RECORDS AND RETENTION POLICY

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Reviewed by the SLT MAT Board

"The Trustees of the Southport Learning Trust are committed to safeguarding and promoting the welfare of children and young people at every opportunity and expect all staff and volunteers to share this commitment"

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1. Introduction

This record retention and deletion policy contains recommended retention periods for the different record series created and maintained by Southport Learning Trust. 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 (UK GDPR), the Data Protection Act 2018 (DPA), 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 will be recorded.

2. Purpose

This policy, for managing records at Southport Learning Trust has been drawn up in conformity with legislation, regulations affecting schools and best practice as promoted by the Information and Records Management Society (IRMS).

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 Southport Learning Trust, 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 FOI. It will be read and used in conjunction with all of our related policies.

It is expected that;

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

3. Disposal of Data

Article 5(e) of the UK GDPR states that personal data will 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 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. Southport Learning Trust will 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 will be destroyed. For confidential, sensitive or personal information, to be considered securely disposed of, it will be in a condition where it cannot either be read or reconstructed.

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

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

CDs/DVDs/discs will be cut into pieces. Hard copy images, AV recordings and hard disks will be dismantled and destroyed. Where third party disposal companies are employed, a certificate of destruction will be obtained. Staff working for external provider will have been trained in the handling and destruction of confidential data.

If Southport Learning Trust receives a request for records that have not yet been destroyed, even if they should have been destroyed, that record will still be made available to the requestor.

The FOI requires the Southport Learning Trust to maintain a list of all records that have been destroyed and who authorised their destruction. This record will be retained for 15 years. The appropriate members of staff (Data Lead) will 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.

4. Transfer of Records to Archives

a) Storage archives, for school or trust 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 or trust 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 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).

5. Transfer of Records to other Media

Where lengthy retention periods have been allocated to records, organisations will 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, will be considered. 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 will 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 will then be securely and confidentially disposed of (see section 4. Disposal of Data). Southport Learning Trust will 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.

6. Transfer of Records to other Settings & 'Last Known School'

When a child leaves a Southport Learning Trust school, all pupil records, including safeguarding/child protection records will 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 will 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 Southport Learning Trust school that the child has departed will then be deleted or retained in line with the retention schedule below, including all paper records and data stored electronically. Generally, a record will be kept for tracking and auditing purposes only. Trust schools will 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 Southport Learning Trust schools 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 most of the 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 will 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 will 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. Trust schools will ensure that safeguarding/child protection records are clearly identified as such so that the receiving school can quickly identify this information. Schools will consider if information such as behaviour notes needs to be transferred to the next setting, or whether it will 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 Southport Learning Trust IT systems/cloud storage or on paper, the SEND co-ordinator will 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 will be sent to the next setting that the pupil will attend. The Education (Pupil Information) (England) Regulations 2005 state that this "Educational Record" will 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 will 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.

As Academies we are not covered by the Education (Pupil Information) (England) Regulations 2005 and therefore have no statutory obligation to transfer either the educational record or the CTF. However we follow the same professional standards by securely sharing key information - particularly safeguarding, SEND and other relevant records - to support the child's welfare and continued learning. Academies may also choose to provide a pupil summary, SEND information, safeguarding material where legally appropriate, or even a CTF where their MIS supports it, in line with UK GDPR principles and sector expectations for safe and lawful information sharing.

Trust 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 will 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 Trust School does retain

pupil records, then they will be prepared to justify this retention and will need to consider if a Data Protection Impact Assessment should be completed 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 trust's standard retention periods for pupil education records and 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 Southport Learning Trust School will retain the record. However, the college will receive a copy of the child protection file, as per the requirements of KCSiE above.
The Pupil Record will 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 Southport Learning Trust School wishes to retain data for analysis or statistical purposes, it will be done in an anonymised fashion.

7. Management Information System (MIS)

The majority of pupil records and some staff records are held on the Southport Learning Trust MIS currently Arbor. Managing data retention on the MIS can be complex because different data sets held on the MIS have different retention requirements. Southport Learning Trust staff have limited time and resources to manage these differing retention periods and will 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, Trust 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 Southport Learning Trust will set out how records will be retained in the MIS in the relevant section of the Retention Table contained in this policy.

8. Records relating to Child Sexual Abuse

Records relating to child sexual abuse will 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 will particularly need to consider digital continuity where:

- they hold digital records for staff or governors/trustees, 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 will 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 Trust School leadership and/or preserving these records.

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.

9. Retention of Records relating to Staff

As stated above regarding the long-term retention of minimal pupil records, Southport Learning Trust 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 Southport Learning Trust and its 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 the Trust and Trust Schools intend to create and maintain these records, this will be noted on the retention policy (at section 7.11)

10. 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

11. Responsibility and Monitoring

The Executive Director and Trust Data Lead and Head Teacher and Data Lead in a school, hold primary and day to day responsibility, for implementing this policy. The Data Protection Officer, in conjunction with the Trust and Schools, 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 CEO at Trust level and Head Teacher at a Trust School and recorded in the member of staff's personnel file.

