HET Records Management and Retention Policy

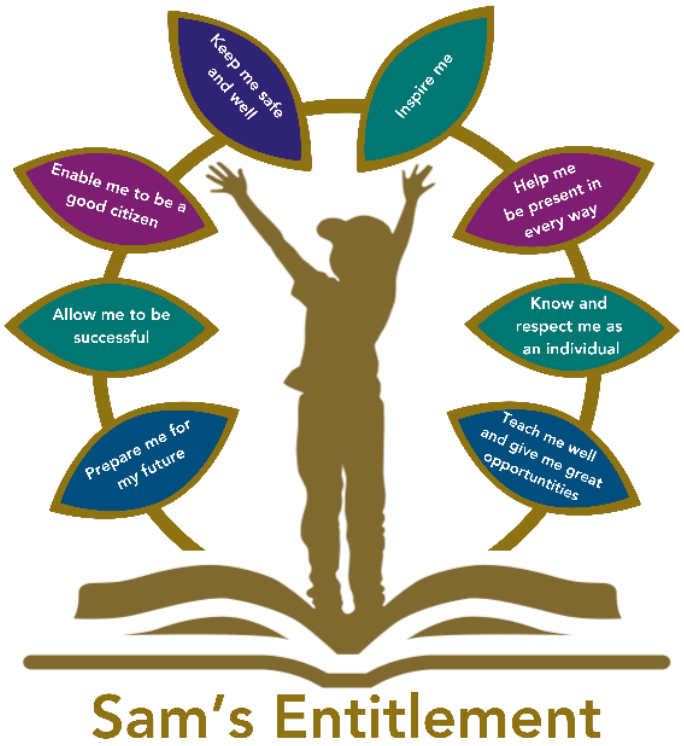
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Owner	Head of Safeguarding and Compliance	Approved by	DCEO

1. History of Policy Changes

Date	Page	Change	Origin of Change
Nov 2026	3-5	Updated statutory references and retention guidance.	Legislative review
Nov 2026	10-16	Expanded safeguarding and information governance requirements.	Regulatory review
Nov 2026	21-23	Added guidance for emails, Teams messages and meeting recordings.	Digital records review

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3. Introduction

The Hamwic Education Trust (HET) recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school and provide evidence for demonstrating performance and accountability.

As a public authority, the [school/trust] undertakes to manage records in relation to the three principles laid out in the Lord Chancellor's Code of Practice issued under Section 46 of the Freedom of Information Act 2000, published in July 2021.

This policy provides the framework to achieve effective management and audit of records.

The security of data and appropriate measures will be implemented to protect breach, loss, or unauthorised sharing of information.

Information will be assessed as to when it is no longer required, necessary, or is to be destroyed or deleted in line with the retention schedule.

4. Scope of the policy

This policy applies to all records created, received, or maintained by permanent and temporary staff, agents, contractors, consultants or third parties acting on behalf of the [school/trust] in the course of carrying out its functions.

Records are defined as all those documents which facilitate the business carried out by HET and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received, or maintained in hard copy or electronic format.

5. Definitions

- 'HET' in this policy refers to the central operations of the Hamwic Education Trust alongside any schools within our multi-academy trust.
- 'Local Governing Committee' in this policy, where reference is made to the Governing Committee, this means the Local Governing Committee of the school, or the Trust in the case of a school where no Local Governing Committee is present. Where a Governing Committee is not present in a school, or numbers are low, Governors from other schools/partnerships may be used.
- Secure disposal means disposal using confidential waste bins, sacks or crosscutter shredding.

6. Responsibilities

HET has a statutory responsibility to maintain the records and record keeping systems in accordance with the regulatory environment specific to them.

The School Leader in each school, supported by their school Data Compliance Officer (DCO), is responsible for day-to-day operational management in the school and will give guidance on good records management practice and will promote compliance with this policy so that information can be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying it at least annually to check if records are stored securely and can be accessed appropriately.

Information will be managed in line with the Records Retention Schedule set out below. This will help to ensure that HET can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (Subject Access Requests 'SARS').

Individual staff and employees must ensure, with respect to records for which they are responsible, that they:

- Create and maintain full and accurate records of their activities and file and maintain the same.
- Manage all records to which they have access consistently in accordance with the school's policies and procedures.
- Properly document their actions and decisions.
- Hold both physical and electronic records, particularly those that contain personal or confidential information, securely.
- Only share records appropriately and do not disclose them to any unauthorised third party.
- Dispose of records securely in accordance with the school's Records Retention Schedule.

If in doubt about whether to retain or dispose of a document, policy or report, please seek guidance via compliance@hamwic.org.

7. Link to other HET policies

This policy has been drawn up within the context of:

- The Data Protection policy.
- The Freedom of Information policy.

8. Retention tables

Please note, these retention rules will not cover every record created. Where a retention period for a record is not referred to below, please use the nearest descriptor of the record or retain for current year + 6 years.

