

East Midlands Academy Trust

Records Retention and Deletion Policy

'Every child deserves to be the best they can be'.

Scope: East Midlands Academy Trust & All Academies within the Trust	
Version: v3	Filename: EMAT Records Retention and Deletion Policy
Approval: March 2026 <i>Approved by the Trust Board</i>	Next Review: March 2027 This Policy will be reviewed by the owner & approved by the Trust Board (Audit and Risk Committee) annually,
Owner: Head of Shared Services	

Revision History

Revision Date	Revisor	Description of Revision
March 2026 v3	DU	<p>Updated template to include the following amends:</p> <p>4. Disposal of Data- amended some wording from 'disposed of' to destroyed</p> <p>5. Transfer to Archives - re-written. Added para to Section 6 re transfer of paper copies to digital and disposal of said paper copies.</p> <p>8. MIS section updated.</p> <p>11. Academisation - re-written</p> <p>13. Retention Tables:</p> <ul style="list-style-type: none"> Amended what / how information is offered to the LA Record Office at the end of use or when school closes. Added 5.2 - Pupil emails, 8.6 - Director disqualification, 10.11 - Fire Assessments, 11.4. Records relating to school vehicles, 19.3 – unauthorised absence Updated 15 - Financial Management – School Meals incl new section (15.4) - breakfast club grant. <p>20. Special Educational Needs (SEN) updated</p> <p>Indicated on policy columns that should not be posted on website</p>
March 2025 v2	DU	Minor changes full changes review process to take place when DPO service releases new major update
Feb 2022 v1	DU	New Policy Created

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, alternatively you can select from an A-Z of relevant provisions.

A-Z

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2. Introduction

This record retention and deletion policy contains recommended retention periods for the different record series created and maintained by East Midland Academy Trust. 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 (UK GDPR), the Data Protection Act 2018 (DPA), 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 will be recorded.

3. Purpose

This policy, for managing records at East Midlands Academy Trust (EMAT) has been drawn up in conformity with legislation, regulations affecting schools and best practice as promoted by the Information and Records Management Society (IRMS).

As well as containing Record Retention tables, this document sets out more general information and 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 EMAT, 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 FOI. It will be read and used in conjunction with all of our related policies.

It is expected that;

- All information held by East Midlands Academy Trust needs to be justifiable, by reference, to its purpose.
- EMAT will be transparent and accountable as to what data they hold.
- EMAT will understand and explain the reasons why they hold data.
- EMAT will be able to respond to Subject Access Requests.
- EMAT will be able to amend, delete or transfer data promptly upon any justified request.
- EMAT will be able to audit how personal data was collected and when and why.
- EMAT will hold sensitive data securely, accessed only by those with reason to view it and possess a policy as to why it is needed.
- East Midlands Academy Trust will have retention policies that reflect the importance of records relating to child sexual abuse to victims and survivors, and that they may take decades to seek access to such records.

4. Disposal of Data

Article 5(e) of the UK GDPR states that personal data will 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. EMAT will 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 will be destroyed. For confidential, sensitive or personal information, to be considered securely disposed of, it will be in a condition where it cannot either be read or reconstructed.

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

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

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

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

The FOI requires the East Midlands Academy Trust to maintain a list of all records that have been destroyed and who authorised their destruction. This record will be retained for 15 years. The appropriate members of staff (Data Lead) will 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.

5. Transfer of Records to Archives

a) Storage archives, for trust business purposes

Little-used records can clutter up the work environment. Some schools and trusts relieve pressure by moving records to a storage space until the retention period runs out. A school or trust lacking room to keep its records safe from harm (such as fire, flood, unauthorised access) may transfer them to a commercial storage service with credentials such as certification to the ISO 27001 information security standard. The school or trust remains legally responsible for the records.

b) Historic archives, for trust heritage

Usually, disposal means securely destroying the documents after the retention period. But if there is an enduring historical value in the records, disposal need not mean destruction. Instead, the school or trust may offer to transfer them to the care of a dedicated archival repository, such as the relevant local authority record office (see Find an archive | The National Archives). Establishing a relationship with an archival repository is the standard method for preserving institutional heritage, as it allows the community to view historic information in a comfortable and supervised setting. Archivists are trained not just to care for the physical documents (using acid-free packaging, humidity-controlled storage, etc) but to manage requests for access in accordance with data protection legislation. They may also loan documents back to the school or trust for special occasions such as anniversary events.

To identify records of historic value, look out for "offer to local record office" in the guidance below. Other records may have obvious historic interest even if they are not mentioned (e.g. a World War II roll of honour). The school / trust should approach the record office with a list of files and agree on how and when to transfer them. It may help to set aside items for permanent preservation routinely, such as by filing a single signed copy of the minutes and key agenda papers after each meeting of the governing body, ready to offer to the repository every few years.

Attempting to set up an onsite alternative to a local record office would be a complex undertaking. A school or trust wishing to do so should consult its Data Protection Officer and approach the record office for advice on management and storage conditions. Remember that archives can include electronic data such as digital photographs, which can only be digitally preserved with the right technical interventions (see the Digital Preservation Handbook).

6. Transfer of Records to other Media

Where lengthy retention periods have been allocated to records, organisations will 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, will be documented in a Digital Continuity Policy. A scanning risk assessment is recommended to ensure the procedure is adequate. Further information about digital continuity can be found on the [National Archives](#) website who also provide guidance on assessing and managing [digital continuity risks](#) and a [digital continuity checklist](#). Organisations that believe that they need to retain digital records over a long period on devices, software systems or in formats that may become inaccessible due to developments in technology will seek further advice from the Data Protection Officer and their IT support staff.

Once any paper records have been digitally converted, the paper copies of these records will then be securely and confidentially disposed of ([see section 4. Disposal of Data](#)). East Midlands Academy Trust will ensure that a record of destruction is held for these paper records ([see Appendix A- example of how to create a destruction record](#)). The only records that should always be retained as physical records are any original documents such as birth certificates, passports, marriage certificates etc (it is unlikely that schools will hold these types of documents). Documents of historical significance such as logbooks may also be retained as hard copies.