All teaching and office staff are given training and guidance on accessing and managing Southport Learning Trust 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.

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 Trust's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the Southport Learning Trust, but any changes will be notified to employees within one month of the date on which the change is intended to take effect. Southport Learning Trust may also vary any parts of the procedure, including time limits, as appropriate.

12. Retention tables

	1. Trust Board and Local Governing Body						
Ref:	**File description**	**Format / How / Where this file is held**	**Responsible Role**	**Retention**			
				Period	**Trigger**	**Basis**	**Action at end of use**
1.1	Instruments of Government including Articles of Association	Paper & electronic on Governor Hub	Governance Professional	Permanent	Closure of school	Common practice	
1.2	Trusts and Endowments managed by the Trust Board		Governance Professional	Permanent	End of operational use	Common practice	
1.3	Scheme of delegation and terms of reference for committees	Paper & electronic on Governor Hub	Governance Professional	Until superseded or whilst relevant	Expiration of terms	Common practice	
1.4	Governor and Trustee's Code of Conduct	Governor Hub	Governance Professional	One copy of each version will be kept for the life of the school.		Common practice	
1.5	Records relating to the election of chair and vice chair	Governor Hub	Governance Professional & Clerks in LGB.	Once the designation has been recorded in the minutes, the records relating to the election can be destroyed	Date of appointment	Common practice	Secure disposal
1.6	Appointment of a Governance Professional to the Trust Board	Every HR	CEO	Date of end of appointment + 6 years)	Date of appointment	Common practice	Secure disposal
1.7	Records relating to the appointment of parent and staff governors, not appointed by the governors	Every HR & Clerk's electronic files	Governance Professional & Clerks in LGB.	Date of election + 6 months	Date of election	Common practice	Secure disposal
1.8	Records relating to the appointment of co-opted governors	Every HR and Clerk's electronic files	Governance Professional & Clerks in LGB	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	Date of appointment	Common practice	Secure disposal

				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.			
1.9	Application forms – successful candidates	Every HR	Governance Professional	End of term in office + 1year	End of period of office	Common practice	Secure disposal
1.10	Appointment documentation: • Terms of office of serving governors, including evidence of appointment • Governor declaration against disqualification criteria • Register of business interests • Training required, and received, by governors • Induction programme for new governors • DBS checks carried out on the clerk and members of the governing body • Governor personnel files.	Governor Hub & Induction documentation.	Governance Professional	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	Governor Hub	Governance Professional	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	

1.12	Annual reports required by the Department of Education	Governor Hub	Governance Professional	Date of report + 10 years	Date of report	Common practice	Secure disposal
1.13	Meetings schedule	Governor Hub & electronic files	Governance Professional	Current year	Date of meeting	Common practice	Secure disposal
1.14	Agendas for Trust Board and LGB meetings	Governor Hub	Governance Professional and LGB Clerks	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 Trust Board and LGB meetings	Governor Hub	Governance Professional	Date of meeting + 6 years	Date of meeting	Common practice	Secure disposal
1.16	Minutes of Trust Board and LGB meetings (Principal Set signed)	Governor Hub and signed paper copies	Governance Professional & Clerks to the LGB	Permanent to be held at school	Date of meeting	Common practice	
1.17	Action plans created and administered by the Trust Board and LGB	Governor Hub	Governance Professional & Clerks to the LGB	Until superseded or whilst relevant	Expiration of action plan	Common practice	Secure disposal
1.18	Reports presented to the Trust Board	Governor Hub	Governance Professional	Reports will be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports will be kept permanently.	Date of report	Common practice	
1.19	Policy documents created and/or administered by the Trust Board and LGB	Governor Hub and websites (Schudio)	Governance Professional & Clerks to the LGB	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. Keep all policies relating to safeguarding and child protection for 75 years in line with the IICSA recommendations for extended retention of	Expiration of the policy	Common practice	Secure disposal

				records relating to child sexual abuse.			
1.20	Records relating to complaints made to, and investigated by the Local Governing Body/ Trust Board and/or Head Teacher	Electronic files and GDPRIS	Governance Professional & Clerks to the LGB	Date of the resolution of the complaint + a minimum of 6 years. If negligence or child protection/safeguarding is in volved then current year + 15 years. 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. Proposals concerning conversion of a school into the Trust	Electronic files	CEO/ Executive Director/ Gov ernance Professional	For the life of the organisation	Date proposal accepted or declined	Common practice	
1.22	Records relating to Trustee and Governor link visits	Governor Hub	Clerks to the LGB & Governance Professional	Date of visit + 3 years	Date of visit	Common practice	Secure disposal
	2. Headteacher & Senior Management/Leadership Team						
Ref:	**File description**	**Format / How / Where this file is held**	**Responsible Role**	**Retention**			
				Period	**Trigger**	**Basis**	**Action at end of use**
2.1	Log books of activity in the school maintained by the Head Teacher (Legislation no longer			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	

