



4.0 Record Retention and Deletion Policy

Swanwick Primary School

Version 1.3

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This

document will be reviewed annually and sooner when significant changes are made to the law

Guidance from the Department for Education about school policies can be found here:

<https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts>

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Schools, please delete this section prior to publication of your finalised version. **You will need to attend or view the “Contextualising Policies” training session to be able to work on this document.** This document is a template. You will need to complete the boxes indicated in yellow, and other rows that are not relevant to your school. You may also add to it. If there are matters that you come across that are not specifically dealt with – find the nearest equivalent and let us know so we can fine tune the next version for you.

4.1 How to use this document

This is a very big document. It can be read from front to back, but this will take time. Therefore, you can use the drop-down boxes below to select your role in school – this will then suggest the most relevant sections, alternatively you can select from an A-Z of relevant provisions.

My Role: (please choose from the dropdown and press tab)	Suggested sections:
Pupil	Attendance Child Protection (CP) / Safeguarding Records Curriculum (Implementation) Parent / Alumni Associations Work Experience / Placement

A-Z

- [Admissions](#)
- [Attendance](#)
- [Central Government](#)
- [Child Protection \(CP\) / Safeguarding Records](#)
- [Curriculum \(Implementation\)](#)
- [Curriculum Management](#)
- [Extra Curriculum Management](#)
- [Family Liaison / Early Help / Alternative Provision](#)
- [Financial Management – Accounts and Statements including Budget Management](#)
- [Financial Management – Contract Management](#)
- [Financial Management – Risk & Insurance, Asset Management](#)
- [Financial Management – School Fund](#)
- [Financial Management – School Meals](#)
- [Governing Body](#)
- [Headteacher & Senior Management/Leadership Team](#)
- [Health and Safety](#)
- [HR - Management of Disciplinary and Grievance Processes](#)
- [HR – Operational Staff Management](#)
- [HR – Payroll & Pensions](#)
- [HR – Recruitment](#)
- [Local Authority Returns](#)
- [Medication \(Administration Records\)](#)
- [Operational Administration](#)
- [Parent / Alumni Associations](#)
- [Property Management](#)
- [Pupil Education Record inc SEN, Ed Psych reports](#)
- [Recording Meetings, calls, online lessons, training](#)

4.2 Introduction

The Independent Inquiry into Child Sexual Abuse (IICSA) states: “Institutions have an obligation to preserve records for the Inquiry for as long as necessary to assist the Inquiry. Prolonged retention of personal data by an organisation at the request of the Inquiry would not therefore contravene data protection legislation, provided **such information is restricted to that necessary to fulfil any potential legal duties that organisation may have in relation to the Inquiry.** An institution may have to account for its previous activities to the Inquiry so retention of the data will be regarded as necessary for this purpose.”

Therefore, any records that may be in scope of the inquiry because they pertain to matters relating to the care or abuse of children should be retained until further notice and the periods specified in this guidance, in relation to those records only, are suspended until further notice.

This record retention and deletion policy contains recommended retention periods for the different record series created and maintained by Swanwick Primary School . The schedule refers to all information whether it is held in hard copy or electronic format including cloud and web based or on third party platforms.

Some of the retention periods are governed by statute. Others are guidelines, following best practice, employed by schools throughout the United Kingdom. Every effort has been made to ensure that these retention periods are compliant with the requirements of the UK General Data Protection Regulation 2018 (GDPR), the Data Protection Act 2018 (DPA), Article 8, the Human Rights Act 1998, the Freedom of Information Act 2000 (FOI) and the Code of Practice on Records Management (under Section 46 of the FOI).

Managing records series using these retention guidelines will be deemed to be ‘normal processing’ under the terms of the legislation noted above. If those record series are to be kept for longer or shorter periods than the time scales held in this document, the reasons for any deviation must be recorded.

4.3 Purpose

This policy, for managing records at Swanwick Primary School has been drawn up in conformity with legislation, regulations affecting schools and best practice as promoted by the Information and Records Management Society of Great Britain.

This policy sets out guidelines for recording, managing, storing and the disposal of data, whether they are held on paper or electronically (including online), in order to assist staff, and the school, to comply with the **General Data Protection Regulation (EU) 2016/679 (GDPR) including as adopted by the United Kingdom as a result of its exit from the European Union (“UK GDPR”)**, Data Protection Act 2018 and the Freedom of Information Act 2000. It should be read and used in conjunction with all of our related policies.

It is expected that;

- All information held by schools needs to be justifiable, by reference, to its purpose.
- Schools must be transparent and accountable as to what data they hold.
- Schools must understand and explain the reasons why they hold data.
- Schools must be able to respond to Subject Access Requests.

