



Extend Learning
Academies Network

Data Retention Schedule

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Written by:	ELAN executive team	
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Adopted by Academies:	Banwell Primary School Bournville Primary School Locking Primary School Mead Vale Primary School Mendip Green Primary School Milton Park Primary School Oldmixon Primary School Walliscote Primary School Windwhistle Primary School	
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Version Control

Version	Issue Date	Amended by	Comments
1.0	11/2019		Final Board approved
1.1	18/06/2020	HR Lead/DPO	Addition of DBS consent forms in section 1.
2.0	July 2022	HR Lead/DPO	Annual review – no updates
3.0	May 2024	HR Lead/DPO	Two year review. Addition of child protection updates and email account retention periods.

1. Child Protection				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Safeguarding Policies and procedures	No	Permanent	ARCHIVE	Transfer to archive for retention when new policy implemented. Ensure that version control is completed for in year updates
Child Protection files	Yes	DOB + 25 years but review sensitive case files every 5-6 years thereafter	SHRED	<p>Child protection information must be shared electronically via CPOMS or sent password protected via egress to ongoing school. Paper files are sent signed for secure (but never copied and retained) and sent under separate cover to new school/college whilst the child is still under 18 (i.e. the information does not need to be sent to a university, for example). Where a child is removed from roll to be educated at home, the file should be copied to the Local Education Authority.</p> <p>Limitation periods can be dis-applied in criminal and civil abuse cases; to be weighed against rights under the GDPR and our insurers' requirements.</p> <p>Special category data MUST be shredded and disposed of securely at the end of its administrative life</p>
Allegations of a child protection nature against a member of staff	Yes	Until the person's normal retirement age, or 10 years from the date of the allegation if that's longer	SHRED	<p>ICO Employment Practices Code: Supplementary Guidance 2.13.1 (Discipline, grievance and dismissal)</p> <p>"Records of allegations about workers who have been investigated and found to be without substance should not normally be retained once an investigation has been completed. There are some exceptions to this where for its own protection the employer has to keep a limited record that an allegation was received and investigated, for example, where the allegation relates to abuse and the worker is employed to work with children or other vulnerable individuals".</p>

				Summary record to be retained on confidential personnel file, and a copy given to the person concerned. Files to be held centrally and not at specific schools.
Redaction of safeguarding files	Yes		Redaction	Prior to transfer of documentation to schools/local authority all files should be redacted to ensure that personal details that are contained within files and are unrelated to that child should be redacted prior to transfer
1. Child Protection (continued)				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
DBS Disclosure Certificates	Yes	No longer than 6 months from decision on recruitment unless DBS specifically consulted	SHRED	Keep a record in the Single Central Record that checks were undertaken, with relevant reference details (Disclosure number, date, who checked it).
DBS Consent Forms	Yes	No longer than 12 months from the application	SHRED	These will be retained centrally and a copy should not be retained within schools

2. Governors				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Minutes – principle set (signed)	Yes	Permanent	ARCHIVE	Transfer to archive for permanent retention after 6 years
Minutes – inspection copies	Yes	Date of Meeting + 3 years	SHRED	Minutes may contain personal information so default method of disposal is shredding
Agendas	No	Permanent - archive one copy with master of minutes, All other copies date of meeting	ARCHIVE one copy. All other copies SHRED	Transfer to archive for permanent retention after 6 years
Reports (including annual report)	Yes	Date of report + 6 years. If minutes refer directly to individual report, said report must be kept permanently	ARCHIVE	Dispose of after retention period
Annual Parent's Meeting papers held under section 33 of the Education Act 2002	No	Date of meeting + 6 years	SHRED	Dispose of after retention period
Instruments of Government including Articles of Association	No	Permanent	Retain in school whilst school is open	Transfer to archive when the school has closed
Trusts and Endowments managed by the Governing Body	No	Permanent	Retain in school whilst operationally required	Transfer to archive
Action Plans	No	Date of action + 6 years	SHRED	These could be disposed of after 3 years but they are often linked to finances which have to be retained for a minimum of 6 years after the end of the financial year. (especially important if the school has been through a difficult period)