9. Table 1: Management

Reference	File Description	Retention Period	Trigger	Basis
1.1 Contracts				
1.1.1	All records relating to the management and monitoring of contracts under seal	Current year + 12 years	End of contract	The Limitation Act 1980
1.1.2	All records relating to the management and monitoring of contracts under signature	Current year + 6 years	End of contract	The Limitation Act 1980
1.2 Finance - Risk and Insurance				
1.2.1	Employer's Liability Insurance Certificate	Date of expiry of insurance + 40 years	Date the policy expires	Common practice. (Note that the statutory requirement to retain these for 40 years was removed by the Employers' Liability (Compulsory Insurance) (Amendment) Regulations 2008) but it is considered best practice to retain these where possible.
1.2.2	Insurance policies	Date the policy expires + 6 years; except Public Liability insurance - day of issue + 40 years	Date the policy expires	Common practice
1.2.3	All records relating to insurance, including inventories of furniture and equipment, and records relating to burglary, theft or vandalism	Current year + 6 years	End of calendar year	Common practice

Reference	File Description	Retention Period	Trigger	Basis
1.3	**Finance - Accounts and Budget**			
1.3.1	Annual accounts and all records relating to the creation and managements of budgets, including the Annual Budget statement, and background papers. This may include: • Invoices, receipts, order books and requisitions, delivery notices • Records relating to the collection and banking of monies • Records relating to the identification and collection of debt • School Fund records	Current year + 6 years	End of financial year	Common practice
1.3.2	Loans and grants managed by the school	Date of last payment on the loan + 12 years then review	End of financial year	Common practice
1.3.3	Student Grant applications	Current year + 3 years	End of financial year	Common practice
1.4	**Finance School Meals**			
1.4.1	All financial records relating to school meals and Free School Meals Register, including evidence of successful FSM eligibility checks.	Current year + 6 years	End of calendar year	Common practice
1.4.2	All other records relating to school meals (non-finance related)	Current year + 3 years	End of calendar year	Common practice

Reference	File Description	Retention Period	Trigger	Basis
1.5 Finance - Strategy and Budget				
1.5.1	All finance records relating to finance planning and budgeting, including: • Annual accounts • Statement of financial activities for the year • Financial planning • Value for money statement • Independent Auditors reports • Records relating to the management of VAT	Current financial year + 6 years	End of financial year	Common practice
1.5.2	Annual Budget statement and background papers	Life of the budget + 3 years	End of financial year	Common practice
1.5.3	Borrowing powers	Until superseded + 6 years	End of financial year	Common practice
1.5.4	Charging and remissions policy	Date policy superseded + 3 years	Expiration of policy	Common practice
1.6 Finance - Funding				
1.6.1	All records relating to funding, incuding: • Funding Records Capital Grant • Funding Records Earmarked Annual Grant (EAG)	Date of last payment of funding + 6 years	End of financial year	Common practice

Reference	File Description	Retention Period	Trigger	Basis
	• Funding Records General Annual Grant (GAG) • Per pupil funding records • Gift Aid and Tax Relief • Exclusions agreement			
1.6.2	Records relating to loans	Date of last payment on loan + 6 years if the loan is under £10,000 or date of last payment on loan + 12 years if the loan is over £10,000	End of financial year	Common practice
1.6.3	Management of Endowment Funds	Life of the fund + 6 years	End of financial year	Common practice
1.6.4	Investment policies	Life of the investment + 6 years	End of financial year	Common practice
1.6.5	Pupil Premium Fund records	Date pupil leaves the provision + 6 years	End of financial year	Common practice
1.6.6	Student Grant applications	Current year + 3 years	End of financial year	Common practice
1.7 Property - Ownership				
1.7.1	Title deeds of properties belonging to the school	Permanent. These should follow the transfer of property unless the property has been registered with the Land Registry	Transfer of property	Common practice

Reference	File Description	Retention Period	Trigger	Basis
1.7.2	All records relating to the maintenance of the school, including work carried out by contractors or school employees and any maintenance log books or records	Current financial year + 6 years. Records relating to rewiring, major alterations, etc. must be retained in the health and safety file whilst the building belongs to the school and should 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
1.7.3	Plans of property belonging to the school	These should be retained whilst the building belongs to the school and should be passed onto any new owners, if the building is leased or sold.	Transfer of property	Common practice
1.7.4	Leases of property leased by, or to, the school	Expiry of lease + 6 years	Expiry of lease	Common practice
1.7.5	Records relating to the letting of school premises	Current financial year + 6 years	End of financial year that the record was created in	Common practice
1.8 Governance				
1.8.1	Instruments of Government including Articles of Association	Permanent	Closure of school	Common practice

Reference	File Description	Retention Period	Trigger	Basis
				N.B. These should be offered to the Local Authority Record Office if school closes
1.8.2	Constitution (including resolutions to amend the Consititution)	Date constitution superseded + 10 years.	Date constitution superseded	Companies Act 2006 Section 355: (This section refers to Records of Resolutions and meetings, etc. it does not mention Constitutions. However, resolutions and minutes under this section must be retained for at least 10 years from date of meeting or decision as appropriate)
1.8.3	Register of Directors/Members	Date Director/Member resigns + 10 years	Date of resignation	Companies Act 2006
1.8.4	Scheme of delegation and terms of reference for committees	Life of Written Scheme of Delegation + 10 years	Expiration of terms	Companies Act 2006
1.8.5	Governor's Code of Conduct	One copy of each version should be kept for the life of the school.	Replacement/updating of Code	Common practice
1.8.6	Appointment documentation: • Terms of office of serving trustees/governors, including evidence of appointment	End of term of office + 6 years	End of term of office	Companies Act 2006

