



ROBERT CLACK SCHOOL

RECORD RETENTION AND DELETION POLICY

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Controlled Document

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Version Control

Version	Date	Author	Description of Change
1	20/01/2022	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	New Policy
2	October 2022	Yvonne Rogers – DPO	Amendments to schedule
3	23/02/2023	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	Policy Review – pupil retention period amended to 31 years
4	01/08/2023	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	Policy Review
5	August 2026	Data Protection Enterprise Ltd	Policy Review. Amendments to Section 1, 2d and retention schedule replaced

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1. THE PURPOSE OF THE RETENTION SCHEDULE

To comply with the storage limitation and accountability principles under the UK GDPR and the Data Protection Act 2018, and to support effective records management under the Freedom of Information Act 2000, the School maintains a records retention schedule identifying the principal categories of records it holds and how long they should be retained.

This policy reflects the UK data protection framework, including amendments made by the Data (Use and Access) Act 2025.

This includes pupil records, staff records, and other administrative, operational, or safeguarding documentation processed as part of the School's functions.

The schedule sets out how long different types of records should be retained and the actions to be taken when they are no longer required. It also supports lawful, consistent and accountable retention and disposal of records under data protection and freedom of information legislation.

The retention schedule applies to all records regardless of the format or medium in which they are stored (e.g. paper, electronic, microfilm, photographic).

Members of staff are expected to manage their records using this schedule and to consider retention periods when developing new systems or storing information.

2. BENEFITS OF A RETENTION SCHEDULE

There are several benefits to implementing and maintaining a clear and consistent retention schedule, such as that recommended by the Information and Records Management Society (IRMS);

- a. Managing records in line with best practice guidance fulfils duties under Section 46 Code of Practice on Records Management (issued under the Freedom of Information Act 2000). A clear retention schedule also helps demonstrate transparency and accountability and supports individuals' rights under the UK GDPR.
- b. Members of staff can be confident about the safe disposal of information at the appropriate time.
- c. Information which is subject to Freedom of Information and Data Protection legislation will be available when required.
- d. The School is not maintaining and storing information unnecessarily.

Routine destruction must be suspended where records are subject to an information request, complaint, investigation, litigation, inquiry, safeguarding review or other legal hold. Records relating to child sexual abuse must be retained in accordance with current Department for Education guidance.

3. MAINTAINING AND AMENDING THE RETENTION SCHEDULE

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

Some of the retention periods are governed by statute and if record series are to be kept for longer or shorter periods than laid out in this document then the reason(s) for this need to be documented.

Where there is a recommendation to archive the information, this may be in an electronic format. There is no requirement to convert the information into a hard copy. Such records should be kept in separate electronic folder suitably marked as holding archival material.

The retention schedule should be reviewed regularly and updated as necessary, including when new categories of records are created or legislation changes. Responsibility for maintaining and updating the schedule lies with the School Business Manager (or equivalent) in consultation with the DPO.

Where records are retained for a longer or shorter period than stated in the schedule, the reasons for this deviation should be documented.

4. WHAT TO DO WITH RECORDS ONCE THEY HAVE REACHED THE END OF THEIR ADMINISTRATIVE LIFE

4a. Destruction of records

Where records have been identified for destruction, they should be disposed of in an appropriate way. All records containing personal information, or sensitive policy information should be shredded before disposal. Any other records should be bundled up and disposed of to a wastepaper merchant or disposed of in other appropriate ways.

The Freedom of Information Act 2000 requires the School to maintain a list of records which have been destroyed and who authorised their destruction. Members of staff should record at least:

- File reference unique identifier;
- File title or description;
- Number of files destroyed
- Date of destruction
- The name and role of the authorising officer

This could be kept in an Excel spreadsheet or other database format.

4b. Transfer of records to the Local Authority

Where records have been identified as being worthy of permanent preservation, arrangements should be made to transfer the records to the Local Authority.

Records identified as having historical or long-term value should be considered for transfer to the Local Authority archive or other approved repository in consultation with the relevant Local Authority archivist or officer.

4c. Transfer of information to other media

Where lengthy retention periods apply, paper records may be converted to digital formats. Before doing so, staff must ensure that the digital copies are of sufficient quality, stored securely, and can be accessed and migrated throughout the required retention period.

5. ALL STAFF

Everyone is responsible for:

- Following procedures and guidance for managing, retaining and disposing of records.
- Only disposing of records in accordance with the requirements outlined in this policy (if authorised to do so).
- Staff must not destroy or remove records without proper authorisation. Any uncertainty about retention or disposal should be escalated to the Headteacher or Data Protection Officer.
- Ensuring that any proposed divergence from the records retention and disposal policies is authorised by the Headteacher.

