

# Record Retention and Deletion Policy

The First Federation Trust

Version: Nov 2025

<b>Last Reviewed</b>	November 2025
<b>Reviewed By (Name)</b>	Isabelle Candy
<b>Job Role</b>	Lead Governance Professional
<b>Next Review Date</b>	July 2026
<b>Version produced Spring 2025</b>	<p>Minor amendments indicated in green text.</p> <p>4. Disposal of Data- amended some wording from ‘disposed of’ to destroyed</p> <p>5. Transfer to Archives – this section has been re-written</p> <p>Added a paragraph to section 6 regarding the transfer of paper copies to digital and the disposal of said paper copes</p> <p>8. Management Information System (MIS) section updated</p> <p>11. Academisation- this section has been re-written</p> <p>Updated ‘The Education (Pupil Registration) (England) Regulations 2006’ to ‘The School Attendance (Pupil Registration) (England) Regulations 2024’</p> <p><b>Wording and abbreviations updated throughout:</b></p> <p>KCSiE 2024 (also updated paragraph references and hyperlinks)</p> <p>Updated the words ‘must’ and ‘should’ to ‘will’ where necessary throughout.</p>

	<p><b>13. Retention Tables:</b></p> <p>Amended Retention table throughout regarding when to offer certain information to the Local Authority Record Office at the end of use or when school closes.</p> <p>5. School Communications- added 5.2 section which covers Pupil emails.</p> <p>8.6. Directors – disqualification added to retention table</p> <p>10.11. Fire Assessments added to retention table</p> <p>11.4. Records relating to school vehicles (records that are not required anywhere else e.g. health and safety, litigation etc) added to retention table</p> <p>Updated info for 15.1.</p> <p>15. Financial Management – School Meals, added a new section (15.4) which covers retention in relation to the breakfast club grant.</p> <p>19.3- Added in retention guidance for unauthorized absence</p> <p>20. Special Educational Needs (SEN) updated</p>
--	--

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

Guidance from the Department for Education about trust policies can be found here:  
<https://www.gov.uk/guidance/-governance-in-academy-trusts/statutory-policies-for-trusts>

# 1 Contents

1.	How to use this document .....	5
2.	Introduction.....	5
3.	Purpose.....	6
4.	Disposal of Data.....	6
5.	Transfer of Records to Archives .....	7
a)	Storage archives, for school/trust business purposes .....	7
b)	Historic archives, for school/trust heritage .....	7
6.	Transfer of Records to other Media.....	8
7.	Transfer of Records to other Settings & ‘Last Known School’ .....	8
8.	Management Information System (MIS).....	10
9.	Records relating to Child Sexual Abuse.....	10
10.	Retention of Records relating to Staff .....	11
11.	Academisation.....	11
12.	Responsibility and Monitoring .....	11
13.	Retention tables.....	12
1.	Governing Boards (Trust and Hub boards) .....	12
2.	Head of School & Senior Management/Leadership Team .....	17
3.	Admissions .....	18
4.	Operational Administration .....	20
5.	School Communications.....	22
6.	HR – Recruitment.....	23
7.	HR – Operational Staff Management.....	25
8.	HR - Management of Disciplinary and Grievance Processes .....	28
9.	HR – Payroll & Pensions .....	30
10.	Health and Safety .....	32
11.	Financial Management – Risk & Insurance, Asset Management .....	33
12.	Financial Management – Accounts and Statements including Budget Management .....	34
13.	Financial Management – Contract Management.....	35
14.	Financial Management – School Meals.....	36
15.	Property Management .....	36
16.	Pupil Education Record (see s2 Education Record (Pupil Information) Regulations 2005 ). .....	38

17.	Child Protection (CP) / Safeguarding Records .....	39
18.	Attendance .....	42
19.	Special Educational Needs (SEN) .....	43
20.	Curriculum Management.....	44
21.	Implementation of Curriculum .....	45
22.	Extra Curriculum Management .....	47
23.	Family Liaison / Early Help / Alternative Provision.....	47
24.	Local Authority.....	48
25.	Central Government.....	48
26.	Parent / Alumni Associations.....	49
27.	Recordings (meetings, calls, online lessons) .....	49
28.	Administration of Medication .....	49
Appendix A – List of School / Trust Records and Data safely destroyed .....		50

## 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

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

## 2. Introduction

This record retention and deletion policy contains recommended retention periods for the different record series created and maintained by the First Federation 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 the First Federation Trust 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 the Trust ([schools and central team](#)), 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 the Trust ([schools and central team](#)) needs to be justifiable, by reference, to its purpose.
- [The Trust \(schools and central team\)](#) **will** be transparent and accountable as to what data they hold.
- [The Trust \(schools and central team\)](#) **will** understand and explain the reasons why they hold data.
- [The Trust \(schools and central team\)](#) **will** be able to respond to Subject Access Requests.
- [The Trust \(schools and central team\)](#) **will** be able to amend, delete or transfer data promptly upon any justified request.
- [The Trust \(schools and central team\)](#) **will** be able to audit how personal data was collected and when and why.
- [The Trust \(schools and central team\)](#) **will** hold sensitive data securely, accessed only by those with reason to view it and possess a policy as to why it is needed.
- [The Trust \(schools and central team\)](#) **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. The [Trust 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 the **Trust (schools and central team)** 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 **Trust (schools and central team)** 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 school/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 school/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](#)). The Trust (schools and/or central team) 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 the **Trust schools**, 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 the **school's** Data Lead. [Keeping Children Safe in Education 2024](#) (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 **school** 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. **Schools 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 the **school** 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 the **school** 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) **schools 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**

