



## Data Retention Policy

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### Contents

Introduction .....	1
Data Protection .....	2
Retention Schedule .....	2
Destruction of Records.....	2
Retention of Safeguarding Records.....	4
Archiving .....	4
Transferring Information to Other Media .....	5
Responsibility and Monitoring .....	5
Emails .....	5
Retention Schedule .....	6

### Introduction

The school has a responsibility to maintain its record and record keeping systems. When doing this, the School will take into account the following factors:

- the most efficient and effective way of storing records and information;
- the confidential nature of the records and information stored;
- the security of the record system used;
- privacy and disclosure; and
- accessibility of records and record keeping systems.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the School's current practice, the requirements of current legislation and best practice and guidance. It may be amended





by the School from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect. The School may also vary any parts of this procedure, including time limits, as appropriate in any case.

## Data Protection

This policy sets out how long employment-related and pupil data will normally be held by the School and when that information will be confidentially destroyed in compliance with the terms of the UK General Data Protection Regulation (UK GDPR) and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of the School. The School's Data Protection Policy outlines its duties and obligations under the UK GDPR.

## Retention Schedule

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the School will adhere to the standard retention times listed within that schedule. Paper records will be regularly monitored by the School Business Manager. Electronic records will be regularly monitored by all individuals within their own area of responsibility.

The retention periods are based on business needs and legal requirements following the IRMS (Information & Records Management Society) Toolkit for Schools guidance, 2022.

<b>Education Management</b>	
Policies and Strategies	3 years from date superseded
<b>Examinations</b>	
Examination papers	Keep until appeals process is complete
Examination results	Add to pupil record and see below for retention period
<b>Finance</b>	
Most financial records	6 years (see full retention schedule in IRMS Schools Toolkit for detail)
Employers Liability Insurance Certificate	40 years. Pass to LCC IRMS if the school closes
<b>Pupil records</b>	





Primary pupil records	Retain for the whole time the pupil is at primary school and then transfer to secondary school or another primary school if they relocate.
Secondary pupil records – non-SEN	25 years from date of birth
Secondary pupil records – SEN	31 years from date of birth
<b>N.B.</b> If pupil dies, changes to home schooling or independent schooling, or moves abroad, then transfer the record to LCC IRMS	
<b>Admissions</b>	
Register of admissions	6 years from date of final entry
Admissions that have been appealed (successful and unsuccessful)	1 year form date of decision
<b>Teachers and staff</b>	
Disciplinary	Keep with staff file
Staff personnel file	85 years from date of birth
<b>Governing Bodies</b>	
Governing body minutes	6 years from date of meeting, then transfer to Lancashire Archives for permanent preservation
<b>Property and equipment</b>	
Property and equipment files	6 years from close date – see full toolkit for specifics

## Destruction of Records

Where records have been identified for destruction, they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation complaints or grievances.

All paper records containing personal information or sensitive policy information should be shredded before disposal. Bulk disposal of paper records should be undertaken by an accredited shredding company. All electronic information will be deleted.

The School maintains a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record the following: -





- A file reference (or other unique identifier);
- A file title/brief description;
- Number of files;
- Date destroyed or deleted from system; and
- Person(s) who undertook destruction.

## Retention of Safeguarding Records

Any allegations made that are found to be malicious must not be part of the personnel records.

For any other allegations made, the School must keep a comprehensive summary of the allegation made, details of how the investigation was looked into and resolved and any decisions reached. This should be kept on the personnel files of the accused.

Any allegations made of sexual abuse should be preserved by the School for the term of an inquiry by the Independent Inquiry into Child Sexual Abuse. All other records (for example, the personnel file of the accused) should be retained until the accused has reached normal pension age for a period of 10 years from the date of the allegation if that is longer.

Guidance from the Independent Inquiry Child Sexual Abuse states that prolonged retention of personal data at the request of an Inquiry would not contravene data protection regulation provided the information is restricted to that necessary to fulfil potential legal duties that a school may have in relation to an Inquiry.

Whilst the Independent Inquiry into Child Sexual Abuse is ongoing, it is an offence to destroy any records relating to it. At the conclusion of the Inquiry, it is likely that an indication regarding the appropriate retention periods of the records will be made.

## Archiving

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. The school follows the IRMS retention schedule with regard to archiving records.





## Transferring Information to Other Media

We retain the pupil's educational record whilst the child remains at the School. Once a pupil leaves the School, the file should be sent to their next school. The responsibility for retention then shifts onto the next school.

We may delay destruction for a further period where there are special factors such as potential litigation.

## Responsibility and Monitoring

The Headteacher has primary and day-to-day responsibility for implementing this policy. The Data Protection Officer and Data Protection Lead, in conjunction with the School is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The Data Protection Lead will consider the suitability and adequacy of this policy and report improvements directly to management.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

## Emails

Email accounts are not a case management tool in itself. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost.





## Retention Schedule

File Description	Retention Period
<b>Employment Records</b>	
Job applications and interview records of unsuccessful candidates	6 months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference.
Job applications and interview records of successful candidates	6 years after employment ceases
Written particulars of employment, contracts of employment, and changes to terms and conditions	6 years after employment ceases
Immigration check	2 years after employment ceases.