6. LINKS WITH OTHER POLICIES

This Records Retention and Deletion Policy is linked to the School:

- Data Protection Policy
- Freedom of Information Policy
- CCTV Policy
- Data Sharing Policy
- Safeguarding Policy
- GDPR Privacy Notices

7. REFERENCES

- UK General Data Protection Regulation
- Data Protection Act 2018
- Article 8, The Human Rights Act 1998
- Freedom of Information Act 2000
- Code of Practice on Records Management (under Section 46 of the FOIA)
- Data Use and Access Act 2025

The Information Commissioner's Office provides a free helpline and a wide range of guidance and resources relating to information rights and data protection. Further information is available from: [Information Commissioner Office \(ICO\)](https://ico.org.uk/)

Secondary Schools - Record Retention Schedule

A practical schedule for maintained Secondary schools

How to use this schedule

Apply the period to the official record, not every duplicate. Delete convenience copies when no longer needed. Where a record falls into more than one category, use the longest applicable period. Suspend routine disposal for an information request, complaint, safeguarding review, investigation, litigation, inquiry or other legal hold. Record and authorise destruction.

Retention periods are minimum operational periods unless the wording says otherwise. Retain longer only where the school can document a lawful and proportionate reason.

1. Pupil and safeguarding records

Record	Retention period	End action	Application notes
Secondary pupil educational record	Until the pupil's 25th birthday	Secure disposal	If the pupil transfers to another school, transfer the educational record securely to the receiving school. Where the pupil leaves without transferring to another school, retain the record until their 25th birthday.
Admission register entries	6 years from the date the entry was made	Secure deletion	School Attendance (Pupil Registration) (England) Regulations 2024, regulation 7.
Attendance register entries	6 years from the date the entry was made	Secure deletion	Includes every entry and required back-up copies.
Attendance correspondence	Retain with the pupil educational record where relevant; otherwise ordinarily 6 years after the pupil leaves where held within the MIS	Secure deletion	Retain longer where linked to prosecution, safeguarding, a complaint or legal proceedings.
Successful admission application	While the pupil attends, then retain with the secondary pupil educational record until the pupil's 25th birthday where it forms part of that record	Secure disposal	Admission-register information follows its separate statutory period. Delete duplicate verification and working documents sooner where they are no longer required.
Unsuccessful admission application	End of the admissions process + 1 year	Secure deletion	Retain longer while an appeal, complaint or legal challenge remains active.
Proof of address for admission	Until verified and any challenge or appeal period has ended; normally no longer than 1 year	Secure deletion	Record that verification was completed rather than retaining unnecessary copies.
Child protection and safeguarding file	Transfer separately to the receiving school. Receiving school: until the child's 25th birthday; child sexual abuse records: until the 75th birthday	Secure disposal	If no receiving school is known, the originating school retains the file. Do not place the safeguarding file inside the main pupil record.

Record	Retention period	End action	Application notes
SEND support records, reviews and plans	Retain relevant records with the secondary pupil educational record until the pupil's 25th birthday where required to evidence the support provided. Transfer current records securely if the pupil moves to another educational setting.	Secure disposal	Review records periodically and securely dispose of duplicates or information that is no longer required. Document the reason where a separate copy is retained.
Education, Health and Care Plan	While current and the pupil attends. Transfer securely to the receiving educational setting where applicable. Retain a school copy only where necessary; if retained, until the pupil's 25th birthday, then securely dispose of it.	Secure disposal	An EHC plan may remain in force up to age 25. The local authority maintains the statutory plan; the school should retain only the information needed to evidence its own provision and decisions.
Behaviour records and exclusions/suspensions	Retain with the secondary pupil educational record until the pupil's 25th birthday	Secure disposal	Retain longer where linked to safeguarding, serious injury, a complaint or legal proceedings.
Pupil medical information and care plans	While current and the pupil attends; transfer relevant information securely	Secure disposal	Superseded care plans may be retained where needed to evidence support provided.
Pupil photographs and publication permissions	While current and the pupil attends, then 12 months	Secure deletion	Published material may remain as an historic record where removal is not reasonably practicable. Respect withdrawals for future use.
Pupil work	Return at the end of the academic year where practicable; retain samples only for a defined purpose	Return or dispose	Remove or minimise identifiable information where work is retained as an exemplar.

