St Nicholas' Primary and Nursery School

Data Retention Policy

September 2025 Review date September 2028

Date agreed by PPR committee	**March 2026**
Date to be reviewed *(maximum 36 months after date above)*	**Sept 2028**
Date adopted by Governing Body	**March 2026**
Governors Committee accountable for review	**PPR**
Staff member accountable for review	**Data Protection Lead**
Governor accountable for monitoring	**GDPR governor**

Introduction -

These retention guidelines have been transcribed from the IRMS's Record Management Toolkit for Schools and Academies to support in developing the data retention schedule.

These guidelines are up to the date on the day of publication.

The majority of the retention periods recommended by the IRMS (Information and Records Management Society) are guidelines rather than statutory requirements, unless there is a reference to statutory guidance or legislation. This means that if there is good reason for keeping information longer and you can justify it, if necessary, the UK's data protection legislation doesn't prevent you from doing this.

Please note, whilst transcribing this information we noticed that a number of the references to legislation under the Statutory Provision column were out of date. These have been checked and updated to the best of our ability but if you notice any errors, please let us know so we can rectify them.

Rationale

The school needs to create and maintain accurate records in order for it to function. The policy for managing records at St. Nicholas' Primary and Nursery School has been drawn up in conformity with legislation, regulations affecting schools and best practice as publicised by the Information and Records Management Society (IRMS).

Aims

The objectives of this Data Retention Policy are to ensure that St. Nicholas' Primary and Nursery School (the "School") and its governors and employees are informed about, and comply with, their obligations under the General Data Protection Regulation ("the GDPR") and other Data Protection legislation.

The School is a OCC maintained school and is the Data Controller for all the Personal Data processed by the School.

This policy sets out guidelines for recording, managing, storing and disposing of data, whether they are held on paper or electronically in order to assist staff, and the School, to comply with the UK's General Data Protection Regulation and the Freedom of Information Act 2000 (FOIA). It should be read and used in conjunction with the following school policies and documents:

▫ Data Protection Policy

▫ Privacy Notices

▫ Information Asset Register

Members of staff are expected to manage their current record keeping systems using the Retention Policy and to take into account the different kinds of retention periods when they are creating new record keeping systems.

Benefits of the Retention Policy

There are a number of benefits which arise from the use of a Retention Policy:

▫ The school is not maintaining and storing information unnecessarily and therefore meeting the requirements of UK data protection legislation.

▫ Members of staff can be confident about destroying information at the appropriate time and in a secure manner.

▫ Information which is subject to Freedom of Information and GDPR legislation will be available when required.

▫ The school is not maintaining and storing information unnecessarily.

Privacy notices

Parents accept a place for their child at St. Nicholas' Primary and Nursery School in the knowledge that data about pupils and their parents will be collected on admission to allow for the efficient operation of the school. This data will be updated regularly and stored/ processed in order with the GDPR rules for good information handling.

More information about how we process personal data and what your rights are in relation to this, can be found in our privacy notices which can be found on our school website: https://stnicholasprimaryschool.org.uk

Staff Induction

All new teaching and office staff will be given training on accessing and managing school records to ensure compliance with these retention time scales. As a guiding principle, GDPR

requires that personal data is only retained for as long as necessary - that is, necessary for the specific lawful purpose (or purposes) it was acquired.

Any information which is held is to be kept in accordance with the schools Data Protection Policy.

Retention Periods

The IRMS (Information and Records Management Society) retention schedule will be referred to and used. This is the basis of our retention schedule (appendix 1). These retention periods for this data are established by the school using the IRMS guidance provided by the DPO for schools. The School is subscribed to IRMS to ensure that the school is alerted to any updates as they occur and will adapt the schedule as necessary. An additional table is in appendix 2. This is for any specific data that we retain in school.

Disposal of Data

When information is no longer required, it can 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 and 'regular' waste disposal are not considered to be secure.

Paper records should be shredded using a cross-cutting shredder or placed in the secure waste bag in the school office. CDs / DVDs should be cut into pieces. Hard-copy images, AV recordings and hard disks should be dismantled and destroyed.

We may also use a third party to safely dispose of records on the school's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.

To use this guide online, please press control and then click on the relevant heading listed under the index as this will take you directly to that section. To return to the index, click on INDEX which is in yellow and can be found on the far left of each heading.

All notes can be found on the last two pages of this document. Notes are indicated on the document by an asterisk and number, therefore please ensure that you read these. Notes can be accessed electronically by pressing control and clicking on the relevant note number. Click on INDEX at the bottom of each notes page to return to this page.

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1. CONTRACTS						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
1.1	All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years, or end of contract + 12 years – whichever is longer.	Secure Disposal	
1.2	All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years or end of contract + 6 years – whichever is longer.	Secure Disposal	
1.3	Records relating to the management of contract with external providers	No		End of contract + 6 years or date of last payment on contract + 6 years – whichever is longer	Secure Disposal	
1.4	Records relating to the monitoring of contracts	No		End of the contract or until the final payment has been made – whichever is longer.	Secure Disposal	
1.5	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years – this may vary depending on type of maintenance. Anything relating to major alterations must be retained in the H & S file and should be passed on if the building is sold or leased.	Secure Disposal	
1.6	All records relating to the maintenance of the school carried out by school employees, including maintenance logbooks	No		Life of equipment + 6 years. Alterations to wiring and major modifications must be entered into the H & S file.	Secure Disposal	
1.7	Records relating to the management of software licences	No		Expiration date of licence + 6 years.	Secure Disposal	
2. EDUCATION MANAGEMENT – Management Information						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
2.1	Published admission number reports (PAN)	Yes		Current year + 6 years	Secure Disposal	
2.2	Curriculum returns	No		Current year + 3 years	Secure Disposal	
2.3	Self-evaluation forms	Yes		Current year + 6 years	Secure Disposal	

2.4	Self-evaluation forms – external moderation	Yes	Until superseded		Secure Disposal	
2.5	Self-evaluation forms – internal moderation	Yes		Academic year + one academic year	Secure Disposal	
2.6	Value added and contextual data	Yes		Current year + 6 years	Secure Disposal	
3. EDUCATION MANAGEMENT – Policies and Frameworks						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
3.1	Complaints policy	No		Life of policy or policy superseded + 3 years. If major changes to policy are made, then an archive copy of previous policies to be retained	Secure Disposal	
3.2	Data protection policy	No		Life of policy or policy superseded + 3 years. If major changes to policy are made, then an archive copy of previous policies to be retained	Secure Disposal	
3.3	Freedom of information policy	No		Life of policy or policy superseded + 3 years. If major changes to policy are made, then an archive copy of previous policies to be retained	Secure Disposal	
3.4	Information security breach policy	No		Life of policy or policy superseded + 3 years. If major changes to policy are made, then an archive copy of previous policies to be retained	Secure Disposal	
3.5	Special education needs policy	No		Life of policy or policy superseded + 3 years. If major changes to policy are made, then an archive copy of previous policies to be retained	Secure Disposal	
3.6	Equality information and objectives (public sector equality duty). Statement for publication	No		Life of statement or date statement superseded + 3 years	Secure Disposal	
3.7	Risk and control framework	No		Life of framework or framework superseded + 3 years. If major changes are made to the framework, then an archive copy of previous policies should be retained	Secure Disposal	