7. Transfer of Records to other Settings & 'Last Known School'

When a child leaves East Midlands Academy Trust, all pupil records, including safeguarding/child protection records will 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 will be obtained and logged by East Midlands Academy Trust Data Lead. [Keeping Children Safe in Education 2025](#) (KCSiE) states that "where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file." All copies of data held by the that the child has departed will then be deleted or retained in line with the retention schedule below, including all paper records and data stored electronically. Generally, a record will be kept for tracking and auditing purposes only. EMAT will be aware that where electronic systems are used, sending a pupil file to the next setting does not mean that their own copy of the file is deleted, so action should be taken to delete or archive copies retained where they are no longer required by EMAT that the pupil has left.

There are four main categories of pupil records that need to be transferred to other settings:

- **Management Information System (MIS) data**

Data held on the MIS is extracted by EMAT using the Common Transfer File mechanism as specified in The Education (Pupil Information) (England) Regulations 2005 and subsequent amendments. The Department for Education specifies what data is to be included in the CTF in technical specification documentation. This will mean that the majority of information held on the MIS is transferred using the CTF method. However, it is important to note that **not all personal data is transferred, only the data sets specified in the CTF schema**. If the MIS has been used to store additional information (documents such as copies of end of year reports or letters) EMAT will take proactive action to ensure these are sent separately and securely. Traditionally, this sort of documentation was held in a pupil 'buff' file, but as



organisations have turned to digital ways of working, these are frequently stored by attaching them to the digital MIS record.

- **Safeguarding/Child Protection records**

EMAT uses vendor educational technology (edtech) products to hold and transfer these records. Many of these products include the functionality to electronically transfer a copy of (and obtain receipt for) pupil records directly to the next school, where the same product is also used by the receiving school. Where this is not possible, these products should have the functionality to download a pupil record for it to then be transferred electronically or printed out and delivered to the new school. Paper records will be dealt with carefully to ensure that these are safely received by the new school.

Some safeguarding edtech products enable EMAT to use the same system to record behavioural and other information in the same log. EMAT will ensure that safeguarding/child protection records are clearly identified as such so that the receiving school can quickly identify this information. EMAT will consider if information such as behaviour notes needs to be transferred to the next setting, or whether it will be deleted if no longer required or relevant (e.g. a child's toileting routine may be very relevant when younger, or merits/demerits received but does not need to be part of a permanent safeguarding record).

- **Special Educational Needs records**

It is becoming more common for EMAT to use vendor edtech products to manage these records. Whether stored in such edtech products, on EMAT IT systems/cloud storage or on paper, the SEND co-ordinator will ensure that a complete record is compiled and passed securely to the next school.

- **Pupil 'buff' files**

For EMAT in recent years, the traditional pupil buff files have dwindled in relevance and importance as organisations have increasingly moved to digital storage. EMAT is left with either sending or receiving folders which are very light and seemingly irrelevant. However, there will be documentation, whether on paper or electronic (on the server, in emails, in the MIS) that will be sent to the next setting that the pupil will attend. The Education (Pupil Information) (England) Regulations 2005 state that this "Educational Record" will be transferred to the next setting within 15 school days of confirmation that a pupil is registered at another school. There may be a significant amount of material that is not contained in the CTF, safeguarding or SEND records that will be transferred to the next setting. Trusts may have inadvertently not adapted their records transfer practices as management of these records have moved from a paper 'buff' file to digital format and so this will be noted where relevant on the retention schedule below.

Trusts may wish to retain some minimal 'skeleton' data about pupils' admission, departure and next destination (where known) in order to respond to any requests for information about these pupils and for the historical archive. They may also wish to retain records relating to safeguarding/child protection or SEND records, even though there is no legislative requirement to do so (i.e. to have their own copy of evidence in case of any later legal action). If trusts intend to create and maintain skeleton records or retain copies of records, this will be noted on the retention policy. In some instances, trusts may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If the trust does retain pupil records, then they will be prepared to justify this retention and will need to consider if a Data Protection Impact Assessment should be completed for any extended retention of records once a pupil has left the trust See section 17.5 below.

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.

Tertiary colleges are not included in this definition, therefore EMAT will retain the record. However, the college will receive a copy of the child protection file, as per the requirements of KCSiE above.

The Pupil Record will 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 EMAT wishes to retain data for analysis or statistical purposes, it will be done in an anonymised fashion.

8. Management Information System (MIS)

The majority of pupil records and some staff records are held on EMATs MIS. Managing data retention on the MIS can be complex because different data sets held on the MIS have different retention requirements. EMAT staff have limited time and resources to manage these differing retention periods and will work with their MIS provider to request support on how to efficiently delete data sets from a record without deleting the entire record (or deleting all data sets except those that are required as part of the ‘skeleton’ record for long term retention). Where this is not possible, EMAT may make a policy decision to retain the entirety of a record for the longest applicable retention period for a data set within the MIS (usually current plus six years). EMAT will set out how records will be retained in the MIS in the relevant section of the Retention Table below.

9. Records relating to Child Sexual Abuse

Records relating to child sexual abuse will be retained for 75 years, in line with the recommendations arising from the outcome of the Independent Inquiry into Child Sexual Abuse (IICSA). The Inquiry stated that these records should be retained for such a long period in recognition of the importance of these records to victims, but that they should be regularly reviewed during that extended retention period. Organisations will particularly need to consider digital continuity where:

- they hold digital records for staff or governors/trustees & members, or
- they are the ‘last known school’ responsible for this long retention period for any relevant pupil records.

Where there is evidence, or allegations of child sexual abuse, then it will almost certainly be appropriate to retain the entire pupil, staff or other record as a whole, not just the parts of the record that pertain to the abuse. Staff whose duties include reviewing or digitising records will be trained to understand the importance of any evidence or allegations of child sexual abuse that they may happen to uncover, whether that was what they were looking for and the importance of them bringing these to the attention EMAT leadership and/or preserving these records.

The Inquiry report also recommends that the UK government directs the Information Commissioner’s Office (ICO) to introduce a Code of Practice on retention of and access to records known to relate to child sexual abuse. This Policy will be updated in line with any Code of Practice from the ICO. The report states that such a code should set out that institutions should have:

- retention policies that reflect the importance of such records to victims and survivors, and that they may take decades to seek to access such records;



- clear and accessible procedures for victims and survivors of child sexual abuse to access such records;
- policies, procedures and training for staff responding to requests to ensure that they recognise the long-term impact of child sexual abuse and engage with the applicant with empathy.