2. Educational visits and activities

Record	Retention period	End action	Application notes
Visit planning and approval record	Date of visit + 6 years	Secure disposal	Includes the final risk assessment, approval record and participant list.
Individual consent forms - no incident	Until the visit is complete and immediate administrative matters are resolved	Secure disposal	For residential visits and activities outside normal school hours. Consent is not normally required for routine curriculum activities during school hours.
Visit records - significant incident	Retain with or cross-reference to the affected pupil's accident, safeguarding or complaint record for the applicable period	Secure disposal	Retain information about other pupils only where necessary to evidence what occurred or that procedures were followed.
Clubs and extra-curricular registers	Current academic year + 1 year	Secure disposal	Retain longer where connected to an incident, complaint or payment dispute.

3. Governance and school management

Record	Retention period	End action	Application notes
Instrument of government	Life of the school	Archive/transfer	Consult the local authority before disposal.
Trusts, endowments and title records	Life of the school or property	Archive/transfer	Permanent legal or historical value may apply.
Governing board and committee minutes	10 years from the meeting; consider permanent archive for signed final minutes	Archive or secure disposal	Keep approved minutes and referenced substantive reports; dispose of duplicate working copies sooner.
Governing board agendas and formal papers	10 years from the meeting where they form part of the formal record	Secure disposal	Routine duplicates and drafts may be deleted after approval.
Governor appointment, election and term records	End of appointment/term + 6 years	Secure disposal	Election ballot material may be destroyed 6 months after the election if no challenge remains.
Governor declarations and business interests	End of appointment + 6 years	Secure disposal	Keep the published current register up to date.
Governor training records	End of appointment + 6 years	Secure disposal	Includes induction and statutory training evidence.
School development and improvement plans	Life of plan + 3 years	Secure disposal	Retain a final version; delete routine drafts sooner.
School policies	Until superseded + 6 years	Secure disposal/archive	Safeguarding, admissions, exclusion and other high-risk policies may warrant longer archival retention.
Headteacher/SLT meeting minutes	Meeting date + 3 years, then review	Secure disposal	Transfer substantive decisions to the relevant official record.
Complaints file	Closure + 6 years	Secure disposal	Retain longer for safeguarding, negligence, serious injury, persistent litigation or an active legal hold.
General correspondence	Current year + 3 years	Secure disposal	Move substantive correspondence to the relevant pupil, HR, governance, contract or complaint record.

4. Information governance and communications

Record	Retention period	End action	Application notes
Routine email	24 months	Automatic secure deletion	Emails forming part of an official pupil, safeguarding, HR, finance, contract, complaint or governance record must be filed in the appropriate system.
Freedom of Information requests and responses	Closure + 3 years	Secure disposal	Retain longer for internal review, ICO involvement, litigation or repeated related requests.
Subject access requests and disclosures	Closure + 3 years	Secure disposal	Retain the request, identity checks, decision record, correspondence and disclosure schedule - not necessarily every disclosed document.
Personal data breach records	Closure + 6 years	Secure disposal	Include assessment, notification decision, remedial action and outcome.
Data protection impact assessments	Life of the processing/system + 6 years	Secure disposal	Review while processing continues and when risks materially change.
Data sharing and processing agreements	End of agreement + 6 years	Secure disposal	Signed as a deed: consider 12 years. Retain supplier due diligence with the contract.
Records of processing and information asset registers	Superseded + 6 years	Secure disposal	Maintain a current version and enough history to demonstrate accountability.
CCTV footage	Normally no longer than 31 days	Secure deletion	Extract and retain relevant footage for an incident, request or investigation; document the reason and review date.
Visitor and contractor sign-in records	6 months	Secure disposal	Retain longer only for safeguarding, security, an incident or contractual purposes.
Website and prospectus	Current version + 3 years	Archive or dispose	Consider keeping one annual snapshot for historical purposes.

5. Human resources

Record	Retention period	End action	Application notes
Unsuccessful recruitment records	Interview/decision + 6 months	Secure disposal	Retain longer only where an Equality Act complaint or other legal challenge is reasonably anticipated or remains active. Have regard to the Information Commissioner's employment practices guidance.