Policy Documents	No	Life of policy + 3 years	SHRED	Retained for inspection purposes – important if policy is linked to previous decision making process. Version control important.
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2. Governors (continued)

Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Complaints files	Yes	Date of resolution of complaint + 6 years	SHRED	Review for further retention before destruction in the case of contentious disputes. Destroy routine complaints. Complaints alleging possible harm to a pupil by a member of staff are covered in 1 above.
Annual reports required by the Department for Education	No	Date of report + 10 years	SHRED	Dispose of after retention period
Proposals for change of status of a maintained school including specialist status schools and academies	No	Date proposal accepted or declined + 3 years	SHRED	Dispose of after retention period
Governor personal details: name, address, date of birth	Yes	Whilst in post + 6 years	ARCHIVE	Keep a record in the Single Central Record. Dispose of after retention period
Trustees personal details: name, address, date of birth	Yes	Retained by Companies House on statutory register. Date of appointment + 20 years	ARCHIVE	Keep a record in the Single Central Record. Dispose of after retention period

3. Management				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Log books	Yes	Date of last entry + 6 years	SHRED	May contain personal information
Minutes of the Senior Leadership Team and other internal administrative bodies	Yes	Date of meeting + 3 years	SHRED	May contain personal information
Records created by Head Teacher or management team (except child protection records which are dealt with in section 1 above)	Yes	Current academic year + 6 years	SHRED	May contain personal information
Correspondence created by Head, Deputy Heads, Heads of Year and other members of staff with administrative responsibilities	Yes	Date of correspondence + 3 years	SHRED	May contain personal information
Professional Development Plans	Yes	Life of the Plan + 6 years	SHRED	May contain personal information
School Development Plans	No	Life of the Plan + 3 years	SHRED	Review before destroying for relevance to any current actions or decisions
All records relating to the creation and implementation of School Admissions Policy	No	Life of the policy + 3 years	SHRED	Review before destroying for relevance to any current actions or decisions
Admissions if successful	Yes	Admission + 1 year	SHRED	May contain personal information

3. Management (continued)				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Admissions if the appeal is unsuccessful	Yes	Resolution of case + 1 year	SHRED	May contain personal information
Proof of address provided by parents as part of the admissions process	Yes	Current + 1 year	SHRED	May contain personal information
Supplementary information form including additional information such as medical conditions, religion etc.	Yes	Successful admission – add to the pupil file Unsuccessful admission – until the appeals process is complete	SHRED	May contain personal information
Records relating to the creation and implementation of the School Admission's Policy	Yes	Life of the policy + 3 years	SHRED	Dispose of after retention period

4. Pupils				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Admission registers	Yes	Date of last entry in the book or file + 6 years	SHRED	Review before destroying. Schools may wish to consider keeping admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school
Attendance registers	Yes	Date of entry + 3 years	SHRED AND/OR DISPOSAL	If these record are retained electronically any back up copies should be destroyed at the same time
Correspondence relating to authorised absence	Yes	Current academic year + 2 years	SHRED	May contain personal information
Correspondence relating to unauthorised absence and issues	Yes	Date of absence + 2 years	SHRED	May contain personal information
Pupil files retained in school	Yes	Retain for the time the pupil remains at the school	TRANSFER	Transfer to secondary school or other primary school when the child leaves the school. In the case of exclusions it may be appropriate to transfer the record to the Pupil Referral Unit
Special Educational Needs files, reviews and IEP's	Yes	DOB of the pupil + 25 years minimum. Recommendation is from date of leaving the school/academy, files should be retained for 70 years	SHRED	Review before destroying. Note: this retention period is the minimum and some authorities elect to keep SEN files for a longer period Special category data MUST be shredded and disposed of securely at the end of its administrative life
Any other records created in the course of contact with pupils	Yes	Current academic year + 3 years	SHRED	Review at the end of 3 years and either allocate a further retention period or dispose or shred
Child protection information held on pupil file	Yes	If any records relating to child protection are placed on the pupil file, they should be in a sealed envelope and retained for the same period of time as the pupil file	See pupil files above	See pupil files above

