emails should be filed according to their content and subject to the retention period of the relevant category (e.g., safeguarding emails follow safeguarding retention periods; HR emails follow employment record retention periods). General administrative emails with no ongoing relevance may be deleted after 2-3 years.
Privacy notices	Until replaced plus 6 years.
Inventories of furniture and equipment	Current year plus 6 years
All records relating to the maintenance of the School carried out by contractors or employees of the school	Whilst the building occupied by the school.
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	Current year plus 6 years then review

Referral forms	While the referral is current
Contact data sheets	Current year then review, if contact is no longer active then destroy