- Schools must be able to amend, delete or transfer data promptly upon any justified request.
- Schools must be able to audit how personal data was collected and when and why.
- Schools must hold sensitive data securely, accessed only by those with reason to view it and possess a policy as to why it is needed.

4.4 Disposal of Data

Article 5(e) of the GDPR states that personal data should be ‘kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes... in order to safeguard the rights and freedoms of the data subject (‘storage limitation’).

Not all data needs to be destroyed. The school should determine whether records are to be selected for permanent preservation, or for destruction or to be transferred into a different format.

When information is no longer required, it should be disposed of. For confidential, sensitive or personal information, to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed.

Skips, ‘regular’ waste disposal and ribbon shredders are not secure.

Paper records should be cross-shredded, incinerated, or pulped.

CDs/DVDs/discs should be cut into pieces. Hard copy images, AV recordings and hard disks should be dismantled and destroyed. Where third party disposal companies are employed, a certificate of destruction must be obtained. Staff working for external provider should have been trained in the handling and destruction of confidential data.

If the school receives a request for records that have not yet been destroyed, even if they should have been destroyed, that record must still be made available to the requestor.

The Freedom of Information Act 2000 requires the school to maintain a list of all records that have been destroyed and who authorised their destruction. This record should be retained for 15 years. The appropriate members of staff (Data Lead) should record:

- File reference and/or unique identifier
- File title or brief description of contents
- Number of files
- Name of the authorising officer

An example is contained in Annex A.

4.5 Transfer of Records to Archives

A school archive is different from official school records. A school archive preserves data where there is a legitimate interest in holding that information e.g. to commemorate a significant event in the life of the school. It can take on many characteristics and serve many purposes--but it neither compliments nor replaces the official record-keeping systems.

Where records have been identified as being worthy of permanent preservation, due to their historical or social value, they may be retained on site or transferred to the Local Authority Record Office ([see local guidance Find an archive | The National Archives](#)).

Where the school decides to maintain an onsite archive, the school should consult with their Data Protection Officer to implement the following steps:

- Establish what information needs to be archived
- Select someone to serve as the archivist. This may be an additional function within an established role, to work alongside both the Data Protection Officer and Data Lead officer (where applicable).
- Select a physical location to house the collection, and determine what equipment and supplies are needed to accomplish the project for the first year and on a continuing basis e.g. safe storage, shelving
- Remember that archives can include electronic data e.g. schools may have digital photographs which are no longer displayed on their website or social media pages. Consider not only holding and cataloguing this data in a secure driver, but making potential requestors aware of its presence, through a dedicated website.
- Come to an agreement with the Local Authority Record Office, in order for the collected materials could be turned over if the school archives should be discontinued.

4.6 Transfer of Records to other Media

Where lengthy retention periods have been allocated to records, schools should consider converting paper records to other media (e.g. digital or virtual, 'cloud' based). The lifespan of the media, and the ability to migrate data, should be documented in a Digital Continuity Policy. [A scanning risk assessment is recommended to ensure the procedure is adequate.](#)

4.7 Transfer of Records to other Settings & 'Last Known School'

When a child leaves the school, all pupil records should be transferred in a secure manner, to the child's new school. If the records contain sensitive information (e.g. Child Protection records), proof of receipt must be obtained and logged by the school's Data Lead. All data held by the school should then be deleted, including all paper records and data stored electronically. A record should be kept for tracking and auditing purposes only.

[Responsibility for maintaining the pupil record passes to the 'last known school'.](#)

[The school is the final or last known school if:](#)

- [secondary phase and the pupil left at 16 years old or for post-16 or independent education, or;](#)
- [at any point the pupil left for elective home education, they are missing from education, or have left the UK, or have died.](#)

[The Pupil Record should be retained as a whole for 25 years from the date of birth of the pupil, after which time, if no longer required, it can be deleted or destroyed.](#)

[SEN and other support service records can be retained for a longer period of 31 years to enable defence in a "failure to provide a sufficient education" case.](#)

[If a school wishes to retain data for analysis or statistical purposes, it should be done in an anonymised fashion.](#)

4.8 Responsibility and Monitoring

The Head Teacher and/or Data Lead, hold primary and day to day responsibility, for implementing this policy. The Data Protection Officer, in conjunction with the school, is responsible for monitoring its use and effectiveness and resolving any queries with regards the interpretation of the policy.

All permissions to access data are granted by the Head Teacher and recorded in the member of staff's personnel file.

All teaching and office staff are given training and guidance on accessing and managing school records, to ensure compliance with the time scales laid out under the retention schedule. All members of staff, with access to records, are expected to;

- Manage their current record keeping systems using the Retention Policy.
- Only dispose of records in accordance with the requirements outlined in this policy, if authorised to do so.
- Ensure that any proposed divergence from the records retention schedule and disposal policies is authorised **and documented** by the Head Teacher.