3.8	Rules and bylaws	No		Life of rules or bylaws or rules or bylaws superseded + 3 years. If major changes are made to the rules of bylaws, then an archive copy of previous policies should be retained	Secure Disposal	

4. EDUCATION MANAGEMENT – Strategy						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
4.1	Strategic review	No		Life of the review or until review superseded + 3 years. If major changes are made to the review, then an archive copy of the previous review to be retained	Secure Disposal	
4.2	Strategic plan or school development plans	No		Life of plan or until plan superseded + 3 years. If major changes are made to the plan, then an archive copy of all previous plans to be retained	Secure Disposal	
4.3	Accessibility plan	No	Equality Act 2010	Life of plan or plan superseded + 3 years, then review. If major changes are made to the plan, then an archive copy of previous policies should be retained	Secure Disposal	

5. EXAMINATIONS						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
5.1	SATs records examination papers	Yes		The exam papers should be kept until any appeals/validation process is complete	Secure Disposal	
5.2	SATs records results	Yes		The results should be recorded on the pupil's educational file and retained until pupil reaches 25 years of age. Schools may wish to keep a composite record of all whole year SATs results, which could be kept for current year + 6 years to allow suitable comparison	Secure Disposal	

5.3	Exam results pupil copies - public	Yes		This information should be added to the pupil file	Schools should follow instructions of the exam board about disposing of uncollected certificates	
5.4	Exam results pupil copies – internal	Yes		This information should be added to the pupil file		
5.5	Exam results – school's copy	Yes		Current year + 6 years	Secure Disposal	
5.6	Management of examination registrations	Yes		The exam board will usually mandate how long these records need to be retained		
6. EXTRA CURRICULUM AND MISCELLANEOUS ACTIVITIES						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
6.1	Records created by schools in order to obtain approval to run an education visit outside the classroom – **primary schools**	No	Limitation Act 1980	Date of visit + 15 years	Secure Disposal	
6.2	Records created by schools in order to obtain approval to run an education visit outside the classroom – **secondary schools**	No	Limitation Act 1980	Date of visit + 15 years	Secure Disposal	
6.3	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip. (Although consent forms could be retained for date of birth + 25 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.)	Secure Disposal	
6.4	Parental permission slips for school trips where there has been a major incident	Yes	Limitation Act 1980	Date of birth of pupil involved in incident + 25 years or 15 years after the incident, whichever is longer. Permission slips for all pupils on the trip need to be retained to	Secure Disposal	

				show that the rules had been followed for all pupils		
6.5	Records relating to residential trips	Yes	Limitation Act 1980	Date of birth of youngest pupil involved + 25 years or, if there is a major incident, then date of incident + 15 years, whichever is longer	Secure Disposal	
7. FINANCE - Funding						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
7.1	Funding Agreement with Secretary of State and supplemental funding agreements [Where there is multi-Academy governance.]	No		Date of last payment of funding + 6 years	Secure Disposal	
7.2	Funding Agreement Termination of the funding agreement	No		Date of last payment of funding + 6 years*2	Secure Disposal	
7.3	Funding Records Capital Grant	No		Date of last payment of funding + 6 years	Secure Disposal	
7.4	Funding Records Earmarked Annual Grant (EAG)	No		Date of last payment of funding + 6 years	Secure Disposal	
7.5	Funding Records General Annual Grant (GAG)	No		Date of last payment of funding + 6 years	Secure Disposal	
7.6	Per pupil funding records	No		Date of last payment of funding + 6 years	Secure Disposal	
7.7	Funding records	No		Date of last payment of funding + 6 years*3	Secure Disposal	
7.8	Gift Aid and Tax Relief	Yes		Date of last payment of funding + 6 years	Secure Disposal	
7.9	Exclusions agreement	No		Date of last payment of funding + 6 years*4	Secure Disposal	
7.10	Records relating to loans	No		Date of last payment on loan + 6 years if the loan is under 10,000 or date of last payment on loan + 12 years if the loan is over 10,000	Secure Disposal	
7.11	Management of Endowment Funds	No		Life of the fund + 6 years	Secure Disposal	
7.12	Investment policies	No		Life of the investment + 6 years	Secure Disposal	
7.13	Pupil Premium Fund records	Yes		Date pupil leaves the provision + 6 years	Secure Disposal	
7.14	Student Grant applications	Yes		Current year + 3 years	Secure Disposal	

8. FINANCE - Operational						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
8.1	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	Secure Disposal	
8.2	Records relating to the collection and banking of monies	No		Current financial year + 6 years	Secure Disposal	
8.3	Records relating to the identification and collection of debt	Yes		Payment or write-off of debt + 6 years	Secure Disposal	
9. FINANCE – Risk Management and Insurance						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
9.1	Employers Liability Insurance Certificate	No	*See note 5	Year of issue + 40 years. Pass to the Local Authority if the school closes	Secure Disposal	
9.2	Insurance policies	No	*See note 5	Date the policy expires + 6 years except Public Liability insurance - day of issue + 40 years	Secure Disposal	
9.3	Records relating to the settlement of insurance claims	Yes		Date claim settled + 6 years	Secure Disposal	
9.4	Burglary, theft and vandalism report forms	Yes		Current year + 6 years	Secure Disposal	
9.5	Audit Committee and appointment of responsible officers	No		As long as necessary*6	Secure Disposal	
10. FINANCE – School Fund						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
10.1	School Fund Ledger	Yes		Current financial year + 6 years	Secure Disposal	
10.2	Whole of government accounts returns	No		Current financial year + 6 years	Secure Disposal	
10.3	School Fund Journey books	No		Current financial year + 6 years	Secure Disposal	
10.4	School Fund Invoices	No		Current financial year + 6 years	Secure Disposal	
10.5	School Fund Receipts	No		Current financial year + 6 years	Secure Disposal	

