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; and
- Their accessibility.

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 us and when that information will be confidentially destroyed in compliance with the terms of the 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, microfilm, photographic etc) in/on which they are stored. All records will be regularly monitored by conducting regular internal reviews.

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 should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate wastepaper merchant. All electronic information will be deleted.

The School maintains a database of records which have been destroyed and who authorised their destruction (detailed in Appendix 1). When destroying documents (paper and electronic records), the appropriate staff member should record in this list the following: -

- File reference (or other unique identifier);
- File title/description;
- Number of files;
- Name of the authorising officer;
- Date destroyed or deleted from system; and
- Person(s) who undertook 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 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, they are scanned and transferred to an external hard drive. A database of the records sent to the archives is maintained by the Business Manager. The appropriate staff member, when archiving documents records in this list the following information: -

- File reference (or other unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising officer.

Files in our archive will be filed away with the destruction date as appropriate.

Transferring Information to Other Media

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

Transferring Information to Another School

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

We may delay destruction for a further period where there are special factors such as potential litigation

Responsibility and Monitoring

The Headteacher has primary and day-to-day responsibility for implementing this Policy. The Data Protection Officer, in conjunction with the School is responsible for monitoring its use and effectiveness and 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 a case management tool in itself. 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.

Retention Schedule

FILE DESCRIPTION	RETENTION PERIOD
Employment Records	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference (up to a maximum of a further six months). In this case, application forms will give applicants the opportunity to object to their details being retained
Job applications and interview records of successful candidates	Added to staff personnel file and retained in line with that record (6 years after employment ceases)
Written particulars of employment, contracts of employment and changes to terms and conditions	Added to staff personnel file and retained in line with that record 6 years after employment ceases.
Right to work documentation including identification documents and immigration checks	Kept separately from personnel file and retained for 2 years after employment ceases.
DBS checks and disclosures of criminal records forms	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 circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months
Change of personal details notifications	No longer than 6 months after receiving this notification
Emergency contact details	Destroyed on termination
Personnel records	While employment continues and up to six years after employment ceases (Limitation Act 1980)
Annual leave records	Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards
Working Time Regulations: • Opt out forms • Records of compliance with WTR	• Two years from the date on which they were entered into • Two years after the relevant period
Disciplinary records	6 years after employment ceases (Limitation Act 1980)
Grievance records	6 years after employment ceases (Limitation Act 1980)

Training	6 years after employment ceases (Limitation Act 1980) or length of time required by the professional body
Staff training where it relates to safeguarding or other child related training	Date of the training plus 40 years (This retention period reflects that the IICSA may wish to see training records as part of an investigation)
Annual appraisal/assessment records	Current year plus 3 years
Professional Development Plans	Life of the plan or plan superseded + 6 years
Allegations of a child protection nature against a member of staff including where the allegation is founded	10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed.
Financial and Payroll Records	
Pension records	12 years (held at RBG payroll)
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	6 years from the end of the scheme year in which the event took place
Payroll and wage records	6 years after end of tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Maternity/Adoption/Paternity Leave records	3 years after end of tax year they relate to (Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567))
Statutory Sick Pay	3 years after the end of the tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Current bank details	Until updated plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Pupil Premium Fund records	Date pupil leaves the provision plus 6 years
National Insurance (schedule of payments)	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Insurance	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Overtime	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Annual accounts	Current year plus 6 years
Loans and grants managed by the School	Date of last payment on loan + 6 years if the loan is under 10,000 or date of last payment on loan + 12 years if the loan is over 10,000
All records relating to the creation and management of budgets	Life of the budget plus 3 years
Invoices, receipts, order books and requisitions, delivery notices	Current financial year plus 6 years
Pupil Premium Fund records	Date pupil leaves the provision or school plus 6 years

