



# DOWNSVIEW PRIMARY SHOOOL

## Data Retention Policy

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## Document Owner and Approval

The Business Manager is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the school's policy review schedule.

A current version of this document is available to all members of staff on the school network.

## Version History Log

Version	Description of Change	Date of Policy Release by Judicium
1	Initial issue	06/05/2018
2	Amended for school use	18/10/2024
3	Updated with HR retention periods from Croydon HR and IRMS Toolkit 2024	21/11/2024
4	Updated retention periods in line with latest DfE guidance	24/05/2025

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## Data Retention Policy

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

- The most efficient and effective way of storing records and information
- The confidential nature of the records and information stored
- The security of the record systems used
- Privacy and disclosure
- Accessibility of records and record keeping systems

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

## Data Protection

This policy sets out how long employment-related and pupil data will normally be held by the school and when that information will be confidentially destroyed in compliance with the terms of the UK General Data Protection Regulation (UK GDPR) and the Freedom of Information Act 2000. Data will be stored and processed to allow for the efficient operation of the school. The School's Data Protection Policy outlines its duties and obligations under the UK GDPR.

## Retention Schedule

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the school will adhere to the standard retention times listed within that schedule.

The retention schedule refers to all records, regardless of the media (e.g., paper, electronic, photographic etc.) in/on which they are stored. All records will be regularly monitored by the school's Data Team (School Business Manager and HR and Office Manager).

## Destruction of Records

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

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

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

The school maintains a Disposal Log of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member will record the following in the Disposal Log:

- File title/description
- Number of files (where relevant)
- Name of the authorising officer
- Date destroyed or deleted from system
- Person who undertook the destruction

## Retention of Safeguarding Records

Any allegations made that are found to be malicious must not be part of the personnel records.

For any other allegations made, the school must keep a comprehensive summary of the allegation made, details of how the investigation was looked into and resolved and any decisions reached. This should be kept on the personnel files of the accused.

Any allegations made of sexual abuse should be preserved by the school for the term of an inquiry by the Independent Inquiry into Child Sexual Abuse. All other records (for example, the personnel file of the accused) should be retained 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. In 2022, the Independent Inquiry into Child Sexual Abuse (IICSA) concluded and published their final report, leaving a recommendation that all records relating to child sexual abuse should be retained for a period of 75 years.

The Information Commissioner's Officer (ICO) has not currently produced guidance or frameworks regarding retention as recommended by the inquiry. Until this has been produced, records will still be retained for a prolonged period as recommended initially by IISCA in order to fulfil potential legal duties that a school may have in relation to the inquiry or any further guidance.

## Archiving

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. A database of the records which are sent to the archives is maintained by the School's Data Team. The appropriate staff member, when archiving documents should record in this list the following information: -

- File title/description
- Number of files (where relevant)
- Name of the authorising officer

## Transferring Information to Other Media

Where lengthy retention periods have been allocated to records, the school may choose to convert paper records to other media, such as digital media or virtual storage centres (such as cloud storage). Where this is the case, the lifespan of the media and the ability to migrate data, where necessary, should always be considered, in line with this policy.

## Transferring Information to Another School

The School retains a pupil's educational record whilst the child remains at the school. Once a pupil leaves the school, the file is sent to their next school. The responsibility for retention then shifts onto the next school.

However, if the pupil transfers to an independent school (and the file is not requested by the receiving school) or transfers to home schooling or leaves the country, the file will be retained for the statutory retention period of the pupil's date of birth + 25 years.

The school may delay destruction for a further period, where there are special factors such as potential litigation.

## Responsibility and Monitoring

The school's Data Team has primary and day-to-day responsibility for implementing this policy. The Data Protection Officer, Judicium Consulting Ltd, in conjunction with the school is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The Data Protection Officer will consider the suitability and adequacy of this policy and report improvements directly to management.

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

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

## Emails

Emails accounts are not case management tools. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record).

It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost.

## Pupil Records

The school has a duty to maintain a pupil record for each pupil. If a child changes schools, the responsibility for maintaining the pupil record moves to the next school.

## 1 Governing Board

This section contains retention periods connected to the work and responsibilities of the Governing Board.

1.1 Management of the Governing Board					
	Basic File Description	Data Protection Issues	Statutory Provisions [where applicable]	Retention Period [operational]	Action at the end of the administrative life of the record
1.1.1	Instruments of Government	No		For the life of the school	These should be retained in the school
1.1.2	Records relating to the election of parent and staff governors not appointed by the governors	Yes		Date of election + 6 months	Secure disposal by shredding
1.1.3	Records relating to the appointment of co-opted governors	Yes		Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children). In this case, retain for 25 years.	Secure disposal by shredding
1.1.4	Records relating to the election of chair and vice chair	Yes		Once the decision has been recorded in the minutes, the records relating to the election can be destroyed	Secure disposal by shredding
1.1.5	Scheme of delegation and terms of reference for committees/panels			Until superseded or whilst relevant [The School may wish to retain these records for reference purposes in case decisions need to be justified]	One copy to be retained in school.
1.1.6	Meetings Schedule			Current Year	Standard disposal
1.1.7	Agendas – principal copy	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the principal set of minutes in the School Office	To be retained in school
1.1.8	Minutes of and papers considered at meetings of the Governing Board and its Committees- principal set (signed)	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		Principle set to be retained for the life of the school	Stored in school as hard/electronic copy/Governor Hub

