# Record Retention and Deletion Policy

## Grange Primary School

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| **Last Reviewed** | Sept 2026 |
| **Reviewed By (Name)** | Zoe Buxton |
| **Job Role** | Head Teacher |
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This document will be reviewed annually by the Data Protection Officer, and sooner where significant changes to the law occur. The school should also review this document annually, and earlier if legal changes are made to the law.

Guidance from the Department for Education about school policies can be found here: https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts



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# 1 Contents

1. How to use this document ..... 3
2. Introduction ..... 4
3. Purpose ..... 4
4. Disposal of Data ..... 4
5. Transfer of Records to Archives ..... 5
a) Storage archives, for school business purposes ..... 5
b) Historic archives, for school heritage ..... 5
6. Transfer of Records to other Media ..... 6
7. Transfer of Records to other Settings & 'Last Known School' ..... 6
8. Management Information System (MIS) ..... 8
9. Records relating to Child Sexual Abuse ..... 8
10. Retention of Records relating to Staff ..... 9
11. Academisation ..... 9
12. Responsibility and Monitoring ..... 9
13. Retention tables ..... 11
1. Governing Body ..... 11
2. Headteacher & Senior Management/Leadership Team ..... 16
3. Admissions ..... 17
4. Operational Administration ..... 19
5. School Communications ..... 20
6. HR – Recruitment ..... 21
7. HR – Operational Staff Management ..... 24
8. HR - Management of Disciplinary and Grievance Processes ..... 27
9. HR – Payroll & Pensions ..... 29
10. Health and Safety ..... 31
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 Fund [where one exists, or has done in the previous 7yrs] ..... 36
15. Financial Management – School Meals ..... 36
16. Property Management ..... 37
17. Pupil Education Record (see s3 Education Record (Pupil Information) Regulations 2005). ..... 39
18. Child Protection (CP) / Safeguarding Records ..... 41
19. Attendance ..... 43



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20. Curriculum Management....44
21. Implementation of Curriculum....46
22. Extra Curriculum Management....47
23. Family Liaison / Early Help / Alternative Provision....48
24. Local Authority....49
25. Central Government....50
26. Parent / Alumni Associations....50
27. Recordings (meetings, calls, online lessons)....51
28. Pupil Work Experience / Placement Records....51
29. Administration of Medication....51
Appendix A – List of School / Trust Records and Data safely destroyed....52

# 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



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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 Grange Primary School. 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 (GDPR), the Data Protection Act 2018 (DPA), Article 8, 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 must be recorded.

# 3. Purpose

This policy, for managing records at Grange Primary School has been drawn up in conformity with legislation, regulations affecting schools and best practice as promoted by the Information and Records Management Society of Great Britain.

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 school, 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 Freedom of Information Act 2000. It should be read and used in conjunction with all of our related policies.

It is expected that;

- All information held by Grange Primary School needs to be justifiable, by reference, to its purpose.
- Grange Primary School must be transparent and accountable as to what data they hold.
- Grange Primary School must understand and explain the reasons why they hold data.
- Grange Primary School must be able to respond to Subject Access Requests.
- Grange Primary School must be able to amend, delete or transfer data promptly upon any justified request.
- Grange Primary School must be able to audit how personal data was collected and when and why.
- Grange Primary School must hold sensitive data securely, accessed only by those with reason to view it and possess a policy as to why it is needed.
- Grange Primary School must 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 GDPR states that personal data should 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


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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 school should 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 must be destroyed. For confidential, sensitive or personal information, to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed.

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

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

The Freedom of Information Act 2000 requires the school to maintain a list of all records that have been destroyed and who authorised their destruction. This record should be retained for 15 years. The appropriate members of staff (Data Lead) should 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.

In the event that the school or any online service used by the school is issued with a Data Preservation Notice (DPN) under the Online Safety Act 2023, as described in Ofcom's Online Safety Information Powers Guidance (December 2025), the school must take all reasonable steps to ensure that no relevant data is deleted, altered, or disposed of until formally advised by the relevant authority. This includes preserving any digital records, logs, communications, or associated metadata required for coronial or regulatory investigation purposes. For more information see section 18.6 in the retention tables.

# 5. Transfer of Records to Archives

### a) Storage archives, for school 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 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



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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 should 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, should 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 should 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 should then be securely and confidentially disposed of (see section 4. Disposal of Data). School should 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 school, all pupil records, including safeguarding/child protection records must 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 should be obtained and logged by the school's Data Lead. Keeping Children Safe in Education (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 should then be deleted or retained in line with the retention schedule below, including all paper records and data stored electronically. Generally, a record should be kept for tracking and auditing purposes only. Schools should 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 should



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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 must 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 should ensure that safeguarding/child protection records are clearly identified as such so that the receiving school can quickly identify this information. The school should consider if information such as behaviour notes needs to be transferred to the next setting, or whether it should 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 Grange Primary School's IT systems/cloud storage or on paper, the SEND co-ordinator should ensure that a complete record is compiled and passed securely to the next school.

- **Pupil 'buff' files**

For many schools in recent years, the traditional pupil buff 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 should be sent to the next setting that the pupil will attend. The Education (Pupil Information) (England) Regulations 2005 state that this "Educational Record" must 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 should 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 'buff' 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 should be noted on the retention policy. In some instances, schools may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If the schools does retain pupil records, then they should be prepared to justify this retention and should consider whether a Data Protection Impact Assessment is required for any extended retention of records once a pupil has left the school. See section 17.5 below.

For pupils who are Looked-After Children (LAC), the school should retain its own LAC-related records (for example Personal Education Plans (PEPs), correspondence with social workers, reports, and any documents created or received by the school in accordance with the school's standard retention periods for pupil education records and



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safeguarding records (section 17 and 18). The Local Authority retains responsibility for its own statutory LAC case files, which may be kept until the individual is 75 years old. Schools must not transfer the entirety of their pupil records to the Local Authority for long-term storage, as the school remains the data controller for the records it creates. Only the usual transfer of records to the next educational setting must take place, and any copies retained by the school must be recorded in this retention schedule.

Responsibility for maintaining the pupil record passes to the 'last known school'.

The school is the final or last known school if:

- secondary phase and the pupil left at 16 years old or for post-16 or independent education, or;
- at any point the pupil left for elective home education, they are missing from education, or have left the UK, or have died.