**Schools** frequently use **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 **schools** to use the same system to record behavioural and other information in the same log. **Schools will** ensure that safeguarding/child protection records are clearly identified as such so that the receiving school can quickly identify this information. The **school 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 **schools** to use vendor edtech products to manage these records. Whether stored in such edtech products, on **(school/trust 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 'paper' files**

For many **schools**, in recent years, the traditional pupil **paper** files have dwindled in relevance and importance as **organisations** have increasingly moved to digital storage. **Schools** are 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. **Schools** may have inadvertently not adapted their records transfer practices as management of these records have moved from a paper '**paper**' file to digital format and so this **will** be noted where relevant on the retention schedule below.

**Schools** 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 **schools** intend to create and maintain skeleton records or retain copies of records, this **will** be noted on the retention policy. In some instances, may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If **the Trust (schools and/or central team)** 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.

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 **the Trust** 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 the **schools/central team** MIS. Managing data retention on the MIS can be complex because different data sets held on the MIS have different retention requirements. **School/Trust** 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, **the Trust** 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). The **Trust 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 **governance volunteers**, 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 of the **school/Trust** 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, the Trust 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 the Trust 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. If the Trust 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 Heads of School (for school records) and CEO (for the central team records) hold primary and day to day responsibility, for implementing this policy. The Data Protection Officer, in conjunction with the Trust and its schools 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 School / CEO (or a nominated representative for the relevant systems).

All teaching and office staff are given training and guidance on accessing and managing on school/Trust 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 Trust's 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
<b>1. Governing Boards (Trust and Hub boards)</b>							
1.1	Instruments of Government including Articles of Association	Electronic – Office 365 – FF Central Teams – Formal documents  Paper – Company folder	Lead Governance Professional  Lead Governance Professional	Permanent	Closure of school	Common practice	These should be retained in the schools whilst the Trust/school is open and then to the Local Authority Record Office/new Trust, when the Trust/school closes
1.2	Scheme of delegation and terms of reference for committees	Electronic – Office 365 and GovernorHub	Lead Governance Professional	Until superseded or whilst relevant (schools may wish to retain these records for reference purposes in case decisions need to be justified)	Expiration of terms	Common practice	If the school is unable to store these, they 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
1.3	Governance Volunteers' Code of Conduct	Electronic – Office 365 and GovernorHub	Lead Governance Professional	One copy of each version will be kept for 6 years plus current.	End of school year	Common practice	Secure disposal
1.4	Records relating to the election of Trust chair and vice chair	Paper slips / MS form	Lead Governance Professional	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
1.5	Appointment of a clerk to the governing body	Paper / Electronic personnel file (Filing cabinet / Office 365)	Director of Operations	Date of end of appointment + 6 years (note HR records may require different retention)	Date of appointment	Common practice	Secure disposal
1.6	Records relating to the appointment of parent and staff governors, not appointed by the governors	Electronic – Office 365 (Governance Team)	Lead Governance Professional	Date of election + 6 months	Date of election	Common practice	Secure disposal
1.7	Records relating to the appointment of co-opted governance volunteers	Electronic – Office 365 (Governance Team)	Lead Governance Professional	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	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
				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 IICSA recommendations for extended retention of records relating to child sexual abuse.			
1.8	Application forms – successful candidates	Electronic – Office 365 (Governance Team)	Lead Governance Professional	End of term in office + 1year	End of period of office	Common practice	Secure disposal
1.9	Appointment documentation: <ul style="list-style-type: none"> <li>• Terms of office of serving governance volunteers, including evidence of appointment</li> <li>• Governance volunteer declaration against disqualification criteria</li> <li>• Register of business interests</li> <li>• Training required, and received, by governance volunteers</li> <li>• Induction programme for new governance volunteers</li> <li>• DBS checks carried out on the clerks and members of the governing boards</li> </ul>	Electronic – Office 365 and GovernorHub	Lead Governance Professional	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
	<ul style="list-style-type: none"> <li>Governance volunteers personnel files.</li> </ul>						
1.10	Annual reports required by the Department of Education	Electronic – Office 365 / Trust/School website	Lead Governance Professional / Director of Finance	Date of report + 10 years	Date of report	Common practice	Secure disposal
1.11	Meetings schedule	Electronic – Office 365 and GovernorHub	Lead Governance Professional	Current year	Date of meeting	Common practice	Secure disposal
1.12	Agendas for Governing Boards meetings	Electronic – Office 365 and GovernorHub	Lead Governance Professional / Governance team	One copy to be retained with the master set of minutes - all other copies can be disposed of	Conclusion of meeting	Common practice	Secure disposal
1.13	Register of attendance at Governing Boards meetings	Electronic – Office 365 and GovernorHub	Lead Governance Professional / Governance team	Date of meeting + 6 years	Date of meeting	Common practice	Secure disposal
1.14	Minutes of Governing Boards meetings	Paper (trust board) / Electronic (hubs) – Office 365 and GovernorHub	Lead Governance Professional / Governance team	Permanent to be held at school	Date of meeting	Common practice	If the Trust/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
							Authority Record Office
1.15	Reports presented to the Governing Boards	Electronic – Office 365 and GovernorHub	Lead Governance Professional / Governance team	Reports will be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports will be kept permanently.	Date of report	Common practice	If the Trust/school is unable to store these, they will be offered to the Local Authority Record Office
1.16	Policy documents created and/or administered by the Governing Body	Electronic – Office 365 / Trust website	Lead Governance Professional	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