1.1.9	Reports made to the governors' meeting which are referred to in the minutes	There may be data protection issues if the report deals with confidential issues relating to staff		If the minutes refer directly to individual reports then the reports should be kept permanently.	Retain with the signed set of the minutes
1.1.10	Register of attendance at Full governing board meetings	Yes		Date of last meeting + 6 years	Secure disposal by shredding
1.1.11	Agendas - additional copies			Date of Meeting	Standard disposal
1.1.12	Records relating to Governor Monitoring Visits	Yes		Date of the visit + 3 years	Secure disposal by shredding
1.1.13	Proposals concerning the change of status to an academy			For the life of the organisation	To be retained in school
1.1.14	Records relating to complaints made to and investigated by the governing board or head teacher	Yes		Date complaint resolved + 3 years then review.  If the complaint relates to negligence or safeguarding then date the complaint resolved + 15 years.  If the complaint relates to child sexual abuse then the complaint resolved + 75 years (this retention period will be reviewed once the government and the ICO have issued guidance about the implementation of the IICSA recommendations)	Secure disposal by shredding
1.1.15	Correspondence sent and received by the Governing Board or Headteacher	Yes		General correspondence should be kept for current year + 3 years	Secure disposal by shredding
1.1.16	Action plans created and administered by the Governing Board	No		Until superseded or whilst relevant	Secure disposal by shredding
1.1.17	Policy documents created and administered by the Governing Board	No		Until superseded  The School should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the government and ICO have published guidance about the implementation of the recommendations made in the IICSA report	Secure disposal by shredding or by electronic disposal

				<b>However please see sections below relating to specific school policies</b>	
1.1.18	Complaints Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	Secure disposal by shredding or by electronic disposal
1.1.19	Data Protection Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	Secure disposal by shredding or by electronic disposal
1.1.20	Freedom of Information Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	Secure disposal by shredding or by electronic disposal
1.1.21	Data Security Breach Prevention Policy and Data Breach Procedure	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	Secure disposal by shredding or by electronic disposal
1.1.22	Special Educational Needs Policy	No		Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained	Secure disposal by shredding or by electronic disposal
1.1.23	Charging and remissions policy	No		Date policy superseded + 3 years	Secure disposal by shredding or by electronic disposal
1.1.24	Resilience (Business Continuity) and Disaster Recovery Plan	Yes		This is a dynamic documents which should be kept up to date	Retain in school
1.1.25	Equality Information and Objectives (public sector equality duty). Statement for publication	No		Life of statement or date statement superseded + 3 years	Secure disposal by shredding or by electronic disposal

1.1.26	Accessibility Plan	No	Equality Act 2010	Life of plan or plan superseded + 6 years the review. If major changes are made to the plan then an archive copy of previous policies should be retained	Secure disposal by shredding or by electronic disposal
1.1.27	Annual Reports created under the requirements of the Education (Governors Annual Reports) (England) (Amendment) Regulations 2002	Yes		Date of report plus 10 years	Secure disposal by shredding or by electronic disposal

## 1.2 Governor Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
1.2.1	Records relating to the appointment of a clerk to the Governing Board	Yes		Date on which clerk appointment ceases + 6 years	Secure disposal by shredding
1.2.2	Records relating to the terms of office of serving governors, including evidence of appointment	Yes		Date appointment ceases + 6 years except where there have been allegations concerning children. In this case, retain for 25 years.	Secure disposal by shredding
1.2.3	Records relating to governor declaration against disqualification criteria	Yes		Date appointment ceases + 6 years	Secure disposal by shredding
1.2.4	Register of business interests	Yes	Companies Act 2006	Date governor resigns + 10 years	Secure disposal by shredding
1.2.5	Governors Code of Conduct	Yes		This is expected to be a dynamic document.  One copy of each version should be kept for the life of the organisation.	To be retained in school
1.2.6	Records relating to the training required and received by Governors	Yes		Date appointment ceases + 6 years	Secure disposal by shredding
1.2.7	Records relating to the induction programme for new governors	Yes		Date appointment ceases + 6 years	Secure disposal by shredding

1.2.8	Records relating to DBS checks carried out on clerk and members of the Governing Board	Yes		Date of DBS check + 6 months (but need to retain a record of the date of the DBS check if renewing every 3)	Secure disposal by shredding
1.2.9	Governor personnel files	Yes		Date appointment ceases + 6 years except where there have been allegations concerning children. In this case retain for 25 years	Secure disposal by shredding

## 2 Management of the School

This section contains retention periods connected to the processes involved in managing the school, including Human Resources, Financial Management, Payroll and Property Management.

### 2.1 Head Teacher and Senior Management Team

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
2.1.1	Minutes of Senior Management Team meetings	Potential		Date of the meeting + 3 years then review	Secure disposal by shredding
2.1.2	Reports created by the Head Teacher or the Management Team	Potential		Date of the report + a minimum of 3 years then review	Secure disposal by shredding
2.1.3	Professional development plans	Yes		These should be held on the individual's personnel file - termination of employment + 6 years	Secure disposal by shredding
2.1.4	School development plans			Life of the plan or until plan superseded + 3 years If major changes are made to the plan then an archive copy of previous plans should be retained	Secure disposal by shredding

### 2.2 Operational Administration

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
2.2.1	Records relating to the creation and publication of the school brochure or prospectus	No		Current academic year + 3 years	Standard disposal

2.2.2	Records relating to the creation and distribution of circulars to staff, parents or pupils			Current academic year + 1 year	Standard disposal
2.2.3	School Privacy Notice which is made available to parents as part of UK GDPR compliance	No		Life of the privacy notice/until the privacy notice plus 6 years	Standard disposal
2.2.4	Consents relating to school activities as part of UK GDPR compliance (for example, consent to be sent marketing materials)	Yes		Consents should be retained for as long as the consent is relied on.	Secure disposal by shredding or by electronic disposal
2.2.6	Newsletters and other items with a short operational use	Yes		One copy to be kept as an archive Current academic year + 1 year	Standard disposal
2.2.7	Visitor management systems (including electronic systems, visitors books and signing-in sheets)	Yes		Last entry in the visitors' book + 6 years (in case of claims by parents or pupils about various actions).	Secure disposal by shredding or by electronic disposal
2.2.8	Emails	Yes		Emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost	Electronic Disposal
2.2.9	CCTV Footage	Yes		CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 31 days. Recorded images will only be retained long enough for any incident to come to light (e.g., for a theft to be noticed) and the incident to be investigated. In the absence of a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months or as required for legal purposes.	Electronic Disposal

## 2.3 Human Resources

**Please note that for HR records:** Retention period after which the file is reviewed and destroyed, unless there are exceptional circumstances where it is in the school's legitimate interest to keep some or all documents for longer.