10.6	School Fund Bank statements	No		Current financial year + 6 years	Secure Disposal	
10.7	School Fund Cheque books	No		Current financial year + 1 year	Secure Disposal	
10.8	School Fund Paying in books	No		Current financial year + 6 years	Secure Disposal	
11. FINANCE – School Meals						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
11.1	Free school meals registers	Yes		Current financial year + 3 years	Secure Disposal	
11.2	School meals summary sheets	No		Current financial year + 6 years	Secure Disposal	
11.3	School meals registers	Yes		Current financial year + 3 years	Secure Disposal	
12. FINANCE – Strategic Finance						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
12.1	Annual accounts	No		Current year + 6 years	Secure Disposal	
12.2	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	
12.3	Statement of financial activities for the year	No		Current financial year + 6 years	Secure Disposal	
12.4	Financial Planning	No		Current financial year + 6 years	Secure Disposal	
12.5	Value for money statement	No		Current financial year + 6 years	Secure Disposal	
12.6	Borrowing powers	No		Until superseded + 6 years	Secure Disposal	
12.7	Charging and remissions policy	No		Date policy superseded + 3 years	Secure Disposal	
12.8	Independent Auditors report on regularity	No		Financial year report relates to + 6 years	Secure Disposal	
12.9	Independent Auditors report on financial statements	Yes		Financial year report relates to + 6 years	Secure Disposal	
12.10	Records relating to the management of VAT	No		Current financial year + 6 years		

13. GOVERNING BODIES - Activities						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
13.1	Records relating to Governor Monitoring Visits	Yes		Date of the visit + 3 years	Secure Disposal	
14. GOVERNING BODIES - Governance						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
14.1	Constitution	No	Companies Act 2006 section 355	Date constitution superseded + 10 years. It may be appropriate to retain one copy of each constitution for archival purposes*7	Secure Disposal	
14.2	Articles of Association	No		Life of the Academy	Secure Disposal	
14.3	Memorandum of Association	No		This can be disposed of once the Academy has been incorporated	Secure Disposal	
14.4	Memorandum of Understanding of Shared Governance among Schools	No		Life of Memorandum of Understanding + 6 years	Secure Disposal	
14.5	Governance Statement	No		Life of governance statement + 6 years. One copy of each iteration may need to be retained for archive purposes	Secure Disposal	
14.6	Written Scheme of Delegation	Yes	Companies Act 2006 section 355	Life of Written Scheme of Delegation + 10 years	Secure Disposal	
14.7	Special Resolutions to amend the Constitution	No	Companies Act 2006 section 355	Date constitution superseded + 10 years. It may be appropriate to retain one copy of each constitution for archival purposes*7		
14.8	Annual Report and Accounts	No	Companies Act 2006 section 355	Date of report + 10 years	Secure Disposal	
14.9	Annual Report Trustees Report	No	Companies Act 2006 section 355	Date of report + 10 years	Secure Disposal	
14.10	Annual Reports created under the requirements of the Education (Governors Annual Reports) (England) (Amendment) Regulations 2002	No		Date of report + 10 years	Secure Disposal	
14.11	Annual Return	No	Companies Act 2006 section 355	Date of report + 10 years	Secure Disposal	

14.12	Instruments of Government	No		For the life of the school	consult local archives before disposal	
14.13	Register of Directors	Yes	Companies Act 2006	Date Director resigns + 10 years*8	Secure Disposal	
14.14	Scheme of Delegation and Terms of Reference for Committees	No		Until superseded or whilst relevant [Schools may wish to retain these records for reference purposes in case decisions need to be justified]	these could be offered to the archives if appropriate	
14.15	Trusts and Endowments managed by the Governing Body	Yes		Life of the Trust or Endowment + 6 years	Secure Disposal	
14.16	Records relating to complaint dealt with by the Governing Body Annual Report and Accounts	Yes		Date complaint resolved + 3 years then review. If the complaint relates to negligence or safeguarding then date the complaint resolved + 15 years. If the complaint relates to child sexual abuse then the complaint resolved + 75 years (this retention period will be reviewed once the government and the ICO have issued guidance about the implementation of the IICSA recommendations)	Secure Disposal	
14.17	All records relating to the conversion of schools to Academy status	No	Companies Act 2006 section 355	For the life of the organisation	Consult local archives before disposal	
14.18	Policy documents created and administered by the Governing Body	No		Until superseded. The school should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the government and ICO have published guidance about the implementation of the recommendations made in the IICSA report	Secure Disposal	

15. GOVERNING BODIES – Governors, Directors and Trustees						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
15.1	Appointment of Trustees and Governors and Directors	Yes	Companies Act 2006 section 355	Life of appointment + 6 years	Secure Disposal	
15.2	Records relating to the election of parent and staff governors not appointed by the governors	Yes		Date of election + 6 months	Secure Disposal	
15.3	Records relating to the appointment of co-opted governors	Yes		Provided that the decision has been recorded in the minutes the records relating to the appointment can be 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.	Secure Disposal	
15.4	Records relating to the terms of office of serving governors including evidence of appointment	Yes		Date appointment ceases + 6 years except where there have been allegations concerning children. In this case retain for 25 years.	Secure Disposal	
15.5	Records relating to Governor Declaration against disqualification criteria	Yes		Date appointment ceases + 6 years	Secure Disposal	
15.6	Governors Code of Conduct	No		This is expected to be a dynamic document, one copy of each version should be kept for the life of the organisation	Secure Disposal	
15.7	Records relating to DBS checks carried out on clerk and members of the governing body	Yes		Date of DBS check + 6 months (but need to retain a record of the date of the DBS check if you are renewing every 3-5 year depending on policy)	Secure Disposal	
15.8	Governor personnel files	Yes		Date appointment ceases + 6 years except where there have been allegations concerning children. In this case retain for 25 years	Secure Disposal	
15.9	Records relating to the induction programme for new governors	Yes		Date appointment ceases + 6 years	Secure Disposal	

15.10	Records relating to the training required and received by Governors	Yes		Date Governor step down + 6 years	Secure Disposal	
15.11	Appointment and removal of Members	No		Life of appointment + 6 years	Secure Disposal	
15.12	Register of members	Yes	Companies Act 2006	Date Member resigns + 10 years	Secure Disposal	
15.13	Statement of Trustees Responsibilities	No		Life of statement + 6 years	Secure Disposal	
15.14	Register of Trustees interests	Yes	Companies Act 2006	Date Trustee resigns + 10 years	Secure Disposal	
15.15	Declaration of Interests Statements [Governors] [this is not a statutory register]	Yes		Date Governor resigns + 10 years	Secure Disposal	
16. GOVERNING BODIES - Meetings						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
16.1	Board Meeting Minutes	Yes	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	offer to archives	
16.2	Board Decisions	Yes if decisions refer to living individuals		Date of the meeting + a minimum of 10 years	offer to archives	
16.3	Board Meeting: Annual Schedule of Business	No		Current year	Secure Disposal	
16.4	Board Meeting: Procedures for conduct of meeting	No	Limitation Act 1980 (Section 2)	Date procedures superseded + 6 years	Secure Disposal	
16.5	Records relating to the management of General Members Meetings	No	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	offer to archives	
16.6	Minutes relating to any committees set up by the Board of Director	Yes if the minutes refer to living individuals		Date of the meeting + a minimum of 10 years	offer to archives	