Reference	File Description	Retention Period	Trigger	Basis
	• Trustee/governor declaration against disqualification criteria • Training required, and received, by trustees and governors • Induction programme for new trustees/governors This list does not include (see HR records for this): • Evidence of DBS checks carried out on the clerk and members of the trustee/governing body • Trustee/governor personnel files.			
1.8.7	Register of business interests (note these can relate to staff or to trustees and governors)	Whilst business interest is relevant plus 6 years	End of business interest	Common practice
1.8.8	Annual reports	Date of the report + 10 years	End of the calendar year that the record was created in	Common practice
1.8.9	Minutes of Trustee or Governing Body meetings and agenda (Principal Set signed) (including any documents or reports referred to) and AGM	Permanent, to be held at school	Date of meeting	Common practice
1.8.10	Register of attendance at Full Governing Board meetings	Date of meeting + 6 years	Date of meeting	Common practice

Reference	File Description	Retention Period	Trigger	Basis
1.8.11	Action plans created and administered by the Governing Body	Until superseded or whilst relevant	Expiration of action plan	Common practice
1.8.12	Policy documents created and/or administered by the Governing Body	Until superseded or whilst relevant	Expiration of the policy	Common practice
1.8.13	Records relating to complaints made to, and investigated by, the Governing Body	Date of the resolution of the complaint + a minimum of 6 years. If negligence or child protection/safeguarding is involved, then current year + 15 years. If child sexual abuse issues are involved then for 75 years in line as per IICSA recommendations.	Conclusion of complaint process	Common practice
1.8.14	Proposals concerning the change of status of a school, including maintained, specialist status schools and academy merger/transfer	For the life of the organisation	Date proposal accepted or declined	Companies Act 2006 N.B. These should be offered to the Local Authority Record Office if school closes
1.8.15	Records relating to Governor Monitoring Visits	Date of visit + 3 years	Date of visit	Common practice
1.8.16	Meeting papers relating to the annual parents' meeting	Date of the meeting + a minimum of 6 years	Date of meeting	Common practice

Reference	File Description	Retention Period	Trigger	Basis
1.8.17	Restrictive interventions- governors' monitoring reports and data analysis: Reports provided to the governing body or HET arising from review and analysis of the institutional incident log, including any reports addressing disproportionality in relation to SEND or protected characteristics.	Date of report + 6 years	Date of report	Common practice. Governance reporting obligations arise from section 93A of the Education and Inspections Act 2006 and the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.
1.9 School management				
1.9.1	Log books of activity in the school maintained by the Head Teacher	Date of the last entry in the log book + a minimum of 6 years and then review	Date of last entry in the log book	Common practice
1.9.2	Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies	Date of the meeting + 3 years	Date of the meeting	Common practice
1.9.3	Professional Development Plans	Life of plan + 6 years	Date plan commences	Common practice
1.9.4	School Development Plans	Life of plan + 3 years	Date plan commences	Common practice
1.9.5	Filtering and monitoring logs. Where these indicate either a HR or child protection concern, the relevant information should be added to the personnel or pupil child protection file.	Filtering: 1 month searchable - 3 months from smoothwall directly. Monitoring: 15 months retention - all data held with smoothwall.	Date of log	Management decision

Reference	File Description	Retention Period	Trigger	Basis
		We expect safeguarding concerns to be added to CPOMS/MyConcern, in line with our HET Guidance of FIltering and Monitoring.		
1.10 Health and Safety				
1.10.1	Accessibility Plans	Current year + 6 years	End of the calendar year that the records were created in	Equality Act 2010
1.10.2	Health and Safety Policy Statements	Life of the policy + 3 years	Replacement of policy	Common practice
1.10.3	Health and Safety Risk Assessments	Life of the assessment + 3 years	End of the life of the assessment	Common practice
1.10.4	Accident reporting - Adults	Date of last entry in the accident book + 3 years but if there is possibility of negligence allegation then date of incident + 15 years or date of settlement + 6 years	Date of incident	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980
1.10.5	Accident reporting - Children	Retain for 25 years	Date of birth of child	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980

Reference	File Description	Retention Period	Trigger	Basis
1.10.6	Records relating to any reportable death, injury, disease, or dangerous occurrence (RIDDOR) where above periods relating to accident reporting are not relevant	Date of incident + 3 years (but see above entries re accident reporting)		Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
1.10.7	Minor incidents (non-reportable) accident book	Retain for 3 years	End of academic year	Common practice
1.10.8	Non-prescription medicines and remedies inc. painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers	Current year + 1 year. This is the school's record. If required, an additional copy can be retained with the pupil record	Date of admistration	Common practice
1.10.9	All other administration of medication not covered by the above, including, but not limited to: peg feeding, injections, treatments for serious conditions such as diabetes, ADHD or depression	Date of birth of the pupil + 25 years This is the school's record. If required, an additional copy can be retained with the pupil record	Date of birth of pupil	Limitation Act 1980
1.10.10	Control of Substances Hazardous to Health (COSHH)	Current year + 40 years	Last action on file	The Control of Substances Hazardous to Health Regulations 2002
1.10.11	Records relating to the monitoring of areas where employees/pupils are likely to come into contact with asbestos	Last action + 40 years	Last action on file	The Control of Asbestos at Work Health Regulations 2012