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

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

## 8. Management Information System (MIS)

The majority of pupil records and some staff records are held on the school MIS. Managing data retention on the MIS can be complex because different data sets held on the MIS have different retention requirements. School staff have limited time and resources to manage these differing retention periods and should 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, schools 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 school should 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 should 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 should particularly consider digital continuity where:

- they hold digital records for staff or governors 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 should 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 school leadership and/or preserving these records.



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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, schools 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 schools 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 schools intend to create and maintain these records, this should 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 Head Teacher and Data Lead, hold 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 resolving any queries with regards the interpretation of the policy.

All permissions to access data are granted by the Head Teacher and recorded in the member of staff's personnel file.

All teaching and office staff are given training and guidance on accessing and managing on schools 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.



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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 school's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the school but any changes should 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 the procedure, including time limits, as appropriate.


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# 13. Retention tables

| Reference | File description | Format / How / Where this file is held | Responsible Role | Retention | | | |
|---|---|---|---|---|---|---|---|
| | | | | Period | Trigger | Basis | Action at end of use |
| **1. Governing Body –** | | | | | | | |
| 1.1 | Instruments of Government including Articles of Association | Governors folder – locked cupboard in office. | Clerk | Permanent | Closure of school | Common practice | Offer to the Local Authority Record Office when the school closes |
| 1.2 | Trusts and Endowments managed by the Governing Body | N/A | N/A | Permanent | End of operational use | Common practice | Offer to the Local Authority Record Office when the school closes |
| 1.3 | Scheme of delegation and terms of reference for committees | Governors folder – locked cupboard in office. | Clerk | 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 should be offered to the Local Authority Record Office |
| 1.4 | Governor's Code of Conduct | Governors folder – locked cupboard in office. | Clerk | One copy of each version should be kept for the life of the school. | | Common practice | |
| 1.5 | Records relating to the election of chair and vice chair | Governors folder – | Clerk | Once the designation has been recorded in | Date of appointment | Common practice | Secure disposal |


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| | | locked cupboard in office. | | the minutes, the records relating to the election can be destroyed | | | |
| 1.6 | Appointment of a clerk to the governing body | Governors folder – locked cupboard in office. | Clerk | Date of end of appointment + 6 years (note HR records may require different retention) | Date of appointment | Common practice | Secure disposal |
| 1.7 | Records relating to the appointment of parent and staff governors, not appointed by the governors | Governors folder – locked cupboard in office. | Clerk | Date of election + 6 months | Date of election | Common practice | Secure disposal |
| 1.8 | Records relating to the appointment of co-opted governors | Governors folder – locked cupboard in office. | Clerk | Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children – in this case, retain for 25 years, or for allegations involving child sexual abuse for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. | Date of appointment | Common practice | Secure disposal |


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| 1.9 | Application forms – successful candidates | Governors folder – locked cupboard in office. | Clerk | End of term in office + 1year | End of period of office | Common practice | Secure disposal |
| 1.10 | Appointment documentation:<br>• Terms of office of serving governors, including evidence of appointment<br>• Governor declaration against disqualification criteria<br>• Register of business interests<br>• Training required, and received, by governors<br>• Induction programme for new governors<br>• DBS checks carried out on the clerk and members of the governing body<br>• Governor personnel files. | Governors folder – locked cupboard in office. | Clerk | End of term of office + 6 years (note HR records may require different retention) | Date of appointment | Common practice | Secure disposal |
| 1.11 | Annual Reports | Governors folder – locked cupboard in office. | Clerk | Date of the report + 10 years | End of the calendar year that the record was created in | Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 and The Limitation Act 1980 | If the school is unable to store these, they should be offered to the Local Authority Record Office |
| 1.12 | Annual reports required by the Department of Education | Governors folder – locked cupboard in office. | Clerk | Date of report + 10 years | Date of report | Common practice | Secure disposal |


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| 1.13 | Meetings schedule | Governors folder – locked cupboard in office. | Clerk | Current year | Date of meeting | Common practice | Secure disposal |
| 1.14 | Agendas for Governing Body meetings | Governors folder – locked cupboard in office. | Clerk | 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 |
| 1.15 | Register of attendance at Full Governing Board meetings | Governors folder – locked cupboard in office. | Clerk | Date of meeting + 6 years | Date of meeting | Common practice | Secure disposal |
| 1.16 | Minutes of Governing Body meetings (Principal Set signed) | Governors folder – locked cupboard in office. | Clerk | Permanent to be held at school | Date of meeting | Common practice | If the school is unable to store these, they should be offered to the Local Authority Record Office |
| 1.17 | Action plans created and administered by the Governing Body | Governors folder – locked cupboard in office. | Clerk | Until superseded or whilst relevant | Expiration of action plan | Common practice | Secure disposal |
| 1.18 | Reports presented to the Governing Body | Governors folder – locked cupboard in office. | Clerk | Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently. | Date of report | Common practice | If the school is unable to store these, they should be offered to the Local Authority Record Office |


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| 1.19 | Policy documents created and/or administered by the Governing Body | Governors folder – locked cupboard in office. | Clerk | 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.<br>Keep all policies relating to safeguarding and child protection for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. | Expiration of the policy | Common practice | Secure disposal |
| 1.20 | Records relating to complaints made to, and investigated by the Governing Body and/or Head Teacher | Governors folder – locked cupboard in office. Management secure area on server for electronic files. | Clerk<br><br>Head teacher | Date of the resolution of the complaint + a minimum of 6 years.<br>If negligence or child protection/safeguarding is involved then current year + 15 years.<br>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 | | |
| 1.21 | Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies | Governors folder – locked cupboard in office. | Clerk | For the life of the organisation | Date proposal accepted or declined | Common practice | If the school is unable to store these, they should be offered to the |