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
2.3.1	<p><b>Recruitment</b></p> <p>(special categories of data): for example:</p> <p>Health checks</p> <p>Equality information</p>	<ul style="list-style-type: none"> <li>To assess an individual's suitability for work and to determine to whom to offer employment</li> <li>To comply with legislative and regulatory requirements</li> <li>For HR and business administration purposes</li> <li>For defence against potential legal claims</li> </ul>	<p><b>UK GDPR</b></p> <p>Compliance with a legal obligation; performance of a contract; defence against potential legal claims.</p>	<p>For unsuccessful job applicants:</p> <ul style="list-style-type: none"> <li>At least 12 months after notifying candidates of the outcome of the recruitment process</li> </ul> <p>For successful candidates:</p> <ul style="list-style-type: none"> <li>At least 12 months after notifying candidates of the outcome of the recruitment process. Not held in employment file</li> </ul>	Secure disposal by shredding or by electronic disposal
2.3.2	<p><b>Recruitment -</b></p> <ul style="list-style-type: none"> <li>- Advertisement</li> <li>- Job Description</li> <li>- Person Specification</li> <li>- Application Form</li> <li>- References</li> <li>- Interview Notes</li> <li>- ID proof</li> <li>- Signed Contract</li> <li>- Offer Letter</li> <li>- Required qualifications for work (if applicable)</li> <li>- Permission to work in the UK</li> <li>- Test Results (if applicable)</li> </ul>	<ul style="list-style-type: none"> <li>To assess an individual's suitability for work and to determine to whom to offer employment</li> <li>To comply with legislative and regulatory requirements</li> <li>For HR and business administration purposes</li> <li>For defence against potential legal claims</li> </ul>	<p><b>UK GDPR:</b></p> <p>Performance of a contract; the purposes of the legitimate interests of the employer; defence against potential legal claims.</p> <p>Limitation Act 1980</p>	<p><b>For successful candidates:</b></p> <ul style="list-style-type: none"> <li>Included in personnel file which is retained for duration of employment plus 6 years</li> </ul> <p><b>For unsuccessful candidates:</b></p> <ul style="list-style-type: none"> <li>At least one year after notifying candidates about outcome of recruitment exercise (unless a Certificate of Sponsorship is issued in which case for the duration of the successful applicant's employment)</li> </ul>	Secure disposal by shredding  Secure disposal by shredding
2.3.3	<p><b>Right to work</b> documentation, including ID documents, immigration checks</p>		Employer's guide to right to work checks: 21 June 2024	<ul style="list-style-type: none"> <li>Where possible, these copies of documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years</li> </ul>	Secure disposal by shredding
2.3.4	<p><b>Recruitment and Employment vetting information</b> including</p>	<ul style="list-style-type: none"> <li>To assess an individual's suitability for work and to determine to whom to offer employment.</li> </ul>	Handling DBS Certificate Information Guidance 2012	DBS certificates should be destroyed as soon as practicable after the check has been completed and the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional	Secure disposal by shredding

	<ul style="list-style-type: none"> <li>- Disclosure and barring checks</li> <li>- Criminal record checks</li> </ul>	<ul style="list-style-type: none"> <li>• To comply with legislative and regulatory requirements</li> <li>• For HR and business administration purposes</li> <li>• For defence against potential legal claims</li> </ul>	<p>DBS Update Service Employer Guide June 2014</p> <p>Keeping Children Safe in Education 2018 (Statutory Guidance from Dept. of Education) Sections 73, 74</p> <p><b><u>UK GDPR:</u></b></p> <p>Compliance with a legal obligation; performance of a contract; defence against potential legal claims.</p>	<p>circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months</p> <ul style="list-style-type: none"> <li>• Duration of employment plus 6 years for a record of the DBS reference number, the date the check was carried out and the decision whether to permit employment.</li> </ul>	
2.3.5	<p><b>Equality Monitoring</b> (special categories of data obtained by consent)</p> <ul style="list-style-type: none"> <li>- Age</li> <li>- Disability status</li> <li>- Marital status</li> <li>- Sexual orientation</li> <li>- Gender re-assignment</li> <li>- Ethnic Origin</li> <li>- Religion or belief</li> <li>- Gender</li> </ul>	<ul style="list-style-type: none"> <li>• Workforce monitoring and to comply with legislative and regulatory requirements (e.g. Public Sector Equality Duty)/Equality Act 2010</li> </ul>	<p><b><u>UK GDPR:</u></b></p> <p>Compliance with a legal obligation;</p> <p>Employee has given explicit consent which can be withdrawn</p>	<p><b><u>For employees:</u></b></p> <ul style="list-style-type: none"> <li>• Duration of employment plus 6 years</li> </ul>	Secure disposal by shredding
2.3.6	<p><b>Induction/Probation</b></p> <ul style="list-style-type: none"> <li>- Induction Checklist</li> <li>- Probation Reports</li> </ul>	<ul style="list-style-type: none"> <li>• To maintain a record of the operation of performance management systems and performance improvement processes</li> <li>• For HR and business administration purposes</li> <li>• For defence against potential legal claims</li> </ul>	<p>Limitation Act 1980, and for audit purposes</p> <p><b><u>UK GDPR:</u></b></p> <p>Compliance with a legal obligation/performance of a contract; defence against potential legal claims.</p>	<ul style="list-style-type: none"> <li>• Duration of employment plus 6 years</li> </ul>	Secure disposal by shredding
2.3.7	<p><b>Changes to Terms and Conditions:</b> for example,</p> <ul style="list-style-type: none"> <li>- Rewarding additional duties/acting up</li> <li>- Secondments</li> <li>- Career progression</li> </ul>	<ul style="list-style-type: none"> <li>• To maintain a record of employees' contractual and statutory rights and terms and conditions of employment</li> <li>• For HR and business administration purposes</li> <li>• For defence against potential legal claims</li> </ul>	<p>Limitation Act 1980, audit purposes and to allow time limits for claims.</p> <p><b><u>UK GDPR</u></b></p> <p>The performance of a contract/ legitimate interests of the employer/legal</p>	<ul style="list-style-type: none"> <li>• Duration of employment plus 6 years</li> </ul>	Secure disposal by shredding

