



Horizons Therapeutic Education Trust




Data Retention Schedule

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Document Version

Document Version	Document Author/Owner	Role
1.0	Ben Howarth	Head of Provision

Document Governance

Last Review Date	Adopted by the Board of Trustees on 23 rd March 2026.
Next Review Date	Every year, as per DfE guidance, as yearly audit of data is undertaken. See Data protection in schools - Record keeping and management - Guidance - GOV.UK for further details.
Amendments Made	
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1. POLICY STATEMENT





Under the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA) schools need to produce a policy setting out retention periods for the personal data that they process. The Freedom of Information Act 2000, also requires schools to maintain a retention schedule listing the record series which the school creates in the course of its business.

The retention schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative or legal use. It also lays down the basis for normal processing under the GDPR and the DPA.

Members of staff are expected to manage their current record keeping systems using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems. This retention schedule applies to all records regardless of format (i.e. paper, electronic, photographic) on/in which it is stored.

2. BENEFITS

There are a number of benefits which arise from the use of a complete retention schedule:

-  Managing records against the retention schedule is deemed to be 'normal processing' under the Data Protection legislation and FOI.
-  Members of staff can be confident about safe disposal information at the appropriate time.
-  Information which is subject to Freedom of Information and Data Protection legislation will be available when required.
-  The Learning Centres are not maintaining and storing information unnecessarily.

Please be aware that if an FOI request is received or a legal hold is imposed (such as records required by the IICSA), then any routine disposal due should be stopped.

3. REVIEW AND AMENDMENTS

When appropriate the retention schedule will be reviewed and amended to include any new record series created and remove any obsolete record series.

This retention schedule contains recommended retention periods for the different record series created and maintained by schools in the course of their business. The schedule refers to all information regardless of the media in which it is stored.

Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the GDPR, The Data Protection Act 2018 and the Freedom of Information Act 2000.

In the majority of cases, it will be appropriate to dispose of records once the minimum retention periods for which records must be retained as given in the retention schedule have expired unless the records have been selected for permanent preservation.

Schools must have procedures and policies for any instances where it is necessary to maintain specifically identified individual records, or group of records for longer than the stated minimum, including;

- 🚩 ongoing access requests, for example, where the ongoing processing of an access request cuts over the minimum retention period. It would not be acceptable to dispose of a record that is part way through being processed for an access request because the minimum retention period has been reached.
- 🚩 public inquiries.
- 🚩 where there is a continued business need beyond the minimum retention period, and this is documented in local policy.
- 🚩 temporary retention.

Where records contain personal data, the decision to retain must comply with the GDPR. Decisions for continued retention beyond the periods laid must be recorded, made in accordance with formal policies and procedures by authorised staff and set a specific period for further review. Where there is justification, records may be retained locally longer than the minimum period set within this schedule

4. HTET DATA RETENTION SCHEDULE

(Based on DfE statutory requirements)

Pupil records

Document type	Retention period	Action at end of retention period	Further information
Secondary school pupil records	Until the pupil's 25th birthday.	Dispose of records securely. If the pupil leaves to go to another school, transfer the records to that school.	See The Education (Pupil Information) (England) Regulations 2005 for details of what to keep in the education record. Retain as detailed in section 2 of the Limitation Act 1980 . There is guidance on what to do if the academy closes before the end of the retention period.

Child protection records

Document type	Retention period	Action at end of retention period	Further information
Child protection files	Until the child's 25th birthday. If the file relates to child sexual abuse, retain until the child's 75th birthday.	Dispose of records securely. Child protection files should be passed on to any new school a child attends. This should be transferred as separately from the main pupil file.	Should be stored either as a separate file or in a sealed envelope in the pupil file. Keeping children safe in education , sections 122 and 123. The Report of the Independent Inquiry into Child Sexual Abuse (IICSA) recommendation on access to records .
Allegations of child protection against a member of staff, including unfounded allegations	Until the staff member's normal retirement age, or 10 years from the date of the	Dispose of records securely.	Keeping children safe in education. Working together to safeguard children.

