



Inspiring Futures Through Learning

Records Management Policy (Part 2) – Retention Schedules

Valid From: January 2021
Review Date: January 2023

This document should be read in conjunction with the Inspiring Futures through Learning Records Management Policy which sets out the overarching principles of records management across the IFtL MAT.

The following tables set out the requirements for retention and deletion of data held by IFtL schools and departments.

The following information is standardised across the IFtL MAT. There may, however, be circumstances where individual schools need to retain information for longer than the periods stated in this document.

Under these circumstances, schools should document their reasoning for this and seek approval from the IFtL Data Protection Officer for the continued retention of such records.

This document is based on information provided in the DfE's Data Protection Toolkit, the IRMS Toolkit and on information from consultation with Stone King (IFtL's Legal Advisors).

While we have summarised the main areas where schools require to retain or dispose of data, this list is by no means exhaustive and should schools require advice relating to items not in the list, they should raise this with IFtL Central Services who can advise and, where necessary, add sections to the document.

Please note that **ANY** document, or set of documents, that contain personal data of any description must be securely disposed of at the end of the retention period. In most cases, this means that paperwork must be securely shredded, and that electronic data should be securely erased.

Under no circumstances should personal data be disposed of without being securely destroyed first.

Data Item Group	Example Data Items	Retention Need	Data Protection Issues	Retention period and action at end of Retention Period
Accident Reporting		<p>Accident records relating to pupils should be kept until the pupil reaches the age of 25. This is because pupils have the right, once they reach 18, to instigate claims relating to accidents for a period of up to 6 years under the Limitation Act.</p> <p>Minor bumps and scrapes should be recorded in a standard accident book but more serious occurrences should be fully documented with accident investigation and witness statements recorded. Please see the IFtL Accident and Incident Reporting policy for further details.</p> <p>Reports of general accidents relating to staff (or other adults) must be kept for 6 years from the date of the incident. However, some accidents relating to work must be kept for 12 years with a further review if particularly serious.</p>	Yes – Contains potential sensitive personal data. Records should be stored securely and appropriately	<p>Varies from 6 years to D.o.B + 25 years</p> <p>Secure disposal required at end of retention period.</p>
Admissions		<p>Admissions data is used extensively from the period of the school receiving it up until the point where children enrol. It is then used for some validation and cross checking of enrolment details. Once enrolled, the child's records in the MIS become the core record. Successful admissions data should be retained for 1 year from the date of admission. Data retained should include proof of address as supplied by parents.</p> <p>Details relating to pupils who failed to secure a place should be retained for 12 months in order to deal with any appeals that may take place. Should an appeal be</p>	Yes – Contains potential sensitive personal data. Records should be stored securely and appropriately	<p>Transfer to new setting when pupil leaves.</p> <p>Some retention of copies allowed for 1 year post transfer (or longer for secondary settings)</p>

		<p>lodged, data should be retained for 1 year from the resolution of the case.</p> <p>Any data retained for statistical purposes following pupils leaving the school should be anonymised.</p> <p>Secondary Schools may well provide references for pupils for up to 3 years after they leave, and so retaining the name in the core pupil record is important (this doesn't mean it needs to be retained in all systems).</p>		
Asbestos		All records relating to asbestos including, but not limited to surveys, removal work, signing in records etc must be kept for a minimum period of 40 years from the date of the document.	No	Review at end of retention. Consider whether archiving is appropriate.
Attainment		<p>Formative assessment data is useful as a child is building towards a particular more formal assessment. Once the child leaves the school, it has little value in terms of retention.</p> <p>Summative attainment is the main outcome of what children 'attain' in school. It is important that future schools where pupils go on to learn can understand previous attainment. Whilst often that information is 'passed on' smoothly as children move phase, it is not always the case, and thus retaining the names alongside the main attainment data for 1 year after the pupil has left the school feels proportionate.</p> <p>Trend analysis is important, 3 to 5 years is often the 'trend' people look at, but longer may be relevant. Whilst this must be fully flexible in reporting small subgroups, and the data would wish to be retained at</p>	Yes, contains personal data.	<p>Transfer to new setting when pupil leaves.</p> <p>Summary or copy data can be retained in the short term for analysis but should be anonymised where kept for longer than 1 year post transfer.</p>