	<ul style="list-style-type: none"> <li>- Job evaluation outcome letter, any appeal letters and new role profile</li> <li>- Market Supplements outcome letter/</li> <li>- Confirmation</li> <li>- Flexible working application, outcome letter; appeals letter</li> <li>- Shift allowance</li> <li>- Compulsory Car user</li> <li>- Salary protection letter</li> <li>- Opt out letter of working time agreement</li> <li>- Letter confirming end of contract</li> <li>- Letter making a fixed term contract permanent</li> <li>- Annual Leave purchase salary sacrifice form/agreement</li> </ul>		obligations; defence against potential legal claims.		
2.3.8	<b>Working Time Regulations:</b> <ul style="list-style-type: none"> <li>- Opt out forms</li> <li>- Records of compliance with WTR</li> </ul>			<ul style="list-style-type: none"> <li>• Two years from the date on which they were entered into</li> <li>• Two years after the relevant period</li> </ul>	Secure disposal by shredding
2.3.9	<b>Annual Leave Records</b>			<ul style="list-style-type: none"> <li>• Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year</li> </ul>	Secure disposal by shredding
2.3.10	<b>Disciplinary &amp; Employee Complaints:</b> for example <ul style="list-style-type: none"> <li>- Warning or dismissal letter</li> <li>- Appeal letters and outcome</li> </ul>	<ul style="list-style-type: none"> <li>• To maintain a record of the operation and outcome of disciplinary and grievance procedures</li> <li>• For HR and business administration purposes</li> <li>• For defence against potential legal claims</li> </ul>	Limitation Act 1980, for audit purposes. and to allow for time limits for claims  <u><b>UK GDPR:</b></u>  Performance of a contract, legitimate interests of the employer; defence against potential legal claims.	<ul style="list-style-type: none"> <li>• Duration of employment plus 6 years (however see requirements under 2.3.11)</li> </ul> <p><b>Care:</b> Where the warning relates to child protection issues. If the disciplinary proceedings relate to a child protection matter, please contact the Designated Safeguarding Lead for further advice. Relevant to all disciplinary cases. The <a href="#">ACAS code of practice on disciplinary and grievance procedures</a> 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</p>	Secure disposal by shredding or deletion from CPOMs StaffSafe, where relevant

				<p>destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee.</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>	
2.3.11	<p><b>Disciplinary documentation</b> where concerns about staff (paid or unpaid) who work with children or vulnerable adults, for example allegations, convictions, disciplinary action, inappropriate behaviour towards children and young people or vulnerable adults.</p> <p>For example, where an employee has breached the code of conduct a record of the behaviour, the action taken and the outcome should be recorded.</p> <p>Examples include:</p> <ul style="list-style-type: none"> <li>- Letter to DBS reporting unsuitability of a worker to work with children</li> <li>- Warning and/or dismissal letters relating to protection of children or vulnerable adults</li> </ul>	<ul style="list-style-type: none"> <li>• To maintain a record of the operation of disciplinary and grievance procedures and their outcome</li> <li>• For HR and business administration purposes</li> <li>• For defence against potential legal claims</li> <li>• For compliance with legal obligations with regard to safeguarding children.</li> <li>• In the legitimate interest of the school and as a body with statutory responsibilities for safeguarding vulnerable adults.</li> </ul>	<p>For concerns and allegations relating to children:</p> <p>Keeping Children Safe in Education</p> <p>Education Act 2002 guidance dealing with Allegations of Abuse against Teachers and Other Staff 2005.</p> <p><b>UK GDPR:</b></p> <p>Legitimate interests of the employer; compliance with a legal obligation with regard to children and young people defence against potential legal claims</p>	<ul style="list-style-type: none"> <li>• Until the person's normal retirement age or 10 years from the date of allegation, whichever is the longer, then review.</li> </ul> <p><i>Note: allegations that are found to be malicious are to be removed from the Personnel file.</i></p> <p><i>If found, they are to be kept on file and a copy provided to the person concerned.</i></p> <p><b>Note:</b> The retention period will be reviewed once the guidance by the government and ICO about implementing the recommendations made by IICSA has been published.</p>	Secure disposal by shredding or deletion from CPOMs StaffSafe, where relevant

	<ul style="list-style-type: none"> <li>- Appeal letters and outcome relating to the protection of children or vulnerable adults.</li> <li>- Concerns about the behaviour of an adult who was working with children or vulnerable adults where s/he behaved in a way that has harmed or may have harmed a child.</li> <li>- Concerns relating to a staff member committing a criminal offence relating to a child or vulnerable adult.</li> <li>- Concerns relating to behaviour of an adult that indicate s/he is unsuitable to work with children or vulnerable adults.</li> </ul>				
2.3.12	<b>Staff training</b> – where dealing with children, including first aid or health and safety.	Yes	Limitation Act 1980	6 years after employment ceases or length of time required by the professional body	To be retained for length Personnel file is retained, then secure disposal by shredding
2.3.13	<b>Staff training</b> – where training relates to safeguarding/child protection related.	Yes		Date of the training + 40 years [This retention period reflects that the IICSA (Independent Inquiry into Child Sexual Abuse) may wish to see training records as part of an investigation]	Secure disposal by shredding
2.3.14	<b>Maternity/paternity</b> <ul style="list-style-type: none"> <li>- Maternity Confirmation Letter</li> <li>- Adoption Leave Letter</li> <li>- Paternity Leave confirmation letter</li> <li>- Parental Leave letter</li> </ul>	<ul style="list-style-type: none"> <li>• To maintain a record of the operation of absence procedures</li> <li>• To ensure that employees receive statutory and contractual sick pay or other pay entitlements (such as maternity or other family-related pay) and benefits</li> <li>• To meet health and safety obligations</li> <li>• For HR and business administration purposes</li> </ul>	<p>Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)</p> <p><b><u>UK GDPR:</u></b></p> <p>Legitimate interests of employer / performance of an employment contract / legal obligation; defence against potential legal claims.</p>	<ul style="list-style-type: none"> <li>• Duration of employment plus 6 years</li> </ul>	Secure disposal by shredding