	requires the completion of a school log book)						
2.2	Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies e.g. Middle Leader meetings	Electronic files	Headteacher	Date of the meeting + 3 years	Date of the meeting	Common practice	Secure disposal
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 will be immediately transferred to the relevant file.	Email (see email retention period in section 5)	Headteacher	Date of correspondence + 3 years and then review	Date of correspondence	Common practice	Secure disposal
2.4	Professional Development Plans	Electronic files	Senior Leader responsible for CPD	Life of plan + 6 years	Date plan commences	Common practice	Secure disposal
2.5	School Development Plans	Electronic Files	Headteacher	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			Current academic year + 6 years then review	Date of record	Common practice	Secure disposal
	3. Admissions						
Ref:	**File description**	**Format / How / Where this file is held**	**Responsible Role**	**Retention**			
				Period	**Trigger**	**Basis**	**Action at end of use**
3.1	All records relating to the creation and implementation of the School's Admission's Policy	Electronic files	Headteacher	Life of the policy + 7 years then review		The School Admissions (Admission	Secure disposal

3.2	Admissions – if the admission is successful Proofs of address, supplied by parents, as part of the admissions process Supplementary information forms to include religion, medical conditions etc.	Arbor	Headteacher	Added to the pupil file	Date of admission	Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012 and School Admissions Code Statutory Guidance 2021	
3.3	Admissions – if the admission is unsuccessful (where no appeal is made)	Electronic files	LA	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)	Electronic files	LA	Resolution of case + 1 year	Resolution of case		Secure disposal
3.5	Admissions – if the admission/application is withdrawn	Electronic files	LA	No retention is required	Date of withdrawal		Secure disposal
3.6	Register of Admissions	Arbor	Headteacher	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. 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 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	Electronic files	LA	Current year + 1 year	Date of admission		Secure disposal
3.8	Admissions (Secondary School – Casual)	Arbor	Headteacher	6 years from the date of admission	Date of admission	The School Attendance (Pupil Registration) (England)	Secure disposal

						Regulations 2024	
3.9	Supplementary information forms to include religion, medical conditions etc. For successful admissions	Arbor	Headteacher	This information will 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	Electronic files	LA	Until the appeal process is completed	Date of admission		Secure disposal
4. Operational Administration							
Ref:	**File description**	**Format / How / Where this file is held**	**Responsible Role**	**Retention**			
				Period	**Trigger**	**Basis**	**Action at end of use**
4.1	Records relating to the creation and publication of the school brochures or prospectus			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			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			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)			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			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)			This information will be added to the pupil file	Date of admission	Common practice	
4.7	Security breach logs			Date of issue + 25 years (pupils) and 6 years (staff)	Date of implementation	Common practice	Secure disposal
4.8	Digital continuity plans which includes: - IT Disaster Recovery Procedure and Plan - Cyber Response Plans			Date of issue + 6 years	Expiration of current plan	Common practice	Secure disposal
4.9	Call Recordings (including VOIP messages and recordings)			School to document here	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 need to be considered individually regarding how long it will be retained- please see CCTV policy)			School to document here	Date of footage recording	Common practice	Secure disposal
	5. School Communications						
Ref:	**File description**	**Format / How / Where this file is held**	**Responsible Role**	**Retention**			
				Period	**Trigger**	**Basis**	**Action at end of use**
5.1	School staff / governor emails and other platforms such as Microsoft Teams/ Google Meet containing personal data – inbox, sent items, deleted items			School to determine and document here Where forming part of a record, information in these will be transferred to appropriate record keeping (e.g. staff file, pupil record, MIS	In line with guidance in Acceptable use policy	Common practice	Full deletion

				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.			
5.2	Pupil emails and other platforms such as Microsoft Teams/ Google Meet containing personal data – inbox, sent items, deleted items			School to determine and document here Where forming part of a record, information in these will be transferred to appropriate record keeping (e.g. 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
5.3	Social media platforms	Instagram & LinkedIn	Trust Marketing and Relationships Manager and School Social Media personnel	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
5.4	Website – pictures / news stories	Website provider	Trust Marketing and Relationships Manager & Senior Lead in schools.	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

Information containing allegations of sexual abuse must 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 will 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 2025 para 421).

