

(UK) GDPR Retention of data - schools

1. Management of the School

This section contains retention periods connected to the general management of the school. This covers the work of the Trust Board, the Academy Head, the Executive Leadership Team, the admissions process and operational administration.

1.1 Trust Board					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
1.1.1	Agendas for TB meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff	One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL ¹	
1.1.2	Minutes of TB meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff			
	Principal Set (signed)		PERMANENT		
	Inspection Copies ²		Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded.	
1.1.3	Reports presented to the TB	There may be data protection issues if the report deals with confidential issues relating to staff	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	SECURE DISPOSAL or retain with the signed set of the minutes	

¹ In this context SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross cut shredder.

² These are the copies which the clerk to the Governor may wish to retain so that requestors can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL	
1.1.5	Instruments of Government including Articles of Association	No	PERMANENT	These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.	
1.1.6	Trusts and Endowments managed by the TB	No	PERMANENT	These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.	
1.1.7	Action plans created and administered by the TB	No	Life of the action plan + 3 years	SECURE DISPOSAL	
1.1.8	Policy documents created and administered by the TB	No	Life of the policy + 3 years	SECURE DISPOSAL	
1.1.9	Records relating to complaints dealt with by the TB	Yes	Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL	

1.1.10	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Date of report + 10 years	SECURE DISPOSAL	
1.1.11	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No	Date proposal accepted or declined + 3 years	SECURE DISPOSAL	

1.2 Trust Leadership (ELT, HoS and Academy Heads)					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
1.2.1	Log books of activity in the school maintained by the relevant leader	There may be data protection issues if the log book refers to individual pupils or members of staff	Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate	
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff	Date of the meeting + 3 years then review	SECURE DISPOSAL	

1.2.3	Reports created by the relevant leader	There may be data protection issues if the report refers to individual pupils or members of staff	Date of the report + a minimum of 3 years then review	SECURE DISPOSAL	
1.2.4	Records created by the relevant leader and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff	Current academic year + 6 years then review	SECURE DISPOSAL	
1.2.5	Correspondence created by the relevant leader and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff	Date of correspondence + 3 years then review	SECURE DISPOSAL	
1.2.6	Professional Development Plans	Yes	Life of the plan + 6 years	SECURE DISPOSAL	
1.2.7	School Development Plans	No	Life of the plan + 3 years	SECURE DISPOSAL	

1.3 Admissions Process					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No	Life of the policy + 3 years then review	SECURE DISPOSAL	
1.3.2	Admissions – if the admission is successful	Yes	Date of admission + 1 year	SECURE DISPOSAL	

1.3.3	Admissions – if the appeal is unsuccessful	Yes	Resolution of case + 1 year	SECURE DISPOSAL	
1.3.4	Register of Admissions	Yes	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. ³	REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school.	
1.3.5	Admissions – Secondary Schools – Casual	Yes	Current year + 1 year	SECURE DISPOSAL	
1.3.6	Proofs of address supplied by parents as part of the admissions process	Yes	Current year + 1 year	SECURE DISPOSAL	
1.3.7	Supplementary Information form including additional information such as religion, medical conditions etc	Yes			
	For successful admissions		This information should be added to the pupil file	SECURE DISPOSAL	
	For unsuccessful admissions		Until appeals process completed	SECURE DISPOSAL	

1.4 Operational Administration					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
1.4.1	General file series	No	Current year + 5 years then REVIEW	SECURE DISPOSAL	
1.4.2	Records relating to the creation and publication of the school brochure or prospectus	No	Current year + 3 years	STANDARD DISPOSAL	
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No	Current year + 1 year	STANDARD DISPOSAL	
1.4.4	Newsletters and other items with a short operational use	No	Current year + 1 year	STANDARD DISPOSAL	
1.4.5	Visitors' Books and Signing in Sheets	Yes	Current year + 6 years then REVIEW	SECURE DISPOSAL	
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No	Current year + 6 years then REVIEW	SECURE DISPOSAL	

2. Human Resources

This section deals with all matters of Human Resources management within the school.