This policy does not form part of any employee's contract of employment and is not intended to have a contractual effect. However, it does reflect the school's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the school but any changes will be notified to employees within one month of the date on which the change is intended to take effect. The school may also vary any parts of the procedure, including time limits, as appropriate.

4.9 Retention tables

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
1. Governing Body							
1.1	Instruments of Government including Articles of Association	Paper Copy – Governors Info file – SBM Office Electronically – Governors Dropbox -	Clerk	Permanent	Closure of school	Common practice	These should be retained in the schools whilst the school is open and then to the Local Authority Record Office, when the school closes
1.2	Trusts and Endowments managed by the Governing Body	N/A	N/A?	Permanent	End of operational use	Common practice	These should be retained by the school, whilst the school is open and then to the Local Authority Record Office, should the school close

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
1.3	Scheme of delegation and terms of reference for committees	School secure O Drive – Governors Electronically – Governors Dropbox		Until superseded or whilst relevant (schools may wish to retain these records for reference purposes in case decisions need to be justified)	Expiration of terms	Common practice	If the school is unable to store these, they should be offered to the Local Authority Office
1.4	Governor’s Code of Conduct			One copy of each version should be kept for the life of the school.		Common practice	
1.5	Records relating to the election of chair and vice chair			Once the designation has been recorded in the minutes, the records relating to the election can be destroyed	Date of appointment	Common practice	Secure disposal
1.6	Appointment of a clerk to the governing body			Date of appointment + 6 years	Date of appointment	Common practice	Secure disposal
1.7	Records relating to the appointment of parent and staff governors, not appointed by the governors			Date of election + 6 months	Date of election	Common practice	Secure disposal
1.8	Records relating to the appointment of co-opted governors			Provided that the decision has been recorded in the minutes, the records relating to the appointment can be	Date of appointment	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children – in this case, retain for 25 years)			
1.9	Application forms – successful candidates			End of year in office + 1 year	End of period of office	Common practice	Secure disposal
1.10	Appointment documentation: <ul style="list-style-type: none"> • Terms of office of serving governors, including evidence of appointment • Governor declaration against disqualification criteria • Register of business interests • Training required, and received, by governors • Induction programme for new governors • DBS checks carried out on the clerk and members of the governing body • Governor personnel files. 			Date of appointment + 6 years	Date of appointment	Common practice	Secure disposal
1.11	Annual Reports			Date of the report + 10 years	End of the calendar year that the record was created in	Education (Governor's Annual Reports) (England) (Amendment)	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
						Regulations 2002	
1.12	Annual reports required by the Department of Education			Date of report + 10 years	Date of report	Common practice	Secure disposal
1.13	Meetings schedule			Current year	Date of meeting	Common practice	Secure disposal
1.14	Agendas for Governing Body meetings			One copy to be retained with the master set of minutes - all other copies can be disposed of	Conclusion of meeting	Common practice	Secure disposal
1.15	Register of attendance at Full Governing Board meetings			Date of meeting + 6 years	Date of meeting	Common practice	Secure disposal
1.16	Minutes of Governing Body meetings (Principal Set signed)			Permanent to be held at school	Date of meeting	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office
1.17	Action plans created and administered by the Governing Body			Until superseded or whilst relevant	Expiration of action plan	Common practice	Secure disposal
1.18	Reports presented to the Governing Body			Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports	Date of report	Common practice	Secure disposal or retain with the signed set of minutes

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				should be kept permanently			
1.19	Policy documents created and/or administered by the Governing Body			A copy of each policy should create a time line of policy development OR a robust version control which allows a snapshot of a policy at any given date. Keep all policies relating to safeguarding and child protection or other pupil related issues, such as exclusion, until the IICSA has issued its recommendations.	Expiration of the policy	Common practice	Secure disposal
1.20	Records relating to complaints made to, and investigated by the Governing Body and/or Head Teacher			Date of the resolution of the complaint + a minimum of 6 years. If negligence is involved then current year + 5 years. If child protection or safeguarding issues are involved then current year + 40 years	Resolution of complaint		