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
6.1	All records leading up to the appointment of a new Head Teacher	Paper Files and Every HR	Head of HR and school HR Officer	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 will 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
6.2	All records leading up to the appointment of a new member of staff (successful candidate)	Paper Files and Every HR	Head of HR and school HR Officer	This information will 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)	Paper Files and Every HR	Head of HR and school HR Officer	Date of appointment + 6 months	Date of appointment	Common practice	Secure disposal
6.4	Pre-employment vetting information of successful candidates	Paper Files held in School & Every HR	Head of HR and school HR Officer	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 will be transferred to the personnel file. If a school 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 may keep a record of the fact that vetting was carried out, the result and the recruitment decision taken if they choose to	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSiE 2025	Secure disposal
6.5	Proofs of identity	Paper Files and Every HR	Head of HR and school HR Officer	To be kept only as proof of right to work. Not kept for any other purpose. These documents will be added to the personal folder. Home Office requires that the documents are kept until termination of	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSiE 2025	Secure disposal

				employment plus not less than 2 years.			
6.6	Pre-employment vetting information of successful candidates – for the purposes of ensuring staff are adequately qualified	Paper Files and Every HR	Head of HR and school HR Officer	To be added to the member of staff's personal folder	Date of receipt	KCSiE 2025	Secure disposal

7. HR – Operational Staff Management

Information containing allegations of sexual abuse will 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 will 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 2025 para 421)

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
7.1	Staff Personnel File	Paper Files and Every HR	Head of HR and school HR Officer	Termination of employment + 6 years	Date of appointment	Limitation Act 1980	Secure disposal
7.2	Timesheets	Paper Files held in school & stored on Microsoft Teams. (Payroll folder-restricted access only to authorised staff)	Head of HR and school HR Officer	Current year + 6 years	Date of appointment	Common practice	Secure disposal

7.3	Annual appraisal/assessment records	Paper Files stored in school & electronically in school.	Head of HR and school HR Officer	Current year + 6 years	End of calendar year that the record was created in	Common practice	Secure disposal
7.4	Sickness absence monitoring	Every HR, Arbor, Microsoft Teams (Central Trust HR folder-restricted access only to authorised staff & paper files.	Head of HR, Headteacher and school HR Officer	Sickness records are categorised as 'sensitive data'. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring. Sickness records will be kept separate from accident records. Current practice recommends that sickness records will be held for the current year + 3 years.	Date of absence	Common practice & Statutory Sick Pay Act 1994	Secure disposal
7.5	Staff training records	Paper Files held in school & Every HR/Arbor	Head of HR and school HR Officer	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 held locally, Microsoft Teams (Central folder-restricted access only to authorised staff) Every HR & Arbor.	Headteacher, Line Manager, Head of HR and school HR Officer	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: · Opt out forms · Records of compliance with WTR	Paper Files held in school, Microsoft Teams (Central HR team-restricted access only to authorised staff), Every HR.	Head of HR and school HR Officer	2 years from the date on which they were entered into 2 years after the relevant period	End of relevant tax year	Common practice	Secure disposal

7.8	Maternity/Adoption/Paternity Leave records	Paper Files held in school, Arbor, Every HR, Microsoft Teams (Central folder- restricted access only to authorised staff)	Head of HR and school HR Officer	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: - contract (UK GDPR A9 (1) (b) - public task (UK GDPR A9 (1) (e) - legal obligation (UK GDPR A9 (1) (c) Consent (UK GDPR A9 (1) (a) is only required where one of the above is not relevant.)	Paper Files held in school, Every HR	Head of HR and school HR Officer	For as long as the data is being processed and up to 6 years afterwards	End of employment	Common practice	Secure disposal
7.10	Staff policy acknowledgement	Every HR, Paper Files held in school	Head of HR and school HR Officer	Life of the policy + 3 years	Implementation of the policy	Common practice (unless otherwise dictated e.g. KCSiE, H&SWA)	Secure disposal
7.11	[see section 10 above regarding this] 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)	Arbor & Every HR	Head of HR and school HR Officer	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	Every HR & Paper Files held in school	Head of HR and school HR Officer	Date of appointment + 6 years	Date of appointment	Common practice	Secure disposal
7.13	Staff accounts in Microsoft or Google	Domain	School or Trust IT lead and HR officer	Date of staff exit + 30 days	Date of staff exit	Common Practice	Secure deletion

8. HR - Management of Disciplinary and Grievance Processes

Information containing allegations of sexual abuse will 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 will 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 2025 para 421)

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
8.1	Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded	Paper Files held in school, electronically on Microsoft Teams (Central HR folder-restricted access only to authorised staff)	Head of HR and school HR Officer	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 will 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 will be removed from personnel files; from the date they are proven to be unfounded.	Date of referral	KCSiE 2025 and Working Together to Safeguard Children	Secure disposal
8.2	Disciplinary proceedings: Verbal warning	Paper Files held in school, electronically on Microsoft Teams (Central HR folder-restricted access only to authorised staff)	Head of HR and school HR Officer	Date of warning + 6 months	Date of warning	KCSiE 2025	Secure disposal
8.3	Disciplinary proceedings: Written warning (level 1)	Paper Files held in school, electronically on	Head of HR and school HR Officer	Date of warning + 6 months	Date of warning	KCSiE 2024	Secure disposal