16.7	Records relating to the management of the Annual General Meeting	Yes if the minutes refer to living individuals	Companies Act 2006 section 248	Minutes must be kept for at least 10 years from the date of the meeting	offer to archives	
16.8	Meetings Schedule	No		Current year	standard disposal	
16.9	Agendas for Governing Body meetings	May be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	Secure Disposal	
16.10	Agendas Additional Copies	No		Date of meeting	standard disposal	
16.11	Minutes of, and papers considered at, meetings of the Governing Body and its committees: Principal Set (signed)	May be data protection issues, if the meeting is dealing with confidential issues relating to staff		Date of meeting + 10 years	offer to archives	
16.12	Minutes of, and papers considered at, meetings of the Governing Body and its committees: Inspection Copies	Yes - may have names and personal issues		Date of meeting + 10 years	Secure Disposal	

		unless redacted				
16.13	Reports presented to the Governing Body	Yes		Date of meeting the report was presented to + 10 years	Secure Disposal or retain with the signed set of minutes	
16.14	Reports made to the Governors Meeting which are referred to in the minutes	Potentially	Companies Act 2006	Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting.	consult local archives before disposal	
16.15	Register of attendance at Full Governing Board meetings	Yes		Date of last meeting in the book + 6 years	Secure Disposal	
16.16	Papers relating to the management of the Annual Parents Meeting	Yes		Date of meeting + 6 years	Secure Disposal	
17. HEALTH AND SAFETY						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
17.1	Health and Safety policy statements	No		Life of policy + 3 years	Secure Disposal	
17.2	Health and safety file to show current state of building including all alterations (wiring, plumbing, building works etc) and to be passed on in the case of change of ownership)	No		Pass to new owner on sale or transfer of building		
17.3	Fire precautions logbooks	No		Current year + 6 years	Secure Disposal	
17.4	Fire risk assessments	No unless containing Personal Emergency Evacuation plans	Fire Service Order 2005; Fire Safety Act 2021; Building Safety Act 2022	Life of the risk assessment + 3 years	Secure Disposal	
17.5	Accident reporting: Adults	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of last entry in the accident book + 3 years but if there is possibility of negligence allegation then date of incident + 15 years or date of settlement + 6 years*9	Secure Disposal	

17.6	Records relating to accident/injury at work including incident reports	Yes		Date of incident + 6 years unless the injury is serious - broken limb, more than 3 days in hospital etc then date of incident + 15 years (Negligence)	Secure Disposal	
17.7	Accident reporting: Children	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below IRMSTK17.9 Do not keep completed entries in the book. They must be removed and kept in a locked location*10	Secure Disposal	
17.8	Control of Substances Hazardous to Health (COSHH)	No		COSHH sheets should be kept whilst the substance is in use + 6 years COSHH policy documents should be kept until the policy is superseded + 6 years	Secure Disposal	
17.9	Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR)	Yes	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2)	Date of incident + 3 years provided that all records relating to the incident are held on personnel file. See IRMSTK17.5 and IRMSTK17.7 For more info visit: http:ww.hse.gov.uk/RIDDOR/ https:wwwhse.gov.uk/pubns/edis1.htm	Secure Disposal	
17.10	Health and Safety risk assessments	No		Life of risk assessment + 3 years	Secure Disposal	
17.11	Process of monitoring of areas where employees and persons have or are likely to have come into contact with asbestos	Yes	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	Secure Disposal	
17.12	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation: Dose assessment and recording	No	The Ionising Radiations Regulation 2017	2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. To keep the records made and maintained or a copy of these records until the person to whom the record relates has or would have attained the age of 75 years but in any event for at least 30 years from when the record was made	Secure Disposal	

17.13	Restrictive interventions incident log – school's institutional record. This is the school's own governance and management record of all incidents of use of force, seclusion and non-force related restraint involving pupils, maintained as an incident log or incident book at school level and separate from individual pupil education or safeguarding records.	Yes	Limitation Act 1980 (by analogy with accident records involving children). Recording obligations arise from: section 93A of the Education and Inspections Act 2006 and statutory guidance issued thereunder (Restrictive Interventions, Including Use of Reasonable Force, in Schools, DfE, April 2026); and the schools' (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.	The current academic year + 6 years as a minimum. Where there are incidents involving physical injury to a pupil or where pupils with SEND are involved, schools should consider extending the retention to the date of birth of the youngest pupil involved in any incident recorded in the log, + 25 years, by analogy with accident records involving children.	Secure Disposal	

18. LIAISON WITH LA-DFE						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
18.1	OFSTED reports and papers	No		Life of the report then REVIEW	Secure Disposal	
18.2	Returns made to central government	No		Current year + 6 years	Secure Disposal	
18.3	School census returns	No		Current year + 5 years	Secure Disposal	
18.4	Circulars and other information sent from the Local Authority			Operational use	Secure Disposal	
18.5	Circulars and other information sent from central government	No		Operational use	Secure Disposal	
18.6	Attendance returns	Yes		Academic year + 1 year	Secure Disposal	
18.7	Secondary transfer sheets (Primary)	Yes		Academic year + 2 years	Secure Disposal	

19. PARENT TEACHER ASSOCIATION						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
19.1	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	Yes		Current year + 6 years then REVIEW	Secure Disposal	

20. PROPERTY						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
20.1	Title deeds of properties belonging to the school	No		These should follow the property, unless the property has been registered with the Land Registry	transfer to new owner	
20.2	Plans of property belonging to the school, including any alterations. This is also a health and safety requirement and includes rewiring diagrams and additional fire safety features	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	pass to next owner	
20.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	Secure Disposal	
20.4	Business continuity and disaster recovery plans	Yes		These are dynamic documents which should be kept up to date	Secure Disposal of old plans	
20.5	Records relating to the letting of school premises	No		Current financial year + 6 years	Secure Disposal	
21. PUPILS AND STUDENTS						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
21.1	Pupils Educational Record required by The Education (Pupil Information) (England) Regulations 2005: Primary	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	Retain whilst the child remains at the primary school *11	The file should follow the pupil when they leave the primary school - note *l	
21.2	pupils educational record required by the education (pupil information) (England) regulations 2005: secondary	yes	limitation act 1980 (section 2)	date of birth of the pupil + 25 years*12	Secure Disposal	