		<p>individual level, some personal data (for example, name) could be removed from the data to reduce sensitivity.</p> <p>After 3 to 5 years, then aggregated summaries that have no risk of identifying individuals are all that are typically needed to be retained.</p>		
Attendance		<p>Attendance data may reside in some 'operational' systems in schools, such as cashless catering. In these systems, the data should only be retained until the associated business processes have concluded (for example, payment of meals). The start of the next academic year once all bills are settled feels proportionate.</p> <p>Attendance is related to individual attainment and so being able to relate attendance to attainment whilst in our care is important. Keeping it in detailed, individual form for one year after the pupil leaves school support conversations about detailed attendance that may be needed to best support that child.</p> <p>After that period, non-identifiable summary statistics are all that is required to support longer term trend analysis of attendance patterns.</p> <p>We noted another GDPR principle here that may apply to attendance. Under data minimisation, where 'paper records' capture attendance, this paper record duplicates the electronic version and is probably no</p>	Yes, contains personal data.	<p>Paper records should be shredded as soon as data is transferred into the main MIS system.</p> <p>Records should be deleted 1 year after pupil transfer unless there is a justifiable reason for retaining the data.</p> <p>Statistical analysis should be anonymised.</p>

		longer required once the paper has been transferred to a stable electronic format.		
Behaviour		Behaviour data remains relevant for the period that the child is attending the school. Retaining this information for 1 year following the pupil leaving allows a period of 'handover' to next institution with conversations supported by rich data if relevant.	Yes, may contain sensitive personal data.	Transfer to new setting when pupil leaves. Some retention of copies allowed for 1 year post transfer to assist with pupil 'handover'.
Biometric Data		Biometric data (typically fingerprints used in things like catering) should be used and retained as set out in the active informed consent gained at the outset, but typically this should not be retained long after the activity that requested its use has finished (for example, the child no longer attends the school to have a meal).	Yes, contains sensitive personal data.	Data should be deleted from the system as soon as it is no longer required (when the pupil leaves).
Catering and Free School Meal Management		A short historic record of what a child has had may be useful in case of any food-related incidents at school, or parental queries about the types of meals their children are choosing. Keeping for up to one year also allows time to do accounting work associated with catering. Typically, 'one month' may not be enough, but 'one year' feels enough. Due to the way school funding works, free school meal eligibility is a financial matter, and thus keeping this data for 6+1 feels appropriate. This 7-year record also needs to be portable with the pupil, as historic dates can be used for funding.	Yes, contains personal data.	Securely destroy order records after 12 months. Financial information to be retained for 7 years.
Disciplinary and Grievance		Allegations of a child protection nature must be retained for 10 years following the allegation or until the normal retirement age of the member of staff to	Yes, contains sensitive personal data.	Varies from 6 months to indefinitely. See 'Retention Need' column.

		<p>which they relate - whichever is the longer period applies.</p> <p>Current guidance from IICSA makes it a criminal offence to destroy records relating to child abuse allegations so this date may be extended while the enquiry is ongoing.</p> <p>Allegations that are found to be malicious must be removed from the individual's personnel file and destroyed.</p> <p>Oral, written and final warnings should be retained as follows;</p> <ul style="list-style-type: none"> • Oral Warning – 6 months from date • Written L1 – 6 months from date • Written L2 – 12 months from date • Final Warning – 18 months from date 		
Email		Email should not be used as a filing system and any data that requires retention should be moved to an appropriate electronic storage system and the appropriate retention period for the information should be applied.		
Exclusions		<p>Exclusion data should be 'passed on' to subsequent settings. That school then has responsibility for retaining the full history of the child. If a private setting or the school is unsure on where the child has gone, then the school should ensure the LA already has the exclusion data.</p> <p>As above, retaining a copy of data for one year allows for informed conversations during the 'handover' period with the new school.</p>	Yes, contains personal data.	<p>Transfer to new setting when pupil leaves.</p> <p>Some retention of copies allowed for 1 year post transfer to assist with pupil 'handover'.</p>
Finance Documents		The majority of finance documents should be retained for the current year + 6 years.	No	7 years generally