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
1.17	Records relating to complaints made to, and investigated by governance volunteers, Board and/or Heads of Schools and/or Trust central team	Electronic – office 365  Pupil file (electronic or paper, in school)	Lead Governance Professional / Clerking Team / Head of School / Trust leaders	Date of the resolution of the complaint + a minimum of 6 years. If negligence or child protection/safeguarding is involved then current year + 15 years. 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.	Resolution of complaint		Secure disposal
1.19	Records relating to Governance Monitoring Visits	Electronic – Office 365 and GovernorHub	Lead Governance Professional / Governance team	Date of visit + 3 years	Date of visit	Common practice	Secure disposal
<b>2. Head of School &amp; Senior Management/Leadership Team</b>							
2.1	Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies (where minutes are taken)	Electronic – Office 365	Team most senior leader	Date of the meeting + 3 years	Date of the meeting	Common practice	If the school/trust 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
2.2	Correspondence created by the <b>CEO, Executive Directors</b> , Heads of School, deputy Heads of Schools, and other members of staff with <b>leadership</b> or administrative responsibilities – <b>not principally concerning pupils, staff or complaints</b> . In those cases, correspondence <b>will</b> be immediately transferred to the relevant file.	Email (see email retention period in section 5)	Correspondence author	Date of correspondence + 3 years and then review	Date of correspondence	Common practice	Secure disposal
2.3	Professional Development Plans	Electronic – Office 365	Plan author	Life of plan + 6 years	Date plan commences	Common practice	Secure disposal
2.4	School Improvement Plans / School Evaluation forms	Electronic – Office 365	Plan/form author	Life of plan + 3 years	Date plan commences	Common practice	Secure disposal
2.5	Other records created by the the <b>CEO, Executive Directors</b> , Heads of School, deputy Heads of Schools, and other members of staff with <b>leadership</b> or administrative responsibilities outside of Business as Usual tasks	Electronic – Office 365	Correspondence author	Current academic year + 6 years then review	Date of record	Common practice	Secure disposal
<b>3. Admissions</b>							
3.1	All records relating to the creation and implementation of the School's Admission's Policy	Electronic – Office 365	<b>Lead Governance Professional</b>	Life of the policy + 7 years then review		The School Admissions (Admission Arrangements and Co-	Secure disposal
3.2	Admissions – if the admission is successful	Paper / Electronic	School administrator	Added to the pupil file	Date of admission		