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| | | | | | | | Local Authority Record Office |
| 1.22 | Records relating to Governor Monitoring Visits | Governors folder – locked cupboard in office. | Clerk | Date of visit + 3 years | Date of visit | Common practice | Secure disposal |
| | | | | | | | |
| **2. Headteacher & Senior Management/Leadership Team** | | | | | | | |
| 2.1 | Log books of activity in the school maintained by the Head Teacher (Legislation no longer requires the completion of a school log book) | Historic log books from 1940 kept in Head teachers locked cupboard. Used for History lessons. | Head teacher | Date of the last entry in the log book + a minimum of 6 years and then review | Date of last entry in the log book | Common practice | If the school is unable to store these, they should be offered to the Local Authority Record Office |
| 2.2 | Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies | Electronic management server area | Head Teacher | Date of the meeting + 3 years | Date of the meeting | Common practice | If the school is unable to store these, they should be offered to the Local Authority Record Office |
| 2.3 | Correspondence created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities – **not principally concerning pupils, staff or complaints.** In those cases, correspondence should be immediately transferred to the relevant file. | Email (see email retention period in section 5) | | Date of correspondence + 3 years and then review | Date of correspondence | Common practice | Secure disposal |



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| 2.4 | Professional Development Plans | Electronic secure management server area | Head Teacher | Life of plan + 6 years | Date plan commences | Common practice | Secure disposal |
| 2.5 | School Development Plans | Electronic secure staff server area | Head Teacher | Life of plan + 3 years | Date plan commences | Common practice | Secure disposal |
| 2.6 | Other records created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities outside of Business as Usual tasks | Electronic secure management and staff server area | Head Teacher | Current academic year + 6 years then review | Date of record | Common practice | Secure disposal |
| | | | | | | | |
| **3. Admissions** | | | | | | | |
| 3.1 | All records relating to the creation and implementation of the School's Admission's Policy | Secure area in school office | Admin team | Life of the policy + 7 years then review | | The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012<br><br>and<br><br>School Admissions Code Statutory Guidance 2021 | Secure disposal |
| 3.2 | Admissions – if the admission is successful<br><br>Proofs of address, supplied by parents, as part of the admissions process<br><br>Supplementary information forms to include; religion, medical conditions etc. | Secure area in school office. Derbyshire process applications | Admin team | Added to the pupil file | Date of admission | | |
| 3.3 | Admissions – if the admission is unsuccessful (where no appeal is made) | Derbyshire store this information securely | | 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) | Secure area in school office | Admin team | Resolution of case + 1 year | Resolution of case | | Secure disposal |
| 3.5 | Admissions – if the admission/application is withdrawn | Secure area in school office. | Admin team | No retention is required | Date of withdrawal | | Secure disposal |



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| 3.6 | Register of Admissions | Secure area in school office. | Admin team | 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.<br>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<br><br>School Admissions Code Statutory Guidance 2021 | Offer to the Local Authority Record Office |
| 3.7 | Proofs of address, supplied by parents, as part of the admissions process | Secure area in school office. | Admin team | Current year + 1 year | Date of admission | | Secure disposal |
| 3.8 | Admissions (Secondary School – Casual) | **N/A** | **N/A** | 6 years from the date of admission | Date of admission | The School Attendance (Pupil Registration) (England) Regulations 2024 | Secure disposal |
| 3.9 | Supplementary information forms to include; religion, medical conditions etc. For successful admissions | Secure area in school office. Derbyshire process applications | Admin team | This information should be added to the pupil file | Date of admission/annual data check | The Limitation Act 1980 | ~~Secure disposal~~ |
| 3.10 | Supplementary information forms to include; religion, medical conditions etc. For unsuccessful admissions | Secure area in school office. Derbyshire process applications | Admin team | Until the appeal process is completed | Date of admission | | Secure disposal |


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| **4. Operational Administration** | | | | | | | |
| 4.1 | Records relating to the creation and publication of the school brochures or prospectus | Secure electronic server | Head Teacher and Admin team | 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 | Secure electronic server | Head Teacher and Admin team | 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 | Secure electronic server | Head Teacher and Admin team | Current year + 1 year | Date of record | Common practice | Offer to the Local Authority Record Office |
| 4.4 | Visitor management systems (including electronic systems, visitors' books and signing in sheets) | Secure electronic server | Admin team | 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 | Secure electronic server | Head Teacher and Admin team | 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) | Secure electronic server | Head Teacher and Admin team | This information should be added to the pupil file | Date of admission | Common practice | |
| 4.7 | Security breach logs | On GDPRis secure system | Business manager and Head Teacher | Date of issue + 25 years (pupils) and 6 years (staff) | Date of implementation | Common practice | Secure disposal |
| 4.8 | Digital continuity plans which may include: - Digital Strategy<br>- IT Disaster Recovery Procedure and Plan | Secure electronic server | Admin team | Date of issue + 6 years | Expiration of current plan | Common practice | Secure disposal |
| 4.9 | Call Recordings (including VOIP messages and recordings) | **N/A** | **N/A** | Answer machine messages deleted daily. | 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 | **N/A** | **N/A** | School does not have CCTV | Date of footage recording | Common practice | Secure disposal |


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| | need to be considered individually regarding how long it should be retained- please see CCTV policy) | | | | | | |
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| **5. School Communications** | | | | | | | |
| 5.1 | School staff / governor emails and other platforms such as Microsoft Teams/ containing personal data – inbox, sent items, deleted items | Emails are deleted on a yearly rolling program. Access to emails and teams are password protected. | IT support and Head Teacher | Where forming part of a record, information in these should 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 | Pupil emails and other platforms such as Microsoft Teams containing personal data – inbox, sent items, deleted items | N/A | **N/A** | N/A | In line with guidance in Acceptable use policy | Common practice | Full deletion |
| 5.3 | Social media platforms | N/A | **N/A** | In line with good practice, any posts containing photographs of pupils should be removed within 1+ year of the pupil leaving the school. | End of academic yr | Common practice | Posts deleted |


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| 5.4 | Website – pictures / news stories | Juniper website | **Head Teacher and deputy Head** | In line with good practice, any posts containing photographs of pupils should be removed within 1+ year of the pupil leaving the school. | End of academic yr | Common practice | Posts deleted |
| | | | | | | | |
| **6. HR – Recruitment**<br>Information containing allegations of sexual abuse should 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 should 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 para 421). | | | | | | | |
| 6.1 | All records leading up to the appointment of a new Head Teacher | Secure management server | Head Teacher and Admin team | 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 should 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 |


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| 6.2 | All records leading up to the appointment of a new member of staff (successful candidate) | Secure electronic management server and paper applications/references kept locked in school office. | Head Teacher and Admin team | This information should 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) | Secure electronic management server and paper applications/references kept locked in school office. | Head Teacher and Admin team | Date of appointment + 6 months | Date of appointment | Common practice | Secure disposal |
| 6.4 | Pre-employment vetting information of successful candidates | Secure electronic management server and paper applications/references kept locked in school office. | Head Teacher and Admin team | 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 should be transferred to the personnel file. If a | Date of receipt | Right to work - Immigration, Asylum and Nationality Act 2006. KCSiE | Secure disposal |