Record	Retention period	End action	Application notes
Successful recruitment records	Transfer relevant records to the personnel file; end of employment + 6 years	Secure disposal	Avoid retaining unnecessary interview notes and duplicate identity documents.
Right-to-work evidence	End of employment + 6 years	Secure disposal	The statutory minimum is employment + 2 years. The School retains this evidence with the personnel file for 6 years after employment ends because it is not operationally practicable to separate and delete individual documents earlier.
DBS certificate/copy	No longer than necessary; ordinarily no more than 6 months after the decision	Secure disposal	Retain check details on the single central record rather than the certificate.
Single central record	Maintain while current; historic evidence for end of employment/role + 6 years where needed	Secure disposal	Access must be restricted. Historic versions should be proportionate.
Staff personnel file	End of employment + 6 years	Secure disposal	Apply longer periods to safeguarding allegations, exposure and pension records.
Appraisal, capability, sickness and training records	End of employment + 6 years where retained on the personnel file	Secure disposal	Remove obsolete duplicates and restrict access.
Disciplinary and grievance records	End of employment + 6 years	Secure disposal	An expired warning is no longer active but an appropriate record may remain. Follow HR policy and legal holds.
Safeguarding allegation against staff	Until normal pension age or 10 years from the allegation, whichever is longer	Secure disposal	Follow Keeping Children Safe in Education 2026 and the Information Commissioner's employment practices guidance. Records of allegations found to be malicious or false should be removed from personnel records unless the individual consents to retention. Retain records of substantiated, unfounded and unsubstantiated allegations for the stated period.
Payroll, tax and expenses records	Current tax/financial year + 6 years	Secure disposal	Check payroll provider and pension scheme requirements for centrally held records.
Pension records	End of employment + 6 years, or longer where required by the pension scheme	Secure disposal	Retain records needed to establish entitlement for the scheme-prescribed period.

6. Health, safety, premises and security

Record	Retention period	End action	Application notes
Health and safety policy	Superseded + 3 years	Secure disposal	Retain longer where relevant to an incident or claim.
Risk assessments	Superseded + 3 years	Secure disposal	Where an incident occurred, retain the applicable assessment with the incident file.
Accident records - adult	Last entry + 3 years	Secure disposal	Retain longer for an investigation, insurance claim, complaint, litigation or legal hold.
Accident records - pupil	Minor: with pupil record. Serious injury or potential claim: until the pupil's 25th birthday, then review	Secure disposal	Retain longer while a claim, investigation, safeguarding matter or legal hold remains active.
RIDDOR record	Date record made + 3 years	Secure disposal	Underlying accident and investigation records follow the applicable adult or pupil period.
COSHH assessments	Until superseded + 5 years	Secure disposal	Retain identifiable exposure/health-surveillance records for the statutory longer period where applicable.
General workplace exposure monitoring	Monitoring date + 5 years	Secure disposal	Where the record identifies an employee, retain for 40 years if required by COSHH.
Employee health surveillance	Last entry + 40 years where required	Secure disposal	Includes statutory surveillance under COSHH/asbestos requirements.
Asbestos register, surveys and management plan	Life of the premises	Transfer to the local authority, governing body or other organisation responsible for maintaining the premises when responsibility changes	Keep the asbestos register, surveys and management plan current throughout the life of the premises.
Asbestos air-monitoring records	Monitoring date + 5 years	Secure disposal	Identifiable exposure or medical-surveillance records: 40 years from last entry.
Fire precautions logbook	Current year + 3 years	Secure disposal	Retain longer where relevant to an incident or enforcement matter.

Record	Retention period	End action	Application notes
Building health and safety file	Life of the building/works	Transfer to the local authority, governing body or other organisation responsible for maintaining the premises when responsibility changes	Includes significant alterations, wiring, plumbing and construction information.
Radiation records	Periods prescribed by the Ionising Radiations Regulations 2017, where applicable	Seek specialist advice	Obtain Radiation Protection Adviser advice before disposal.

7. Finance, contracts and assets

Record	Retention period	End action	Application notes
Annual accounts, ledgers, invoices, receipts and bank records	Current financial year + 6 years	Secure disposal	Subject to local authority financial regulations and audit requirements.
Debtor records	Final payment/closure + 6 years	Secure disposal	Retain longer while recovery or litigation continues.
Contracts signed under hand	End of contract/last payment + 6 years	Secure disposal	Include necessary procurement and performance records.
Contracts executed as a deed	End of contract/last payment + 12 years	Secure disposal	Limitation Act 1980.
Loans and grants	Final payment/closure + 6 years; 12 years where executed as a deed	Secure disposal	Check grant conditions for a longer specified period.
School fund and trip payment records	Current financial year + 6 years	Secure disposal	Consent forms follow the educational-visits section.
Asset register	Life of asset + 6 years	Secure disposal	Permanent property/title records may require archival retention.
Insurance policies and claims	Policy expiry + 6 years; claim closure + 6 years	Secure disposal	Retain longer where the insurer or nature of the risk requires it.