Reference	File Description	Retention Period	Trigger	Basis
1.10.12	Records relating to the monitoring of areas where employees/pupils are likely to come into contact with radiation	Last action + 50 years	Last action on file	The Ionising Radiations Regulation 2017
1.10.13	Fire Precautions log books	Current year + 6 years	End of calendar year	Common practice
1.10.14	Fire risk assessments	Life of the risk assessment + 3 years	End of risk assessment use	Fire Service Order 2005 (states records must be kept, but not length of retention)
1.10.15	Restrictive interventions incident log- school's institutional record. This is the school's own governance and management record of all incidents of use of force, seclusion and non-force related restraint involving pupils, maintained as an incident log or incident book at school level and separate from individual pupil education or safeguarding records.	Current academic year + 6 years as a minimum. Where incidents involve physical injury to a pupil, or where pupils with SEND are involved, schools should consider extending retention to the date of birth of the youngest pupil involved in any incident recorded in the log + 25 years, by analogy with accident records involving children.	End of academic year in which the entry is made	Minimum: Limitation Act 1980 (by analogy with accident records involving children — entries 1.10.4 and 1.10.5 above). Recording obligations arise from: section 93A of the Education and Inspections Act 2006 and statutory guidance issued thereunder (*Restrictive Interventions, Including Use of Reasonable Force, in Schools*, DfE, April 2026); and the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025. Management decision on length of retention.

Reference	File Description	Retention Period	Trigger	Basis
1.11 Local Authority				
1.11.1	Attendance Returns	Current year + 1 year	End of the academic year that the record was created in	Common practice
1.11.2	School Census Returns	Current year + 5 years	Completion of return	Common practice
1.11.3	Circulars and other information sent from the Local Authority	Whilst in operational use	Date of issue	Common practice
1.12 Central Government				
1.12.1	OFSTED reports and papers	Retain whilst current	Date new report is issued	Common practice
1.12.2	Returns made to central government, including Schools Financial Value Standard (SFVS) and assurance statement	Current year + 6 years	End of the calendar year that the record was created in	Common practice
1.12.3	Circulars and other information sent from central government	Whilst in operational use	Date of issue	Common practice
1.13 Education Management				
1.13.1	Published Admission Number (PAN) reports	Current year + 6 years	End of academic year	Common practice
1.13.2	Curriculum Returns	Current year + 3 years	End of academic year	Common practice
1.13.3	Self-evaluation forms	Current year + 6 years	End of academic year	Common practice

Reference	File Description	Retention Period	Trigger	Basis
1.13.4	Policy documentation	Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained. Retain all policies relating to safeguarding and child protection for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Expiration of the policy	Common practice
1.13.5	Risk and Control Framework	Life of framework or framework superseded + 3 years. If major changes are made to the framework then an archive copy of previous policies should be retained	Expiration of the policy	Common practice
1.13.6	School Development Plans and strategic reviews	Life of plan or until plan superseded + 3 years.	Expiration of the plan	Common practice
1.14 Operational Administration				

Reference	File Description	Retention Period	Trigger	Basis
1.14.1	Records relating to the creation and publication of the school brochures or prospectus	Current year + 3 years	Expiration of current publication	Common practice
1.14.2	Records relating to the creation and distribution of circulars to staff, parents or pupils	Current year + 1 year	Date of record	Common practice
1.14.3	Newsletters and other items with short operational use	Current year + 1 year	Date of record	Common practice
1.14.4	Visitor management systems (including electronic systems, visitors' books and signing in sheets)	Current year + 6 years then review	End of calendar year	Common practice
1.14.5	Records relating to the creation and management of Parent Teacher Associations and/or Alumni Associations	Current year + 6 years then review	Date of record	Common practice
1.14.6	Privacy Notices (as part of UK GDPR compliance)	Date of issue + 6 years	When policy is superseded	Common practice
1.14.7	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)	Date of consent + 6 years whilst relied upon (This information may be added to the pupil file)	Date of consent	Common practice
1.14.8	Data Protection related security breach logs	Date of log + 25 years (where pupil personal data involved) and 6 years (adult personal data)	Date of log	Common practice

Reference	File Description	Retention Period	Trigger	Basis
1.14.9	Disaster Recovery, Digital Continuity and other Cyber Security Plans and Records	Date of issue + 6 years	Expiration of current plan	Common practice
1.14.10	Call recordings (including VOIP messages and recordings)	Date of recording + 30 days Where schools use Hamwic (Intech) system, retention is 30 days. if schools use different platforms then retention will vary. Any recordings that are needed should be downloaded immediately and saved in a different location for future evidence.	Date of call recording	Common practice
1.14.11	CCTV recordings (any footage retained for specific purposes will fall outside of this and should be retained in accordance with the nature of the footage)	Date of recording + 28 days.	Date of footage recording	Common practice
1.14.12	Emails, meeting recordings, and other communication platforms including Microsoft Teams/Google Meet messaging	There is no fixed retention period for emails. Individuals should regularly review their inboxes and delete emails that are no longer required. Emails and attachments relating to pupils, staff, safeguarding,	Date of record	Management decision

Reference	File Description	Retention Period	Trigger	Basis
		complaints, decisions, actions, or other HET business should be saved promptly within the appropriate HET system. HR-related records should be saved within the appropriate personnel or HR file. Inboxes should be reviewed regularly and subject to appropriate clean-up at the end of each academic year. Emails must not be deleted where they are subject to a legal hold, investigation, or other requirement to retain them. Teams messages should be retained only for as long as necessary to support day-to-day business, after which they should be deleted. Where Teams messages contain information relating to a pupil, member of staff, safeguarding concern, complaint, decision, action, or other HET business, the relevant information		