2.3.15	<b>Payroll</b> <ul style="list-style-type: none"> <li>- Records of salary and other payments</li> <li>- Records of deductions from pay.</li> <li>- Records of and confirmation of overpayments and underpayments including confirmation of repayment terms</li> </ul>	<ul style="list-style-type: none"> <li>• To pay employees and make appropriate tax payments</li> <li>• For HR and business administration, and financial planning purposes</li> <li>• For defence against potential legal claims</li> </ul>	<u><b>UK GDPR</b></u>  Performance of an employment contract/ legal obligations; defence against potential legal claims.  Taxes Management Act 1970; Income and Corporation Taxes 1988	<ul style="list-style-type: none"> <li>• 6 years after end of tax year they relate to, that is duration of employment plus 6 years</li> </ul>	Secure disposal by shredding - [If warnings are placed on personal files then they must be weeded from the file]
2.3.16	<b>Performance/Capability</b> <ul style="list-style-type: none"> <li>- Capability Formal outcome letters</li> <li>- Appeal letters and outcome</li> </ul>	<ul style="list-style-type: none"> <li>• To maintain a record of the operation of performance management systems and performance improvement processes</li> <li>• For HR and business administration purposes</li> <li>• For defence against potential legal claims</li> </ul>	Limitation Act 1980  <u><b>UK GDPR:</b></u>  Legitimate interests of employer/performance of an employment contract; defence against potential legal claims.	<ul style="list-style-type: none"> <li>• Duration of employment plus 6 years</li> </ul>	Secure disposal by shredding or deletion from CPOMs StaffSafe, where relevant
2.3.17	<b>Redeployment</b> <ul style="list-style-type: none"> <li>- Trial period confirmation letter</li> <li>- Confirmation of trial outcome (appointed or unsuccessful)</li> <li>- Contract</li> <li>- Role Profile</li> </ul>	<ul style="list-style-type: none"> <li>• To maintain a record of employees' contractual and statutory rights</li> <li>• For HR and business administration purposes</li> <li>• For defence against potential legal claims</li> <li>• May also be necessary for compliance with legal obligations</li> </ul>	Limitation Act 1980  <u><b>UK GDPR</b></u>  Legitimate interests of employer/performance of an employment contract; defence against potential legal claims.	<ul style="list-style-type: none"> <li>• Duration of employment plus 6 years</li> </ul>	Secure disposal by shredding
2.3.18	<b>Redundancy</b> <ul style="list-style-type: none"> <li>- Notice of dismissal</li> <li>- Appeal Letter and outcomes</li> <li>- Redundancy calculation/instruction form – FINAL instruction to payroll</li> <li>- Early retirement authorisation form</li> <li>- Voluntary severance form</li> <li>- Correspondence from the individual about voluntary severance.</li> </ul>	<ul style="list-style-type: none"> <li>• To pay employees and make appropriate tax payments</li> <li>• For HR and business administration purposes</li> <li>• For defence against potential legal claims</li> <li>• For compliance with legal obligations</li> </ul>	<u><b>UK GDPR</b></u>  Legitimate interests of employer/performance of an employment contract; defence against potential legal claims	<ul style="list-style-type: none"> <li>• Duration of employment plus 6 years</li> </ul>	Secure disposal by shredding

	- Settlement Agreement (signed copy by all parties)				
2.3.19	<b>Reorganisation</b> <ul style="list-style-type: none"> <li>- Assimilation letter</li> <li>- Revised contract and/or confirmation of contractual changes</li> <li>- New role profile</li> <li>- Appeal letter and outcomes</li> </ul>	<ul style="list-style-type: none"> <li>• To comply with legislative and regulatory requirements</li> <li>• For HR and business administration purposes</li> <li>• For defence against potential legal claims</li> <li>• To maintain a record of employees' contractual and statutory rights</li> </ul>	<u><b>UK GDPR</b></u> Legitimate interests of employer/performance of an employment contract; defence against potential legal claims.	<ul style="list-style-type: none"> <li>• Duration of employment plus 6 years</li> </ul>	Secure disposal by shredding
2.3.20	<b>Medical/Health and safety Records</b> – for example <ul style="list-style-type: none"> <li>- Accident/injury reports</li> <li>- RIDDOR form</li> <li>- Risk assessments</li> <li>- Industrial injury form</li> </ul>	<ul style="list-style-type: none"> <li>• To comply with legislative and regulatory requirements</li> <li>• For HR and business administration purposes</li> <li>• For defence against potential legal claims</li> </ul>	Control of Substances Hazardous to Health Regulations (COSHH) Control of Asbestos at Work Regulations <u><b>UK GDPR</b></u> Legitimate interests of employer/performance of an employment contract; defence against potential legal claims.	<ul style="list-style-type: none"> <li>• 3 years from date of last entry</li> <li>• 40 years for anything with health implications including working with ionising radiation or asbestos</li> <li>• Risk assessments are retained until reviewed</li> </ul>	Secure disposal by shredding or deletion from CPOMs StaffSafe, where relevant
2.3.21	<b>Employee Relations Case Work and Legal Cases</b> <ul style="list-style-type: none"> <li>- ET Investigations</li> <li>- Documents and case files relating to investigation of disciplinary, capability and sickness management concerns and allegations.</li> <li>- Documents and case files relating to investigation of employee complaints (grievances).</li> <li>- Settlement/compromise agreements.</li> <li>- COT3 agreements</li> <li>- Compliance with statutory requests by HMRC</li> </ul>	<ul style="list-style-type: none"> <li>• To comply with legislative and regulatory requirements</li> <li>• For HR and business administration purposes</li> <li>• For defence against additional potential legal claims</li> <li>• To maintain a record of employees' contractual and statutory rights</li> </ul>	Limitation Act 1980 <u><b>UK GDPR:</b></u> Legal obligations; performance of a contract defence against potential legal claims	<ul style="list-style-type: none"> <li>• Duration of employment plus 6 years</li> </ul>	Secure disposal by shredding or deletion from CPOMs StaffSafe, where relevant