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention				
				Period	Trigger	Basis	Action at end of use	
	Proofs of address, supplied by parents, as part of the admissions process  Supplementary information forms to include; religion, medical conditions etc.	(Office 365) – pupil files				ordination of Admission Arrangements) (England) Regulations 2012 and School Admissions Code Statutory Guidance 2021		
3.3	Admissions – if the admission is unsuccessful (where no appeal is made)	Electronic (Office 365)	School administrator / Lead Governance Professional	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)	Electronic (Office 365)	School administrator / Lead Governance Professional	Resolution of case + 1 year	Resolution of case			Secure disposal
3.5	Register of Admissions	MIS	School administrator	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	Offer to the Local Authority Record Office	
3.6	Proofs of address, supplied by parents, as part of the admissions process	Paper / Electronic	School administrator	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
		(Office 365) – pupil files				2021	
3.7	Supplementary information forms to include; religion, medical conditions etc. For successful admissions	Paper / Electronic (Office 365) – pupil files	School administrator	This information will be added to the pupil file	Date of admission/annual data check	The Limitation Act 1980	Secure disposal
3.8	Supplementary information forms to include; religion, medical conditions etc. For unsuccessful admissions	Electronic (Office 365)	School administrator / Lead Governance Professional	Until the appeal process is completed	Date of admission		Secure disposal
<b>4. Operational Administration</b>							
4.1	Records relating to the creation and publication of the school brochures or prospectus	Electronic – Office 365 / Canva	School administrator / Trust marketing lead Current year + 3 years	Current year + 3 years	Expiration of current publication	Common practice	Offer to the Local Authority Record Office
4.2	Records relating to the creation and distribution of circulars to staff, parents or pupils	Electronic – Office 365	Document author	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	Electronic – Office 365	Document author	Current year + 1 year	Date of record	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
4.4	Visitor management systems (including electronic systems, visitors' books and signing in sheets)	Paper visitor's books / Sign-in app	School administrator	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	Electronic – office 365 / school website	School administrator	Date of issue + 6 years	When policy is superseded	Common practice	Secure disposal
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)	Paper / Electronic – pupil files / Office 365 / MIS	School administrator	This information <b>will</b> be added to the pupil file	Date of admission	Common practice	
4.7	Security breach logs	Electronic – Office 365	School administrator	Date of issue + 25 years (pupils) and 6 years (staff)	Date of implementation	Common practice	Secure disposal
4.8	Digital continuity plans <b>which may include:</b> - Digital Strategy - IT Disaster Recovery Procedure and Plan	Electronic – Office 365 + paper copy in secure storage	School administrator	Date of issue + 6 years	Expiration of current plan	Common practice	Secure disposal
4.9	Call Recordings (including VOIP messages and recordings) <b>These are not routinely recorded but might be recorded to evidence unreasonable behaviour</b>	3CX	School administrator	Date of call + 1 year then review	Date of call recording	Common practice	Secure disposal
4.10	CCTV Recordings (retention for all 'ordinary' footage- any footage retained for specific purposes e.g. accident will need to be considered individually)	See CCTV policy on Trust website	School administrator	See CCTV policy on Trust website	Date of footage 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
	regarding how long it <b>will</b> be retained- please see CCTV policy)						
<b>5. School Communications</b>							
5.1	School <b>staff / governance</b> emails and other platforms such as Microsoft Teams/ <b>Zoom</b> containing personal data – inbox, sent items, deleted items	Email to be set to 3 years. Retention policy for MS teams / Zoom to be confirmed.	To be automatically deleted through Office 365 settings once retention confirmed	School to determine and document here  Where forming part of a record, information in these <b>will</b> 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 be destroyed on a routine basis.	In line with guidance in Acceptable use policy	Common practice	Full deletion
5.2	Social media platforms	Facebook, Twitter, Instagram, YouTube, LinkedIn	Social media administrator / account holder	Current year + 2 years	End of academic yr	Common practice	Posts deleted