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
1.21	Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies			For the life of the organisation	Date proposal accepted or declined	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office
1.22	Records relating to Governor Monitoring Visits			Date of visit + 3 years	Date of visit	Common practice	Secure disposal
1.23	Meeting papers relating to the annual parents' meeting			Date of the meeting + a minimum of 6 years	Date of meeting	Common practice	Secure disposal
2. Headteacher & Senior Management/Leadership Team							
2.1	Log books of activity in the school maintained by the Head Teacher (Legislation no longer requires the completion of a school log book)			Date of the last entry in the log book + a minimum of 6 years and then review	Date of last entry in the log book	Common practice	These could be of permanent historical value and should be offered to the Local Authority Office
2.2	Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies			Date of the meeting + 3 years	Date of the meeting	Common practice	Secure disposal
2.3	Records created by the Head Teacher, deputy Head Teachers, Heads of Year and			Current academic year + 6 years then review	Date of record	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
	other members of staff with administrative responsibilities						
2.4	Correspondence created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities – not principally concerning pupils, staff or complaints. In those cases, correspondence should be immediately transferred to the relevant file.	Email (see email retention period)		Date of correspondence + 3 years and then review	Date of correspondence	Common practice	Secure disposal
2.5	Professional Development Plans			Life of plan + 6 years	Date plan commences	Common practice	Secure disposal
2.6	School Development Plans			Life of plan + 3 years	Date plan commences	Common practice	Secure disposal
3. Admissions							
3.1	All records relating to the creation and implementation of the School's Admission's Policy			Life of the policy + 7 years then review		The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012	Secure disposal
3.2	Admissions – if the admission is successful Proofs of address, supplied by parents, as part of the admissions process Supplementary information forms to include; religion, medical conditions etc.			Date of admission + 1 year Added to the pupil file	Date of admission	and	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
3.3	Admissions – if the admission is unsuccessful (where no appeal is made)			Date of applied for admission + 1 year	Date of applied for admission	School Admissions	Secure disposal
3.4	Admissions – if the admission is unsuccessful (where an appeal is made)			Resolution of case + 1 year	Resolution of case	Code Statutory Guidance 2021	Secure disposal
3.5	Register of Admissions			3 years after the date on which the last entry was made	Last entry in register	The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012	Transfer to the Local Authority Record Office
3.6	Proofs of address, supplied by parents, as part of the admissions process			Current year + 1 year	Date of admission	and School Admissions Code Statutory Guidance 2021	Secure disposal
3.7	Admissions (Secondary School – Casual)			Current year + 1 year	Date of admission	The Limitation Act 1980	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
3.8	Supplementary information forms to include; religion, medical conditions etc. For successful admissions			This information should be added to the pupil file	Date of admission/annual data check	The Limitation Act 1980	Secure disposal
3.9	Supplementary information forms to include; religion, medical conditions etc. For unsuccessful admissions			Until the appeal process is completed	Date of admission		Secure disposal
4. Operational Administration							
4.1	Records relating to the creation and publication of the school brochures or prospectus			Current year + 3 years	Expiration of current publication	Common practice	Transfer to the Local Authority Record Office
4.2	Records relating to the creation and distribution of circulars to staff, parents or pupils			Current year + 1 year	Date of record	Common practice	Transfer to the Local Authority Record Office
4.3	Newsletters and other items with short operational use			Current year + 1 year	Date of record	Common practice	Transfer to the Local Authority Record Office
4.4	Visitor management systems (including electronic systems, visitors' books and signing in sheets)			Current year + 6 years then review	End of calendar year	Common practice	Secure disposal
4.5	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupil Associations			Current year + 6 years then review	Date of record	Common practice	Secure disposal
4.6	Pupil & Family Privacy Notice which is made available via the school website as part of UK GDPR compliance			Date of issue + 6 years	When policy is superseded	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
4.7	Consents relating to school activities as part of UK GDPR compliance (e.g. consent to be sent circulars or mailings)			This information should be added to the pupil file	Date of admission	Common practice	Secure disposal
4.8	Security breach logs			Date of issue + 25 years (pupils) and 6 years (staff)	Date of implementation	Common practice	Secure disposal
4.9	Digital Continuity Plans			Date of issue + 6 years	Expiration of current plan	Common practice	Secure disposal
5. School Communications							
5.1	School emails containing personal data – inbox, sent items, deleted items			School to determine and document here	In line with guidance in Acceptable use policy	Common practice	Full deletion
5.2	Social media platforms	list here		School to determine and document here	End of academic yr	Common practice	Posts deleted
5.3	Website – pictures / news stories				End of academic yr	Common practice	Posts deleted
6. HR – Recruitment							
Information containing allegations of sexual abuse must be preserved – IICSA. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2021 para399)							
6.1	All records leading up to the appointment of a new Head Teacher			Unsuccessful attempts - date of appointment + 6 months. Successful attempts - add to the staff personnel file and	Date of appointment	Common practice. Right to work - Immigration, Asylum and	Secure disposal (subject to IICSA)