2.3.22	<b>Sickness management</b> <ul style="list-style-type: none"> <li>- Formal Sickness letters</li> <li>- Occupational health advice</li> </ul>	<ul style="list-style-type: none"> <li>• To maintain a record of the operation of absence procedures</li> <li>• To ensure that employees receive statutory and contractual sick pay or other pay entitlements (such as maternity or other family-related pay) and benefits</li> <li>• To meet health and safety obligations</li> <li>• To meet disability reasonable adjustments</li> <li>• For HR and business administration purposes</li> <li>• For defence against potential legal claims</li> </ul>	<u><b>UK GDPR</b></u>  Legitimate interests of employer; performance of an employment contract/ legal obligations; defence against potential legal claims.	<ul style="list-style-type: none"> <li>• Duration of employment plus 6 years</li> </ul>	Secure disposal by shredding or deletion from CPOMs StaffSafe, where relevant
2.3.23	<b>Annual appraisal/assessment records</b>			<ul style="list-style-type: none"> <li>• Duration of employment plus 6 years</li> </ul>	Secure disposal by shredding or by electronic disposal
2.3.24	<b>Consents for the processing of personal and sensitive data</b>			<ul style="list-style-type: none"> <li>• For as long as the data is being processed and up to 6 years afterwards</li> </ul>	Secure disposal by shredding or by electronic disposal
2.3.25	<b>Records relating to the employment of temporary and Casual Workers</b>			<ul style="list-style-type: none"> <li>• 3 years from date of appointment</li> </ul>	Secure disposal by shredding or by electronic disposal
2.3.26	<b>Current Bank details</b>		Taxes Management Act 1970; Income and Corporation Taxes 1988	<ul style="list-style-type: none"> <li>• Until updated plus 3 years</li> </ul>	Secure disposal by shredding or by electronic disposal
2.3.27	<b>Leavers</b> <ul style="list-style-type: none"> <li>- Resignation letter</li> <li>- Dismissal letter</li> <li>- Termination letter</li> <li>- Leaver form</li> <li>- Ill-health retirement certificate</li> </ul>	<ul style="list-style-type: none"> <li>• For HR and business administration purposes</li> <li>• For defence against potential legal claims</li> <li>• May also be necessary for compliance with legal obligations</li> </ul>	Limitation Act 1980  <u><b>GDPR:</b></u>  Legitimate interests of employer; performance of an employment contract; defence against potential legal claims.	<ul style="list-style-type: none"> <li>• Duration of employment plus 6 years</li> </ul>	Secure disposal by shredding or by electronic disposal

2.4 Health and Safety					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
2.4.1	Health and Safety Policy	No		Life of policy + 3 years	Secure disposal by shredding or by electronic disposal
2.4.2	Health and Safety Risk Assessments		Limitations Act 1980	Life of risk assessment + 3 years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred	Secure disposal by shredding or by electronic disposal
2.4.3	Accident reporting records for individuals who are over 18 years of age at the time of the incident - Adults	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25.  Social Security Administration Act 1992 Section 8.  Limitation Act 1980	Date of last entry in the accident book + 3 years but if there is possibility of negligence allegation then date of incident + 15 years or date of settlement + 6 years.	Secure disposal by shredding or by electronic disposal
2.4.4	Records relating to accident/injury at work including incident reports	Yes		Date of incident plus 6 years unless the injury is serious - broken limb, more than 3 days in hospital etc. then date of incident plus 15 years (Negligence)	Secure disposal by shredding or by electronic disposal
2.4.5	Accident reporting records relating to individuals who are under 18 years of age at the time of the incident - Children	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25.  Social Security Administration Act 1992 Section 8. Limitation Act 1980  Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628  Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628	Until the child reaches the age of 21 (The official guidance states that this data should be kept for 3 years from the date of entry in the accident book but the DPO advise keeping until 21 (3 years from when they turn 18) as this covers the limitation period of making a claim once the child turns 18.	Secure disposal by shredding or by electronic disposal

			<p>Social Security Administration Act 1992 Section 8</p> <p>Social Security (Claims and Payments) Amendment (No 30) Regulations 1993 SI 1993 No 2113</p> <p>Allows the information to be kept electronically</p>		
2.4.6	Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR).	Yes	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2)	<p>Date of incident + 3 years provided that all records relating to the incident are held on personnel file</p> <p>For pupils: DOB of the child + 25 years</p>	Secure disposal by shredding or by electronic disposal
2.4.7	Control of Substances Hazardous to Health (COSHH) - Health surveillance records. Medical records and details of: - employees exposed to asbestos dust records specified by the Control of Substances Hazardous to Health Regulations (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11	40 years from the date of the last entry made in the record	Secure disposal by shredding or by electronic disposal
2.4.8	Process of monitoring of areas where employees and persons are likely to have become in contact with substances hazardous to health, including asbestos - Monitoring exposure to substances hazardous to health - Records of tests and examinations of control systems and protection equipment under COSHH.	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	5 years from the date on which the record was made.	Secure disposal by shredding or by electronic disposal
2.4.9	Fire Precautions log books			Current year + 6 years	Secure disposal by shredding or by electronic disposal
2.4.10	Fire Risk Assessments	No	Fire Service Order 2005	Life of the risk assessment plus six years	Secure disposal by shredding or by electronic disposal

2.4.11	Health and safety file to show current state of building, including all alterations (wiring, plumbing, building works, etc.), to be passed on in the case of change of ownership			Pass to new owner on sale or transfer of building	To be retained in school
2.4.12	Long term administration of medication (e.g. insulin) as part of a pupil's Health Care Plan	Yes		Date of pupil leaving + 1 year	Secure disposal by shredding or by electronic disposal
2.4.13	Health Care Plans	Yes		Copy in the child's Pupil Record to go to transferring school or DOB + 25 years, if kept in school	Secure Disposal by shredding or by electronic disposal

## 2.5 Financial Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
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### Risk Management and Insurance

2.5.1	Risk Management and Insurance - Employer's Liability Insurance Certificate	No		Year of Issue + 40 years Pass onto the local authority if the school closes	Not applicable
2.5.2	Records relating to the settlement of insurance claims	Yes		Date claim settled + 6 years	Secure disposal by shredding or by electronic disposal