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
5.3	Website – pictures / news stories	School / Trust website	School administrator / Trust marketing lead	Current year + 2 years Unless longer retention agreed with data subjects	End of academic yr	Common practice	Posts deleted
<p><b>6. HR – Recruitment</b></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. <a href="#">(KCSiE 2024 para 424)</a>.</p>							
6.1	All records leading up to the appointment of a new Head of School	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	Unsuccessful attempts - date of appointment + 6 months. Successful attempts - add to the staff personnel file and retain until the end of 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.	Date of appointment	Common practice. Right to work - Immigration, Asylum and Nationality Act 2006	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
6.2	All records leading up to the appointment of a new member of staff (successful candidate)	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	This information will be added to the staff personnel file	Date of appointment	Common practice. Right to work - Immigration, Asylum and Nationality Act 2006	
6.3	All records leading up to the appointment of a new member of staff (unsuccessful candidate)	Paper recruitment file / SAM people	Head of HR / Trust HR coordinator	Date of appointment + 6 months	Date of appointment	Common practice	Secure disposal
6.4	Pre-employment vetting information of successful candidates	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	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 2024	Secure disposal
6.5	Proofs of identity	Personnel files (paper /	Head of HR / Trust HR	To be kept only as proof of right to work.	Date of receipt	Right to work - Immigration,	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
		Office 365 / SAM people	coordinator / Director of Operations	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.		Asylum and Nationality Act 2006. KCSiE 2024	
6.6	Pre-employment vetting information of successful candidates – for the purposes of ensuring staff are adequately qualified	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	To be added to the member of staff's personal folder	Date of receipt	KCSiE 2024	Secure disposal
<p><b>7. HR – Operational Staff Management</b></p> <p>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 2024 para 424)</p>							
7.1	Staff Personnel File	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	Termination of employment + 6 years	Date of appointment	Limitation Act 1980	Secure disposal
7.2	Timesheets	Paper log (school) / online claim (iTrent)	School administrator / claims approvers	Current year + 6 years	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
7.3	Annual appraisal/assessment records	Electronic – Office 365	Line manager	Current year + 6 years	End of calendar year that the record was created in	Common practice	Secure disposal
7.4	Sickness absence monitoring	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	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. Current practice recommends that sickness records will be held for the current year + 3 years.	Date of absence	Common practice & Statutory Sick Pay Act 1994	Secure disposal
7.5	Staff training records	Paper / Electronic (Office 365)	School administrator / Compliance & governance assistant	Keep on personnel file (see above).	Date of appointment	Common practice (unless dictated by a professional body)	Secure disposal
7.6	Annual leave records	Electronic (Office 365)	Director of Operations	6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year	End of relevant tax year	Common practice	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
7.8	Maternity/Adoption/Paternity Leave records	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	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.)	Personnel files (paper / Office 365 / SAM people)	Consent requester	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	Paper / Electronic (Office 365)	School administrator (school based staff) / HR coordinator (central team)	Life of the policy + 3 years	Implementation of the policy	Common practice (unless otherwise dictated eg KCSiE, H&SWA)	Secure disposal
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)	MIS	Head of HR / Trust HR coordinator / Director of Operations	Permanent. These form part of the historical archives of the school.			
7.12	Register of business interests	Electronic (Office 365 /	Director of Finance / Lead	Date of appointment + 6 years	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
		Trust website)	Governance Professional				
<p><b>8. HR - Management of Disciplinary and Grievance Processes</b></p> <p>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 2024 para 424)</p>							
8.1	Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	Until the person’s normal retirement age or 10 years from the date of allegation, whichever is longer, then review. 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 NB – allegations that are found to be malicious will be removed from personnel files, from the date they are proven to be unfounded.	Date of referral	KCSiE 2024 and Working Together to Safeguard Children	Secure disposal
8.2	Disciplinary proceedings: Verbal warning	Personnel files (paper /	Head of HR / Trust HR	Date of warning + 6 months	Date of warning	KCSiE 2024	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
		Office 365 / SAM people)	coordinator / Director of Operations				
8.3	Disciplinary proceedings: Written warning (level 1)	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	Date of warning + 6 months	Date of warning	KCSiE 2024	Secure disposal
8.3	Disciplinary proceedings: Written warning (level 2)	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	Date of warning + 12 months	Date of warning	KCSiE 2024	Secure disposal
8.4	Disciplinary proceedings: Final Warning	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	Date of warning + 18 months	Date of warning	KCSiE 2024	Secure disposal
8.5	Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings)	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	If the incident is child protection related then see above; otherwise dispose following the conclusion of the case	Date of resolution	KCSiE 2024	Secure disposal
8.6	Directors (aka Trustees) – disqualification	Electronic – Office 365	Lead Governance Professional	15 years from the date of disqualification	Date of disqualification	The Education (Company Directors Disqualification Act 1986: Amendments to	Secure Disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
						Disqualification Provisions) (England) 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>							
<b>9. HR – Payroll &amp; Pensions</b>							
9.1	Maternity Pay Records	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	Current year + 3 years	End of the financial year in which the maternity pay period ends	Statutory Maternity Pay (General) Regulations 1986	Secure disposal
9.2	Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	Current year + 6 years	End of the financial year	Retirement Benefits Schemes (Information Powers) Regulations 1995	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
9.3	Batches, 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	Personnel files (paper / Office 365 / SAM people) and/or iTrent	Head of HR / Trust HR coordinator / Director of Operations	Current year + 6 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal
9.4	Milage claims, Overtime	Paper / electronic (iTrent)	School administrator / Line manager	Current year + 3 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal
9.5	Income Tax P60, Personal bank details. Tax Forms P6/P11/P11D/P35/P45/P46/P48	Personnel files (paper / Office 365 / SAM people) Electronic – iTrent, PSF	Head of HR / Trust HR coordinator / Director of Operations	Current year + 6 years	End of the financial year	Common practice	Secure disposal
9.6	Absence records, Sickness records, Staff returns, Time Sheets	Personnel files (paper / Office 365 / SAM people)	Head of HR / Trust HR coordinator / Director of Operations	Current year + 3 years	End of the financial year	Common practice	Secure disposal
9.7	Statutory Sick Pay	Personnel files (paper / Office 365 / SAM people) Electronic – iTrent	Head of HR / Trust HR coordinator / Director of Operations	Current year + 3 years	End of the 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
<b>10. Health and Safety</b>							
10.1	Accessibility Plans	Electronic (Office 365)	School administrator	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	Electronic (Office 365)	Lead Governance Professional	Life of the policy + 3 years	Implementation of the policy	Common practice	Secure disposal
10.3	Health and Safety Risk Assessments	Paper / Electronic (H&S file)	School administrator	Life of the assessment + 3 years	Implementation of the assessment	Common practice	Secure disposal
10.4	Adults: Accident reporting (reportable accidents - <a href="https://www.hse.gov.uk/riddor/reportable-incidents.htm">https://www.hse.gov.uk/riddor/reportable-incidents.htm</a> ) and <a href="https://www.hse.gov.uk/pubns/edis1.htm">https://www.hse.gov.uk/pubns/edis1.htm</a>	Electronic (OSHEN)	School administrator	Retain for 7 years	Date of incident	Common practice	Secure disposal
10.5	Children: Accident reporting (reportable accidents - <a href="https://www.hse.gov.uk/riddor/reportable-incidents.htm">https://www.hse.gov.uk/riddor/reportable-incidents.htm</a> ) and <a href="https://www.hse.gov.uk/pubns/edis1.htm">https://www.hse.gov.uk/pubns/edis1.htm</a>	Electronic (OSHEN)	School administrator	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	Incident book	School administrator	Retain for 3 years	End of academic year	Common practice and The Social Security (Claims and Payments Regulations	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
						1979) Regulation 25	
10.7	Control of Substances Hazardous to Health (COSHH) – for in-house cleaners	COSHH file	Cleaner supervisor	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	Asbestos register	School administrator	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 (Radon – where appropriate)	H&S file	School administrator	Last action + 50 years	Last action on file	The Ionising Radiations Regulation 2017	Secure disposal
10.10	Fire Precautions log books	H&S file	School administrator	Current year + 3 years	End of calendar year	Common practice	Secure disposal
10.11	Fire Assessments	H&S file	School administrator	Life of the risk assessment + 6 years	End of calendar year	Fire Service Order 2005 and The Limitation Act 1980	Secure disposal
<b>11. Financial Management – Risk &amp; Insurance, Asset Management</b>							
11.1	Employer’s Liability Insurance Certificate	Electronic (office 365)	Director of Operations	Date of closure + 40 years	Closure of school	Common practice	Offer to Local