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| | | | | school or college decides to retain a copy of the DBS certificate or criminal information disclosed by the candidate, there should be a valid reason for doing so and it should not be kept for longer than 6 months. When the information is destroyed a school or college may keep a record of the fact that vetting was carried out, the result and the recruitment decision taken if they choose to. | | | |
| 6.5 | Proofs of identity | Secure electronic management server and paper applications/references kept locked in school office. | Head Teacher and Admin team | To be kept only as proof of right to work. Not kept for any other purpose. These documents should be added to the personal folder. Home Office requires that the documents are kept until termination of employment plus not less than 2 years. | Date of receipt | Right to work - Immigration, Asylum and Nationality Act 2006. KCSiE | Secure disposal |
| 6.6 | Pre-employment vetting information of successful candidates – for the purposes of ensuring staff are adequately qualified | Secure electronic management server and paper | Head Teacher and Admin team | To be added to the member of staff's personal folder | Date of receipt | KCSiE | Secure disposal |


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| | | applications/references kept locked in school office. | | | | | |
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| **7. HR – Operational Staff Management**<br>Information containing allegations of sexual abuse should 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 should 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 para 421) | | | | | | | |
| 7.1 | Staff Personnel File | Secure management server | Head Teacher/ Deputy Head | Termination of employment + 6 years | Date of appointment | Limitation Act 1980 | Secure disposal |
| 7.2 | Timesheets | paper documents kept locked in school office. | Head Teacher and Admin team | Current year + 6 years | Date of appointment | Common practice | Secure disposal |
| 7.3 | Annual appraisal/assessment records | Secure electronic management server and paper files kept locked in Head teachers office. | Head Teacher/Deputy Head | Current year + 6 years | End of calendar year that the record was created in | Common practice | Secure disposal |
| 7.4 | Sickness absence monitoring | Secure electronic management server and paper files kept locked in Head teachers office. | Head Teacher/ Deputy head/ business manager | Sickness records are categorised as 'sensitive data'. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring. Sickness records should be kept separate from accident | Date of absence | Common practice & Statutory Sick Pay Act 1994 | Secure disposal |


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| | | | | records. Current practice recommends that sickness records should be held for the current year + 3 years. | | | |
| 7.5 | Staff training records | Secure electronic management server and paper files kept locked in Head teachers office. | Head Teacher | Keep on personnel file (see above). | Date of appointment | Common practice (unless dictated by a professional body) | Secure disposal |
| 7.6 | Annual leave records | paper files kept locked in school office. | Head Teacher and admin team | 6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year | End of relevant tax year | Common practice | Secure disposal |
| 7.7 | Working Time Regulations:<br>· Opt out forms<br>· Records of compliance with WTR | paper files kept locked in school office. | admin team | 2 years from the date on which they were entered into<br>2 years after the relevant period | End of relevant tax year | Common practice | Secure disposal |
| 7.8 | Maternity/Adoption/Paternity Leave records | paper files kept locked in school office or electronic copies on admin secure server | admin team | 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:<br>- contract (UK GDPR A9 (1) (b) | paper files kept locked in school office or electronic | admin team | For as long as the data is being processed and up to 6 years afterwards | End of employment | Common practice | Secure disposal |


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| | - public task (UK GDPR A9 (1) (e)<br>- legal obligation (UK GDPR A9 (1) (c)<br>Consent (UK GDPR A9 (1) (a) is only required where one of the above is not relevant.) | copies on admin secure server | | | | | |
| 7.10 | Staff policy acknowledgement | Secure electronic management server and electronically on MyConcern | Head Teacher/ Deputy Head | Life of the policy + 3 years | Implementation of the policy | Common practice (unless otherwise dictated e.g. KCSiE, H&SWA) | Secure disposal |
| 7.11 | 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) | Paper copy in locked area in school office. Electronic copies in admin secure area on server. | Admin team | Permanent. These form part of the historical archives of the school. | Archive on closure of the school. | Common Practice. | Offer to the Local Authority Record Office |
| 7.12 | Register of business interests | Paper copy in locked area in school office. Electronic copies in admin secure area on server. | Admin team | Date of appointment + 6 years | Date of appointment | Common practice | Secure disposal |
| 7.13 | Staff Accounts- Microsoft | Electronically on admin secure | **Admin team and IT support** | date of staff exit + 30 days | Date of staff exit | Common Practice | Secure deletion |


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| **8. HR - Management of Disciplinary and Grievance Processes**<br>Information containing allegations of sexual abuse should 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 should 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 para 421) | | | | | | | |
| 8.1 | Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded | Secure electronic management server and paper files kept locked in Head teachers office. | Head Teacher | 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 should 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 should be removed from personnel files, from the date they are proven to be unfounded. | Date of referral | KCSiE and Working Together to Safeguard Children | Secure disposal |
| 8.2 | Disciplinary proceedings:<br>Verbal warning | Secure electronic management server and paper files kept locked in Head teachers office. | Head Teacher | Date of warning + 6 months | Date of warning | KCSiE | Secure disposal |


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| 8.3 | Disciplinary proceedings:<br>Written warning (level 1) | Secure electronic management server and paper files kept locked in Head teachers office. | Head Teacher | Date of warning + 6 months | Date of warning | KCSiE | Secure disposal |
| 8.3 | Disciplinary proceedings:<br>Written warning (level 2) | Secure electronic management server and paper files kept locked in Head teachers office. | Head Teacher | Date of warning + 12 months | Date of warning | KCSiE | Secure disposal |
| 8.4 | Disciplinary proceedings:<br>Final Warning | Secure electronic management server and paper files kept locked in Head teachers office. | Head Teacher | Date of warning + 18 months | Date of warning | KCSiE | Secure disposal |
| 8.5 | Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings) | Secure electronic management server and paper files kept locked in Head teachers office. | Head Teacher | If the incident is child protection related then see above; otherwise dispose following the conclusion of the case | Date of resolution | KCSiE | Secure disposal |
| 8.6 | Low-level concerns | Secure electronic | **Head Teacher** | It is recommended that it is retained at least until the individual | Date of concern | KCSiE | Secure disposal |