10. Retention of Records relating to Staff

As stated above regarding the long-term retention of minimal pupil records trusts may wish to retain very basic 'skeleton' records about staff beyond the normal retention of the whole personnel/HR file. This information may include the staff name, role, contract start and end dates. This may be useful for trusts who may need to respond to requests for information from/regarding staff, in the event of it being needed for litigation or other legal purpose and as part of their historical archive. EMAT intends to create and maintain these records, this will be noted on the retention policy (at section 7.11 below)

11. Academisation

When a maintained school becomes an academy, it is legally a new organisation. However, it can still have an operational need for the records of the original school, including files relating to former pupils and employees. The Commercial Transfer Agreement that created the academy may include a section assigning responsibility for these old records, so the rights of the academy and the local authority are formally established. For instance, the agreement might direct the academy to keep the school records on trust until the retention period runs out, and to offer historically valuable documents to the local record office (see 5. Transfer of Records to Archives).

For further information regarding academy record keeping and retention information from the DfE, please see the following link:

[Record keeping and retention information for academies - GOV.UK](#)

12. Responsibility and Monitoring

The Data Leads in schools, hold primary and day to day responsibility, for implementing this policy. The Data Protection Officer, in conjunction with the trust 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 of People and Culture and recorded in the member of staff's personnel file.

All teaching and office staff are given training and guidance on accessing and managing on EMAT's 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 trusts current practice, the requirements of current legislation and best practice and guidance. It may be amended by the trust but any changes will be notified to employees within one month of the date on which the change is intended to take effect. The trust may also vary any parts of the procedure, including time limits, as appropriate.

13. 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	GovHub MS SharePoint	Head of Governance	Permanent	Closure of school	Common practice	Offer to the Local Authority Record Office when the school closes
1.2	Trusts and Endowments managed by the Governing Body	GovHub MS SharePoint	Head of Governance	Permanent	End of operational use	Common practice	Offer to the Local Authority Record Office when the school closes
1.3	Scheme of delegation and terms of reference for committees	Govhub MS SharePoint	Head of Governance	Until superseded or whilst relevant (schools may wish to retain these records for	Expiration of terms	Common practice	If the school is unable to store these, they will be

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				reference purposes in case decisions need to be justified)			offered to the Local Authority Record Office
1.4	Governor's Code of Conduct	GovHub MS SharePoint	Head of Governance	One copy of each version will be kept for the life of the school.		Common practice	
1.5	Records relating to the election of chair and vice chair	Govhub MS SharePoint	Head of Governance	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	Govhub MS SharePoint SamPeople	Head of Governance	Date of end of appointment + 6 years (note HR records may require different retention)	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
		Iris HR					
1.7	Records relating to the appointment of parent and staff governors, not appointed by the governors	Govhub MS SharePoint	Head of Governance	Date of election + 6 months	Date of election	Common practice	Secure disposal
1.8	Records relating to the appointment of co-opted governors	Govhub MS SharePoint	Head of Governance	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, or for allegations involving child sexual abuse for 75 years in line with the	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
				IICSA recommendations for extended retention of records relating to child sexual abuse.			
1.9	Application forms – successful candidates	Govhub MS SharePoint	Head of Governance	End of term in office + 1year	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. 	GovHub MS SharePoint	Head of Governance	End of term of office + 6 years (note HR records may require different retention)	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
1.11	Annual Reports	Gov Hub MS SharePoint	Head of Governance	Date of the report + 10 years	End of the calendar year that the record was created in	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 and The Limitation Act 1980	If the school is unable to store these, they will be offered to the Local Authority Record Office
1.12	Annual reports required by the Department of Education	GovHub MS SharePoint	Head of Governance	Date of report + 10 years	Date of report	Common practice	Secure disposal
1.13	Meetings schedule	GovHub	Head of Governance	Current year	Date of meeting	Common practice	Secure disposal
1.14	Agendas for Governing Body meetings	GovHub	Head of Governance	One copy to be retained with the master set of minutes - all other	Conclusion of meeting	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
				copies can be disposed of			
1.15	Register of attendance at Full Governing Board meetings	GovHub	Head of Governance	Date of meeting + 6 years	Date of meeting	Common practice	Secure disposal
1.16	Minutes of Governing Body meetings (Principal Set signed)	GovHub	Head of Governance	Permanent to be held at school	Date of meeting	Common practice	If the school is unable to store these, they will be offered to the Local Authority Record Office
1.17	Action plans created and administered by the Governing Body	GovHub	Head of Governance	Until superseded or whilst relevant	Expiration of action plan	Common practice	Secure disposal
1.18	Reports presented to the Governing Body	GovHub	Head of Governance	Reports will be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then	Date of report	Common practice	If the school is unable to store these, they will be offered to the Local

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				the reports will be kept permanently.			Authority Record Office
1.19	Policy documents created and/or administered by the Governing Body	GovHub SAMPeople MS SharePoint	Head of Governance	A copy of each policy will 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 for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	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	GovHub	Head of Governance	Date of the resolution of the complaint + a minimum of 6 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
		MS SharePoint		<p>If negligence or child protection/safeguarding is involved then current year + 15 years.</p> <p>If child sexual abuse issues are involved then for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.</p>			
1.21	Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies	GovHub MS SharePoint	Head of Governance	For the life of the organisation	Date proposal accepted or declined	Common practice	If the school is unable to store these, they will be offered to the Local Authority Record Office

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
1.22	Records relating to Governor Monitoring Visits	GovHub MS SharePoint	Head of Governance	Date of visit + 3 years	Date of visit	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)	MS SharePoint	Head of School/Operations Manager	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	If the school is unable to store these, they will be offered to the Local Authority Record Office
2.2	Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies	MS SharePoint	Head of School/ Executive Assistant (central team Operations Manager	Date of the meeting + 3 years	Date of the meeting	Common practice	If the school is unable to store these, they will be offered to the Local Authority