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				retain until the end of the appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years		Nationality Act 2006	
6.2	All records leading up to the appointment of a new member of staff (successful candidate)			Date of appointment + 6 years. This information should be added to the staff personnel file	Date of appointment	Common practice. Right to work - Immigration, Asylum and Nationality Act 2006	Secure disposal (subject to IICSA)
6.3	All records leading up to the appointment of a new member of staff (unsuccessful candidate)			Date of interview + 12 months	Date of interview	Common practice	Secure disposal
6.4	Pre-employment vetting information of successful candidates			Application forms, references and other documents – for the duration of their employment + 6 years. Note there is no requirement to keep a copy of DBS once the details have been entered into the Single Central Record	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2021	Secure disposal (subject to IICSA)
6.5	Proofs of identity			To be kept only as proof of right to work.	Date of receipt	Right to work - Immigration, Asylum and	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				Not kept for any other purpose. These documents should be added to the personal folder. Home Office requires that the documents are kept until termination of employment plus not less than 2 years.		Nationality Act 2006. KCSIE 2021	(subject to IICSA)
6.6	Pre-employment vetting information of successful candidates – for the purposes of ensuring school staff are adequately qualified			To be added to the member of staff's personal folder	Date of receipt	KCSIE 2021	Secure disposal (subject to IICSA)
7. HR – Operational Staff Management Information containing allegations of sexual abuse must be preserved – IICSA. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2021 para399)							
7.1	Staff Personnel File			Termination of employment + 6 years	Date of appointment	Limitation Act 1980	Secure disposal (subject to IICSA)
7.2	Timesheets			Current year + 6 years	Date of appointment	Common practice	Secure disposal (subject to IICSA)
7.3	Annual appraisal/assessment records			Current year + 6 years	End of calendar year that the	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
					record was created in		(subject to IICSA)
7.4	Sickness absence monitoring			Sickness records are categorised as 'sensitive data'. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records. Current practice recommends that sickness records should be held for the current year + 3 years.	Date of absence	Common practice & Statutory Sick Pay Act 1994	Secure disposal (subject to IICSA)
7.5	Staff training records			Keep on personnel file	Date of appointment	Common practice (unless dictated by a professional body)	Secure disposal (subject to IICSA)
7.6	Annual leave records			6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year	End of relevant tax year	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
7.7	Working Time Regulations: · Opt out forms · Records of compliance with WTR			2 years from the date on which they were entered into 2 years after the relevant period	End of relevant tax year	Common practice	Secure disposal
7.8	Maternity/Adoption/Paternity Leave records			Current year + 3 years	End of relevant tax year	Common practice	Secure disposal
7.9	Consents for the processing of personal and sensitive data			For as long as the data is being processed and up to 6 years afterwards	End of employment	Common practice	Secure disposal
7.10	Staff policy acknowledgement			Life of the policy + 3 years	Implementation of the policy	Common practice (unless otherwise dictated eg KCSIE, H&SWA)	Secure disposal (subject to IICSA)
8. HR - Management of Disciplinary and Grievance Processes Information containing allegations of sexual abuse must be preserved – IICSA. Unless allegations are found to be malicious or false, other records pertaining to an accused person should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. (KCSIE 2021 para399)							
8.1	Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded			Until the person's normal retirement age or 10 years from the date of allegation, whichever is longer, then review. NB – allegations that are	Date of referral	KCSIE 2021	Secure disposal (subject to IICSA)

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				found to be malicious should be removed from personnel files, from the date they are proven to be unfounded.			
8.2	Disciplinary proceedings: Verbal warning			Date of warning + 6 months	Date of warning	KCSIE 2021	Secure disposal (subject to IICSA)
8.3	Disciplinary proceedings: Written warning (level 1)			Date of warning + 6 months	Date of warning	KCSIE 2021	Secure disposal (subject to IICSA)
8.3	Disciplinary proceedings: Written warning (level 2)			Date of warning + 12 months	Date of warning	KCSIE 2021	Secure disposal (subject to IICSA)
8.4	Disciplinary proceedings: Final Warning			Date of warning + 18 months	Date of warning	KCSIE 2021	Secure disposal (subject to IICSA)
8.5	Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings)			If the incident is child protection related then see above; otherwise dispose following the conclusion of the case	Date of resolution	KCSIE 2021	Secure disposal (subject to IICSA)
N.B. 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.							