		Documents relating to loans and grants should be retained for 12 years following the last repayment.		12 years relating to loans and grants
Fire Log Books		These must be kept for 6 years plus the current year.	No	7 years
Governing Body Papers	<ul style="list-style-type: none"> • Agenda • Reports • Minutes • Papers 	<p>A master copy of minutes should be retained. This file should be retained indefinitely.</p> <p>Reports to GB's should be retained for a minimum of 6 years. However, if a report is referred to in the minutes, it should be retained indefinitely alongside the minutes.</p> <p>Articles of Association and other Instruments of Government must also be retained indefinitely.</p> <p>Action plans and policy documents arising from Governors meetings should be retained for a minimum of the life of the policy/plan + 3 years.</p>	Yes, some papers will contain sensitive personal data. Consider how to securely store minutes relating to staff, and confidential matters.	Varies from 3 years to indefinitely. See 'Retention Need' column.
Headteacher and SMT/SLT Data	<ul style="list-style-type: none"> • Meeting Minutes • Reports • Professional Development plans • School Development Plans 	<p>General guidance is a minimum of 3 years for the majority of documents in this category. After this time, the relevance of documents should be reviewed and a further retention period can be set if necessary, or records can be destroyed.</p> <p>Professional development plans should be retained for the life of the plan + 6 years.</p>	Not generally but some papers may relate to staff and could contain sensitive personal data. Consider how these are stored and disposed of.	Generally 3 years with some requiring longer.
Insurance Certificates		Employers liability certificates should be retained until 40 years after the closure of the school. It would be good practice to retain public liability for the same time.	No	Secure Disposal
Letting Agreements		Records relating to lettings of school premises should be retained for the current year + 6 years	Yes, may contain personal data	Secure Disposal
Maintenance Records		Details relating to maintenance by contractors or by school staff must be retained for a minimum of 6 years.	No	Secure Disposal

<p>Medical Information and Administration</p>		<p>To support any handover work about effective management of medical conditions, data should be passed to any subsequent institution.</p> <p>Permission forms that parents sign should be retained for the period that medication is given, and for 3 months afterwards if no issue is raised by child/parent. If no issue is raised in that time, that feels a reasonable window to assume all was administered satisfactorily. Adding this policy to the permission slip would seem prudent.</p> <p>Medical 'incidents' that have a behavioural or safeguarding angle (including the school's duty of care) should refer to the retention periods associated with those policies.</p>	<p>Yes, will contain sensitive personal data</p>	<p>Transfer to new setting when pupil leaves.</p> <p>Some retention of copies allowed for 1 year post transfer to assist with pupil 'handover'.</p> <p>Some serious incidents will require retention until the pupils date of birth + 25 years.</p>
<p>Performance Management</p>		<p>Performance management paperwork and plans should be retained for the current year + 5 years.</p>	<p>Yes, contains personal data.</p>	<p>6 years</p>
<p>Personnel Files</p>		<p>Personnel files must be retained for 6 years from the date of termination of employment.</p> <p>If allegations relation to safeguarding have been made against the staff member, there may be a requirement to keep the files for longer. Please see IFtL_Transfer and Retention of Safeguarding and Child Protection Files document for further guidance.</p>	<p>Yes, contains personal data. May contain sensitive personal data.</p>	<p>Termination of employment + 6 years.</p> <p>Indefinitely in some circumstances.</p>
<p>Photographs</p>		<p>Images are used for different reasons, and the reason should dictate the retention period.</p> <p>Images used purely for identification can be deleted when the child leaves the setting.</p> <p>Images used in displays etc. can be retained for educational purposes whilst the child is at the school.</p> <p>If images are to be retained following the departure of</p>	<p>Yes, images are classified as personal data.</p>	<p>Secure disposal when pupil leaves the setting unless consent has been obtained for continued use.</p>

		<p>the child from the school, consent will need to be obtained.</p> <p>Other usages of images (for example, marketing) should be retained and used in line with the active informed consent, captured at the outset of using the photograph. Schools should ensure that their consent forms are adequate for the intended use of the image, particularly where they wish to continue to use an image after the child has left the setting.</p>		
Postcode Data		<p>Postcode data is useful in analysing longer-term performance trends or how catchment/pupil populations are shifting over time, but names or full address data (house number and road) are not required for that activity and all data used for this purpose should be anonymised.</p>	No	No disposal required if data is anonymised.
Pupil Files		<p>Pupil files should be retained for the period that the pupil has a place at the school. For Primary Schools, the pupil file should transfer to the new school when the pupil leaves.</p> <p>Where a pupil leaves to be home schooled. Transfers out of the country or transfers to an independent school, the file should be retained by the Primary School, or passed to the local Authority, where it should be kept until the pupil reaches the age of 25.</p> <p>Secondary schools, where they are the pupils final setting, must retain the pupil file until the pupil's 25th birthday.</p>	<p>Yes, contains personal data.</p> <p>May contain sensitive personal data.</p>	<p>Transfer to new setting when pupil leaves.</p> <p>Some retention of copies allowed for 1 year post transfer to assist with pupil 'handover'.</p> <p>Some circumstances require retention until pupil's date of birth + 25 years.</p>
Radiation		<p>Any records relating to areas where employees or other persons may have been in contact with radiation must be retained for a minimum period of 50 years.</p>	<p>May contain employee details where contact has been identified.</p>	<p>Consider archiving at end of retention period.</p>