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
							Record Office
11.2	Inventories of furniture and equipment	Electronic (office 365)	School administrator	Current year + 6 years	End of calendar year	Common practice	Secure disposal
11.3	Burglary, theft and vandalism report forms	Electronic (office 365)	School administrator	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)	Electronic (office 365)	Finance team	6 years from the disposal of the vehicle	End of calendar year	The Limitation Act 1980	Secure disposal
<b>12. Financial Management – Accounts and Statements including Budget Management</b>							
12.1	Annual accounts	Electronic (Audit files / PSF)	Director 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	Electronic (Audit files / PSF)	Director of Finance	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	Electronic (finance records)	School administrator	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	Electronic (Audit files / PSF / Governance records including GovernorHub)	Central business team / Lead Governance Professional	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
12.5	Invoices, receipts, order books and requisitions, delivery notices, VAT records	Electronic (PSF) / Paper (school office files)	Central business team / School administrator	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	Paper (school office files) / Electronic (PSF)	School administrator	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	Paper (school office files) / Electronic (Office 365, PSF)	School administrator / Central business team	Current financial year + 6 years	End of financial year	Standard financial regulations and The Limitation Act 1980	Secure disposal
12.8	Pupil Premium Fund records, including evidence of successful FSM eligibility checks	Electronic / paper as available	School administrator	Date pupil leaves the provision + 6 years	End of financial year	Common practice	Secure disposal
<b>13. Financial Management – Contract Management</b>							
13.1	All records relating to the management of contracts	Electronic (Office 365 / PSF)	Director of Operations / Head of Procurement / School administrators	Current year + 6 years	End of contract	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
13.2	Records relating to the monitoring of contracts	Electronic (Office 365 / PSF)	Director of Operations / Head of Procurement / School administrators	Current year + 6 or 12 years	End of calendar year	The Limitation Act 1980	Secure disposal
<b>14. Financial Management – School Meals</b>							
14.1	Free School Meals Register, including evidence of successful FSM eligibility checks	MIS	School administrator	Date pupil leaves the provision + 6 years	End of financial year	Common practice	Secure disposal
14.2	School Meals Register	MIS / Paper	School administrator	Current year + 3 years	End of calendar year	Common practice	Secure disposal
14.3	School Meals Summary Sheets	MIS / Paper	School administrator	Current year + 3 years	End of calendar year	Common practice	Secure disposal
14.4	Data for the purposes of the DfE breakfast club provision	MIS / Paper	School administrator	Current year + 7 years	End of the Academic year	<a href="#">Breakfast clubs early adopters: conditions of grant for the 2024 to 2025 academic year, beginning from 22 April 2025 - GOV.UK</a>	Secure Disposal
<b>15. Property Management</b>							

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
15.1	Title deeds of properties belonging to the school/trust	Electronic (Office 365)	Director of Operations	Permanent. These will follow the property unless the property has been registered with the Land Registry	Archive upon closure	Common practice	Offer to Local Authority Record Office
15.2	All records relating to the maintenance carried out by contractors	Paper (H&S file) / Electronic (PSF for financial aspect)	School administrator / Central business team	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
15.3	All records relating to the maintenance carried out by trust employees, including maintenance log book	Paper (H&S file) / Electronic (PSF for financial aspect)	School administrator / Central business team	Current calendar 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/trust and will be passed onto any new owners if the building is leased or sold.	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
15.4	Plans of property belonging to the school/trust	Paper / electronic	School administrator / Director of Operations	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
15.5	Leases of property leased by, or to, the school/trust	Paper / electronic	School administrator / Director of Operations	Expiry of lease + 6 years	Commencement of lease	Common practice	Secure disposal
15.6	Records relating to the letting of school/trust premises	Paper / electronic (lettings file / PSF for financial transactions)	School administrator	Current financial year + 6 years	End of financial year that the record was created in	Common practice	Secure disposal
<p><b>16. Pupil Education Record</b> (see <u>s2 Education Record (Pupil Information) Regulations 2005</u> ).                      Much of this information is stored in electronic form on the school’s Management Information System (MIS) which is Arbor.                      SEN is dealt with in <u>section 20</u>.</p>							
16.1	Primary	MIS / safeguarding record platform / pupil files	Head of School	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 <u>1.7 Last School</u> and <u>1.8</u>	Date pupil changes school	Education (Pupil Information) (England) Regulations 2005	The file will follow the pupil when they leave the primary school (see <u>1.7 Last School</u> . If pupil does