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
<p>Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct at a later date, and then defend themselves by denying they would undertake such an action, reference to the earlier proceedings may show that they should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that they had e.g. "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim. Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.</p>							
9. HR – Payroll & Pensions							
9.1	Maternity Pay Records			Current year + 3 years	End of the financial year in which the maternity pay period ends	Statutory Maternity Pay (General) Regulations 1986	Secure disposal
9.2	Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity			Current year + 6 years	End of the financial year	Retirement Benefits Schemes (Information Powers) Regulations 1995	Secure disposal
9.3	Batches, Bonus Sheets, Car Loans, Car Mileage Output, Insurance, Members Allowance Register, National Insurance (Schedule of payments), Part Time Fee claims, Payroll (gross/net, weekly or monthly), Payroll Reports, Payslips (copies), Pension Payroll, Superannuation adjustments and reports			Current year + 6 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
9.4	Bonus sheets, Car Allowance claims, Overtime			Current year + 3 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal
9.5	Income Tax P60, Personal bank details. Tax Forms P6/P11/P11D/P35/P45/P46/P48			Current year + 6 years	End of the financial year	Common practice	Secure disposal
9.6	Absence records, Sickness records, Staff returns, Time Sheets/Clock Cards/Flexitime			Current year + 3 years	End of the financial year	Common practice	Secure disposal
9.7	Statutory Sick Pay			Current year + 3 years	End of the financial year	Common practice	Secure disposal
10. Health and Safety							
10.1	Accessibility Plans			Current year + 6 years	End of the calendar year that the records was created in	Equality Act 2010	Secure disposal
10.2	Health and Safety Policy Statements			Life of the policy + 3 years	Implementation of the policy	Common practice	Secure disposal
10.3	Health and Safety Risk Assessments			Life of the assessment + 3 years	Implementation of the assessment	Common practice	Secure disposal
10.4	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm): Adults			Retain for 7 years	Date of incident	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
10.5	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm): Children			Retain for 25 years	Date of birth	Common practice	Secure disposal
10.6	Minor incidents (non reportable) accident book			Retain for 3 years	End of academic year	Common practice	Secure disposal
10.7	Control of Substances Hazardous to Health (COSHH)			Current year + 40 years	Last action on file	The Control of Substances Hazardous to Health Regulations 2002	Secure disposal
10.8	Process of monitoring areas where employees/pupils are likely to come into contact with asbestos			Last action + 40 years	Last action on file	The Control of Asbestos at Work Health Regulations 2012	Secure disposal
10.9	Process of monitoring areas where employees/pupils are likely to come into contact with radiation			Last action + 50 years	Last action on file	The Ionising Radiations Regulation 2017	Secure disposal
10.10	Fire Precautions log books			Current year + 3 years	End of calendar year	Common practice	Secure disposal
11. Financial Management – Risk & Insurance, Asset Management							
11.1	Employer's Liability Insurance Certificate			Date of closure + 40 years	Closure of school	Common practice	Transfer to Local Record Office
11.2	Inventories of furniture and equipment			Current year + 6 years	End of calendar year	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
11.3	Burglary, theft and vandalism report forms			Current year + 6 years	End of calendar year	Common practice	Secure disposal
12. Financial Management – Accounts and Statements including Budget Management							
12.1	Annual accounts			Current year + 6 years	End of financial year	Common practice	Transfer to Local Record Office
12.2	Loans and grants managed by the school			Date of last payment on the loan + 12 years then review	End of financial year	Standard financial regulations	Secure disposal
12.3	Student Grant applications			Current year + 3 years	End of financial year	Standard financial regulations	Secure disposal
12.4	All records relating to the creation and managements of budgets, including the Annual Budget statement, and background papers			Current financial year + 3 years	End of financial year	Common practice	Secure disposal
12.5	Invoices, receipts, order books and requisitions, delivery notices			Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.6	Records relating to the collection and banking of monies			Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.7	Records relating to the identification and collection of debt			Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.8	Pupil Premium Fund records			Date pupil leaves the provision + 6 years	End of financial year	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
13. Financial Management – Contract Management							
13.1	All records relating to the management of contracts under seal			Current year + 12 years	End of contract	The Limitation Act 1980	Secure disposal
13.2	All records relating to the management of contracts under signature			Current year + 6 years	End of contract	The Limitation Act 1980	Secure disposal
13.3	Records relating to the monitoring of contracts			Current year + 6 or 12 years	End of calendar year	The Limitation Act 1980	Secure disposal
14. Financial Management – School Fund							
14.1	School Fund: <ul style="list-style-type: none"> • cheque books and paying in books • ledger • invoices • receipts • bank statements • journey books 			Current year + 6 years	End of use	Financial Services Act 2012, HMRC regulations Companies Act 2006	Secure disposal
15. Financial Management – School Meals							
15.1	Free School Meals Register			Current year + 6 years	End of calendar year	Common practice	Secure disposal
15.2	School Meals Register			Current year + 3 years	End of calendar year	Common practice	Secure disposal
153	School Meals Summary Sheets			Current year + 3 years	End of calendar year	Common practice	Secure disposal
16. Property Management							
16.1	Title deeds of properties belonging to the school			Permanent. These should follow the	Archive upon closure	Common practice	Transfer to Local