Reference	File Description	Retention Period	Trigger	Basis
		should be transferred to the appropriate HET system as soon as practicable. Teams chats and channel content should be reviewed and subject to appropriate clean-up at the end of each academic year. Meeting recordings should be retained only for as long as necessary to prepare and agree any required notes, minutes, or actions arising from the meeting, after which they should be deleted. Where formal minutes or meeting notes are created and shared, relevant information should be retained as part of the pupil's or employee's record. This information should be transferred to the appropriate record-keeping system (for example, the staff file, pupil record, or MIS		

Reference	File Description	Retention Period	Trigger	Basis
		safeguarding or behaviour log) as soon as practically possible.		
1.14.13	Social media platforms	Social media posts containing personal data should be retained for the academic year in which they are published, plus one additional academic year.	End of the academic year that the record was created in	Management decision
1.14.14	Website – pictures/news stories	Pictures and news stories published on the school website should be retained until the end of the academic year in which they are published, and for one further academic year thereafter.	End of the academic year that the record was created in	Management decision
1.14.15	Teacher diaries & notebooks	Contents should be transferred to appropriate record keeping (e.g. staff file, pupil record, MIS safeguarding/behaviour log) as soon as possible. Destroyed within 3 months.	Completion of notebook/diary	Common practice
1.15 Transport				
1.15.1	Tachograph: Analogue and electronic including driver's cards	Current year + 12 months	End of academic year	Transport Act 1968 Chapter 73, Sections 96, 98, 99, 103. Passenger and Goods Vehicles (Recording

Reference	File Description	Retention Period	Trigger	Basis
				Equipment) Regulations 2005. Passenger and Goods Vehicles (Recording Equipment) (downloading and Retention of Data) Regulations 2008 Regulation 561/2006 EC or AETR rules may also apply includes digital recording equipment.
1.15.2	All records relating to vehicle acquisition, disposal, maintenance and management	Disposal of the vehicle + 6 years	Disposal of vehicle	Limitation Act 1980
1.15.3	Driver's records book	12 months from date of return of book to employer or in the case of owner driver 12 months from date of completion of book or it ceased to be used. Driver to retain book for 14 days after all weekly record sheets have been used.	Completion of book	Transport Act 1968 Chapter 73, Sections 96, 98, 99, 103. Drivers' Hours (Goods Vehicles) (Keeping of Records) Regulations 1987. SI 1987 No.1421. Regulation 11 Preservation of driver's record books.
1.15.4	Walking bus registers	Date of register + 3 years (but see above, re: accidents and dangerous incidents)	End of academic year	Common practice
1.16 Curriculum				

Reference	File Description	Retention Period	Trigger	Basis
1.16.1	Schemes of Work	Current year + 1 year	End of the academic year that the record was created in	Common practice
1.16.2	Timetable	Current year + 1 year	End of the academic year that the record was created in	Common practice
1.16.3	Class record books, mark books, homework records (inc. teacher spreadsheets, records on vendor systems, etc.)	Current year + 1 year	End of the academic year that the record was created in	Common practice
1.16.4	Other curriculm records including returns and development plants	Current year + 3 years	End of the academic year that the record was created in	Common practice
1.17 Extra curriculum				
1.17.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom where there has not been a major incident - Primary schools.	Date of visit + 14 years	Date of visit	The Health and Safety at Work Act 1974 (Common practice re: length of retention)
1.17.2	Records created by schools to obtain approval to run an Educational Visit outside the classroom where there has not been a major incident - Secondary schools.	Date of visit + 10 years	Date of visit	The Health and Safety at Work Act 1974 (Common practice re: length of retention)
1.17.3	Parental consent forms for school trips where there has been no major incident	End of visit	End of visit	Common practice

Reference	File Description	Retention Period	Trigger	Basis
1.17.4	Records created by schools to obtain approval to run an Educational Visit outside the classroom, **where there has been a major incident.**	Retain for 25 years from the date of birth of the youngest pupil/s involved in the incident	Pupil's DOB	The Limitation Act 1980
1.17.5	Parental consent forms for school trips, **where there has been a major incident**	Retain for 25 years from the date of birth of the youngest pupil/s involved in the incident. (The permission slips for all pupils on the trip need to be retained to show that the rules have been followed for all pupils)	Pupil's DOB	The Limitation Act 1980
1.17.6	Records created by schools in relation to offsite pupil work experience where there **has not been a major incident**	Date of placement + 10 years	Date of placement	The Health and Safety at Work Act 1974
1.17.7	Records created by schools in relation to offsite pupil work experience **where there has been a major incident**	Retain for 25 years from the date of birth of the youngest pupil/s involved in the incident	Pupil's DOB	The Limitation Act 1980
1.18 Other support work (non-teaching and where not required for addition to pupil record or pupil child protection record e.g. family liaison work)				

Reference	File Description	Retention Period	Trigger	Basis
1.18.1	Group registers, day books, contact data sheets, session summaries	Current year + 2 years	End of the academic year that the record was created in	Common practice

10. HR

Retention of all records relating to HR should take into account the recommendations of the Independent Inquiry into Child Sexual Abuse (IICSA). The report from the Inquiry recommended that records associated with child sexual abuse (CSA) should be preserved for 75 years. The Inquiry emphasised the need for this extended retention period due to the significant value these records hold for victims, and advised that they should be subject to regular reviews throughout this duration.