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
							Record Office
2.3	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 will be immediately transferred to the relevant file.	Email (see email retention period in section 5)	Head of Governance	Date of correspondence + 3 years and then review	Date of correspondence	Common practice	Secure disposal
2.4	Professional Development Plans	Sam People Iris HR	Head of People and Culture	Life of plan + 6 years	Date plan commences	Common practice	Secure disposal
2.5	School Development Plans	MS Share Point	Head of Education	Life of plan + 3 years	Date plan commences	Common practice	Secure disposal
2.6	Other records created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities outside of Business as Usual tasks	MS SharePoint	Head of Governance	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
3. Admissions							
3.1	All records relating to the creation and implementation of the School's Admission's Policy	MS SharePoint	Head of School/Operations Manager	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.	Arbor MS SharePoint	Head of School/Operations Manager	Added to the pupil file	Date of admission	and School Admissions Code Statutory Guidance 2021	
3.3	Admissions – if the admission is unsuccessful (where no appeal is made)	MS SharePoint	Head of School/Operations Manager	Date of applied for admission + 1 year	Date of applied for admission		Secure disposal
3.4	Admissions – if the admission is unsuccessful (where an appeal is made)	MS S SharePoint	Head of School/Operations Manager	Resolution of case + 1 year	Resolution of case		Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
3.5	Register of Admissions	MS SharePoint Arbor	Head of School/Operations Manager	Every entry in the School admission and attendance register is to be preserved for 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.	Last entry in register	The School Attendance (Pupil Registration) (England) Regulations 2024 Regulations 5, 7 School Admissions Code Statutory Guidance 2021	Offer to the Local Authority Record Office
3.6	Proofs of address, supplied by parents, as part of the admissions process	MS SharePoint Physical secure Storage	Head of School/Operations Manager	Current year + 1 year	Date of admission		Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
3.7	Admissions (Secondary School – Casual)	Arbor MS SharePoint	Head of School/Operations Manager	6 years from the date of admission	Date of admission	The School Attendance (Pupil Registration) (England) Regulations 2024	Secure disposal
3.8	Supplementary information forms to include; religion, medical conditions etc. For successful admissions	Arbor	Head of School/Operations Manager	This information will 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	Arbor	Head of School/Operations Manager	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	MS SharePoint	Head of Communications	Current year + 3 years	Expiration of current publication	Common practice	Offer to the Local Authority

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
							Record Office
4.2	Records relating to the creation and distribution of circulars to staff, parents or pupils	MS SharePoint MS Sway Arbor	Head of Communications	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office
4.3	Newsletters and other items with short operational use	MS Sway Arbor MS SharePoint	Head of Communications	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office
4.4	Visitor management systems (including electronic systems, visitors' books and signing in sheets)	Sign In App	Head of Shared Service	Current year + 6 years then review	End of calendar year	Common practice	Secure disposal
4.5	Pupil & Family Privacy Notice which is made available via the school website as part of UK GDPR compliance	Website MS SharePoint	Head of Governance	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
4.6	Consents relating to school activities as part of UK GDPR compliance (e.g. consent for photographs to be published, social media / website etc as well as for mailings)	Arbor	Head of School/Operations Manager	This information will be added to the pupil file	Date of admission	Common practice	
4.7	Security breach logs	MS SharePoint GDPRIS MIS system	Head of Shared Service	Date of issue + 25 years (pupils) and 6 years (staff)	Date of implementation	Common practice	Secure disposal
4.8	Digital continuity plans which may include: - Digital Strategy - IT Disaster Recovery Procedure and Plan	MS SharePoint Hardcopy Central office	Head of shared service Head o of School	Date of issue + 6 years	Expiration of current plan	Common practice	Secure disposal
4.9	Call Recordings (including VOIP messages and recordings)	3CX Telephone System	IT Business Partner	30 Days	Date of call recording	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
4.10	CCTV Recordings (retention for all 'ordinary' footage- any footage retained for specific purposes e.g. accident will need to be considered individually regarding how long it will be retained- please see CCTV policy)	HikVision PVR located in secure server rooms	Estates Manager	15 Days	Date of footage recording	Common practice	Secure disposal
5. School Communications							
5.1	School staff / governor emails and other platforms such as Microsoft Teams containing personal data – inbox, sent items, deleted items	Office 365	IT Business Partner	6 Months Where forming part of a record, information in these will be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. The Code of Practice states that	In line with guidance in Acceptable use policy	Common practice	Full deletion

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				there is no need to retain ephemeral material and this may be destroyed on a routine basis.			
5.2	Pupil emails and other platforms such as Microsoft Teams containing personal data – inbox, sent items, deleted items	Office365	IT business Partner	Until end of study NOTE: Where forming part of a record, information in these will be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. The Code of Practice states that there is no need to retain ephemeral material and this may	In line with guidance in Acceptable use policy	Common practice	Full deletion

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				be destroyed on a routine basis.			
5.3	Social media platforms	Facebook Instagram LinkedIn	Head of Communications	5 years	End of academic yr	Common practice	Posts deleted
5.4	Website – pictures / news stories	EMAT's CMS system	Head of Communications	5 years	End of academic yr	Common practice	Posts deleted
<p>6. HR – Recruitment</p> <p>Information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person will 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 2025 para 424).</p>							
6.1	All records leading up to the appointment of a new Head Teacher	MS SharePoint Iris HR	Head of People & Culture	Unsuccessful attempts - date of appointment + 6 months. Successful attempts - add to the staff personnel file and retain until the end of	Date of appointment	Common practice. 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	
				the appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years or information containing allegations of sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.			Nationality Act 2006	
6.2	All records leading up to the appointment of a new member of staff (successful candidate)	MS SharePoint Iris HR	Head of People & Culture	This information will be added to the staff personnel file	Date of appointment		Common practice. Right to work - Immigration, Asylum and Nationality Act 2006	