Document type	Retention period	Action at end of retention period	Further information
	allegation, whichever is later.		

Finance records

Document type	Retention period	Action at end of retention period	Further information
Contracts	6 years from the last payment on the contract.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
Debtor's records	6 years from end of the financial year.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
VAT records	6 years from finance year end.	Dispose of records securely.	May include invoices, budgets, bank statements and annual accounts. Record keeping (VAT Notice 700/21) .

Governance records

Document type	Retention period	Action at end of retention period	Further information
Admissions	6 years from the admission date.	Dispose of records securely.	Regulation 7 of the School Attendance (Pupil Registration) (England) Regulations 2024 .
Attendance registers	6 years from the date of entry.	Dispose of records securely.	Regulation 7 of the School Attendance (Pupil Registration) (England) Regulations 2024 .
Annual governors' report	10 years.	Dispose of records securely.	The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002 . Retain as detailed in section 2 of the Limitation Act 1980 .
Curricular record	At least 1 year.	Dispose of records securely.	The Education (School Records) Regulations 1989 . Regulation 3 of the Education (Pupil Information) (England) Regulations 2005 .

Document type	Retention period	Action at end of retention period	Further information
Directors – disqualification	15 years from the date of disqualification.	Dispose of records securely.	The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England) Regulations 2004.
Records of educational visits	10 years from the date of the visit. If there was an incident on the visit, retain the permission slips for all pupils and the incident report in the pupil record .	Dispose of records securely.	Health and safety on educational visits. Retain as detailed in section 2 of the Limitation Act 1980 .
School vehicles	6 years from the disposal of the vehicle.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
Statutory registers and compliance	Retention periods vary, for example: Memorandums of understanding should be retained for the life of the academy plus 6 years. Annual reports should be retained for 10 years from the date of the report. Board meeting records should be retained for 10 years from the date of the meeting.	Dispose of records securely.	May include annual reports and governance records. Companies Act 2006 contains information on which statutory registers to keep. Compliance guidance in the maintained schools governance guide. Compliance guidance in the academy trust governance guide. Academy trust handbook.

Health and safety records

Document type	Retention period	Action at end of retention period	Further information
Accessibility plans	Life of plan plus 6 years.	Dispose of records securely.	Retain as detailed in section 2 of the Limitation Act 1980 .
Accident records	3 years from the date of the accident.	Dispose of records securely.	Accidents involving pupils should be retained in the pupil record . Regulation 25 of the Social Security (Claims and Payments) Regulations 1979 .
Monitoring exposure to substances hazardous to health, including asbestos	5 years.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002 .
Health surveillance records	40 years.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002 . Health surveillance - Record keeping .
Other health records of staff	While the worker is employed in your school.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002 . HSE guidance on Health surveillance - Record keeping .
Fire assessments	Life of the risk assessment plus 6 years.	Dispose of records securely.	Fire Service Order 2005 . Retain as detailed in section 2 of the Limitation Act 1980 .

Property records

Document type	Retention period	Action at end of retention period	Further information
Maintenance records	6 years from finance year end.	Dispose of records securely.	Record keeping (VAT Notice 700/21) .
Title deeds	12 years from end of deed.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .

Staff records

Document type	Retention period	Action at end of retention period	Further information
Copies of DBS certificates	6 months from date of recruitment.	Dispose of records securely.	Keeping children safe in education.
Maternity pay records	3 years after the end of the tax year in which the maternity pay period ends.	Dispose of records securely.	The Statutory Maternity Pay (General) Regulations 1986.
Pay records	3 years from the end of the tax year they relate to.	Dispose of records securely.	PAYE and payroll for employers: Keeping records.
Personnel files	6 years from termination of employment.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
Retirement benefits	A minimum of 6 years from the end of the year in which the accounts were signed.	Dispose of records securely.	Regulation 15 of the Retirement Benefits Schemes (Information Powers) Regulations 1995.

5. LINKED POLICIES

The Data Retention Schedule should be read in conjunction with the HTET Data Protection Policy and Privacy Notices.