In instances where there is evidence or allegations of CSA, schools and academies may decide to retain the complete record, whether of a pupil, staff member, or other related documents - not merely the segments directly related to the abuse.

The Inquiry report advised that the UK government instructs the Information Commissioner's Office (ICO) to develop a Code of Practice concerning the retention of, and access to records known to relate to CSA. This has not been actioned some years following the report's publication, and it is unknown whether this work will be completed. Therefore, there is no statutory requirement to retain these records for such an extensive time period, and a careful management review will need to take place for each record where CSA is relevant before disposal or destruction.

In relation to disciplinary and greivance processes, the ACAS Code of Practice 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, reference to the earlier proceedings may be relevant. 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 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. Careful attention should be paid to the requirements of the statutory guidance in Keeping Children Safe in Education in relation to any records of disciplinary matters, including inclusion in a reference for a future employer.

11. Table 2: HR

Reference	File Description	Retention Period	Trigger	Basis
1.19 Recruitment				
1.19.1	All records leading up to the appointment of a new member of staff (unsuccessful candidate)	Date of appointment + 6 months	Date of appointment	Common practice
1.19.2	All records leading up to the appointment of any new member of staff (successful candidate), including leaders, trustees and governors, including pre-appointment vetting	This information should be added to the staff personnel file. Note there is no requirement to keep a copy of DBS once the details have been entered into the Single Central Record. At the end of employment, information contained in the Single Central Record should be transferred out of the SCR into the personnel file.	Date of appointment	Common practice. Right to work - Immigration, Asylum and Nationality Act 2006 Keeping Children Safe in Education statutory guidance
1.19.3	Proof of identity	To be retained only as proof of right to work. Not kept for any other purpose. These documents should be added to the personal folder. Home Office requires that the documents are kept until termination of employment plus not less than 2 years.	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006 Keeping Children Safe in Education statutory guidance
1.20 Operational				
1.20.1	Staff Personal File, including recruitment information, employment contract, staff	Termination of employment + 6 years	Termination of employment	Limitation Act 1980

Reference	File Description	Retention Period	Trigger	Basis
	training records, policy acknowledgements, data protection consents			
1.20.2	Sickness absence monitoring	Sickness records are 'special category data'. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring. Where sickness pay is not paid then current year + 3 years is acceptable, whilst if sickness pay is made then it becomes a financial record and current year + 6 years applies (note differing retention for employees where asbestos or radiation exposure in H&S section)	Date of absence	Common practice & Statutory Sick Pay Act 1994
1.20.3	Annual leave records, including records of workers' entitlement to annual leave (including additional leave), holiday pay entitlements, entitlements for irregular hours and part-year workers, and any payments in lieu of untaken holiday on termination	6 years from the date on which they were made	End of the calendar year that the record was created in	Employment Rights Act 2025
1.20.4	Timesheets, any absence or leave records (non sickness) **other than annual leave**, including maternity/adoption/paternity leave records, appraisal/assessment	Current year + 3 years	End of calendar year that the record was created in	Common practice
1.20.5	Records relating to any TUPE process	Date last member of staff transfers or leaves the organisation + 6 years		Common practice (minimum retention 3

Reference	File Description	Retention Period	Trigger	Basis
				years as per National Minimum Wage Act 1998)
1.20.6	Any records relating to the Working Time Regulations (excluding annual leave records) [N.B for annual leave records see row 2.2.3]	2 years from the date on which they were entered into 2 years after the relevant period	End of relevant tax year	Working Time Regulations 1998
1.20.7	Staff 'skeleton' record (which includes 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.	Permanent. These form part of the historical archives of the school.	Archive on closure of the school.	Management decision
1.21 Disciplinary and Grievance				
1.21.1	Allegation of a child protection nature, against a member of staff.	Until the person's normal retirement age or 10 years from the date of allegation, whichever is longer, then review. See additional information above regarding IICSA. Where the allegation is found to be malicious or is unfounded, a management decision on the matter will be required, with the retention decision communicated to the relevant parties.	Date of allegation	Limitation Act 1980 Keeping Children Safe in Education
1.21.2	Disciplinary Proceedings: Written warning	A first written warning will remain active for 12 months and a final written warning	Date of warning	Common practice

Reference	File Description	Retention Period	Trigger	Basis
		for 24 months. After the active period, the warning will remain permanently on the employee's personnel file but will be disregarded in deciding the outcome of future disciplinary proceedings. In some cases, a final written warning may state that it will remain active indefinitely.		
1.21.3	Disciplinary proceedings: – substantiated or unsubstantiated	Outcome letter: end of employment + 6 years All other records: close of case + 6 years	Date of outcome	Common practice
1.21.4	Disciplinary proceedings – false or malicious	Outcome letter: end of employment + 6 years All other records: shred at close of case.	Date of outcome	Common practice
1.22 Payroll & Pensions				
1.22.1	Maternity Pay Records	Current year + 3 years	End of the financial year in which the maternity pay period ends	Statutory Maternity Pay (General) Regulations 1986
1.22.2	Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity	Current year + 6 years	End of the financial year	Retirement Benefits Schemes (Information Powers) Regulations 1995
1.22.3	Batches, bonus sheets, car loans, car mileage output, insurance, Members Allowance	Current year + 6 years	End of the financial year	Common practice