21.3	attendance registers		school attendance guidance for maintained schools, academies, independent schools and local authorities [updated and re-published annually]	Every entry in the attendance register must be preserved for a period of 6 years beginning with the day on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates.	Secure Disposal	
21.4	correspondence relating to any absence (authorised or unauthorised)	potentially	education act 1996 section 7	current academic year + 2 years	Secure Disposal	
21.5	Restrictive interventions incident record – pupil's copy. The individual incident record form (or a copy of it) filed as part of the pupil's safeguarding or educational record.	Yes	Limitation Act 1980 (by analogy with accident records involving children). Recording obligations arise from: section 93A of the Education and Inspections Act 2006 and statutory guidance issued thereunder (Restrictive Interventions, Including Use of Reasonable Force, in Schools, DfE, April 2026); and the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.	This record must travel with the child to their new educational setting. The 'last known school' is responsible for retaining this in line with pupil educational and safeguarding records (usually date of birth of the pupil + 25 years)	Secure Disposal	
22. SCHOOL ADMISSIONS						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
22.1	All records relating to the creation and implementation of the School Admissions Policy	No	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels	Life of the policy + 7 years. 15(2) of the regulation refers to the 7 preceding years	Secure Disposal	
22.2	Register of admissions	Yes	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities.	Every entry in the admission register must be preserved for a period of 6 years after the date on which the entry was made.	review schools may wish to consider keeping the admission register	

				Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates.	permanently, as often schools receive enquiries from past pupils to confirm the dates they attended the school	
22.3	Admissions if the appeal is unsuccessful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels	Resolution of case + 1 year	Secure Disposal	
22.4	Admissions if the admission is successful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels	Date of admission + 1 year	Secure Disposal	
22.5	Admissions Secondary Schools Casual	Yes		Current academic year + 1 year	Secure Disposal	
22.6	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels	Current academic year + 1 year	Secure Disposal	
22.7	Supplementary information form, including additional information such as religion and medical conditions: For successful admissions	Yes		This information should be added to the pupil file	as per pupil file	
22.8	Supplementary information form, including additional information such as religion and medical conditions: For unsuccessful admissions.	Yes		Until appeals process completed	Secure Disposal	
22.9	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	Secure Disposal	

23. SCHOOL ASSETS						INDEX
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
23.1	Community School leases for land	No		Date lease expires + 6 years	Secure Disposal	
23.2	Commercial transfer arrangements	No		Date of transfer + 6 years	Secure Disposal	
23.3	Transfer of land to the Academy Trust	No		Life of land ownership then transfer to new owner	Secure Disposal	
23.4	Transfers of freehold land	No		Life of land ownership then transfer to new owner	Secure Disposal	
23.5	Records relating to the leasing of shared facilities, such as sports centres	No		End of lease + 6 years	Secure Disposal	
23.6	Land and building valuations	No		Date valuation superseded + 6 years	Secure Disposal	
23.7	Disposal of assets	No		Date asset disposed of + 6 years	Secure Disposal	
23.8	Burglary, theft and vandalism report forms	No		Date of insurance settlement + 6 years	Secure Disposal	
23.9	Inventories of furniture and equipment	No		Life of equipment + 6 years. Equipment will have write-down value over several years - the time depending on the type of equipment	Secure Disposal	
24. SCHOOL MANAGEMENT						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
24.1	Logbooks of activity in the school maintained by the Head Teacher	Possibly – there may be data protection issues if the logbook refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then review	these could be of permanent historical value and should be offered to the county archives service, if appropriate	

24.2	Visitor Management Systems (including electronic systems, visitors' books and signing in sheets)	Yes		Academic Year + 1 year [Schools may decide to archive one copy]	Secure Disposal	
24.3	School Privacy Notice which is sent to parents as part of GDPR compliance	No		Life of the privacy notice/until the privacy notice + 6 years	Secure Disposal	
24.4	Consents relating to school activities as part of GDPR compliance (for example, consent to be sent circulars or mailings)	Yes		Consents should be retained for as long as the consent is relied on.	Secure Disposal	
24.5	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	standard disposal – schools to decide if items on school website are retained / archived or whether they should be deleted with master copy	
24.6	Minutes of Senior Management Team meetings and meetings of other internal administrative bodies	Possibly – there may be data protection issues if the minutes refer to individual pupils or staff members		Date of the meeting + 3 years then review	Secure Disposal	
24.7	Reports created by the Head Teacher or the Management Team	Possibly - there may be data protection		Date of the report + a minimum of 3 years then review	Secure Disposal	

		issues if the minutes refer to individual pupils or staff members				
24.8	Records created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	Possibly - there may be data protection issues if the minutes refer to individual pupils or staff members		Current academic year + 3 years then review	Secure Disposal	
24.9	Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	Possibly - there may be data protection issues if the minutes refer to individual pupils or staff members		Date of correspondence + 3 years then review	Secure Disposal	
24.10	Management of complaints	Yes		Date complaint resolved + 3 years then review. If the complaint relates to negligence or safeguarding then date the complaint resolved + 15 years. If the complaint relates to child sexual abuse then the complaint resolved + 75 years (this retention period will be reviewed once the government and the ICO have issued guidance about the	Secure Disposal	

				implementation of the IICSA recommendations)		
24.11	Newsletters and other items with a short operational use	No		Current year + 1 year	Secure Disposal – schools to decide if items on school website are retained/archived or whether they should be deleted with master copy	
24.12	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years. Schools should consider archiving one copy for historical reasons	standard disposal	
25. SPECIAL EDUCATION NEEDS AND DISABILITIES						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
25.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Education Act 1996 as amended up to 2024 Children and Families Act 2014 Limitation Act 1980	Date of birth of the pupil + 30 years [This would normally be retained on the pupil file] unless the document is subject to a legal hold then 6 years after legal action ended (This retention period will be reviewed once the government and the Information Commissioner have published guidance about implementing the recommendations made by IICSA) (DfE Data Protection in Schools)	Secure Disposal	
25.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 as amended up to 2024 Children and Families Act 2014 Limitation Act 1980	Date of birth of the pupil + 30 years [This would normally be retained on the pupil file] unless the document is subject to a legal hold then 6 years after legal action ended (This retention period will be reviewed once the government and the Information	Secure Disposal	

				Commissioner have published guidance about implementing the recommendations made by IICSA) (DfE Data Protection in Schools)		
25.3	Advice and information provided to parents regarding educational needs	Yes	Education Act 1996 as amended up to 2024 Children and Families Act 2014 Limitation Act 1980	Date of birth of the pupil + 30 years [This would normally be retained on the pupil file] unless the document is subject to a legal hold then date legal action ceases + 6 years (This retention period will be reviewed once the government and the Information Commissioner have published guidance about implementing the recommendations made by IICSA) (DfE Data Protection in Schools)	Secure Disposal	
25.4	Accessibility strategy	Yes	Education Act 1996 as amended up to 2024 Children and Families Act 2014 Limitation Act 1980	Date of birth of the pupil + 30 years [This would normally be retained on the pupil file] unless the document is subject to a legal hold then date legal action ceases + 6 years (This retention period will be reviewed once the government and the Information Commissioner have published guidance about implementing the recommendations made by IICSA)	Secure Disposal	
26. TEACHERS AND STAFF - Disciplinary						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
26.1	Disciplinary Proceedings: Oral warning	Yes		Date of warning + 6 months *13	Secure Disposal	
26.2	Disciplinary Proceedings: Written warning level 1	Yes		Date of warning + 6 months *14	Secure Disposal	