		Microsoft Teams (Central HR folder-restricted access only to authorised staff)					
8.3	Disciplinary proceedings: Written warning (level 2)	Paper Files held in school, electronically on Microsoft Teams (Central HR folder-restricted access only to authorised staff)	Head of HR and school HR Officer	Date of warning + 12 months	Date of warning	KCSiE 2025	Secure disposal
8.4	Disciplinary proceedings: Final Warning	Paper Files held in school, electronically on Microsoft Teams (Central HR folder-restricted access only to authorised staff)	Head of HR and school HR Officer	Date of warning + 18 months	Date of warning	KCSiE 2025	Secure disposal
8.5	Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings)	Paper Files held in school, electronically on Microsoft Teams (Central HR folder-restricted access only to authorised staff)	Head of HR and school HR Officer	If the incident is child protection related then see above; otherwise dispose following the conclusion of the case	Date of resolution	KCSiE 2025	Secure disposal
8.6	Low-level concerns	Every HR	Headteacher/ DSL	Retained at least until the individual leaves their employment	Date of concern	KCSiE 2025	Secure disposal
8.7	Trustees/Directors – disqualification	Paper Files held in school, electronically on Microsoft Teams (Central HR folder-restricted	Head of HR and school HR Officer	15 years from the date of disqualification	Date of disqualification	The Education (Company Directors Disqualification Act 1986: Amendments to	Secure Disposal

		access only to authorised staff)				Disqualification Provisions) (England) Regulations 2004.	

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.
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.
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

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
9.1	Maternity Pay Records	Paper File held in school, Arbor, Every HR, Microsoft Teams (Central Payroll folder-restricted access only to authorised staff)	Head of HR and school HR Officer	Current year + 3 years	End of the financial year in which the maternity pay perio d ends	Statutory Maternity Pay (General) Regulations 1986	Secure disposal

9.2	Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity	Paper copy may be held in school, Every HR, Microsoft Teams (Central Payroll/HR folder-restricted access only to authorised staff)	Head of HR and school HR Officer				
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 may be held in school, Microsoft Teams (Central Payroll folder-restricted access only to authorised staff)	Head of HR and school HR Officer				
9.4	Bonus sheets, Car Allowance claims, Overtime	Paper copy held in school, Microsoft Teams (Central Payroll folder-restricted access only to authorised staff)	Head of HR and school HR Officer				
9.5	Income Tax P60, Personal bank details. Tax Forms P6/P11/P11D/P35/P45/P46/P48	Microsoft Teams (Central Payroll folder-restricted access only to authorised staff)	Head of HR and school HR Officer	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 file held in school, Microsoft Teams (Central Payroll folder-restricted access only to authorised staff)	Head of HR and school HR Officer	Current year + 3 years	End of the financial year	Common practice	Secure disposal

9.7	Statutory Sick Pay	Microsoft Teams (Central Payroll folder-restricted access only to authorised staff)	Head of HR and school HR Officer	Current year + 3 years	End of the financial year	Common practice	Secure disposal
10. Health and Safety							
Ref:	**File description**	**Format / How / Where this file is held**	**Responsible Role**	**Retention**			
				Period	**Trigger**	**Basis**	**Action at end of use**
10.1	Accessibility Plans	Smartlog / Teams	Trust Estates Manager Site 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	Smartlog / Teams	CEO Headteachers	Life of the policy + 3 years	Implementation of the policy	Common practice	Secure disposal
10.3	Health and Safety Risk Assessments	Smartlog RA's completed by Compliance Ltd.	Trust Estates Manager Site 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 https://www.hse.gov.uk/pubns/edis1.htm	Smartlog	Headteacher	Retain for 7 years	Date of incident	Common practice	Secure disposal
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	Smartlog	Headteacher	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	Smartlog	Headteacher	Retain for 3 years	End of academic year	Common practice and The Social	Secure disposal

						Security (Claims and Payments Regulations 1979) Regulation 25	
10.7	Control of Substances Hazardous to Health (COSHH)	School / Sefton	Headteacher	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	Asbestos Management Report Smartlog	Site Manager Trust Estates 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	Smartlog	Site Manager and Cleapss Trained Personnel	Last action + 50 years	Last action on file	The Ionising Radiations Regulation 2017	Secure disposal
10.10	Fire Precautions log books	Smartlog	Site Manager Trust Estates Manager	Current year + 3 years	End of calendar year	Common practice	Secure disposal
10.11	Fire Assessments	Smartlog	Site Manager Trust Estates 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	Smartlog	Headteacher	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							

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
11.1	Employer's Liability Insurance Certificate	Teams & Schools	**Executive Director**	Date of closure + 40 years	Closure of school	Common practice	Offer to Local Record Office
11.2	Inventories of furniture and equipment	Teams & Schools	Headteacher & Site Manager	Current year + 6 years	End of calendar year	Common practice	Secure disposal
11.3	Burglary, theft and vandalism report forms	Teams & Schools	Headteacher	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)	Teams & Schools	Headteacher & Site Manager	6 years from the disposal of the vehicle	End of calendar year	The Limitation Act 1980	Secure disposal