Reference	File Description	Retention Period	Trigger	Basis
	Register, National Insurance records, part time fee claims, payroll reports, payslips (copies), pension payroll, superannuation adjustments and reports, Tax forms P6/P11/P11D/P35/P45/P46/P48, Members Allowance register			
1.22.4	Pensions management	Date of last payment on the pension + 6 years		
1.22.5	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	From the end of the year in which the accounts were signed for + 6 years		Retirement Benefits Schemes (Information Powers) Regulations 1995
1.22.6	Car allowance claims, time sheets, Income Tax P60, personal bank details.	Current year + 3 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988
1.22.7	Absence records, sickness records, staff returns, time sheets/clock cards/flexitime (excluding annual leave records) [N.B for annual leave records see row 2.2.3]	Current year + 3 years	End of the financial year	Common practice
1.22.8	Statutory Sick Pay	Current year + 3 years	End of the financial year	Common practice

Reference	File Description	Retention Period	Trigger	Basis
				With effect from 6 April 2014 employers are no longer required to keep records of sickness absence however, an employer may be required to produce records to show SSP has been paid to their employees.

12. Student Records

Retention of all records relating to students should take into account the recommendations of the report of the Independent Inquiry into Child Sexual Abuse (IICSA). The report from the Inquiry recommended that records associated with child sexual abuse (CSA) should be preserved for 75 years. The Inquiry emphasised the need for this extended retention period due to the significant value these records hold for victims, and advised that they should be subject to regular reviews throughout this duration.

In instances where there is evidence or allegations of CSA, schools and academies may decide to retain the complete record - whether of a pupil, staff member, or other related documents - not merely the segments directly related to the abuse.

The Inquiry report advised that the UK government instructs the Information Commissioner's Office (ICO) to develop a Code of Practice concerning the retention of, and access to, records known to relate to CSA. This has not been actioned some years following the report's publication, and it is unknown whether this work will be completed. Therefore, there is no statutory requirement to retain these records for such an extensive time period, and a careful management review will need to take place for each record where CSA is relevant before disposal or destruction of the record.

13. Table 3: Student Records

Reference	File description	Retention	Trigger	Basis
1.23 Admissions				
1.23.1	All records relating to the creation and implementation of the School Admissions Policy	Life of the policy + 7 years. 15(2) of the regulation refers to the 7 preceding years	Expiration of the policy	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels
1.23.2	Register of Admissions	Every entry in the attendance register must be preserved for a period of 6 years after the date on which the entry was made.	Entry admissions register	School Attendance (Pupil Registration) (England) Regulations 2024

Reference	File description	Retention	Trigger	Basis
1.23.3	Admissions Appeals - unsuccessful	Resolution of case + 1 year	Resolution of case	School Admissions Code Statutory Guidance
1.23.4	Admissions Appeals - successful	Date of admission + 1 year Any relevant supplementary information may be added to the student file	Date of admission	School Admissions Code Statutory Guidance
1.23.5	Proof of address supplied by parents as part of the admissions process [only where required - see 2.5 of the School Admissions Code 2021]	Current academic year + 1 year	Date of admission	School Admissions Code Statutory Guidance
1.23.6	Records relating to the management of exclusions	Date of birth of the pupil involved + 25 years. Information should normally be added to the pupil file.	Pupil date of birth	Common practice
1.24 Attendance				
1.24.1	Attendance Registers	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	School Attendance (Pupil Registration) (England) Regulations 2024
1.24.2	Correspondence relating to absence	Date of absence + 2 years. Information should normally be added to the pupil file.	Date of absence	Common practice

Reference	File description	Retention	Trigger	Basis
1.25 Exams				
1.25.1	SATS results	Recorded on the pupil's educational record (see below). The school may also keep a record of all the whole year SATs results for the current year + 6 years to allow suitable comparison. Personal data should be removed if required for comparison purposes.	Date of results day	Management decision
1.25.2	Examination results (pupil copies - public)	Recorded on the pupil's educational record (see below). 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.	Date of results day	Common practice
1.25.3	Examination results (pupil copies - internal)	Recorded on the pupil's educational record (see below).	Date of exam	Common practice
1.25.4	Examination results (school's copy)	The school may keep a record of all the whole year exam results for the current year + 6 years to allow suitable comparison. Personal data should be removed if required for comparison purposes.	Date of results day	Common practice
1.25.5	Management of examination registrations	The examination boards will usually mandate how long these records need to be retained.	Set by exam board	n/a
1.26 Pupil Education Record				