### Asset Management

2.5.3	Asset Management - Inventories of furniture and equipment	No		Current year + 6 years	Secure disposal by shredding or by electronic disposal
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2.5.4	Asset Management - Burglary, theft and vandalism report forms	No		Current year + 6 years	Secure disposal by shredding or by electronic disposal
<b>Accounts and Statements (including budget management)</b>					
2.5.5	Annual Accounts	No		Current year + 6 years	Secure disposal by shredding or by electronic disposal
2.5.6	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 6 years	Secure disposal by shredding or by electronic disposal
2.5.7	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	Secure disposal by shredding or by electronic disposal
2.5.8	Records relating to the collection and banking of monies	No		Current financial year + 6 years	Secure disposal by shredding or by electronic disposal
2.5.9	Records relating to the identification and collection of debt	No		Final payment or write-off of debt + 6 years	Secure disposal by shredding or by electronic disposal
2.5.10	Current Bank Details	No		Until updated plus 3 years	Secure disposal by shredding or by electronic disposal
2.5.11	Grants managed by the school	No		Date of last payment on loan + 6 years	Secure disposal by shredding or by electronic disposal
<b>Pupil Finance</b>					
2.5.112	Student Grant applications	Yes		Current year + 3 years	Secure disposal by shredding or by electronic disposal

2.5.13	Pupil Premium Fund records	Yes		Date pupil leaves the provision + 6 years	Secure disposal by shredding or by electronic disposal
2.5.14	Per pupil funding records	No		Date of last payment of funding + 6 years	Secure disposal by shredding or by electronic disposal
<b>Contract Management</b>					
2.5.15	Contract Management - All records relating to the management of contracts under signature	No	Limitation Act 1980	Last payment on the contract + 6 years or end of contract + 6 years whichever is the longer	Secure disposal by shredding or by electronic disposal
2.5.16	Records relating to the monitoring of contracts	No		End of the contract or until the final payment has been made whichever is the longer	Secure disposal by shredding or by electronic disposal
2.5.17	Records relating to the management of software licences	No		Date licence expires + 6 years	Secure disposal by shredding or by electronic disposal
<b>Educational Trust Fund</b>					
2.5.18	Educational Trust Fund - Cheque books	No		Current year + 6 years	Secure disposal by shredding or by electronic disposal
2.5.19	Educational Trust Fund - Paying in books	No		Current year + 6 years	Secure disposal by shredding or by electronic disposal
2.5.20	Educational Trust Fund – Invoices	No		Current year + 6 years	Secure disposal by shredding or by electronic disposal
2.5.21	Educational Trust Fund – Receipts	No		Current year + 6 years	Secure disposal by shredding or by electronic disposal

2.5.22	Educational Trust Fund – Bank statements	No		Current year + 6 years	Secure disposal by shredding or by electronic disposal
<b>School Meals Management</b>					
2.5.23	Free school meals registers (where the register is used as a basis for funding)	No		Current year + 3 years	Secure disposal by shredding or by electronic disposal
2.5.24	School meals summary sheets	No		Current financial year + 6 years	Secure disposal by shredding or by electronic disposal
<b>Financial Audit</b>					
2.5.25	Internal Audit Reports by the Council	Yes		Financial year report relates to + 6 years	Secure disposal by shredding or by electronic disposal

<b>2.6 Property Management</b>					
	<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
<b>Maintenance</b>					
2.6.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years for financial records all other documents should be retained whilst the building belongs to the school and should be passed on to any new owners.	Secure disposal by shredding or by electronic disposal
2.6.2	All records relating to the maintenance of the school carried out by school employees, including maintenance log books	No		Life of equipment + 6 years.	Secure disposal by shredding or by electronic disposal
2.6.3	Records relating to the letting of the school premises	Yes		Current financial year + 6 years	Secure disposal by shredding or by electronic disposal

### 3 Pupil Management

This section contains retention periods connected to the processes involved in managing a pupil's journey through school, including the admissions process.

3.1 Admissions Process					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
3.1.1	Admissions if the admissions is successful	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	Date of Admissions + 1 year	Secure disposal by shredding or by electronic disposal
3.1.2	Admissions if the appeal is unsuccessful	YES	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	Resolution of case + 1 year	Secure disposal by shredding or by electronic disposal
3.1.3	Admissions Register	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Pupil admissions are recorded on the school's Management Information System – Entries to be preserved for six years from date of entry	Retained in school
3.1.4	Proofs of address supplied by parents as part of the admissions process (Nursery)	Yes	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels.	Current year plus 1 year	Secure disposal by shredding or by electronic disposal

3.1.5	Records relating to the management of exclusions	Yes		Date of birth of the pupil involved + 25 years	Secure disposal by shredding or by electronic disposal
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### 3.2 Pupil's Educational Record

**Please note** that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, the school will seek the advice of the local authority or take independent legal advice.

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
3.2.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005, The Pupil Information (Wales) Regulations 2011)	Retain whilst the child remains at the school	<p>The file should follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> <li>• to another primary school</li> <li>• to a secondary school</li> <li>• to a pupil referral unit</li> </ul> <p>If the pupil transfers to an independent school (and the file is not requested by the receiving school), transfers to home schooling or leaves the country, the file will be retained for the statutory retention period of the pupil's date of birth + 25 years.</p>
3.2.2	Examination Results – Pupil Copies	Yes		This information should be added to the Pupil's Educational Record	See data retention periods for pupil's educational record.
3.2.3	Information relevant to a child's behaviour	Yes		<p>Behaviour records are stored in CPOMS and CPOMS is used for internal use only. CPOMS records are not transferred to receiving schools. Date of leaving + 1 year if not related to a medical condition.</p> <p>If related to a medical condition, then a copy should go into the child's Pupil Record</p>	Secure disposal by shredding or deletion from electronic systems

				to go to transferring school or DOB + 25 years if kept in school.	
3.2.4	Child Protection information held on pupil file	Yes	Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018	<p>If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.</p> <p>Note: This retention period will be reviewed when the government and ICO have published guidance about the implementation of the recommendations made by IICSA.</p>	<p>See retention periods under 3.2.1</p> <p>Once the retention period is reached these records must be securely disposed of by shredding.</p>
3.2.5	Child protection information held in separate files	Yes	<p>Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018</p> <p>Based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance</p>	<p>DOB of the child + 25 years then review</p> <p>Note: If aspects of the record relate to child sexual abuse, then these records should be retained indefinitely. This retention period will be reviewed when the government and ICO have published guidance about the implementation of the recommendations made by IICSA.</p>	Secure disposal by shredding or deletion from electronic systems
3.2.6	Allegations of sexual abuse	Yes		If the complaint relates to child sexual abuse then indefinitely. (Based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)	

### 3.3 Attendance

**Please note** that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If the school is unsure about what records should be retained, the school will seek the advice of their own local authority or take independent legal advice.