12. Financial Management – Accounts and Statements including Budget Management

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
12.1	Annual accounts	Electronic files, Governor Hub & website	CFO	Current year + 6 years	End of financial year	Common practice	Offer to Local Record Office
12.2	Loans and grants managed by the school or trust	Electronic Files	CFO or Executive Director	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	Electronic Files	CFO	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	Electronic Files	CFO	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	PS Financials and Paper Records	CFO	Current financial year + 6 years	End of financial year	Standard financial regulations and Record Keeping (VAT Notice 700/21)	Secure disposal
12.6	Records relating to the collection and banking of monies	Paper Copies	CFO	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	PS Financials and paper records	CFO	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	Administered by Sefton LA	Pupil Premium Assistant Headteacher Leads	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	Arbor	Headteacher	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

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use

13.1	All records relating to the management of contracts under seal	Teams and Secure storage	Executive Director & Governance Professional	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	Teams	Executive Director	Current year + 6 years	End of contract	The Limitation Act 1980	Secure disposal
13.3	Records relating to the monitoring of contracts	Teams	Executive Director	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]							
Ref:	**File description**	**Format / How / Where this file is held**	**Responsible Role**	**Retention**			
				Period	**Trigger**	**Basis**	**Action at end of use**
14.1	School Fund: • cheque books and paying in books • ledger • invoices • receipts • bank statements • journey books	N.A. (included in Trust main accounts)	CFO	Current year + 6 years	End of use	Financial Services Act 2012, HMRC regulations Companies Act 2006	Secure disposal
15. Financial Management – School Meals							
Ref:	**File description**	**Format / How / Where this file is held**	**Responsible Role**	**Retention**			
				Period	**Trigger**	**Basis**	**Action at end of use**
15.1	Free School Meals Register, including evidence of successful FSM eligibility checks	Arbor	Headteacher	Date pupil leaves the provision + 6 years	End of financial year	Common practice	Secure disposal
15.2	School Meals Register	Arbor	Headteacher	Current year + 3 years	End of calendar year	Common practice	Secure disposal
15.3	School Meals Summary Sheets	Arbor	Headteacher	Current year + 3 years	End of calendar year	Common practice	Secure disposal

15.4	Data for the purposes of the DfE breakfast club provision	Arbor	Headteacher	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 Trust	Electronic or paper copies	Governance Professional	Permanent. These will 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	Electronic or Paper Files	Site Manager	Current financial year + 6 years Records relating to rewiring, major alterations etc will be retained in the health and safety file whilst the building belongs to the school and will 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
16.3	All records relating to the maintenance carried out by school employees, including maintenance log book	Smartlog	Site Manager / Trust Estates Manager	Current calendar year + 6 years Records relating to rewiring, major alterations etc will be retained in the health and safety file whilst the building belongs to the school/trust and will 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 or trust	Teams and paper files	Governance Professional/ Executive Director	These will be retained whilst the building belongs to the trust and will be passed onto any new owners, if the building is leased or sold.	Transfer of asset	Common practice	
16.5	Leases of property leased by, or to, the school or trust	Teams and paper files	Governance Professional/ Executive Director	Expiry of lease + 6 years	Commencement of lease	Common practice	Secure disposal
16.6	Records relating to the letting of school premises	Lettings Software (School Hire)	Site Manager	Current financial year + 6 years	End of financial year that the record was created in	Common practice	Secure disposal

17. Pupil Education Record (see s2 Education Record (Pupil Information) Regulations 2005).
Much of this information is stored in electronic form on the school's Management Information System, Arbor
SEN is dealt with in section 20.

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
17.1	Nursery/Primary	Arbor	School Data Lead	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 Last School and 8 Management Information System	Date pupil changes school	Education (Pupil Information) (England) Regulations 2005	The file will follow the pupil when they leave the nursery/ primary school (see 7 Last 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. If pupil does not attend a secondary school, or the child dies, then records will be retained as per 17.2 below.)
17.2	Secondary (or where the school is the 'last known school')	Arbor	School Data Lead	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	School Examinations Officer	This information will be added to the pupil file, and any certificates will 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.
17.4	Examination Results - Pupil Copies Internal	Arbor	Examinations Officer	This information will be added to the pupil file	Date of examination	Common practice	Secure disposal
17.5	[see section 7 above regarding this] Pupil 'skeleton' record (which may include a brief record of pupil names, UPNs, date of birth, address, parent details, date of admission, date of departure and destination (if known))	Arbor	School Data Lead	May be kept in perpetuity as these form part of the historical archives.	Archive on closure of the school or trust.	Common Practice.	Offer to the Local Authority Record Office

18. Child Protection (CP) / Safeguarding Records

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
18.1	Child Protection Information - Nursery/Primary (or where the school is not the 'last known school')	CPOMs	Designated Safeguarding Lead	CP files will be transferred to the new school/establishment as soon as possible (5 days), to maintain continuity. Ensure secure transit, and a confirmation of receipt will	Date pupil changes school (Where a child is removed from the roll to be educated at home/missing	KCSiE 2024 & Annex C	Transferred to new or Secondary school. Duplicates will be securely disposed of.