Reference	File description	Retention	Trigger	Basis
1.26.1	Primary	Retain whilst the child remains at the primary school. The file should be sent either in advance or as soon as possible after the pupil leaves the primary school. If pupil does not attend a secondary school, the child dies, moves to independent or home schooling then the record should be kept as the 'last known school' below.	Date pupil starts at a new school	Education (Pupil Information) (England) Regulations 2005
1.26.2	Secondary (or where the school is the 'last known school')	Date of birth of the pupil + 25 years	Pupil's date of birth	The Limitation Act 1980
1.26.3	Pupil 'skeleton' record (which would include a brief record of pupil names, UPNs, date of birth, address, parent details, date of admission, date of departure and destination (if known))	Permanent. These form part of the historical archives of the school. This may form part of an historical admissions log.	Archive on closure of the school.	Common Practice.
1.27 Pupil work				
1.27.1	Pupil work	Where possible, pupils' work should be returned to the pupil at the end of the academic year. If this is not, retain for the current year +1	End of the academic year that the record was created in	Common practice
1.27.2	Online learning platforms	As above. Work should be cleared from platforms at the end of the academic year	End of the academic year that the record was created in	Common practice

Reference	File description	Retention	Trigger	Basis
1.28 Child Protection/Safeguarding				
1.28.1	Child Protection/Safeguarding Records - Primary	Transferred to the new school, either in advance or at the latest within 5 days of the pupil starting at the new school. Schools may retain a copy of the log for a limited period (e.g. one term) once the child has left the school to allow for transfer queries or file error issues.	Date pupil starts at new school	Keeping Children Safe in Education statutory guidance
1.28.2	Child Protection/Safeguarding Records – Secondary or where the school is the 'last known school' (including for Children Missing from Education (CME), transferred to EHE or independent education, and for children who have died.)	Where a pupil moves between secondary schools – treat as primary above. Otherwise, retain for 25 years from the child's date of birth, then review prior to destruction	Pupil's date of birth	Keeping Children Safe in Education statutory guidance
1.29 Special Educational and Disability (SEND)				
1.29.1	SEND files, reviews and Individual Education Plans – Primary	Retain for duration of attendance at school, then transfer to new school in advance or as soon as possible. Schools may retain a copy of the log for a limited period once the child has left the school to allow for transfer queries or file error issues.	Date pupil starts at a new school	The Limitation Act 1980

Reference	File description	Retention	Trigger	Basis
1.29.2	SEND files, reviews and Individual Education Plans – Secondary (or where the school is the 'last known school')	Date of birth of the pupil + 25 years, unless the document is subject to a legal hold, then 6 years after legal action ended.	Pupil's date of birth	Special Educational Needs and Disability Act 2001 & Children and Families Act 2014
1.29.3	Statement/Education Health Care Plan (EHCP) under Section 324 of the Education Act 1996 and any amendments made to the plan.	Date of birth of the pupil + 25 years, unless the document is subject to a legal hold, then 6 years after legal action ended. [N.B. Local Authority may issue guidance on this - also see Browne Jacobson guidance on retention of SEND records]	Pupil's date of birth	Special Educational Needs and Disability Act 2001, Children and Families Act 2014 & The Limitation Act 1980
1.30 Restrictive Interventions — Pupil Records				
Recording obligations in relation to the use of force, seclusion and non-force related restraint involving pupils arise from two sources: section 93A of the Education and Inspections Act 2006 and statutory guidance issued thereunder (Restrictive Interventions, Including Use of Reasonable Force, in Schools, DfE, April 2026); and the schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025. Each incident record is simultaneously a record forming part of the individual pupil's safeguarding and educational file (addressed in the entries below) and an institutional management record (addressed in Table 1 at entries 1.8.17 and 1.10.15 above). Schools should ensure that records are maintained and retained separately.				
3.8.1	Restrictive interventions incident record- pupil's copy (primary school, or where the pupil transfers to another school). The individual incident record form (or a copy of it) filed as part of the pupil's	If considered to be a safeguarding record, transfer to the new school either in advance or at the latest within 5 days of the pupil starting at the new school (or within the first 5 days of a new term for mid-year transfers). Schools may retain a copy of the log for a limited period once the child has left the	Date pupil starts at new school	Education (Pupil Information) (England) Regulations 2005; Keeping Children Safe in Education statutory guidance; section 93A of the Education and Inspections Act 2006; Schools (Recording and Reporting of Seclusion

Reference	File description	Retention	Trigger	Basis
	safeguarding or educational record. This record must travel with the child to their new educational setting.	school to allow for transfer queries or file error issues. Where records are retained in copy form after transfer, they should be destroyed securely once the transfer has been confirmed.		and Restraint) (No. 2) (England) Regulations 2025.
3.8.2	Restrictive interventions incident record- pupil's copy (secondary school, or where the school is the 'last known school'). The individual incident record form filed as part of the pupil's safeguarding or educational record, where the school is the pupil's last known school (including where the pupil moves to independent or home education, goes missing from education, or has died).	Date of birth of the pupil + 25 years, then review prior to destruction.	Pupil's date of birth	Limitation Act 1980; Keeping Children Safe in Education statutory guidance; section 93A of the Education and Inspections Act 2006; Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.
3.8.3	Record of parental notification of a restrictive	Retain with the individual pupil's incident record and apply the same retention period as entries 3.8.1 or 3.8.2 above as applicable.	As entries 3.8.1 or 3.8.2	Common practice; Schools (Recording and Reporting of Seclusion

Reference	File description	Retention	Trigger	Basis
	intervention incident: Evidence that the written record (for maintained schools) or written information about the incident (for independent schools and academies) was provided to parents, including the date, method, and identity of the person who notified. Where the safeguarding exception applied and the local authority was notified instead, records of that notification.			and Restraint) (No. 2) (England) Regulations 2025; section 93A of the Education and Inspections Act 2006.