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| | | management server | | leaves their employment | | | |
| 8.7 | Directors – disqualification (MATs only) | N/A | **N/A** | 15 years from the date of disqualification | Date of disqualification | The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England) Regulations 2004. | Secure Disposal |
| 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.<br>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.<br>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. | | | | | | | |
| | | | | | | | |
| **9. HR – Payroll & Pensions** | | | | | | | |
| 9.1 | Maternity Pay Records | Paper copy in locked area in school office. Electronic copies in admin secure area on server. | Admin team | Current year + 3 years | End of the financial year in which the maternity pay period ends | Statutory Maternity Pay (General) Regulations 1986 | Secure disposal |


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| 9.2 | Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity | Paper copy in locked area in school office. Electronic copies in admin secure area on server. | Admin team | Current year + 6 years | End of the financial year | Retirement Benefits Schemes (Information Powers) Regulations 1995 | Secure disposal |
| 9.3 | Batches, Bonus Sheets, Car Loans, Car Mileage Output, Insurance, Members Allowance Register, National Insurance (Schedule of payments), Part Time Fee claims, Payroll (gross/net, weekly or monthly), Payroll Reports, Payslips (copies), Pension Payroll, Superannuation adjustments and reports | Paper copy in locked area in school office. Electronic copies in admin secure area on server. | Admin team | Current year + 6 years | End of the financial year | Taxes and Management Act 1970, Income and Corporation Taxes Act 1988 | Secure disposal |
| 9.4 | Bonus sheets, Car Allowance claims, Overtime | Paper copy in locked area in school office. Electronic copies in admin secure area on server. | Admin team | 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 | Paper copy in locked area in school office. Electronic copies in admin secure area on server. | Admin team | Current year + 6 years | End of the financial year | Common practice | Secure disposal |
| 9.6 | Absence records, Sickness records, Staff returns, Time Sheets/Clock Cards/Flexitime | Paper copy in locked area in school office. | Admin team | Current year + 3 years | End of the financial year | Common practice | Secure disposal |



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| | | Electronic copies in admin secure area on server. | | | | | |
| 9.7 | Statutory Sick Pay | Paper copy in locked area in school office. Electronic copies in admin secure area on server. | Admin team | Current year + 3 years | End of the financial year | Common practice | Secure disposal |
| | | | | | | | |
| **10. Health and Safety** | | | | | | | |
| 10.1 | Accessibility Plans | Electronic copies in Staff secure area and on Website. | Head Teacher/ business manager | Current year + 6 years | End of the calendar year that the records was created in | Equality Act 2010 and The Limitation Act 1980 | Secure disposal |
| 10.2 | Health and Safety Policy Statements | Electronic copies in Staff secure area and on Website. | Head Teacher/ business manager | Life of the policy + 3 years | Implementation of the policy | Common practice | Secure disposal |
| 10.3 | Health and Safety Risk Assessments | Electronic copies in Staff secure area and on Website. | Head Teacher/ business manager | Life of the assessment + 3 years | Implementation of the assessment | Common practice | Secure disposal |
| 10.4 | Adults: Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm) and | Secure area in school office. | Head Teacher/ business manager | Retain for 7 years | Date of incident | Common practice | Secure disposal |


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| | https://www.hse.gov.uk/pubns/edis1.htm | | | | | | |
| 10.5 | Children: Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm) and https://www.hse.gov.uk/pubns/edis1.htm | Secure area in school office. | Head Teacher/ business manager | Retain for 25 years | Date of birth | Common practice | Secure disposal |
| 10.6 | Minor incidents (non reportable in 10.4 & 10.5 above) accident book | Secure area in school office. | Head Teacher/ business manager | Retain for 3 years | End of academic year | Common practice and The Social Security (Claims and Payments Regulations 1979) Regulation 25 | Secure disposal |
| 10.7 | Control of Substances Hazardous to Health (COSHH) | Secure area in school office and site managers office. | Business manager and site manager | Current year + 40 years | Last action on file | The Control of Substances Hazardous to Health Regulations 2002 | Secure disposal |
| 10.8 | Process of monitoring areas where employees/pupils are likely to come into contact with asbestos | Secure area in school office and site managers office. | Business manager and site manager | 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 | Secure area in school office and site | Business manager and site manager | Last action + 50 years | Last action on file | The Ionising Radiations Regulation 2017 | Secure disposal |


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| | | managers office. | | | | | |
| 10.10 | Fire Precautions log books | Secure area in school office and site managers office. | Business manager and site manager | Current year + 3 years | End of calendar year | Common practice | Secure disposal |
| 10.11 | Fire Assessments | Secure area in school office and site managers office. | Business manager and site manager | Life of the risk assessment + 6 years | End of calendar year | Fire Service Order 2005 and The Limitation Act 1980 | Secure disposal |
| 10.12 | Restrictive Intervention / Use of Force / Seclusion – Institutional Incident Log | Electronically on Arbor secure system | **Head Teacher/ Deputy Head** | Retain for 25 years | Date of incident | IRMS April 2026 Guidance (analogy with accident records involving children) | Secure Disposal |
| | | | | | | | |
| **11. Financial Management – Risk & Insurance, Asset Management** | | | | | | | |
| 11.1 | Employer's Liability Insurance Certificate | Secure area in school office. | Business manager | Date of closure + 40 years | Closure of school | Common practice | Offer to Local Record Office |
| 11.2 | Inventories of furniture and equipment | Secure area in school office and site managers office. | Business manager and site manager | Current year + 6 years | End of calendar year | Common practice | Secure disposal |
| 11.3 | Burglary, theft and vandalism report forms | Secure area in school office. | Business manager | Current year + 6 years | End of calendar year | Common practice | Secure disposal |
| 11.4 | Records relating to school/trust vehicles (records that are not required anywhere else e.g. health and safety, litigation etc) | N/A | **N/A** | 6 years from the disposal of the vehicle | End of calendar year | The Limitation Act 1980 | Secure disposal |