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
3.3.1	Attendance Registers	Yes	School attendance Guidance for maintained schools, academies, independent schools and local authorities	Every entry in the attendance register must be preserved for a period of six years from the date of entry.	Deletion from the school's MIS
3.3.2	Correspondence relating to authorised and unauthorised absence	Yes	Education Act 1996 Section 7	Current academic year plus 2 years	Deletion from the school's MIS

### 3.4 Special Educational Needs

**Please note** that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If the school is unsure about what records should be retained, they will seek the advice of the local authority or take independent legal advice.

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
3.4.1	Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Yes	Children and Family's Act 2014; Special Educational Needs and Disability Act 2001  Limitation Act 1980	Whilst the child attends the school and the file is then transferred to the child's next school.  Please note: However, DPO advised that should it be felt that a claim may arise in relation to the SEN provision or if the child's file is not transferred to another school, then the information could be retained by primary school – from date of birth of the pupil plus 31 years (Education, Health and Care Plans are valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years	File transferred to the child's next school or retained in school from the date of birth of the pupil + 31 years if the child's file is not transferred to another school.

				from the end of the plan in line with the Limitation Act).	
3.4.2	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] unless the document is subject to a legal hold then date legal action ceases + 6 years  Note: This retention period will be reviewed once the government and the Information Commissioner have published guidance about implementing the recommendations made by IICSA.	File transferred to the child's next school or retained in school from the date of birth of the pupil + 31 years if the child's file is not transferred to another school.

#### 4 Curriculum and Extra Curricular Activities

This section contains retention periods connected to the processes involved in managing the curriculum and extra-curricular activities.

4.1 Statistics and Management Information					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
4.1.1	SATS records – Results (pupil copy)	Yes		The SATS results should be recorded on the pupil's educational file and retained in line with that record.	Secure disposal by shredding
4.1.2	SATS Examination Papers	Yes		The examination papers should be kept until any appeals/validation process is complete	Secure disposal by shredding
4.1.3	SATS records – Examination Results (school copy)	Yes		The SATS results should be recorded on the pupils educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	Secure disposal by shredding
4.1.4	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	Secure disposal by shredding

4.1.5	Self-Evaluation Forms	Yes		Current year + 6 years	Secure disposal by shredding
4.1.6	Internal moderation	Yes		Academic year plus 1 academic year	Secure disposal by shredding
4.1.7	External moderation	Yes		Until superseded	Secure disposal by shredding
4.1.8	Value added and contextual data	Yes		Current Year + 6 years	Secure disposal by shredding

#### 4.2 Implementation of Curriculum

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
4.2.1	Timetables	No		Current year plus 1 year	Normal disposal
4.2.2	Pupil's Work	No		Where possible pupils' work should be returned to the pupil at the end of the academic year.  Some copies may be retained for monitoring purposes.	Returned to pupils
4.2.3	Schemes of Work	No		Current Year plus 1 year	Secure disposal by shredding or deletion from electronic systems
4.2.4	Class Record Books	No		Current Academic Year plus 1 year	Secure disposal by shredding or deletion from electronic systems
4.2.5	Record of homework set	No		Current Academic Year plus 1 year	Secure disposal by shredding or deletion from electronic systems
4.2.6	Photographs of pupils	Yes		For the time the child is at the School and for a short while after.  Please note select images may also be kept for longer (for example to illustrate history of the school)	Secure disposal by shredding or deletion from electronic systems

4.3 School Trips					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
4.3.1	Parental consent forms for school trips where there has been no major incident	Yes		End of the trip or end of the academic year (subject to a risk assessment carried out by the School)	Secure disposal by shredding
4.3.2	Parental permission slips for school trips/residential trips – where there has been a major incident	Yes	Limitation Act 1980	Date of birth of the pupil involved in the incident plus 25 years or 15 years after the incident, whichever is the longer. 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	Secure disposal by shredding
4.3.3	Records created by schools in order to obtain approval to run an educational visit outside of the classroom.	Yes	Limitation Act 19.80	Date of Visit + 15 years	Secure disposal by shredding

4.4 School Support Organisations					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Family Liaison Officers and Home School Liaison Assistants					
4.4.1	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	Secure disposal by shredding
4.4.2	Referral forms	Yes		Whilst child is attending school and then destroy	Secure disposal by shredding
4.4.3	Contacts data on school's MIS	Yes		Contacts are recorded on the school's Management Information System and can be updated by parents using the Sims Lite App.	Deletion from the school's MIS

Parent Teacher Associations					
4.4.4	Records relating to the creation and management of Parent Teacher Associations	Yes		Current year + 6 years then review	Secure disposal by shredding

## 5 Central Government and Local Authority

This section covers records created in the course of interaction between the school and local authority and central Government

5.1 Local Authority					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
5.1.1	Secondary Transfer Sheets	Yes		Current year + 6 years	Secure disposal by shredding
5.1.3	School Census Returns	Yes		Current year + 5 years	Secure disposal by shredding
5.1.4	Circulars and other information sent from the Local Authority	No		Operational use	Secure disposal by shredding

5.2 Central Government					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
5.2.1	OFSTED reports and papers where a physical copy is held	No		Life of the report then review	Secure disposal by shredding
5.2.2	Returns made to central government	No		Current year + 6 years	Secure disposal by shredding
5.2.3	Circulars and other information sent from central government	No		Operational use	Secure disposal by shredding