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				<u>Management Information System</u>			not attend a secondary school, or the child dies, then records <b>will</b> be retained as per 17.2 below)
16.2	Where the school is the 'last known school')	MIS / paper (print safeguarding records for retention)	Head of School	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
17.5	[see <a href="#">section 7</a> above regarding this] Pupil 'skeleton' record (which would include a brief record of pupil names, UPNs, date of birth, address, parent details, date of admission, date of departure and destination (if known))	MIS	School administrator	Permanent. These form part of the historical archives.	Archive on closure of the school/trust.	Common Practice.	Offer to the Local Authority Record Office
<b>17. Child Protection (CP) / Safeguarding Records</b>							
17.1	Child Protection Information – when the pupil transfers to another state school within the UK	CPOMS / MyConcern	Designated safeguarding lead	CP files <b>will</b> be transferred to the new school as soon as possible (5 days), to maintain continuity.	Date pupil changes school (Where a child is removed from the roll to be educated at home/missing from education, see below)	<a href="#">KCSiE 2024 &amp; Annex C</a>	Transferred to new or Secondary school. Duplicates <b>will</b> be

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
				<p>Ensure secure transit, and a confirmation of receipt <b>will</b> be obtained.</p> <p>The CP file <b>will</b> be transferred separately from the main pupil file.</p> <p>Where there is an ongoing complaint, access to the pupil safeguarding file will be retained until the complaint process has concluded.</p>			securely disposed of.
17.2	Child Protection (CP) Information –where the school is the ‘last known school’)	Paper (print electronic records for retention and keep stored securely)	Designated safeguarding lead	<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 <b>will</b> 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><a href="#">KCSiE 2024</a> &amp; Annex C 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.			
17.3	Child Protection (CP) Information – Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths.	Paper (print electronic records for retention and keep stored securely)	Designated safeguarding lead	Retain for 25 years from the child’s date of birth, then review. Information relating to child sexual abuse <b>will</b> 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
17.4	Child Protection (CP) Information – Child is removed from the roll and is Elective Home Educated	Paper (print electronic records for retention and keep stored securely)	Designated safeguarding lead	Retain for 25 years from the child’s date of birth, then review. Information relating to child sexual abuse <b>will</b> 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 Elective Home Education Coordinator and Secure disposal
17.5	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.	IT support / filtering & monitoring system provider	Designated safeguarding lead	<b>This will be clarified with RM Education</b>	Date of log	Common Practice	Deletion

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
<b>18. Attendance</b>							
18.1	Attendance Registers	MIS	School administrator	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	Secure disposal
18.2	Correspondence relating to authorized absence	MIS / pupil file (electronic or paper)	School administrator	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
18.3	Correspondence relating to unauthorized absence	MIS / pupil file (electronic or paper)	School administrator	Date of absence + 3 years	Date of absence	Section 23 of the Anti-Social Behaviour Act 2003	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
<b>19. Special Educational Needs (SEN)</b>							
19.1	Statements and Reviews of Special Educational Needs under <a href="#">Section 324 and 328 of the Education Act 1996</a> and any amendments made to the plan	Paper / Electronic (SEND file)	SENDCo	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School
19.2	Statements and Reviews of Special Educational Needs under <a href="#">Section 324 and 328 of the Education Act 1996</a> and any amendments made to the plan - where the school is the 'last known school'	Paper / Electronic (SEND file)	SENDCo	Date of birth of pupil + 35 years (To be checked with LA)	Pupil's date of birth	Special Educational Needs and Disability Act 2001 & Children and Families Act 2014 & <a href="#">The Limitation Act 1980</a>	Secure disposal
19.3	Individual Education Plans and Education Health Care Plan (EHCP) and all other SEN files	Paper / Electronic (SEND file)	SENDCo	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School
19.4	Individual Education Plans and Education Health Care Plan (EHCP) and all other SEN files - where the school is the 'last known school'	Paper / Electronic (SEND file)	SENDCo	Date of birth of pupil + 35 years (To be checked with LA)	Pupil's date of birth	Special Educational Needs and Disability Act	Secure disposal