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| **12. Financial Management – Accounts and Statements including Budget Management** | | | | | | | |
| 12.1 | Annual accounts | Secure area in school office and in electronic secure admin area. | Business manager | 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 | Secure area in school office and in electronic secure admin area. | Business manager | 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 | Secure area in school office and in electronic secure admin area. | Business manager | 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 | Secure area in school office and in electronic secure admin area/ management area | Business manager and Head Teacher | Current financial year + 3 years | End of financial year | Common practice | Secure disposal |
| 12.5 | Invoices, receipts, order books and requisitions, delivery notices, VAT records | Secure area in school office and in electronic secure admin area. | Business manager and admin team | Current financial year + 6 years | End of financial year | Standard financial regulations and Record Keeping (VAT Notice 700/21) | Secure disposal |


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| 12.6 | Records relating to the collection and banking of monies | Secure area in school office and in electronic secure admin area. | Business manager and admin team | 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 | Secure area in school office and in electronic secure admin area. | Business manager and admin 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 | Secure area in school office and in electronic secure admin area. | Business manager and admin team | Date pupil leaves the provision + 6 years | End of financial year | Common practice | Secure disposal |
| 12.9 | Student bursary application records, including application forms and household income evidence | N/A | **N/A** | The school must retain hard or scanned copies of documentation to support eligibility, and the funding claimed for 6 years (records can be kept electronically). This includes the application form, the household income evidence for the discretionary bursary and evidence of actual financial need. | Data of application | 16 to 19 Bursary Fund guide: 2025 to 2026 - GOV.UK | Secure disposal |
| | | | | | | | |
| **13. Financial Management – Contract Management** | | | | | | | |



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| 13.1 | All records relating to the management of contracts under seal | Secure area in school office and in electronic secure admin area. | Business manager and admin team | Current year + 12 years | End of contract | The Limitation Act 1980 | Secure disposal |
| 13.2 | All records relating to the management of contracts under signature | Secure area in school office and in electronic secure admin area. | Business manager and admin team | Current year + 6 years | End of contract | The Limitation Act 1980 | Secure disposal |
| 13.3 | Records relating to the monitoring of contracts | Secure area in school office and in electronic secure admin area. | Business manager and admin team | Current year + 6 or 12 years | End of calendar year | The Limitation Act 1980 | Secure disposal |
| | | | | | | | |
| **14. Financial Management – School Fund [where one exists, or has done in the previous 7yrs]** | | | | | | | |
| 14.1 | School Fund:<br>• cheque books and paying in books<br>• ledger<br>• invoices<br>• receipts<br>• bank statements<br>• journey books | Secure area in school office and in electronic secure admin area. | Business manager and admin team | Current year + 6 years | End of use | Financial Services Act 2012, HMRC regulations Companies Act 2006 | Secure disposal |
| | | | | | | | |
| **15. Financial Management – School Meals** | | | | | | | |
| 15.1 | Free School Meals Register, including evidence of successful FSM eligibility checks | Arbor [MIS] | **Admin team** | Date pupil leaves the provision + 6 years | End of financial year | Common practice | Secure disposal |
| 15.2 | School Meals Register | Arbor [MIS] | **Admin team** | Current year + 3 years | End of calendar year | Common practice | Secure disposal |



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| 15.3 | School Meals Summary Sheets | Arbor [MIS] | **Admin team** | Current year + 3 years | End of calendar year | Common practice | Secure disposal |
| 15.4 | Data for the purposes of the DfE breakfast club provision | N/A | **N/A** | Current year + 7 years | End of the Academic year | Breakfast clubs early adopters: conditions of grant for the 2024 to 2025 academic year, beginning from 22 April 2025 - GOV.UK | Secure Disposal |
| | | | | | | | |
| **16. Property Management** | | | | | | | |
| 16.1 | Title deeds of properties belonging to the school/trust | Secure area in the school office | **Business manager** | Permanent. These should follow the property unless the property has been registered with the Land Registry | Archive upon closure | Common practice | Offer to Local Authority Record Office |
| 16.2 | All records relating to the maintenance carried out by contractors | Secure area in school office and in electronic secure admin area. | Business manager and site manager | Current financial year + 6 years<br>Records relating to rewiring, major alterations etc should be retained in the health and safety file whilst the building belongs to the school and must 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 |



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| 16.3 | All records relating to the maintenance carried out by school employees, including maintenance log book | Secure area in school office and in electronic secure admin area. | Business manager and site team | Current calendar year + 6 years<br>Records relating to rewiring, major alterations etc should be retained in the health and safety file whilst the building belongs to the school/trust and must 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 |
| 16.4 | Plans of property belonging to the school/trust | Secure area in the school office | **Business manager and Site manager** | These should be retained whilst the building belongs to the school/trust and should be passed onto any new owners, if the building is leased or sold. | Transfer of asset | Common practice | Offer to Local Authority Record Office |
| 16.5 | Leases of property leased by, or to, the school/trust | Secure area in school office and in electronic secure admin area. | Business manager and admin team | Expiry of lease + 6 years | Commencement of lease | Common practice | Secure disposal |
| 16.6 | Records relating to the letting of school/trust premises | Secure area in school office and in electronic secure admin area. | Business manager and admin team | Current financial year + 6 years | End of financial year that the record was created in | Common practice | Secure disposal |
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| **17. Pupil Education Record** (see s3 Education Record (Pupil Information) Regulations 2005).<br>Much of this information is stored in electronic form on the school's Management Information System - Arbor<br>This includes Special Educational Needs (SEN) records, such as Individual Education Plans, Education Health Care Plans (EHCPs) and all other SEN files. | | | | | | | |
| 17.1 | Nursery/Primary | Arbor [MIS] | **Admin team** | Retain whilst the child remains at the nursery/primary school. Records may be kept on the MIS in an archive or 'former roll' area) after a pupil has left the school – see 7. Transfer of Records to other Settings & 'Last Known School' and 8. Management Information System (MIS) | Date pupil changes school | Education (Pupil Information) (England) Regulations 2005 | The file must follow the pupil when they leave the nursery/primary school (see 7. Transfer of Records to other Settings & 'Last Known School'. This includes any exclusion documentation. In certain circumstances, the school may retain a copy of the documentation for an additional year where necessary to defend potential legal claims, judicial review, or related proceedings. |