				be obtained. The CP file will 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.	from education, see below)		
18.2	Child Protection (CP) Information – Secondary (or where the school is the 'last known school')	CPOMs	Designated Safeguarding Lead	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. Information relating to child sexual abuse will 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 (Where a child is removed from the roll to be educated at home/missing from education, see below)	KCSiE 2024 & Annex C 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.	CPOMs	Designated Safeguarding Leads	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse will 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	CPOMs	Designated Safeguarding Lead	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse will 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 Elective Home Education Coordinator and Secure disposal
18.5	Filtering & Monitoring Logs. Where these indicate a child protection/safeguarding concern, the log will be added to the pupil CP Information and retained in line with the periods in 18.1-18.4.	Senso CPOMs	Trust IT Manager	Retained on provider dash board for up to 18months. We will 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)	CPOMS/Arbor	Headteacher	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						

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
19.1	Attendance Registers	Arbor	Senior Leader for Attendance	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. 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	Secure disposal
19.2	Correspondence relating to authorized absence	Arbor	Senior Leader for Attendance	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 unauthorised absence	Arbor (pupil records)	Senior Leader for Attendance	Date of absence + 3 years	Date of absence	Section 23 of the Anti-Social Behaviour Act 2003	Secure disposal
20. Special Educational Needs (SEN)							
Ref:	**File description**	**Format / How / Where this file is held**	**Responsible Role**	**Retention**			
				Period	**Trigger**	**Basis**	**Action at end of use**

20.1	Statements and Reviews of Special Educational Needs under Section 324 and 328 of the Education Act 1996 and any amendments made to the plan – Primary	Electronic files and Edukey Provision Map	SENDCO	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School
20.2	Statements and Reviews of Special Educational Needs under Section 324 and 328 of the Education Act 1996 and any amendments made to the plan - Secondary (or where the school is the 'last known school')	Electronic files and Edukey Provision Map	SENDCO	Date of birth of pupil + 35 years	Pupil's date of birth	Special Educational Needs and Disability Act 2001 & Children and Families Act 2014 & The Limitation Act 1980	Secure disposal
20.3	Individual Education Plans and Education Health Care Plan (EHCP) and all other SEN files -Primary	Electronic files and Edukey Provision Map	SENDCO	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School
20.4	Individual Education Plans and Education Health Care Plan (EHCP) and all other SEN files - Secondary (or where the school is the 'last known school')	Electronic files and Edukey Provision Map	SENDCO	Date of birth of pupil + 35 years	Pupil's date of birth	Special Educational Needs and Disability Act 2001, Children and Families Act 2014 & The Limitation Act 1980	Secure disposal
21. Curriculum Management							

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
21.1	Curriculum returns			Current year + 3 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.2	Curriculum development			Current year + 6 years	End of the calendar year that the record was created in	Common practice	
21.3	Examination Results (School's copy)			Current year + 6 years	Date of examination	Common practice	Secure disposal
21.4	SATs Results		Headteacher	The SATS result will 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
21.5	SATs Examination papers		Headteacher	The examination papers will be kept until any appeals/validation process is complete	Date of examination	Common practice	Secure disposal
21.6	Published Admission Number (PAN) Reports		Headteacher	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.7	Value Added and Contextual Data		Headteacher	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal

21.8	Self-Evaluation Forms	Electronic Files	Headteacher	Current year + 6 years	Date of completion	Common practice	Secure disposal
21.9	Internal Moderation	Electronic Files	Headteacher	Academic year + 1 academic year	Date of commencement	Common practice	Secure disposal
21.10	External Moderation	Electronic Files	Headteacher	Until superseded	Date of commencement	Common practice	Secure disposal

22. Implementation of Curriculum

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
22.1	Schemes of Work	Electronic files and MS Teams	Senior Leader for Curriculum	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
22.2	Timetable	Timetabler within Arbor	Senior Leader for Curriculum	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.3	Class Record books, mark books, homework records (e.g. teacher spreadsheets etc)	Electronic files and MS Teams	Senior Leader for Curriculum	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.4	Pupil work	Exercise books and electronic files in pupil folders	Senior Leader for Curriculum	Where possible, pupils' work will be returned to the pupil at the end of the academic year or Key Stage	End of the academic year that the record was created in	Common practice	Secure disposal
22.5	Online learning platforms	Online portal	Teacher responsible	As above. Work will be cleared from platforms at the	End of the academic year that	Common practice	Secure disposal

			for each platform	end of the following academic year	the record was created in		
22.6	Teacher diaries & Notebooks			Contents will be transferred to appropriate record keeping (e.g. 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