2.1 Recruitment					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.1.1	All records leading up to the appointment of a Trust leader	Yes	Date of appointment + 6 years	SECURE DISPOSAL	
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes	Date of appointment of successful candidate + 6 months	SECURE DISPOSAL	
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes	All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months	SECURE DISPOSAL	
2.1.4	Pre-employment vetting information – DBS Checks	No	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months		

1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes	Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file		
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ⁴	Yes	Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years		

2.2 Operational Staff Management					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.2.1	Staff Personal File	Yes	Termination of Employment + 6 years	SECURE DISPOSAL	
2.2.2	Timesheets	Yes	Current year + 6 years	SECURE DISPOSAL	
2.2.3	Annual appraisal/ assessment records	Yes	Current year + 5 years	SECURE DISPOSAL	

2.3 Management of Disciplinary and Grievance Processes					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded ⁵	Yes	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned	SECURE DISPOSAL These records must be shredded	
2.3.2	Disciplinary Proceedings	Yes			
	oral warning		Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file]	
	written warning – level 1		Date of warning + 6 months		
	written warning – level 2		Date of warning + 12 months		
	final warning		Date of warning + 18 months		
	case not found		If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL	

2.4 Health and Safety					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.4.1	Health and Safety Policy Statements	No	Life of policy + 3 years	SECURE DISPOSAL	
2.4.2	Health and Safety Risk Assessments	No	Life of risk assessment + 3 years	SECURE DISPOSAL	
2.4.3	Records relating to accident/ injury at work	Yes	Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL	
2.4.4	Accident Reporting	Yes			
	Adults		Date of the incident + 6 years	SECURE DISPOSAL	
	Children		DOB of the child + 25 years	SECURE DISPOSAL	
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Current year + 40 years	SECURE DISPOSAL	
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Last action + 40 years	SECURE DISPOSAL	

2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No	Last action + 50 years	SECURE DISPOSAL	
2.4.8	Fire Precautions log books	No	Current year + 6 years	SECURE DISPOSAL	

2.4 Payroll and Pensions

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
2.5.1	Maternity pay records	Yes	Current year + 3 years	SECURE DISPOSAL	
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Current year + 6 years	SECURE DISPOSAL	

3. Financial Management of the School

This section deals with all aspects of the financial management of the school including the administration of school meals

3.1 Risk Management and Insurance

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.1.1	Employer's Liability Insurance Certificate	No	Closure of the school + 40 years	SECURE DISPOSAL	

3.2 Asset Management					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.2.1	Inventories of furniture and equipment	No	Current year + 6 years	SECURE DISPOSAL	
3.2.2	Burglary, theft and vandalism report forms	No	Current year + 6 years	SECURE DISPOSAL	

3.3 Accounts and Statements including Budget Management					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.3.1	Annual Accounts	No	Current year + 6 years	STANDARD DISPOSAL	
3.3.2	Loans and grants managed by the school	No	Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL	
3.3.3	Student Grant applications	Yes	Current year + 3 years	SECURE DISPOSAL	
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No	Life of the budget + 3 years	SECURE DISPOSAL	
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No	Current financial year + 6 years	SECURE DISPOSAL	
3.3.6	Records relating to the collection and banking of monies	No	Current financial year + 6 years	SECURE DISPOSAL	

3.3.7	Records relating to the identification and collection of debt	No	Current financial year + 6 years	SECURE DISPOSAL	
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3.4 Contract Management					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.4.1	All records relating to the management of contracts under seal	No	Last payment on the contract + 12 years	SECURE DISPOSAL	
3.4.2	All records relating to the management of contracts under signature	No	Last payment on the contract + 6 years	SECURE DISPOSAL	
3.4.3	Records relating to the monitoring of contracts	No	Current year + 2 years	SECURE DISPOSAL	

3.5 School Fund					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.5.1	School Fund - Cheque books	No	Current year + 6 years	SECURE DISPOSAL	
3.5.2	School Fund - Paying in books	No	Current year + 6 years	SECURE DISPOSAL	
3.5.3	School Fund – Ledger	No	Current year + 6 years	SECURE DISPOSAL	
3.5.4	School Fund – Invoices	No	Current year + 6 years	SECURE DISPOSAL	
3.5.5	School Fund – Receipts	No	Current year + 6 years	SECURE DISPOSAL	

3.5.6	School Fund - Bank statements	No	Current year + 6 years	SECURE DISPOSAL	
3.5.7	School Fund – Journey Books	No	Current year + 6 years	SECURE DISPOSAL	

3.6 School Meals					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
3.6.1	Free School Meals Registers	Yes	Current year + 6 years	SECURE DISPOSAL	
3.6.2	School Meals Registers	Yes	Current year + 3 years	SECURE DISPOSAL	
3.6.3	School Meals Summary Sheets	No	Current year + 3 years	SECURE DISPOSAL	

4. Property Management

This section covers the management of buildings and property.