4. Pupils (continued)				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Child protection information held in separate files	Yes	DOB of the child + 25 years, then review sensitive case files every 5-6 years thereafter	TRANSFER	<p>Child protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (i.e. the information does not need to be sent to a university, for example).</p> <p>In the case of pupil exclusions it may be appropriate to transfer the record to the Local Education Authority or Pupil Referral Unit.</p> <p>Where a child is removed from roll to be educated at home, the file should be copied to the Local Education Authority.</p> <p>Limitation periods can be dis-applied in criminal and civil abuse cases; to be weighed against rights under the GDPR and our insurers' requirements.</p> <p>Special category data MUST be shredded and disposed of securely at the end of its administrative life (DOB of the child + 25 years).</p>
Statement maintained under the Education Act 1996-Section 234 and any amendments made to the statement	Yes	DOB + 25 years. (This would normally be retained on the pupil file)	SHRED	<p>Shred unless legal action is pending.</p> <p>Special category data MUST be shredded and disposed of securely at the end of its administrative life.</p>
Advice and information to parents regarding educational needs	Yes	DOB of pupil + 25 years. (This would normally be retained on the pupil file)	SHRED	<p>Shred unless legal action is pending.</p> <p>Special category data MUST be shredded and disposed of securely at the end of its administrative life.</p>
Accessibility Strategy	Yes	DOB + 25 years. (This would normally be retained on the pupil file)	SHRED	<p>Special category data MUST be shredded and disposed of securely at the end of its administrative life.</p>
Parental consent forms for school trips – where there has been no major incident	Yes	Conclusion of the trip	SHRED	<p>May contain personal information</p>

4. Pupils (continued)				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Parental consent forms for school trips – where there has been a major incident	Yes	DOB of the pupil involved in the incident + 25 years. 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	SHRED	May contain personal information
Pupil medical records	Yes	DOB + 25 years	SHRED	Special category data MUST be shredded and disposed of securely at the end of its administrative life.
Published Admission Number (PAN) reports	Yes	Current year + 6 years	SHRED	May contain personal information
Self-evaluation forms	Yes	Current year + 6 years	SHRED	May contain personal information

5. Curriculum				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Curriculum development	No	Current academic year + 6 years	DESTROY	If personal data is recorded in the records, they must be shredded.
Curriculum returns	No	Current year + 3 years	DESTROY	If personal data is recorded in the records, they must be shredded
SAT's records	Yes	Current academic year + 6 years	SHRED	May contain personal information
Trip records	Yes	Date of trip + 2 years	SHRED	See also H & S with regard to risk assessments. Records should be retained for longer if an incident occurs
Pupil's work	No	Current academic year + 1 year	DESTROY	Review these records at the end of each academic year and allocate a new retention period or destroy
Class record books	No	Current academic year + 1 year	DESTROY	Review these records at the end of each academic year and allocate a new retention period or destroy. If additional personal data is recorded in the books, they must be shredded.
Schemes of work	No	Current academic year + 1 year	DESTROY	Review these records at the end of each academic year and allocate a new retention period or destroy

6. Staff Records					
Data Description	Data Protection Issues	Retention Period		Action at the end of the administrative life of the record	
Contracts of employment	Yes	End of contract + 6 years		SHRED	May contain personal information
Timesheets	Yes	End of contract + 6 years		SHRED	May contain personal information
Personnel files (including leave and training records)	Yes	End of contract + 6 years		SHRED	May contain personal information
Email accounts	Yes	Teacher Support Staff SMSA Governor	Date of leaving + 2 school terms	Permanent Deletion	May contain personal information
		Site team	Date of leaving + 12 months and 1 school term		
		Headteacher Deputy Head Assist Head SLT (Other) DSL Pastoral SENDCo Administrator Chair of Govs	Date of leaving + 3 years		
Interview notes and recruitment records	Yes	Date of interview + 3 years (if successful).		SHRED	See also separate note on retention of DBS certificates. Notes from unsuccessful candidates can be destroyed after 6 months