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				property unless the property has been registered with the Land Registry			Authority Record Office
16.2	All records relating to the maintenance of the school, carried out by contractors			Current financial year + 6 years	End of financial year that the record was created in	Common practice	Secure disposal
16.3	All records relating to the maintenance of the school, carried out by school employees, including maintenance log book			Current calendar year + 6 years	End of calendar year that the record was created in	Common practice	Secure disposal
16.4	Plans of property belonging to the school			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.	Transfer of asset	Common practice	Transfer to Local Authority Record Office
16.5	Leases of property leased by, or to, the school			Expiry of lease + 6 years	Commencement of lease	Common practice	Secure disposal
16.6	Records relating to the letting of school premises			Current financial year + 6 years	End of financial year that the record was created in	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
17. Pupil Education Record (see s2 Education Record (Pupil Information) Regulations 2005). SEN is dealt with in section 20							
17.1	Primary			Retain whilst the child remains at the primary school	Date pupil changes school	Education (Pupil Information) (England) Regulations 2005	The file should follow the pupil when they leave the primary school (see 4.7 Last School!)
17.2	Secondary			Date of birth of the pupil + 25 years	Pupil's date of birth	The Limitation Act 1980	Secure disposal (subject to IICSA)
17.3	Examination Results - Pupil Copies Public			This information should be added to the pupil file	Date of examination	Common practice	All uncollected certificates to be returned to the examination board, after reasonable attempts to contact the pupil have failed
17.4	Examination Results - Pupil Copies Internal			This information should be added to the pupil file	Date of examination	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
18. Child Protection (CP) / Safeguarding Records							
18.1	Child Protection Information - Primary			CP files must be transferred to the new school as soon as possible (5 days), to maintain continuity. Ensure secure transit, and a confirmation of receipt should be obtained. The CP file should be transferred separately from the main pupil file.	Date pupil changes school (Where a child is removed from the roll to be educated at home/missing from education, see below)	KCSIE para 112 & Annex C	Transferred to new or Secondary school. Duplicates must be securely disposed of.
18.2	Child Protection (CP) Information – Secondary			Where a pupil moves between secondary schools – treat as primary above. Otherwise, retain for 25 years from the child’s date of birth, then review. LA Safeguarding Services advise that the principal copy of this information will be held by the LA	Pupil’s date of birth (Where a child is removed from the roll to be educated at home/missing from education, see below)	KCSIE para 112 & Annex C Common Practice	Secure disposal (subject to IICSA)

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
18.3	Child Protection (CP) Information – Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths.			Retain for 25 years from the child’s date of birth, then review. LA Safeguarding Services advise that the principal copy of this information will be held by the LA	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Coordinator for Missing Children and Secure disposal (subject to IICSA)
18.4	Child Protection (CP) Information – Child is removed from the roll and is Elective Home Educated			Retain for 25 years from the child’s date of birth, then review. LA Safeguarding Services advise that the principal copy of this information will be held by the LA	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Elective Home Education Coordinator and Secure disposal (subject to IICSA)
19. Attendance							
19.1	Attendance Registers			Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made	Last entry in register	DfE School attendance Guidance for maintained schools, academies, independent schools and	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
						local authorities August 2020 para 19	
19.2	Correspondence relating to authorized absence			Date of absence + 2 years	Date of absence	DfE School attendance Guidance for maintained schools, academies, independent schools and local authorities August 2020	Secure disposal
20. Special Educational Needs (SEN)							
20.1	SEN files, reviews and Individual Education Plans – Primary			Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School
20.2	SEN files, reviews and Individual Education Plans – Secondary			Date of birth of pupil + 35 years (This period is recommended by LA)	Pupil's date of birth	Special Educational Needs and Disability Act 2001 & Children and Families Act 2014	Secure disposal (subject to IICSA)

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
20.3	Statement / Education Health Care Plan (EHCP) under Section 324 of the Education Act 1996 and any amendments made to the plan			Date of birth of pupil + 25 years	Pupil's date of birth	Special Educational Needs and Disability Act 2001, Children and Families Act 2014 & The Limitation Act 1980	Secure disposal (subject to IICSA)
21. Curriculum Management							
21.1	Curriculum returns			Current year + 3 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.2	Curriculum development			Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.3	Examination Results (School's copy)			Current year + 6 years	Date of examination	Common practice	Secure disposal
21.4	SATs Results			The SATS result should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the ages of 25 years. The school may wish to keep a	Date that results are released	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				composite record of all the whole year SATS results. These could be kept for the current year + 6 years to allow suitable comparison			
21.5	SATs Examination papers			The examination papers should be kept until any appeals/validation process is complete	Date of examination	Common practice	Secure disposal
21.6	Published Admission Number (PAN) Reports			Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.7	Value Added and Contextual Data			Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.8	Self-Evaluation Forms			Current year + 6 years	Date of completion	Common practice	Secure disposal
21.9	Internal Moderation			Academic year + 1 academic year	Date of commencement	Common practice	Secure disposal
21.10	External Moderation			Until superseded	Date of commencement	Common practice	Secure disposal
22. Implementation of Curriculum							
22.1	Schemes of Work			Current year + 1 year	End of the academic year	Common practice	Review these records at the end of