26.3	Disciplinary Proceedings: Written warning level 2	Yes		Date of warning + 12 months *14	Secure Disposal	
26.4	Disciplinary Proceedings: Final warning	Yes		Date of warning + 18 months *14	Secure Disposal	
26.5	Disciplinary Proceedings: Case not found	Yes		If the incident is child protection related, then see IRMSTK29.1 otherwise dispose of at the conclusion of the case	Secure Disposal	
27. TEACHERS AND STAFF – Pay and Pensions						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
27.1	Records relating to the agreement of pay and conditions	No		Date pay and conditions superseded + 6 years	Secure Disposal	
27.2	Payroll records	Yes		Date payroll run + 6 years	Secure Disposal	
27.3	Payroll reports	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 6 years	Secure Disposal	
27.4	Payroll awards	Yes		Current year + 6 years	Secure Disposal	
27.5	Payroll gross / net weekly or monthly	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 6 years	Secure Disposal	
27.6	Payslips copies	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 6 years	Secure Disposal	
27.7	Pay packet receipt by employee	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003 and annual Finance Acts; Income Tax (Earnings and Pensions)	Current year + 2 years	Secure Disposal	

			Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009			
27.8	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567); Employment Rights Act 1996	Current year + 3 years	Secure Disposal	
27.9	Part time fee claims	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 6 years	Secure Disposal	
27.10	Overtime	Yes		Current year + 3 years	Secure Disposal	
27.11	National Insurance Schedule of payments	Yes		Current year + 6 years	Secure Disposal	
27.12	Insurance	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 6 years	Secure Disposal	
27.13	Car allowance claims	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 3 years	Secure Disposal	
27.14	Car mileage output	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 6 years	Secure Disposal	
27.15	Car loans	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Completion of loan + 6 years	Secure Disposal	
27.16	Time sheets /clock cards / flexitime	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 3 years	Secure Disposal	
27.17	Bonus sheets	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 3 years	Secure Disposal	

27.18	Staff returns	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 3 years	Secure Disposal	
27.19	Sickness records	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 3 years	Secure Disposal	
27.20	Tax forms P6 /P11 / P11D / P35 / P45/ P46 / P48	Yes		Current year + 6 years	Secure Disposal	
27.21	Personal bank details	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Until superseded + 3 years	Secure Disposal	
27.22	Income tax form P60	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 6 years. Employees should keep records for at least 22 months from the end of the tax year they relate to. The tax year runs from 6 April to the following 5 April, so keep paperwork until at least 31 January nearly two years later. For example, you should keep records relating to the tax year 2022/23 (which ends 5 April 2023) until 31 January 2025 or longer if you are self-employed *15	SECURE DISPOSAL	
27.23	Pension payroll	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 6 years	Secure Disposal	
27.24	Superannuation adjustments	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 6 years	Secure Disposal	
27.25	Superannuation reports	Yes		Completion of loan + 6 years	Secure Disposal	
27.26	Members Allowance register	Yes	Taxes Management Act 1970 and annual Finance Acts; Income Tax (Earnings and Pensions) Act 2003; Income Tax Act 2007 and Corporation Tax Act 2009	Current year + 6 years	Secure Disposal	

27.27	Records relating to pension registrations	Yes		Date of last payment on the pension + 6 years	Secure Disposal	
27.28	Management of the Teachers' Pension Scheme	Yes		Date of last payment on the pension + 6 years	Secure Disposal	
27.29	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103) Regulation 15	From the end of the year in which the accounts were signed for a minimum of 6 years	Secure Disposal	
28. TEACHERS AND STAFF - Recruitment						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
28.1	All records leading up to the appointment of a new Head Teacher	Yes		Length of appointment + 6 years*16	Secure Disposal	
28.2	All records leading up to the appointment of a new member of staff successful candidate	Yes		All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months	Secure Disposal	
28.3	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	
28.4	Pre-employment vetting information DBS Checks	Yes	https://www.gov.uk/government/publications/dbs-update-service-employer-guide/dbs-update-service-employer-guide DBS Update Service Employer Guide December 2024; Education 2024 (Academies are bound by the legislation that applies to independent schools and not maintained schools)	Schools do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record. When a school chooses to retain a copy, there should be a valid reason for doing so and it should not be kept for longer than six months. When the information is destroyed, it must be done securely. Once a recruitment (or other relevant) decision has been made, we do not keep certificate information (e.g. DBS number) for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints or be for the purpose of completing safeguarding audits. If the school disposes of the certificate the following information should be retained in line with the DBS	Secure Disposal	

				Code of Practice: Retain the following after the certificate is destroyed - 1. The date of issue of a disclosure; 2. The name of the subject; 3. The type of the disclosure requested; the position for which the Disclosure was requested; 4. The unique reference number of the Disclosure; 5. The details of the recruitment decision taken.		
28.5	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 documentation, then this should be added to the Staff Personal File	Secure Disposal	
28.6	Pre-employment vetting information. Evidence proving the right to work in the United Kingdom	Yes	An employer's guide to right to work checks [Home Office May 2015] Last updated September 2024.	Where possible, these copies of documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment + not less than 2 years *17	Secure Disposal	
28.7	Records relating to the employment of overseas teachers	Yes		Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment + not less than 2 years	Secure Disposal	
29. TEACHERS AND STAFF - safeguarding						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
29.1	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded	Yes	Keeping children safe in education Statutory guidance for schools and colleges 2024; https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Kee	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then review unless found to be malicious or false.	Secure Disposal	

			ping_children_safe_in_education_2024.pdf Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2024, Section 422	(The retention period will be reviewed once the guidance by the government and ICO about implementing the recommendations made by IICSA has been published)		
30. TEACHERS AND STAFF – Staff Management						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
30.1	Staff Personal File, including employment contract and staff training records	Yes	Limitation Act 1980	Termination of employment + 6 years	Secure Disposal	
30.2	Timesheets	Yes		Current year + 3 years	Secure Disposal	
30.3	Absence record	Yes		Current year + 3 years	Secure Disposal	
30.4	Sickness Absence Monitoring	Yes		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' (2003) It could be argued that where sickness pay is not paid then current year + 3 years is acceptable whilst if sickness pay is made then it becomes a financial record and current year + 6 years applies. The actual retention may depend on the internal auditors. Most seem to accept current year+ 3 years as being acceptable as this gives the Department for Work and Pensions and Inland Revenue time to investigate if they need to.	Secure Disposal	
30.5	Annual appraisal/assessment records	Yes		Current year + 3 years	Secure Disposal	
30.6	Records relating to the TUPE process	Yes		Date last member of staff transfers or leaves the organisation + 6 years	Secure Disposal	
30.7	Training needs analysis	No		Current year + 1 year	Secure Disposal	