23. Extra Curriculum Management

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
23.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Primary schools) where there has not been a Major Incident (Records created might include risk assessments)	Evolve	School EVC	Date of visit + 14 years	Date of visit	The Health and Safety at Work Act 1974	Secure disposal
23.2	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	Evolve	School EVC	Date of visit + 10 years	Date of visit	The Health and Safety at Work Act 1974	Secure disposal

23.3	Parental consent forms for school trips where there has been no Major Incident	Paper Copies	**School EVC and Group Leader**	No retention is required		Common practice	Secure disposal
23.4	Records created by schools to obtain approval for to run an Educational Visit outside the Classroom, **where there has been a Major Incident** (Records created might include risk assessments)	Evolve	**School EVC and Group Leader**	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
23.5	Parental consent forms for school trips, **where there has been a Major Incident**	Paper Copies	**School EVC and Group Leader**	Retain for 25 years from the date of birth of the pupil/s involved in the incident. 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

24. Family Liaison / Early Help / Alternative Provision

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
24.1	Day books			Current year + 2 years then review	End of the calendar year that the record was created in	Common practice	Secure disposal
24.2	Reports for outside agencies – where the report has been included on the agency case file	CPOMs Arbor	Headteacher/ DSL	Whilst the child is attending school and then destroy	Date of completion of report	Common practice	Secure disposal
24.3	Referral forms	Online entry	Headteacher/ DSL	While the referral is current	Date of completion of form	Common practice	Secure disposal
24.5	Contact data sheets and database entries	Arbor	School Data Lead	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
24.6	Group registers	Arbor	School Data Lead	Current year + 2 years	Last entry in register	Common practice	Secure disposal

25. Local Authority

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
25.1	Secondary Transfer sheets	Arbor	School Data Lead	Current year + 2 years	Year of transfer	Common practice	Secure disposal
25.2	Attendance Returns	Arbor	School Data Lead	Current year + 1 year	End of the calendar year that the record was created in	Common practice	Secure disposal
25.3	School Census Returns	Arbor	School Data Lead	Current year + 5 years	Completion of return	Common practice	Secure disposal
25.4	Circulars and other information sent from the Local Authority	MS Teams	Headteacher	Operational use	Date of issue	Common practice	Secure disposal

26. Central Government

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
26.1	OFSTED reports and papers	Electronically MS Teams	Headteacher	Retain whilst current	Date new report is issued	Common practice	Secure disposal
26.2	Returns made to central government, including Schools financial value standard (SFVS) and assurance statement	MS Teams Governor Hub	CEO/CFO	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
26.3	Circulars and other information sent from central government	MS Teams	CEO/CFO/Headteachers	Operational use	Date of issue	Common practice	Secure disposal

27. Parent / Alumni Associations

Ref:	File description			Retention

		Format / How / Where this file is held	Responsible Role	Period	Trigger	Basis	Action at end of use
27.1	Records relating to the creation and management of PTA and Old Pupil Associations	Charity Commission Electronic files	Chair of PTA	Current year + 6 years	Date of foundation	Common practice	Secure disposal

28. Recordings (meetings, calls, online lessons) – please adapt this section to suit ensuring it is consistent with the Acceptable Use policy

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use
28.1	Incoming & Outgoing calls	Online phone system		30 days	Date of call	Common practice	
28.2	Meetings	MS Team	IT Manager	1 year	Date of foundation	Common practice	
28.3	Online lessons	MS Teams	Curriculum Leads	Duration of curriculum needs		Common practice	
28.4	Staff training	MS Teams Smartlog Online platforms	Senior CPD Leaders in schools	Duration of need. Safeguarding training to be for 10 years		Common practice	

29. Pupil Work Experience / Placement Records (Secondary schools)

Ref:	File description	Format / How / Where this file is held	Responsible Role	Retention			
				Period	Trigger	Basis	Action at end of use

29.1	Records created in relation of offsite pupil work experience where there has not been a Major Incident	MS Teams	Senior Careers Lead	Date of placement + 10 years	Date of placement	The Health and Safety at Work Act 1974	Secure disposal
29.2	Records created in relation of offsite pupil work experience **where there has been a Major Incident**	Smartlog Arbor	Senior Careers Lead/DSL	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
30. Administration of Medication							
Ref:	**File description**	**Format / How / Where this file is held**	**Responsible Role**	**Retention**			
				Period	**Trigger**	**Basis**	**Action at end of use**
30.1	Non-prescription medicines and remedies inc painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers	Smartlog	Headteacher/ First Aid leader	Current year + 1 year	Date of administration	Limitation Act 1980	Secure disposal
30.2	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	Smarlog Medical records procedure at Merefield	Headteacher/ First Aid leader	Date of birth of the pupil + 25 years	Date of administration	Limitation Act 1980	Secure disposal

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 safely destroyed in accordance with Data Retention Guidelines Yes/No	Name of Authorising Officer
1.	School invoices	Copies of purchase invoices dated 2025/12	Folders marked 'Purchase Invoices 2025/12' 1-3	3 Folders	Cross shredded	Yes	J Smith (Head)