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
						2001, Children and Families Act 2014 & The Limitation Act 1980	
<b>20. Curriculum Management</b>							
20.1	Curriculum development	Electronic (Office 365)	Subject leaders / teachers / Director of School Improvement	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Offer to the Local Authority Record Office
20.2	SATs Results	Electronic	Head of School	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
20.3	SATs Examination papers	Paper	Head of School	The examination papers will be kept until any	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
				appeals/validation process is complete			
20.4	Published Admission Number (PAN) Reports	Electronic (part of school admissions policies)	Lead Governance Professional	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
20.5	Value Added and Contextual Data	Electronic	Head of School	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
20.6	Internal Moderation	Paper / electronic	Head of School	Academic year + 1 academic year	Date of commencement	Common practice	Secure disposal
20.7	External Moderation	Paper / electronic	Head of School	Until superseded	Date of commencement	Common practice	Secure disposal
<b>21. Implementation of Curriculum</b>							
21.1	Schemes of Work	Paper / electronic		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

Reference	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
21.2	Timetable	Paper / electronic	School leaders / teachers	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
21.3	Class Record books, mark books, homework records (eg teacher spreadsheets etc)	Paper / electronic	School leaders / teachers	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
21.4	Pupil work	Paper	Class teacher	Where possible, pupils' work <b>will</b> be returned to the pupil at the end of the academic year. If this is not, currently policy then it <b>will</b> be retained for the current year +1 (or until the next inspection if part of a case study)	End of the academic year that the record was created in	Common practice	Secure disposal
21.5	Online learning platforms	As per school pupils & families privacy notice	Teacher responsible for each platform	As above. Work <b>will</b> 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
21.6	Teacher diaries & Notebooks	Paper / Office 365	Teacher	Contents <b>will</b> be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon	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
				as possible. Destroyed within 3 months.			
<b>22. Extra Curriculum Management</b>							
22.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom where there has not been a Major Incident <small>(Records created might include risk assessments)</small>	Electronic (Evolve)	Education visit coordinator	Date of visit + 14 years	Date of visit	The Health and Safety at Work Act 1974	Secure disposal
22.2	Parental consent forms for school trips where there has been no Major Incident	Paper / Electronic (MS forms)	School administrator	No retention is required		Common practice	Secure disposal
22.3	Records created by schools to obtain approval for to run an Educational Visit outside the Classroom, <b>where there has been a Major Incident</b> <small>(Records created might include risk assessments)</small>	Electronic (OSHEN)	Education visit coordinator	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
22.4	Parental consent forms for school trips, <b>where there has been a Major Incident</b>	Electronic (OSHEN)	Education visit coordinator	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
<b>23. Family Liaison / Early Help / Alternative Provision</b>							
23.1	Day books	Paper	Head of School	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
					that the record was created in		
23.2	Reports for outside agencies – where the report has been included on the agency case file	Electronic (normally CPOMs/ My Concern)	Designated safeguarding lead	Whilst the child is attending school and then destroy	Date of completion of report	Common practice	Secure disposal
23.3	Referral forms	Paper / Electronic (pupil file)	Referrer	While the referral is current	Date of completion of form	Common practice	Secure disposal
<b>24. Local Authority</b>							
24.4	Circulars and other information sent from the Local Authority	Electronic	Recipient / User	Operational use	Date of issue	Common practice	Secure disposal
<b>25. Central Government</b>							
25.1.	School Census Returns	Electronic	School administrator				
25.2	OFSTED reports and papers	Electronic	Head of School (school records) / Lead Governance Professional (governance records)	Retain whilst current	Date new report is issued	Common practice	Offer to Local Authority Record Office
25.3	Returns made to central government, including SRMSAT and assurance statement	Electronic	Director of Finance	Current year + 6 years	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
25.4	Circulars and other information sent from central government	Electronic	Recipient / Users	Operational use	Date of issue	Common practice	Secure disposal
<b>26. Parent / Alumni Associations</b>							
27.1	Records relating to the creation and management of PTA and Old Pupil Associations	Electronic	School administrator	Current year + 6 years	Date of foundation	Common practice	Offer to the Local Authority Record Office
<b>27. Recordings (meetings, calls, online lessons)</b>							
27.1	Incoming & Outgoing calls	As per 4.9	As per 4.9	As per 4.9	As per 4.9	Common practice	
27.2	Meetings	Teams	Clerk / Note taker / Meeting lead	Meetings recorded for minute taking purposes until minutes are approved by the chair / meeting lead Other meetings: 1 year		Common practice	
27.3	Online lessons	Teams	Teacher	1 year	Date of recording	Common practice	
27.4	Staff training	Teams	Training lead	1 year	Date of recording	Common practice	
<b>28. Administration of Medication</b>							
28.1	Non-prescription medicines and remedies inc painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers	Paper (administration of	School administrator	Current year + 1 year	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
		medicine book)					
28.2	All other administration of medication not covered by 30.1 including, but not limited to: peg feeding, injections, treatments for serious conditions such as diabetes, ADHD or depression	Paper (pupil health care plan)	School administrator / Medication or treatment giver	Date of birth of the pupil + 25 years	Date of administration	Limitation Act 1980	Secure disposal

## Appendix A – List of School / Trust 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.	School invoices	Copies of purchase invoices dated 2011/12	Folders marked 'Purchase Invoices 2011/13' 1-3	3 Folders	Cross shredded	Yes	J Smith (Head)