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| | | | | | | | If pupil does not attend a secondary school, or the child dies, then records should be retained as per 17.2 below). |
| 17.2 | Secondary (or where the school is the 'last known school') | N/A | **N/A** | Date of birth of the pupil + 25 years | Pupil's date of birth | Education (Pupil Information) (England) Regulations 2005 and The Limitation Act 1980 | Secure disposal |
| 17.3 | Examination Results - Pupil Copies Public | Arbor [MIS] INSIGHT | **Admin team Deputy Head** | This information should be added to the pupil file and any certificates should be safely handed over to pupils. | Date of examination | Common practice | Contact the relevant exam board to obtain instructions regarding whether uncollected certificates to be returned to the examination board or destroyed after reasonable attempts to contact the pupil have failed. |


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| 17.4 | Examination Results - Pupil Copies Internal | Arbor [MIS] INSIGHT | **Admin team Deputy Head** | This information should be added to the pupil file | Date of examination | Common practice | Secure disposal |
| | | | | | | | |
| **18. Child Protection (CP) / Safeguarding Records** | | | | | | | |
| 18.1 | Child Protection Information – Nursery/Primary (or where the school is not the 'last known school') | Electronically on MyConcern | **Head Teacher and safeguarding team** | CP files must be transferred to the new school/establishment as soon as possible (5 days), to maintain continuity. Ensure secure transit, and a confirmation of receipt should be obtained. The CP file should be transferred separately from the main pupil file. Where a pupil moves from a secondary school to a college, a copy of the child protection information should be transferred. All other records should remain with the last known school in line with the retention policy- 17.2. We archive safeguarding records on MyConcern. | Date pupil changes school (Where a child is removed from the roll to be educated at home/missing from education, see below) | KCSiE & Annex C | Transferred to new or Secondary school. Duplicates should be securely disposed of. |



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| 18.2 | Child Protection (CP) Information – Secondary (or where the school is the 'last known school') | Electronically archived on MyConcern | **Head Teacher** | Where a pupil moves between secondary schools or to a college – treat as nursery/primary above. Otherwise, retain for 25 years from the child's date of birth, then review.<br>Information relating to child sexual abuse should be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. | Pupil's date of birth<br>(Where a child is removed from the roll to be educated at home/missing from education, see below) | KCSiE & Annex C<br>Common Practice | Secure disposal |
| 18.3 | Child Protection (CP) Information – Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths. | Electronically on management server<br>And archived on MyConcern | **Head Teacher** | Retain for 25 years from the child's date of birth, then review.<br>Information relating to child sexual abuse should be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse. | Date removed from roll | Common Practice (there is guidance in KCSiE, but not as to retention period) | Transfer to LA Coordinator for Missing Children and Secure disposal |
| 18.4 | Child Protection (CP) Information – Child is removed from the roll and is Elective Home Educated | Electronically on management server<br>And archived on MyConcern | **Head Teacher** | Retain for 25 years from the child's date of birth, then review.<br>Information relating to child sexual abuse should be preserved for 75 years in line with the | 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 |


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| | | | | IICSA recommendations for extended retention of records relating to child sexual abuse. | | | |
| 18.5 | Filtering & Monitoring Logs. Where these indicate a child protection/safeguarding concern, the log should be added to the pupil CP Information and retained in line with the periods in 18.1-18.4. | Electronically on Smoothwall monitoring system. | **Head Teacher and Deputy Head teacher with IT support** | Retained on Smoothwall dash board for up to 18months. We should request deletion of erroneous logs as soon as is practically possible. | Date of log | Common Practice | Deletion |
| 18.6 | Records covered by a Data Preservation Notice (DPN) | GDPRiS system | **Head Teacher and business manager** | Preserve until the DPN is formally withdrawn or replaced with a Coroner Information Notice or other lawful instruction | Receipt of a formal DPN from Ofcom or another authorised body | Online Safety Act 2023, Ofcom Online Safety Information Powers Guidance (Dec 2025) | Reviewed and then either: returned to their normal retention schedule or securely disposed of if their scheduled retention period has already expired. |
| **19. Attendance** | | | | | | | |
| 19.1 | Attendance Registers | Arbor [MIS] | **Admin team** | Every entry in the School admission and attendance register is to be preserved for 6 years beginning with the day on which the entry was made. | Last entry in register | The School Attendance (Pupil Registration) (England) Regulations 2024 | Secure disposal |


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| | | | | Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates. | | Regulations 5, 7 | |
| 19.2 | Correspondence relating to authorized absence | Paper copies in locked area in school office | Head teacher and admin team | Date of absence + 2 years | Date of absence | DfE School attendance Guidance for maintained schools, academies, independent schools and local authorities May 2022 | Secure disposal |
| 19.3 | Correspondence relating to unauthorized absence | Paper copies in locked area in school office | Head teacher and admin team | Date of absence + 3 years | Date of absence | Section 23 of the Anti-Social Behaviour Act 2003 | Secure disposal |
| | | | | | | | |
| **20. Curriculum Management** | | | | | | | |
| 20.1 | Curriculum returns | On secure server and in secure management server | Head Teacher | Current year + 3 years | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 20.2 | Curriculum development | On secure server and in secure management server | Head Teacher and curriculum leads | Current year + 6 years | End of the calendar year that the record was created in | Common practice | Offer to the Local Authority Record Office |


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| 20.3 | Examination Results (School's copy) | On secure server and in secure management server | Head Teacher | Current year + 6 years | Date of examination | Common practice | Secure disposal |
| 20.4 | SATs Results | On secure server and in secure management server | Head Teacher | The SATS result should 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 |
| 20.5 | SATs Examination papers | In locked area in school office. | Head Teacher | The examination papers should be kept until any appeals/validation process is complete | Date of examination | Common practice | Secure disposal |
| 20.6 | Published Admission Number (PAN) Reports | On secure server and in secure management server | Head Teacher | Current year + 6 years | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 20.7 | Value Added and Contextual Data | On secure server and in secure management server | Head Teacher | Current year + 6 years | End of the calendar year that the record was created in | Common practice | Secure disposal |


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| 20.8 | Self-Evaluation Forms | On secure server and in secure management server | Head Teacher | Current year + 6 years | Date of completion | Common practice | Secure disposal |
| 20.9 | Internal Moderation | On secure server and in secure management server | Head Teacher | Academic year + 1 academic year | Date of commencement | Common practice | Secure disposal |
| 20.10 | External Moderation | On secure server and in secure management server | Head Teacher | Until superseded | Date of commencement | Common practice | Secure disposal |
| | | | | | | | |
| **21. Implementation of Curriculum** | | | | | | | |
| 21.1 | Schemes of Work | On secure server and in secure management server | Head Teacher and curriculum leads | 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 |
| 21.2 | Timetable | On secure server and in secure management server | Head Teacher and 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) | On secure server and in secure | Head Teacher and teachers | Current year + 1 year | End of the academic year | Common practice | Secure disposal |