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
6.3	All records leading up to the appointment of a new member of staff (unsuccessful candidate)	MS SharePoint Iris HR	Head of People & Culture	Date of appointment + 6 months	Date of appointment	Common practice	Secure disposal
6.4	Pre-employment vetting information of successful candidates	MS SharePoint Iris HR	Head of People & Culture	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. At the end of employment, information contained in the Single Central Record will be transferred to the personnel file.	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSiE 2025	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
6.5	Proofs of identity	MS SharePoint Iris HR	Head of People & Culture	To be kept only as proof of right to work. Not kept for any other purpose. These documents will be added to the personal folder. Home Office requires that the documents are kept until termination of employment plus not less than 2 years.	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSiE 2025	Secure disposal
6.6	Pre-employment vetting information of successful candidates – for the purposes of ensuring staff are adequately qualified	IRIS HR MS SharePoint	Head of People & Culture	To be added to the member of staff's personal folder	Date of receipt	KCSiE 2025	Secure disposal
7. HR – Operational Staff Management							

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
Information containing allegations of sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person will 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 2025 para 424)							
7.1	Staff Personnel File	IRIS HR	Head of People and Culture	Termination of employment + 6 years	Date of appointment	Limitation Act 1980	Secure disposal
7.2	Timesheets	IRIS HR	Head of People and Culture	Current year + 6 years	Date of appointment	Common practice	Secure disposal
7.3	Annual appraisal/assessment records	IRIS HR	Head of People and Culture	Current year + 6 years	End of calendar year that the record was created in	Common practice	Secure disposal
7.4	Sickness absence monitoring	IRIS HR	Head of People and Culture	Sickness records are categorised as 'sensitive data'. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring. Sickness records will be kept separate from accident records.	Date of absence	Common practice & Statutory Sick Pay Act 1994	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				Current practice recommends that sickness records will be held for the current year + 3 years.			
7.5	Staff training records	IRIS HR Sam People	Head of People and Culture	Keep on personnel file (see above).	Date of appointment	Common practice (unless dictated by a professional body)	Secure disposal
7.6	Annual leave records	IRIS HR Sam People	Head of People and Culture	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
7.7	Working Time Regulations: <ul style="list-style-type: none"> · Opt out forms · Records of compliance with WTR 	IRIS HR Sam People	Head of People and Culture	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

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
7.8	Maternity/Adoption/Paternity Leave records	IRIS HR Sam People	Head of People and Culture	Current year + 3 years	End of relevant tax year	Common practice	Secure disposal
7.9	Consents for the processing of personal and sensitive data (this will be rare as the majority of staff data is processed due to: - contract (UK GDPR A9 (1) (b)) - public task (UK GDPR A9 (1) (e)) - legal obligation (UK GDPR A9 (1) (c)) Consent (UK GDPR A9 (1) (a) is only required where one of the above is not relevant.)	IRIS HR Sam people	Head of People and Culture	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	IRIS HR Sam People	Head of People and Culture	Life of the policy + 3 years	Implementation of the policy	Common practice (unless otherwise dictated eg KCSiE, H&SWA)	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
7.11	[see section 10 above regarding this] Staff 'skeleton' record (which would include a brief record of name, job role, contract start and end dates (and any information that would be needed to be included in a reference))	IRIS HR Sam People	Head of People and Culture	Permanent. These form part of the historical archives of the school.	Archive on closure of the school.	Common Practice.	Offer to the Local Authority Record Office
7.12	Register of business interests	GovHub MS SharePoint	Head of People and Culture	Date of appointment + 6 years	Date of appointment	Common practice	Secure disposal

8. HR - Management of Disciplinary and Grievance Processes

Information containing allegations of sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. Unless allegations are found to be malicious or false, other records pertaining to an accused person will 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 2025](#) para 424)