30.08	Staff Training where the training leads to Continuing Professional Development	Yes		Length of time required by the professional body	Secure Disposal	
30.09	Staff Training except where dealing with children, e.g. First Aid or Health and Safety	Yes		This should be retained on the personnel file	Secure Disposal	
30.10	Staff Training where the training relates to children (e.g. safeguarding or other child related training)	Yes		Date of the training + 40 years (This retention period will be reviewed when the government and ICO have published guidance about how to implement the recommendations made by IICSA.)	Secure Disposal	
30.11	Professional Development Plans	Yes		Life of the plan or plan superseded + 6 years	Secure Disposal	
31. TEACHING AND THE CURRICULUM						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
31.1	Schemes of Work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period, or, Secure Disposal	
31.2	Timetable	No		Academic year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further	

					retention period, or, Secure Disposal	
31.3	Class record books	No		Academic year + 1 year	it may be appropriate to review these records at the end of each year and allocate a further retention period, or, Secure Disposal	
31.4	Mark books	No		Academic year + 1 year	it may be appropriate to review these records at the end of each year and allocate a further retention period, or, Secure Disposal	
31.5	Record of homework set	No		Academic year + 1 year	it may be appropriate to review these records at the end of each year and allocate a further retention period, or, Secure Disposal	
31.6	Pupils work	Yes		Where possible, work should be returned to the pupil at the end of the academic	Secure Disposal	

				year. If this is not the schools' policy, then current year + 1 year		
32. TRANSPORT						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
32.1	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	No	Limitation Act 1980	Disposal of the vehicle + 6 years	Secure Disposal	
32.2	The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, and maintenance	No	Limitation Act 1980	Disposal of the vehicle + 6 years	Secure Disposal	
32.3	Service logs and vehicle logs	No	Limitation Act 1980	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	Secure Disposal	
32.4	GPS tracking data relating to the vehicles	No	Limitation Act 1980	Current year + 12 months	Secure Disposal	
32.5	Tachograph: Analogue and electronic including driver's cards	Yes	Transport Act 1980. Passenger and Goods Vehicles (Recording Equipment) Regulations 2005 SI 2005 No 1904. Passenger and goods Vehicles (Recording Equipment) (downloading and Retention of Data) Regulations 2008 SI 2008 No 198. EC Regulation 561/2006 EC or AETR rules may also apply including digital recording equipment	Current year + 12 months	Secure Disposal	
32.6	Driver's records book	Yes	Transport Act 1980. Drivers' Hours (Goods Vehicles) (Keeping of Records) Regulations 1987. SI 1987 No.1421. Regulation 11 Preservation of driver's record books.	12 months from date of return of book to employer or in the case of owner driver 12 months from date of completion of book or it ceased to be used Driver to retain book for 14 days after all weekly record sheets have been used	Secure Disposal	
32.7	Walking bus registers	Yes		Date of register + 3 years. This takes into account the fact that, if there is an incident requiring an accident report, the	Secure Disposal [if these records are retained	

				register will be submitted with the accident report and kept for the period of time required for accident reporting	electronically any back up copies should be destroyed at the same time]	
33. WELFARE/CHILD PROTECTION						**INDEX**
	Description	**Data Protection Issues**	**Statutory Provisions**	**Retention Period**	**Action at end of administrative life of record**	**Date retention period checked**
33.1	Family Liaison Officers and Home School Liaison Assistants: Day Books	Yes		Current year + 2 years then review	Secure Disposal	
33.2	Family Liaison Officers and Home School Liaison Assistants: Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	Secure Disposal	
33.3	Family Liaison Officers and Home School Liaison Assistants: Referral forms	Yes		While the referral is current	Secure Disposal	
33.4	Family Liaison Officers and Home School Liaison Assistants: Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	Secure Disposal	
33.5	Family Liaison Officers and Home School Liaison Assistants: Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	Secure Disposal	
33.6	Family Liaison Officers and Home School Liaison Assistants: Group Registers	Yes		Current year + 2 years	Secure Disposal	
33.7	Accessibility Plan relating to individual pupils	Yes	Limitation Act 1980	The plan should be included on the pupil file	Secure Disposal	
33.8	Child protection information held on pupil file	Yes	Keeping children safe in education Statutory guidance for schools and colleges 2024; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2023	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.	Secure Disposal	

				If the file relates to child sexual abuse, retain date of birth + 75 years. See DfE Data Protection Toolkit - https://www.gov.uk/guidance/data-protection-in-schools		
33.9	Child protection information held in separate files	Yes	Keeping children safe in education Statutory guidance for schools and colleges 2024; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2023	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record. If the file relates to child sexual abuse, retain date of birth + 75 years. See DfE Data Protection Toolkit - https://www.gov.uk/guidance/data-protection-in-schools	Secure Disposal **(these records must be shredded)**	
33.10	Correspondence relating to authorised absence	Yes	Education Act 1996 Section 7	Current academic year + 2 years	Secure Disposal	

NOTES

NO.	REF	NOTE
2	7.2	Either party may give not less than 7 financial years written notice to terminate the Agreement, such notice to expire on 31 August. Or, where the Academy has significant financial issues or is insolvent, the Agreement can be terminated by the Secretary of State to take effect on the date of the notice.
3	7.7	Funding agreement which says that the Academy can receive donations and can only charge where the law allows maintained schools to charge [see Charging and Remission Policy].
4	7.9	The Academy can enter into an arrangement with a Local Authority (LA), so that payment will flow between the Academy and the LA, in the same way as it would do were the Academy a maintained school.
5	9.1 9.2	EXPLANATORY NOTE (This note is not part of the Regulations) These Regulations amend the Employers' Liability (Compulsory Insurance) Regulations 1998 (the 1998 Regulations). Regulation 2(1) omits paragraphs (4) and (5) from regulation 4 of the 1998 Regulations. Paragraph (4) required an employer to retain a copy of its employer liability insurance certificate for 40 years. Paragraph (5) was a consequential provision to paragraph (4), providing for the retention of certificates, and is therefore also being omitted. Paragraph (3) substitutes paragraphs (1) and (2) of regulation 5 of the 1998 Regulations. Under the new provisions, the requirements for the display of the certificate will be satisfied if the certificate is made available in electronic form and is reasonably accessible to the relevant employees. Paragraph (4) makes a consequential amendment to regulation 6(b) of the 1998 Regulations.
6	9.5	Life of Academy. Under the Companies Act members can have their details removed after a certain time. Details should be removed on request.
7	14.1 14.7	Companies Act 2006 Section 355: This section refers to Records of Resolutions and meetings etc. it does not mention Constitutions. Resolutions and minutes under this section to be retained for at least 10 years from date of meeting or decision as appropriate (Section 355 (2)
8	14.13	Companies Act Section121 Removal of entries relating to former members. An entry relating to a former member of the company may be removed from the register after the expiration of ten years from the date on which he ceased to be a member
9	17.5	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below IRMSTK17.9 Do not keep completed entries in the book. They must be removed and kept in a locked location.
10	17.7	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below [see also the incident reporting form]