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| | | management server | | | that the record was created in | | |
| 21.4 | Pupil work | In classrooms – school books. | Teachers | Where possible, pupils' work should be returned to the pupil at the end of the academic year. If this is not, currently policy then it should be retained for the current year +1 | End of the academic year that the record was created in | Common practice | Secure disposal |
| 21.5 | Online learning platforms | N/A | N/A | As above. Work should 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 | Kept in secure areas in classrooms | Teachers | Contents should be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. Destroyed within 3 months. | Expiration of diary. Completion of notebook | Common practice | Secure disposal |
| **22. Extra Curriculum Management** | | | | | | | |
| 22.1 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Nursery/Primary schools) where there has not been a Major Incident<br>(Records created might include risk assessments) | Evolve on-line system used to keep records. Risk assessments also saved on Staff secure server. | Teachers and EVC | Date of visit + 14 years | Date of visit | The Health and Safety at Work Act 1974 | Secure disposal |



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| 22.2 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Secondary schools) where there has not been a Major Incident | N/A | N/A | Date of visit + 10 years | Date of visit | The Health and Safety at Work Act 1974 | Secure disposal |
| 22.3 | Parental consent forms for school trips where there has been no Major Incident | In school office until trip completed. Parentpay also used as parent consent evidence. | Admin team | No retention is required | | Common practice | Secure disposal |
| 22.4 | Records created by schools to obtain approval for to run an Educational Visit outside the Classroom, **where there has been a Major Incident**<br>(Records created might include risk assessments) | Evolve on-line system used to keep records. Risk assessments also saved on Staff secure server. | Teachers and EVC | 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 |
| 22.5 | Parental consent forms for school trips, **where there has been a Major Incident** | Evolve on-line system used to keep records. Risk assessments also saved on Staff secure server. | Teachers and EVC | Retain for 25 years from the date of birth of the pupil/s involved in the incident.<br>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 |
| | | | | | | | |
| **23. Family Liaison / Early Help / Alternative Provision** | | | | | | | |



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| 23.1 | Day books | Locked area in sunshine room | Early help practitioner | Current year + 2 years then review | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 23.2 | Reports for outside agencies – where the report has been included on the agency case file | MyConcern safeguarding system | Head Teacher and safeguarding team | Whilst the child is attending school and then destroy | Date of completion of report | Common practice | Secure disposal |
| 23.3 | Referral forms | MyConcern safeguarding system. Copies kept in Secure safeguarding management area on server. | Head Teacher and safeguarding team | While the referral is current | Date of completion of form | Common practice | Secure disposal |
| 23.5 | Contact data sheets and database entries | Locked area in sunshine room Secure safeguarding server area. | Early help practitioner | Current year then review – if contact is no longer active then destroy | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 23.6 | Group registers | Locked area in sunshine room Secure safeguarding server area. | Early help practitioner | Current year + 2 years | Last entry in register | Common practice | Secure disposal |
| | | | | | | | |
| **24. Local Authority** | | | | | | | |
| 24.1 | Secondary Transfer sheets | Electronic – secure admin area | **Admin team** | Current year + 2 years | Year of transfer | Common practice | Secure disposal |


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| 24.2 | Attendance Returns | Electronic – Arbor | **Admin team** | Current year + 1 year | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 24.3 | School Census Returns | Electonic – secure admin area | **Admin team** | Current year + 5 years | Completion of return | Common practice | Secure disposal |
| 24.4 | Circulars and other information sent from the Local Authority | Electronic – management secure area | **Head teacher/admin team** | Operational use | Date of issue | Common practice | Secure disposal |
| | | | | | | | |
| **25. Central Government** | | | | | | | |
| 25.1 | OFSTED reports and papers | Copies kept in secure Management area on server. | Head teacher | Retain whilst current | Date new report is issued | Common practice | Offer to Local Authority Record Office |
| 25.2 | Returns made to central government, including Schools financial value standard (SFVS) and assurance statement | Copies kept in secure Management area or secure admin area on server. | Head teacher and business manager | Current year + 6 years | End of the calendar year that the record was created in | Common practice | Secure disposal |
| 25.3 | Circulars and other information sent from central government | Copies kept in secure Management area or secure admin area on server. | Head teacher and business manager | Operational use | Date of issue | Common practice | Secure disposal |
| | | | | | | | |
| **26. Parent / Alumni Associations** | | | | | | | |
| 26.1 | Records relating to the creation and management of PTA and Old Pupil Associations | Copies kept in secure admin | Head teacher and admin team | Current year + 6 years | Date of foundation | Common practice | Offer to the Local Authority Record Office |



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| | | area on server. | | | | | |
| **27. Recordings (meetings, calls, online lessons)** | | | | | | | |
| 27.1 | Incoming & Outgoing calls | N/A as not recorded | | | | Common practice | |
| 27.2 | Meetings | N/A as not recorded. | | | | Common practice | |
| 27.3 | Online lessons | N/A as not recorded. | | | | Common practice | |
| 27.4 | Staff training | On secure staff server. | Head Teacher | | | Common practice | |
| | | | | | | | |
| **28. Pupil Work Experience / Placement Records (Secondary schools)** | | | | | | | |
| 28.1 | Records created in relation of offsite pupil work experience where there has not been a Major Incident | N/A | **N/A** | Date of placement + 10 years | Date of placement | The Health and Safety at Work Act 1974 | Secure disposal |
| 28.2 | Records created in relation of offsite pupil work experience **where there has been a Major Incident** | N/A | **N/A** | 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 |
| | | | | | | | |
| **29. Administration of Medication** | | | | | | | |
| 29.1 | Non-prescription medicines and remedies inc painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers | Paper copies of forms – secure area in school office | Admin team | Current year + 1 year | Date of administration | Limitation Act 1980 | Secure disposal |
| 29.2 | 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 copies of forms – secure area in school office | Admin team | Date of birth of the pupil + 25 years | Date of administration | Limitation Act 1980 | Secure disposal |


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# 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) |



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