8.1	Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded	MS SharePoint Iris HR	Head of People & Culture	Until the person's normal retirement age or 10 years from the date of allegation, whichever is longer, then review. Information containing	Date of referral	KCSiE 2025 and Working Together to Safeguard Children	Secure disposal
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Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				allegations of sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse NB – allegations that are found to be malicious will be removed from personnel files, from the date they are proven to be unfounded.			
8.2	Disciplinary proceedings: Verbal warning	Iris HR	Head of People & Culture	Date of warning + 6 months	Date of warning	KCSiE 2025	Secure disposal
8.3	Disciplinary proceedings: Written warning (level 1)	Iris HR	Head of People & Culture	Date of warning + 6 months	Date of warning	KCSiE 2025	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
8.3	Disciplinary proceedings: Written warning (level 2)	Iris HR	Head of People & Culture	Date of warning + 12 months	Date of warning	KCSiE 2025	Secure disposal
8.4	Disciplinary proceedings: Final Warning	Iris HR	Head of People & Culture	Date of warning + 18 months	Date of warning	KCSiE 2025	Secure disposal
8.5	Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings)	Iris HR	Head of People & Culture	If the incident is child protection related then see above; otherwise dispose following the conclusion of the case	Date of resolution	KCSiE 2025	Secure disposal
8.6	Directors – disqualification (MATs only)	MS SharePoint Iris HR	Head of People & Culture	15 years from the date of disqualification	Date of disqualification	The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England)	Secure Disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
						Regulations 2004.	
<p>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.</p> <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.</p> <p>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	IRIS HR	Payroll Manager	Current year + 3 years	End of the financial year in which the maternity pay period ends	Statutory Maternity Pay (General) Regulations 1986	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
9.2	Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity	IRIS HR MS SharePoint	Payroll Manager	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	IRIS HR MS SharePoint	Payroll Manager	Current year + 6 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal
9.4	Bonus sheets, Car Allowance claims, Overtime	IRIS HR	Payroll Manager	Current year + 3 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
9.5	Income Tax P60, Personal bank details. Tax Forms P6/P11/P11D/P35/P45/P46/P48	SAM People IRIS HR	Payroll Manager	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	SAM People IRIS HR	Payroll Manager	Current year + 3 years	End of the financial year	Common practice	Secure disposal
9.7	Statutory Sick Pay	SAM People IRIS HR	Payroll Manager	Current year + 3 years	End of the financial year	Common practice	Secure disposal
10. Health and Safety							
10.1	Accessibility Plans	Smart Log	School Operations Manager	Current year + 6 years	End of the calendar year that the records was created in	Equality Act 2010 and The Limitation Act 1980	Secure disposal
10.2	Health and Safety Policy Statements	MS SharePoint	Head of Governance	Life of the policy + 3 years	Implementation of the policy	Common practice	Secure disposal
10.3	Health and Safety Risk Assessments	MS SharePoint SmartLog	School Operations Manager	Life of the assessment + 3 years	Implementation of the assessment	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
10.4	Adults: Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm) and https://www.hse.gov.uk/pubns/edis1.htm	Smart Log	School Operations Manager	Retain for 7 years	Date of incident	Common practice	Secure disposal
10.5	Children: Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm) and https://www.hse.gov.uk/pubns/edis1.htm	SmartLog	School Operations Manager	Retain for 25 years	Date of birth	Common practice	Secure disposal
10.6	Minor incidents (non reportable in 10.4 & 10.5 above) accident book	SmartLog	School Operations Manager	Retain for 3 years	End of academic year	Common practice and The Social Security (Claims and Payments Regulations 1979) Regulation 25	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
10.7	Control of Substances Hazardous to Health (COSHH)	Physical Folders MS SharePoint	Estates Manger School Operations Manager	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	Smart Log MS SharePoint	Estates Manger	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	MS SharePoint Physical School based folder	School Science Lead	Last action + 50 years	Last action on file	The Ionising Radiations Regulation 2017	Secure disposal
10.10	Fire Precautions log books	Physical Site based folder	Estates Manger	Current year + 3 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
10.11	Fire Risk Assessments	SmartLog Physical School based folder	Estates Manger	Life of the risk assessment + 6 years	End of calendar year	Fire Service Order 2005 and The Limitation Act 1980	Secure disposal
11. Financial Management – Risk & Insurance, Asset Management							
11.1	Employer’s Liability Insurance Certificate	Office 365 Hard copy in all school receptions	Head of Shared Service	Date of closure + 40 years	Closure of school	Common practice	Offer to Local Record Office
11.2	Inventories of furniture and equipment	SmartLog	Estates Manager (estates) IT Business Partner for IT Assets	Current year + 6 years	End of calendar year	Common practice	Secure disposal
11.3	Burglary, theft and vandalism report forms	MS SharePoint	Estates Manager	Current year + 6 years	End of calendar year	Common practice	Secure disposal
11.4	Records relating to school/trust vehicles (records that are not required anywhere else e.g. health and safety, litigation etc)	Central office Safe	Head of Shared Service	6 years from the disposal of the vehicle	End of calendar year	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
		and Office 365					
12. Financial Management – Accounts and Statements including Budget Management							
12.1	Annual accounts	MS Sharepoint	Head of Finance	Current year + 6 years	End of financial year	Common practice	Offer to Local Record Office
12.2	Loans and grants managed by the school/trust	N/A	N/A	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	N/A	N/A	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	Iris financials MS SharePoint	Head of Finance	Current financial year + 3 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
		IMP Budget software					
12.5	Invoices, receipts, order books and requisitions, delivery notices, VAT records	Iris Financials MS SharePoint	Head of Finance	Current financial year + 6 years	End of financial year	Standard financial regulations and Record Keeping (VAT Notice 700/21)	Secure disposal
12.6	Records relating to the collection and banking of monies	Iris Financials MS SharePoint	Head of Finance	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	Iris Financials MS SharePoint	Head of Finance	Current financial year + 6 years	End of financial year	Standard financial regulations and 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
12.8	Pupil Premium Fund records, including evidence of successful FSM eligibility checks	Arbor	School Operations Manager	Date pupil leaves the provision + 6 years	End of financial year	Common practice	Secure disposal
13. Financial Management – Contract Management							
13.1	All records relating to the management of contracts under seal	SmartLog Locked Storage Central Office MS SharePoint	Head of Finance	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	SmartLog MS SharePoint	Procurement Manager	Current year + 6 years	End of contract	The Limitation Act 1980	Secure disposal
13.3	Records relating to the monitoring of contracts	Smart Log	Procurement Manager	Current year + 6 or 12 years	End of calendar year	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
		MS SharePoint					
14. Financial Management – School Fund [where one exists, or has done in the previous 7yrs]							
14.1	School Fund: <ul style="list-style-type: none"> • cheque books and paying in books • ledger • invoices • receipts • bank statements • journey books 	Iris Financials Locked storage, central office and schools	Head of Finance	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, including evidence of successful FSM eligibility checks	Arbor	School Operations Manager	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
15.2	School Meals Register	Arbor	School Operations Manager	Current year + 3 years	End of calendar year	Common practice	Secure disposal
15.3	School Meals Summary Sheets	Arbor	School Operations Manager	Current year + 3 years	End of calendar year	Common practice	Secure disposal
15.4	Data for the purposes of the DfE breakfast club provision	Arbor	School Operations Manager	Current year + 7 years	End of the Academic year	<u>Breakfast clubs early adopters: conditions of grant for the 2024 to 2025 academic year, beginning from 22 April 2025 - GOV.UK</u>	Secure Disposal
16. Property Management							
16.1	Title deeds of properties belonging to the trust	N/A	N/A	Permanent. These will follow the property unless the property has	Archive upon closure	Common practice	Offer to Local Authority

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				been registered with the Land Registry			Record Office
16.2	All records relating to the maintenance carried out by contractors	SmartLog and Physical folders in school	Head of Shared Services	Current financial year + 6 years Records relating to rewiring, major alterations etc will be retained in the health and safety file whilst the building belongs to the school and will be passed onto any new owners if the building is leased or sold.	End of financial year that the record was created in	Common practice and Record Keeping (VAT Notice 700/21)	Secure disposal
16.3	All records relating to the maintenance carried out by school employees, including maintenance log book	SmartLog and Physical folders in school	Head of Shared Services	Current calendar year + 6 years Records relating to rewiring, major alterations etc will be retained in the health and safety file whilst	End of calendar year that the record was created in	Common practice and Record Keeping (VAT Notice 700/21)	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				the building belongs to the school/trust and will be passed onto any new owners if the building is leased or sold.			
16.4	Plans of property belonging to the school/trust	Office 365	Head of Shared Services	These will be retained whilst the building belongs to the school/trust and will be passed onto any new owners, if the building is leased or sold.	Transfer of asset	Common practice	Offer to Local Authority Record Office
16.5	Leases of property leased by, or to, the school/trust	Central office Document store And office 365	Head of Shared Services	Expiry of lease + 6 years	Commencement of lease	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
16.6	Records relating to the letting of school/trust premises	Office 365	School Operations Manager	Current financial year + 6 years	End of financial year that the record was created in	Common practice	Secure disposal
<p>17. Pupil Education Record (see s2 Education Record (Pupil Information) Regulations 2005).</p> <p>Much of this information is stored in electronic form on the school's Management Information System [insert name].</p> <p>SEN is dealt with in section 20.</p>							
17.1	Primary	Arbor	School Operations Manager	Retain whilst the child remains at the primary school. Records may be kept on the MIS in an archive or 'former roll' area) after a pupil has left the school – see 1.7 Last School and 1.8 Management Information System	Date pupil changes school	Education (Pupil Information) (England) Regulations 2005	The file will follow the pupil when they leave the primary school (see 1.7 Last School . If <u>pupil does not attend a secondary school, or</u>