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
					that the record was created in		each year and allocate a further retention period or secure disposal
22.2	Timetable			Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.3	Class Record books, mark books, homework records (eg teacher spreadsheets etc)			Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.4	Pupil work			Where possible, pupils' work should be returned to the pupil at the end of the academic year. If this is not, currently, the school's policy then it should be retained for the current year +1	End of the academic year that the record was created in	Common practice	Secure disposal
22.5	Online learning platforms		Teacher responsible for each platform	As above. Work should be cleared from platforms at the end of the following academic year	End of the academic year that the record was created in	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
22.6	Teacher diaries & Notebooks			Contents should be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. Destroyed within 3 months.	Expiration of diary. Completion of notebook	Common practice	Secure disposal
23. Extra Curriculum Management							
23.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Primary schools) where there has not been a Major Incident <small>(Records created might include risk assessments)</small>			Date of visit + 14 years	Date of visit	The Health and Safety at Work Act 1974	Secure disposal
23.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Secondary schools) where there has not been a Major Incident			Date of visit + 10 years	Date of visit	The Health and Safety at Work Act 1974	Secure disposal
23.3	Parental consent forms for school trips where there has been no Major Incident			No retention is required		Common practice	Secure disposal
23.4	Records created by schools to obtain approval for to run an Educational Visit outside the Classroom, where there has been a Major Incident <small>(Records created might include risk assessments)</small>			Retain for 25 years from the date of birth of the pupil/s involved in the incident	Pupil's DOB	The Limitation Act 1980	Secure disposal
23.5	Parental consent forms for school trips, where there has been a Major Incident			Retain for 25 years from the date of birth of the pupil/s involved in the incident.	Pupil's DOB	The Limitation Act 1980	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils			
24. Family Liaison / Early Help / Alternative Provision							
24.1	Day books			Current year + 2 years then review	End of the calendar year that the record was created in	Common practice	Secure disposal
24.2	Reports for outside agencies – where the report has been included on the agency case file			Whilst the child is attending school and then destroy	Date of completion of report	Common practice	Secure disposal (subject to IICSA)
24.3	Referral forms			While the referral is current	Date of completion of form	Common practice	Secure disposal (subject to IICSA)
24.5	Contact data sheets and database entries			Current year then review – if contact is no longer active then destroy	End of the calendar year that the record was created in	Common practice	Secure disposal (subject to IICSA)
24.6	Group registers			Current year + 2 years	Last entry in register	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
25. Local Authority							
25.1	Secondary Transfer sheets			Current year + 2 years	Year of transfer	Common practice	Secure disposal
25.2	Attendance Returns			Current year + 1 year	End of the calendar year that the record was created in	Common practice	Secure disposal
25.3	School Census Returns			Current year + 5 years	Completion of return	Common practice	Secure disposal
25.4	Circulars and other information sent from the Local Authority			Operational use	Date of issue	Common practice	Secure disposal
26. Central Government							
26.1	OFSTED reports and papers			Retain whilst current	Date new report is issued	Common practice	Transfer to Local Authority Record Office
26.2	Returns made to central government, including Schools financial value standard (SFVS) and assurance statement			Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
26.3	Circulars and other information sent from central government			Operational use	Date of issue	Common practice	Secure disposal
27. Parent / Alumni Associations							
27.1	Records relating to the creation and management of PTA and Old Pupil Associations			Current year + 6 years	Date of foundation	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
28. Recordings (meetings, calls, online lessons) – schools, please adapt this section to suit ensuring it is consistent with the Acceptable Use policy section 7.8							
28.1	Incoming & Outgoing calls					Common practice	
28.2	Meetings					Common practice	
28.3	Online lessons					Common practice	
28.4	Staff training					Common practice	
29. Administration of Medication							
29.1	Non-prescription medicines and remedies inc painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers			Current year + 1 year	Date of administration	Limitation Act 1980	Secure disposal
29.2	All other administration of medication not covered by 30.1 including, but not limited to: peg feeding, injections, treatments for serious conditions such as diabetes, ADHD or depression			Date of birth of the pupil + 25 years	Date of administration	Limitation Act 1980	Secure disposal

Appendix A – List of School Records and Data safely destroyed

Specimen Checklist for Annual Review of School Records and Safe Data Destruction

The following is an example of how to create a destruction record – this could be a spreadsheet.

Reference Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of Destruction	Confirm; (i) Safely Destroyed (ii) In accordance with Data Retention Guidelines Yes/No	Name of Authorising Officer
1.	School invoices	Copies of purchase invoices dated 2011/12	Folders marked 'Purchase Invoices 2011/13' 1-3	3 Folders	Cross shredded	Yes	J Smith (Head)

[School Name]

Data Protection Framework: 4. Record Retention and Deletion Policy