6. Staff Records				
Data Description	Data Protection Issues			
Pre-employment vetting information (including online checks and unsuccessful DBS checks)	Yes	Date of check + 6 months (if unsuccessful)	SHRED	If successful , this information must be placed on the personnel file and managed in line with this policy
Pension or other benefit schedule	Yes	Permanent	ARCHIVE	Transfer to archive after employee has left employment
Disciplinary proceedings for all matters except those relating to child protection issues (for these circumstances see section 1) (Including investigation notes and witness statements)	Yes	Informal warning: date of warning + 6 months Written warning: date of warning + 12 months Final Warning: date + 18 months	SHRED	If these are placed on personnel files they need to be removed at the end of the retention period If, following investigation there is found to be no case to answer (except child protection allegations – see section 1), documents should be shredded upon conclusion of the case
Records relating to accident/injury at work	Yes	Date of incident + 5 years	SHRED	Review at the end of this period. In the case of serious accident, a further retention period will need to be applied
Appraisal documentation and assessment records or action plans	Yes	Duration of employment + 6 years	SHRED	May contain personal information
Health records	Yes	Duration of employment + 6 years	SHRED	May contain personal information
Pension records	Yes	Last payment + 6 years	SHRED	May contain personal information
Salary records	Yes	End of employment + 6 years	SHRED	May contain personal information
Maternity pay records	Yes	Current year +3 years	SHRED	May contain personal information
Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	Until the person's normal retirement age or 10 years from the date of	SHRED	Allegations that are found to be malicious should be removed from the files. If founded, they are to be kept on file and a copy provided to the person concerned May contain personal information

		the allegation, whichever is longer then REVIEW.		
7. Health and Safety				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Accessibility plans	Yes	Current year + 6 years	DESTROY	May contain personal information
Accident reporting records	Yes	Adults: last entry in the book/file + 6 years Children: DOB + 25 years	SHRED	Latent injuries can take years to manifest and the limitation period for claims reflects this. Notes should be kept of all procedures as they were, along with a record that they were followed. Review each case before destruction, especially if a case is live. Child may make a claim for negligence for 7 years from their 18 th birthday. To ensure that all records are kept until the pupil reaches the age of 25, this retention period has been applied.
COSHH	No	Current year + 40 years	DESTROY	Review and where appropriate an additional retention period may be allocated
Policy Statements	No	Date of expiry + 3 years	DESTROY	Version control is important
Risk Assessments, including personal RA's	Yes (if personal)	Completion of project, event, incident or activity + 7 years	SHRED	Retain if risk assessment relates to a visit or trip during which an incident occurred and a claim is ongoing. Review if an incident occurred but no claim was made. Risk assessments for trips can be destroyed 3 years after the trip if no incident occurred
Records relating to accidents/injury at work	Yes	Date of incident + 12 years. For serious accidents this will have to be increased	DESTROY	Review and where appropriate an additional retention period may be allocated
Process of monitoring areas where employees are likely to have come into contact with asbestos	No	Last action + 40 years	DESTROY	Records maintained by Estates Manager
Process of monitoring areas where employees are likely to have come into contact with radiation	No	Last action + 50 years	DESTROY	Records maintained by Estates Manager

Fire Log Books	No	Current year + 6 years	DESTROY	Records maintained by Estates Manager
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8. Administration

Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Employers Liability Certificate	No	Permanent	ACHIVE	Retain for 40 years after the school has closed
Inventory of furniture and equipment	No	Current year + 6 years	DESTROY	
School prospectus	No	Current academic year + 3 years	ARCHIVE	Transfer to archive
Circulars (staff/parents/pupils)	No	Current academic year + 1 year	DESTROY/ARCHIVE	Review for any items which may be usefully archived
Newsletters etc.	Yes	Current academic year + 1 year	SHRED/ARCHIVE	Review for any items which may be usefully archived
Visitors' book	Yes	Current academic year + 2 years	SHRED/ARCHIVE	Review for any items which may be usefully archived
Insurance Policy	No	End of cover + 1 year	SHRED	May contain confidential Company information
Insurance records (renewals, claims, notifications etc.)	No	End of cover + 7 years	SHRED	Review before destruction. Retain records for claims which may be ongoing for a further period