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
							<u>the child dies, then records will be retained as per 17.2 below</u>)
17.2	Secondary (or where the school is the 'last known school')	Arbor	School Operations Manager	Date of birth of the pupil + 25 years	Pupil's date of birth	Education (Pupil Information) (England) Regulations 2005 and The Limitation Act 1980	Secure disposal
17.3	Examination Results - Pupil Copies Public	Arbor	School Operations Manager	This information will be added to the pupil file and any certificates will be safely handed over to pupils.	Date of examination	Common practice	Contact the relevant exam board to obtain instructions regarding whether

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
							uncollected certificates to be returned to the examination board or destroyed after reasonable attempts to contact the pupil have failed.
17.4	Examination Results - Pupil Copies Internal	Arbor	School Operations Manager	This information will be added to the pupil file	Date of examination	Common practice	Secure disposal
17.5	[see section 7 above regarding this] Pupil 'skeleton' record (which would include a brief record of pupil names, UPNs, date of birth, address, parent details, date of	Arbor	School Operations Manager	Permanent. These form part of the historical archives.	Archive on closure of the school/trust.	Common Practice.	Offer to the Local Authority Record Office

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
	admission, date of departure and destination (if known))						
18. Child Protection (CP) / Safeguarding Records							
18.1	Child Protection Information - Primary	MyConcern	School DSL	<p>CP files will be transferred to the new school as soon as possible (5 days), to maintain continuity.</p> <p>Ensure secure transit, and a confirmation of receipt will be obtained.</p> <p>The CP file will be transferred separately from the main pupil file.</p> <p>Please add a note here if you use a safeguarding platform</p>	<p>Date pupil changes school</p> <p>(Where a child is removed from the roll to be educated at home/missing from education, see below)</p>	KCSiE 2024 & Annex C	<p>Transferred to new or Secondary school. Duplicates will be securely disposed of.</p>

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				and you intend to retain a copy of the log once the child has left for secondary			
18.2	Child Protection (CP) Information – Secondary (or where the school is the ‘last known school’)	MyConcern Arbor	School DSL	<p>Where a pupil moves between secondary schools – treat as primary above.</p> <p>Otherwise, retain for 25 years from the child’s date of birth, then review.</p> <p>Information relating to child sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention</p>	<p>Pupil’s date of birth</p> <p>(Where a child is removed from the roll to be educated at home/missing from education, see below)</p>	<p>KCSiE 2025 & Annex C</p> <p>Common Practice</p>	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				of records relating to child sexual abuse.			
18.3	Child Protection (CP) Information – Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths.	My Concern Arbor	School DSL	Retain for 25 years from the child’s date of birth, then review. Information relating to child sexual abuse will be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	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
18.4	Child Protection (CP) Information – Child is removed from the roll and is Elective Home Educated	My Concern Arbor	School DSL	Retain for 25 years from the child’s date of birth, then review. Information relating to child sexual abuse will be preserved for 75 years in line with the IICSA recommendations	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

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				for extended retention of records relating to child sexual abuse.			Secure disposal
18.5	Filtering & Monitoring Logs. Where these indicate a child protection/safeguarding concern, the log will be added to the pupil CP Information and retained in line with the periods in 18.1-18.4.	Senso (monitoring) Securely (Filtering)	IT Business Partner	Information retrained in dashboard for up to 18 Months for up to 18months. Any erroneous logs will be deleted as soon as is practically possible	Date of log	Common Practice	Deletion
19. Attendance							
19.1	Attendance Registers	Arbor	School Operations Manager	Every entry in the school admission and attendance register is to be preserved for 6 years beginning with the day on which the entry was made.	Last entry in register	The School Attendance (Pupil Registration) (England) Regulations 2024	Secure disposal

				Retention			
Reference	File description	Format / How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
				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.		Regulations 5, 7	
19.2	Correspondence relating to authorized absence	Arbor	Operations Manager	Date of absence + 2 years	Date of absence	DfE School attendance Guidance for maintained schools, academies, independent schools and local authorities May 2022	Secure disposal
19.3	Correspondence relating to unauthorized absence	Arbor	Operations Manager	Date of absence + 3 years	Date of absence	Section 23 of the Anti-Social	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
						Behaviour Act 2003	
20. Special Educational Needs (SEN)							
20.1	Statements and Reviews of Special Educational Needs under <u>Section 324 and 328 of the Education Act 1996</u> and any amendments made to the plan – Primary	Arbor	Head Teacher / Operations Manager	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School
20.2	Statements and Reviews of Special Educational Needs under <u>Section 324 and 328 of the Education Act 1996</u> and any HSS	Arbor	Head Teacher / Operations Manager	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