School fund documentation (including but not limited to invoices, cheque books, receipts, bank statements etc).	Current year plus 6 years
Free school meals registers (where the register is used as a basis for funding)	Current year plus 6 years
School meal registers and summary sheets	Current year plus 3 years
Agreements and Administration Paperwork	
Collective workforce agreements and past agreements that could affect present employees	Permanently
Trade union agreements	10 years after ceasing to be effective
Strategic Plan or School Development Plans	Life of 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
Visitors Signing In Records	6 years
Newsletters and circulars to staff, parents and pupils	1 year (and the School may decide to archive one copy)
Minutes of Senior Management Team meetings	Date of the meeting plus 3 years or as required
Reports created by the Head Teacher or the Senior Management Team.	Date of the report plus a minimum of 3 years or as required
Health and Safety Records	
Health and Safety consultations	Permanently
Health and Safety Risk Assessments	Life of the risk assessment plus 3 years
Health and Safety Policy Statements	Life of policy plus 3 years
Any records relating to any reportable death, injury, disease or dangerous occurrence	Date of incident plus 3 years provided that all records relating to the incident are held on personnel file
Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	Until the child reaches the age of 21. (Limitations Act 1980)
Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	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. (Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980)
Fire precaution log books	Current year plus 6 years
Medical records and details of: - • control of lead at work • employees exposed to asbestos dust	40 years from the date of the last entry made in the record (Control of Substances Hazardous to Health Regulations (COSHH); Control of Asbestos at Work Regulations)

• records specified by the Control of Substances Hazardous to Health Regulations (COSHH)	
Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made
Temporary and Casual Workers	
Records relating to hours worked and payments made to workers	3 years
Governing Body Documents	
Instruments of government	For the life of the School. Consult local archives before disposal
Meetings schedule	Current year
Minutes – principal set	Date of meeting + 10 years
Agendas – principal copy	Where possible the agenda should be stored with the principal set of the minutes
Agendas – additional copies	Date of meeting
Policy documents created and administered by the governing body	Until replaced
Register of attendance at full governing board meetings	Date of last meeting in the book plus 6 years
Annual Reports created under the requirements of the Education (Governors Annual Reports) (England) (Amendment) Regulations 2002	Date of report plus 10 years
Records relating to complaints made to and investigated by the governing body or head teacher	Major complaints: current year plus 6 years. If negligence involved: current year plus 15 years. If child protection or safeguarding issues are involved then: current year plus 40years. 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)
Correspondence sent and received by the governing body or head teacher	General correspondence should be retained for current year plus 3 years
Records relating to the terms of office of serving governors, including evidence of appointment	Date appointment ceases plus 6 years except where there have been allegations concerning children. In this case retain for 25 years.
Register of business interests	Date appointment ceases plus 10 years (Companies Act 2006)
Records relating to the training required and received by governors	Date appointment ceases plus 6 years
Records relating to the appointment of a clerk to the governing body	Date on which clerk appointment ceases plus 6 years
Governor personnel records	Date appointment ceases plus 6 years

Pupil Records	
Admissions register	Entries to be preserved for six years from date of entry (Working together to improve school attendance, Section, 36, 2024 Statutory guidance)
Pupil Record, including non-child protection safeguarding records.	Electronic details: Until the child turns 25 Paperwork: Whilst the child attends the School (The Education (Pupil Information) (England) Regulations 2005, The Pupil Information (Wales) Regulations 2011)
Attendance Registers	Six years from the date of entry (Working together to improve school attendance, Section 36, 2024 Statutory guidance)
Special Educational Needs files, reviews and individual education plans (this includes any statement and all advice and information shared regarding educational needs)	Until the child turns 25.
Child protection information (to be held in a separate file).	DOB of the child plus 25 years then review. If aspects of the record relate to child sexual abuse, then these records should be retained indefinitely. (Based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)
Records relating to any allegation of a child protection nature against a member of staff	Until the accused normal retirement age or 10 years from the date of the allegation (whichever is the longer) (Retention period informed by the guidance of KCSIE)
Photographs of pupils	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)
Other records	
Emails	Rolling program of deleting e-mails after 12 months.
CCTV	30 days
Privacy Notices	Until replaced plus 6 years

Date this policy was last reviewed:	September 2026
Date next review due:	September 2027