9. Finance				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Annual accounts	No	Current year + 6 years	SHRED	May contain confidential Company financial information
Loans and grants	No	Date of last payment + 12 years	SHRED	May contain confidential Company financial information
Contracts	No	Contract completion + 6 years	SHRED	May contain confidential Company financial information
Copy orders	No	Current year + 2 years	SHRED	May contain confidential Company financial information
Budget reports/monitoring documents	No	Life of the budget + 3 years	SHRED	May contain confidential Company financial information
Invoices, receipts and other records covered by the Financial Regulations	No	Current year + 6 years	SHRED	May contain confidential Company financial information
Annual budget and background papers	No	Current year + 6 years	SHRED	May contain confidential Company financial information
Delivery documentation	No	Current year + 6 years	SHRED	May contain confidential Company financial information
Debtor's records	No	Current year + 6 years	SHRED	May contain confidential Company financial information
School Fund cheque books	No	Current year + 6 years	SHRED	May contain confidential Company financial information
School Fund paying in books	No	Current year + 6 years	SHRED	May contain confidential Company financial information

9. Finance (continued)					
Data Description		Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
School Fund bank statements	No	Current year + 6 years	SHRED	May contain confidential Company financial information	
School fund ledger, invoices and receipts	No	Current year + 6 years	SHRED	May contain confidential Company financial information	
Free School Meals registers	Yes	Current year + 6 years	SHRED	May contain personal information. Special category data MUST be shredded and disposed of securely at the end of its administrative life	
Petty cash books	No	Current year + 3 years	SHRED	May contain confidential Company financial information	
School Meal registers, summaries and records	No	Current year + 3 years	SHRED	May contain confidential Company financial information	
Bursary/grant applications	No	Current year + 3 years	SHRED	May contain confidential Company financial information	

10. Property				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Title deeds	No	Permanent	ARCHIVE	May contain confidential Company information
Plans	No	Permanent	ARCHIVE	Retain in school whilst operational
Maintenance and contractors records and reports	Yes	Current year + 6 years	SHRED	May contain confidential Company information. If personal details about individual contractors are included these must be shredded at the end of their life
Service Level Agreements	Yes	Until superseded	SHRED	May contain confidential Company information. If personal details about individual contractors are included these must be shredded at the end of their life
Leases	No	Expiry of lease + 6 years	SHRED	May contain confidential Company information
Lettings	Yes	Current year + 6 years	SHRED	May contain confidential Company information. If this documentation contains personal detail about individuals these must be shredded at the end of their life
Burglary, theft and vandalism reports	Yes	Current year + 6 years	SHRED	May contain confidential Company information. If this documentation contains personal detail about individuals these must be shredded at the end of their life
Maintenance log books	No	Current year + 6 years	SHRED	May contain confidential Company information. If this documentation contains personal detail about individuals these must be shredded at the end of their life
Contractors' reports	No	Current year + 6 years	SHRED	May contain confidential Company information. If this documentation contains personal detail about individuals these must be shredded at the end of their life

11. Local Authority				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Secondary transfer sheets	Yes	Current year + 2 years	SHRED	May contain personal information
Attendance returns	Yes	Current year + 1 year	SHRED	May contain personal information
School census returns	No	Current year + 5 years	SHRED/DISPOSE	Dispose of after retention period
Circulars from LA	No	Whilst operationally required	DISPOSE	Review to see whether a further retention period is required before disposal

12. Department for Children, Schools and Families

Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
HMI reports	No	No longer need to be retained	SHRED	
Ofsted reports	No	Replace former report with any new inspection report	SHRED	Review to see whether a further retention period is required
Returns	No	Current year + 6 years	DISPOSE	Review to see whether a further retention period is required before disposal
Circulars	No	Whilst operationally required	SHRED	Review to see whether a further retention period is required

13. Work Experience				
Data Description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Work experience and risk assessments	Yes	DOB of child + 18 years	SHRED	