4.1 Property Management					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
4.1.1	Title deeds of properties belonging to the Trust	No	PERMANENT These should follow the property unless the property has been registered with the Land Registry		
4.1.2	Plans of property belong to the Trust	No	These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.		

4.1.3	Leases of property leased by or to the Trust	No	Expiry of lease + 6 years	SECURE DISPOSAL	
4.1.4	Records relating to the letting of Trust premises	No	Current financial year + 6 years	SECURE DISPOSAL	

4.2 Maintenance					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
4.2.1	All records relating to the maintenance of the Trust carried out by contractors	No	Current year + 6 years	SECURE DISPOSAL	
4.2.2	All records relating to the maintenance of the Trust carried out by Trust employees including maintenance logbooks	No	Current year + 6 years	SECURE DISPOSAL	

5. Pupil Management

This section includes all records which are created during the time a pupil spends at the school. For information about accident reporting see under Health and Safety above

5.1 Pupil's Educational Record					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes			
	Primary		Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school. ³	
	Secondary		Date of Birth of the pupil + 25 years	SECURE DISPOSAL	
5.1.2	Examination Results – Pupil Copies	Yes			

³ This will include: (i) to another primary school (ii) to a secondary school (iii) to a pupil referral unit (iv) If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority

	Public		This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.	
	Internal		This information should be added to the pupil file		
5.1.3	Child Protection information held on pupil file		If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.	SECURE DISPOSAL – these records MUST be shredded	
5.1.4	Child protection information held in separate files		DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	SECURE DISPOSAL – these records MUST be shredded	

5.2 Attendance					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.2.1	Attendance Registers	Yes	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL	

5.2.2	Correspondence relating to authorized absence		Current academic year + 2 years	SECURE DISPOSAL	
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5.3 Special Educational Needs					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Date of Birth of the pupil + 25 years	<p>REVIEW</p> <p>NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.</p>	

5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold	
			Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold	
			Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold	

6. Curriculum Management

6.1 Statistics and Management Information					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
6.1.1	Curriculum returns	No	Current year + 3 years	SECURE DISPOSAL	
6.1.2	Examination Results (Schools Copy)	Yes	Current year + 6 years	SECURE DISPOSAL	
	SATS records –	Yes			

	Results		<p>The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years.</p> <p>The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison</p>	SECURE DISPOSAL	
	Examination Papers		The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL	
6.1.3	Published Admission Number (PAN) Reports	Yes	Current year + 6 years	SECURE DISPOSAL	
6.1.4	Value Added and Contextual Data	Yes	Current year + 6 years	SECURE DISPOSAL	
6.1.5	Self-Evaluation Forms	Yes	Current year + 6 years	SECURE DISPOSAL	

6.2 Implementation of Curriculum

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (✓)
6.2.1	Schemes of Work	No	Current year + 1 year	Review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL	
6.2.2	Timetable	No	Current year + 1 year		
6.2.3	Class Record Books	No	Current year + 1 year		

6.2.4	Mark Books	No	Current year + 1 year		
6.2.5	Record homework set	No	Current year + 1 year		
6.2.6	Pupils' Work	No	Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year	SECURE DISPOSAL	

7. Extra Curriculum Management

7.1 Educational Visits outside the Classroom					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Date of visit + 14 years	SECURE DISPOSAL	
7.1.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Date of visit + 10 years	SECURE DISPOSAL	

7.1.3	Parental consent forms for school trips where there has been no major incident	Yes	Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.	
7.1.4	Parental permission slips 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		

7.2 Walking Bus					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
7.2.1	Walking Bus Registers	Yes	Date of register + 3 years This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]	

7.3 Family Liaison Officers and Home School Liaison Assistants					
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record	Annual Review Completed Tick (v)
7.3.1	Day Books	Yes	Current year + 2 years then review		
7.3.2	Reports for outside agencies - where thereport has been included on the case file created by the outside agency	Yes	Whilst child is attending school and then destroy		
7.3.3	Referral forms	Yes	While the referral is current		
7.3.4	Contact data sheets	Yes	Current year then review, if contact is no longer active then destroy		
7.3.5	Contact database entries	Yes	Current year then review, if contact is no longer active then destroy		
7.3.6	Group Registers	Yes	Current year + 2 years		