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
						The Limitation Act 1980	
20.3	Individual Education Plans and Education Health Care Plan (EHCP) and all other SEN files -Primary	Arbor	Head Teacher / Operations Manager	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School
20.4	Individual Education Plans and Education Health Care Plan (EHCP) and all other SEN files - Secondary (or where the school is the 'last known school')	Arbor	Head Teacher / Operations Manager	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 & 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
21. Curriculum Management							
21.1	Curriculum returns	MS SharePoint	Head Teacher / Operations Manager	Current year + 3 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.2	Curriculum development	MS SharePoint	Head Teacher / Operations Manager	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Offer to the Local Authority Record Office
21.3	Examination Results (School's copy)	MS SharePoint Secure Physical Storage	Head Teacher / Operations Manager	Current year + 6 years	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
21.4	SATs Results	Arbor MS SharePoint	Head Teacher / Operations Manager	The SATS result will be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the ages of 25 years. The school/trust may wish to keep a composite record of all the whole year SATS results. These could be kept for the current year + 6 years to allow suitable comparison	Date that results are released	Common practice	Secure disposal
21.5	SATs Examination papers	School Secure Storage / MS SharePoint	School Operations Manager	The examination papers will be kept until any appeals/validation process is complete	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
21.6	Published Admission Number (PAN) Reports	MS SharePoint	Head Teacher / Operations Manager	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	MS SharePoint	Head Teacher / Operations Manager	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.8	Self-Evaluation Forms	MS SharePoint	Head Teacher / Operations Manager	Current year + 6 years	Date of completion	Common practice	Secure disposal
21.9	Internal Moderation	MS SharePoint	Head Teacher / Operations Manager	Academic year + 1 academic year	Date of commencement	Common practice	Secure disposal
21.10	External Moderation		Head Teacher / Operations Manager	Until superseded	Date of commencement	Common practice	Secure disposal
22. Implementation of Curriculum							

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
22.1	Schemes of Work	MS SharePoint	School Operations Manager	Current year + 1 year	End of the academic year that the record was created in	Common practice	Review these records at the end of each year and allocate a further retention period or secure disposal
22.2	Timetable	Arbor	School Operations Manager	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)	Arbor	School Operations Manager	Current year + 1 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
22.4	Pupil work	Works books / Physical	School Operations Manager	Where possible, pupils' work will be returned to the pupil at the end of the academic year. If this is not, currently policy then it will 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	Time Table Rockstar Purple Mash	Teacher responsible for each platform	As above. Work will 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
22.6	Teacher diaries & Notebooks	Physical Notebooks	Teacher responsible for notebooks	Contents will be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding /	Expiration of diary. Completion of notebook	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
				behaviour log) as soon as possible. Destroyed within 3 months.			
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 (Records created might include risk assessments)	Arbor	School Operations Manager	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	Arbor	School Operations Manager	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	Arbor	School Operations Manager	No retention is required		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
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 (Records created might include risk assessments)	Arbor	School Operations Manager	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	Arbor	School Operations Manager	Retain for 25 years from the date of birth of the pupil/s involved in the incident. 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	Pupil's DOB	The Limitation Act 1980	Secure disposal
24. Family Liaison / Early Help / Alternative Provision							
24.1	Day books	MS SharePoint	School Operations Manager	Current year + 2 years then review	End of the 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
			Behaviour lead		that the record was created in		
24.2	Reports for outside agencies – where the report has been included on the agency case file	MS SharePoint	School Operations Manager Behaviour lead	Whilst the child is attending school and then destroy	Date of completion of report	Common practice	Secure disposal
24.3	Referral forms	MS SharePoint	School Operations Manager Behaviour lead	While the referral is current	Date of completion of form	Common practice	Secure disposal
24.5	Contact data sheets and database entries	MS SharePoint	School Operations Manager Behaviour lead	Current year then review – if contact is no	End of the 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
				longer active then destroy	that the record was created in		
24.6	Group registers	MS SharePoint	School Operations Manager Behaviour lead	Current year + 2 years	Last entry in register	Common practice	Secure disposal
25. Local Authority							
25.1	Secondary Transfer sheets	Arbor	School Operations Manager	Current year + 2 years	Year of transfer	Common practice	Secure disposal
25.2	Attendance Returns	Arbor	School Operations Manager School Data Manager	Current year + 1 year	End of the calendar 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
25.3	School Census Returns	Arbor	School Operations Manager	Current year + 5 years	Completion of return	Common practice	Secure disposal
25.4	Circulars and other information sent from the Local Authority	Office 365	School Operations Manager	Operational use	Date of issue	Common practice	Secure disposal
26. Central Government							
26.1	OFSTED reports and papers	MS SharePoint	Head of Governance	Retain whilst current	Date new report is issued	Common practice	Offer to Local Authority Record Office
26.2	Returns made to central government, including Schools financial value standard (SFVS) and assurance statement	Iris Finance MS SharePoint	Head of Finance	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	MS Exchange	Executive Assistant	Operational use	Date of issue	Common practice	Secure disposal
27. Parent / Alumni Associations							

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
27.1	Records relating to the creation and management of PTA and Old Pupil Associations	MS Office Documents SharePoint	School Operations Manager	Current year + 6 years	Date of foundation	Common practice	Offer to the Local Authority Record Office
28. Recordings (meetings, calls, online lessons) – please adapt this section to suit ensuring it is consistent with the Acceptable Use policy							
28.1	Incoming & Outgoing calls	N/A	N/A	N/A	N/A	Common practice	N/A
28.2	Meetings	N/A	N/A	N/A	N/A	Common practice	N/A
28.3	Online lessons	N/A	N/A	N/A	N/A	Common practice	N/A
28.4	Staff training	MS SharePoint	Executive Director of Primary Education	N/A	N/A	Common practice	N/A

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
29. Pupil Work Experience / Placement Records (Secondary Phase)							
29.1	Records created in relation of offsite pupil work experience where there has not been a Major Incident	Arbor	School Careers Lead	Date of placement + 10 years	Date of placement	The Health and Safety at Work Act 1974	Secure disposal
29.2	Records created in relation of offsite pupil work experience where there has been a Major Incident	Arbor MS SharePoint Smartlog	Head of School / Operations Manager	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
30. Administration of Medication							
30.1	Non-prescription medicines and remedies inc painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers	SmartLog	School Operations Manager	Current year + 1 year	Date of administration	Limitation Act 1980	Secure disposal
30.2	All other administration of medication not covered by 30.1 including, but not limited to: peg feeding, injections, treatments for	SmartLog	School Operations Manager	Date of birth of the pupil + 25 years	Date of administration	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
	serious conditions such as diabetes, ADHD or depression						

Appendix A – List of Records and Data safely destroyed

Specimen Checklist for Annual Review of School/ Trust 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.							