8. Reporting, curriculum and external bodies

Record	Retention period	End action	Application notes
School census returns	Current year + 5 years	Secure disposal	Retain only the school copy; DfE retains the submitted return separately.
Assessment and attainment data	Official information forming part of the secondary pupil educational record: until the pupil's 25th birthday. Separate working datasets: current academic year + 6 years, or earlier anonymisation where identifiable data is no longer required.	Secure disposal or anonymisation	Retain only the official record needed to evidence attainment, qualifications, educational provision and decisions. Delete duplicate departmental spreadsheets and working copies sooner.
Public examination results	Retain the official results record until the pupil's 25th birthday; an anonymised or aggregated historical record may be retained permanently	Secure disposal or anonymisation	Delete duplicate departmental and working copies sooner.
Examination certificates	Distribute as soon as practicable. Retain unclaimed certificates for at least 12 months or for the period required by current JCQ rules	Return or securely destroy	Keep a record of certificates distributed or securely destroyed and follow current JCQ requirements.
Examination administration, scripts and coursework	For the period required by current JCQ and awarding-body rules and until all reviews, appeals, malpractice proceedings and other post-results processes have concluded	Return or securely dispose	JCQ and awarding-body requirements are updated regularly and take precedence where they prescribe a particular period.
Examination access arrangements	For the relevant examination series and until any inspection, post-results process, appeal or complaint has concluded. Evidence that also forms part of the SEND or educational record follows the applicable pupil-record period.	Secure disposal	Avoid unnecessarily duplicating medical, diagnostic or SEND evidence in the examinations file.
Careers guidance and individual careers activity	While the pupil attends and until their immediate post-16 or post-18 destination has been established; ordinarily no longer than 1 year after leaving unless there is a documented continuing need	Secure disposal or anonymisation	Records needed for safeguarding, SEND or NEET support follow the relevant pupil-record period. Aggregated destination information may be retained for longer-term analysis.
Work-experience placement records	Placement end date + 6 years	Secure disposal	Includes placement agreements, employer checks and school risk-management records. Incident records follow the pupil's applicable accident, safeguarding or complaint period.
Sixth-form bursary and learner-support records, where applicable	End of the relevant academic or funding year + 6 years, subject to any longer period specified by the funding body	Secure disposal	Restrict access to financial evidence and special-category information.
UCAS and post-16/post-18 applications, where applicable	End of the application cycle + 1 year	Secure disposal	Retain longer only where a complaint, dispute, safeguarding issue or legal hold remains active. A final reference or substantive decision record may be retained with the pupil's educational record where necessary.

Record	Retention period	End action	Application notes
Ofsted reports and key inspection papers	Life of report, then review	Archive or dispose	Final published reports may be retained permanently as part of school history.
Returns to central government/local authority	Current year + 6 years	Secure disposal	Delete routine working copies sooner once verified.
Family liaison and pastoral case records	While active and the pupil attends; then transfer relevant content to the pupil/safeguarding record or destroy	Secure disposal	Do not rely solely on an outside agency's copy where the school needs its own decision/action record.
External-agency referrals	While active; retain the school's decision and action record with the relevant pupil or safeguarding file	Secure disposal	Review duplicate forms and working copies after closure.

Sources and interpretation notes

- Department for Education, Data protection in schools: Record keeping and management (updated July 2026).
- The School Attendance (Pupil Registration) (England) Regulations 2024.
- The Education (Pupil Information) (England) Regulations 2005.
- Keeping Children Safe in Education 2026 (in force from 1 September 2026) and Working Together to Safeguard Children.
- UK General Data Protection Regulation, Data Protection Act 2018 and amendments made by the Data (Use and Access) Act 2025.
- Information Commissioner's Office, The Employment Practices Code and current online guidance on recruitment and selection and keeping employment records.
- Freedom of Information Act 2000 and the section 46 Code of Practice on records management.
- Limitation Act 1980 and applicable health and safety, tax, employment and pensions legislation.
- Joint Council for Qualifications, current General Regulations for Approved Centres and current awarding-body requirements.
- Department for Education, Careers guidance and access for education and training providers (updated June 2026).

This schedule is operational guidance. Seek advice from the Data Protection Officer, local authority, HR adviser, insurer or legal adviser where a case is unusual, contested or subject to a legal hold.