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NO.	REF	NOTE
11	21.1	The file should follow the pupil when they leave the primary school. This will include: • To another primary school • To a secondary school • To a pupil referral unit • If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the statutory retention period. • If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the school should discuss with the local authority about where the file should be stored for the remainder of its statutory retention
12	21.2	Section 2: Time limit for actions founded on tort. An action founded on tort shall not be brought after the expiration of 6 years from the date on which the cause of action accrued
13	26.1	Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice relevant to all disciplinary cases. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line and defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim. 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.
14	26.2 26.3 26.4	If warnings are placed on personal files, then they must be weeded from the file. Where the warning relates to child protection issues, see above. If the disciplinary proceedings relate to a child protection matter, please contact your Safeguarding Children Officer for further advice. Relevant to all disciplinary cases. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceeding 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 five year down the line and defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim. 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.
15	27.22	There is no harm in keeping them longer than strictly required. In particular, it is possible to go back up to four tax years to claim some reliefs and to claim a tax refund. In order to make those claims you need supporting evidence, so it would be helpful to keep records for at least four years after the end of the tax year.
16	28.1	Academies do not necessarily have to employ people with qualified teacher status – only the SEN and designated LAC teacher must be qualified.
17	28.6	Employers are required to take a clear copy of the documents which they are shown as part of this process.

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Appendix 2:

St. Nicks data retention schedule for specific data not covered under IRMS data retention schedule or specific to our school				
Basic File and systems description	**Data Protection Issues**	**Retention Period**	**Action at the end of the administrative life of the record**	
Child Protection files/Cpoms record red flag (MASH/LCSS involvement) Safeguarding Chronology sheets – form part of safeguarding records,	**Yes**	Until child leaves St. Nicholas' Primary and Nursery School then transfer to the new education provider Child Protection information must be electronically copied and sent under separate cover to new school/college whilst the child is still under 18 (i.e. the information does not need to be sent to a university, for example). Where a child is removed from roll to be educated at home – or is registered as missing in education - the file should be copied to the Local Education Authority. Standard Safeguarding records - until the pupil's 25th birthday Child Sexual Abuse (CSA) or Looked After Children Records – Until the individual's 75th birthday. SEND (Special Educational Needs and Disabilities) Records – Six years after the cessation of the Education, Health and Care (EHC) Plan, or until the individual's 33rd birthday. Allegations against Staff – Until the staff member's normal retirement age, or 10 years from the allegation date, whichever Is longer. Historical SG documents pre-cpoms to be kept in HT's office	Follow cpoms section and data destruction policy – any non- red flag information to be deleted from the cpoms archive within 2 years after the child has left the school If the cpoms information cannot be passed on i.e. school abroad cannot be found, non- red flag information will be deleted after two years and red flag information will be kept until the child's 25th birthday. The primary record is transferred securely to the new school when a child moves, and the originating school may delete its copy after confirming receipt.	
Class behaviour Bound Book entries	Yes	Fix it forms to be stored electronically and destroyed a term after the child has left school To be destroyed after 70 years from date of last entry. Securely secured in HT's locked cupboard	Paper Secure disposal	

Teacher/TA planner paper- based mark book	Yes	Current year +1 year	Secure disposal	
Emergency paper contact folder in office for clubs Paper copies following trips/enrichments	Yes	Keep for current year then update annually Destroyed the week after the trip/enrichment	Secure disposal	
Pupils' exercise books	Yes	Work returned to pupil at the end of the school year. Where school is archiving and storing example books for a year then retain for 1 year and return. Must seek parental agreement.	Secure disposal if it cannot be returned	
School website – photos/content	Yes	Annual update of photos / documents	Delete files	Only keep photos of children on the website where parental consent has been granted
Staff encrypted memory sticks	Yes	Memory stick to be returned to school before staff member leaves	All files deleted and stick reset	
Staff teaching drive	Yes	Records kept in line with data period agreed Delete names of children off planning at the end of each academic year Photos – whilst children are at school, then delete the year children leave All assessment data stored on teaching drive – delete the year children leave school	Delete	Remove files for children who have left the school at the end of the academic year
Staff laptops/PCS/iPads	Yes	Staff member has a designated laptop assigned to them and network profile assigned	When staff member leaves, laptop handed back to school. School's Technical Support Team will erase profile and delete files.	

			Laptops and PCs decommissioned by the School's Technical Support Team.	
Emails		SEN/Safeguarding documents to be stored on the drive/CPoms during the year. Emails related to children to then be deleted at the end of the academic year .		
Class inclusion/SEN folder	Yes	Retain for the year. Senco stores all SEN information securely on the drive. Passed on to the new school when the child leaves. Deleted after 1 year.		
Tapestry	Yes	See separate Tapestry contract that ensures GDPR compliance – stored in GDPR files electronically School controls the data that is stored on Tapestry. Stored during the children's time at the school then deleted.	At the end of the contract Tapestry's standard practice is to delete data from the school's systems after 90 days. The data will be deleted from the school's backup systems 90 days after it is deleted from the school's systems.	
Dojo		See Class Dojo Parent User Agreement Form (on school website). Part of parent consent sign up to Arbor. Retention period is the time that the child attends the school.	Child's dojo account closed within a term of them leaving the school	
Arbor	Yes	See separate GDPR privacy notice – stored in GDPR files electronically School controls the data that is stored and processed on Arbor	All personal data will be held in accordance with Capita plc group policy, and historical records will not be held without legitimate reason. We have a variety of automated retention policies in place that ensure data is regularly cleared down within our system if it has not been used, updated or interacted with in a reasonable amount of time. Data is kept on MIS records for two terms after the pupil has left (refer to DfE website https://www.gov.uk/guidance/data-protection-in-schools/record-keeping-and-management#create-a-data-retention-schedule	