Recruitment		<p>Records leading up to the recruitment of a new Headteacher should be retained for 6 years from the date of appointment.</p> <p>For recruitment of other staff, all relevant information should be transferred to the personnel file. All other information should be retained for 6 months before being securely destroyed.</p> <p>Proof of ID collected as part of the DBS application process should be checked and a note made of what was seen and by whom. If it is felt necessary to keep copies of this information, this must be added to the individual's personnel file.</p> <p>Schools should not keep copies of employees DBS certificates.</p> <p>Pre-employment checks, including right to work checks, should be kept on the individual's personnel file.</p> <p>Information relating to unsuccessful candidates should be retained for 6 months from the date of appointment of the successful candidate.</p>	Yes, contains personal data.	<p>6 years for Headteacher recruitment</p> <p>6 months for other staff for information that is not transferred to the personnel file.</p> <p>6 months for unsuccessful applicants.</p>
Safeguarding and Child Protection		<p>All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained within these files.</p> <p>The safeguarding file should pass on to the next institution within 5 days of a pupil transferring. In</p>	Yes, highly sensitive personal data.	<p>Files should be transferred to the pupil's new setting.</p> <p>Copies may be retained for 1 year post-transfer and should be securely destroyed after that year.</p>

		<p>some cases, discussions should take place with the new setting prior to the child transferring if it would help support the child more effectively.</p> <p>Copies of safeguarding and child protection files should only be retained under the following circumstances;</p> <ul style="list-style-type: none"> • Where there is an ongoing case concerning the child • Where there is suspicion of a member of staff relating to the child <p>Schools may retain a copy of the safeguarding file for a period of 12 months to assist with conversations with the new setting during the 'handover' period. After this time, these copies should be securely destroyed.</p> <p>Please consult the IFTL_Transfer and Retention of Safeguarding and Child Protection Files document for further information on this area.</p>		<p>Some limited circumstances apply where files may be kept for longer (see IFTL Transfer and Retention of Safeguarding and Child Protection Files document).</p>
SEN		<p>SEN details would normally be retained in the pupil file and, as such, the same rules apply. Details need to be retained until the child's 25th birthday. These details should be retained on the pupil file and, as such, responsibility for retention of these details transfers to the new school when files are transferred.</p>	<p>Yes, contains sensitive personal data.</p>	<p>Files should be transferred to the pupil's new setting.</p> <p>Copies may be retained for 1 year post-transfer and should be securely destroyed after that year.</p>
Trips and Activities		<p>Financial information related to trips should be retained for 6 years + 1 for audit purposes. This would include enough child identifiers to be able to confirm contributions.</p>	<p>Yes, contains personal data.</p>	<p>7 years for financial data</p> <p>Trip 'field file' can be securely disposed of</p>

		<p>A 'field file' is the information that is taken on a trip by a school. This can be destroyed following the trip, once any medicines administered on the trip have been entered onto the core system. If there is a minor medical incident on the trip (for example, a medical incident dealt with by staff in the way it would be dealt with 'within school'), then adding it into the core system would be done.</p> <p>If there is a major incident (for example, a medical incident that needed outside agency) then retaining the entire file until time that the youngest child becomes 25 would be appropriate.</p> <p>Permission to go on the trip slips will contain personal data, and destroying them after the trip unless any significant incident arises is appropriate, otherwise refer to the policies above.</p> <p>Schools sometimes share personal data with people providing 'educational visits' into school. There should be good policies in place to ensure that the sharing is proportionate and appropriately deleted afterwards.</p>		<p>following trip if no major incidents.</p> <p>Major incident data requires retention until pupil date of birth + 25 years.</p>
Visitor Records		<p>Visitor records should be retained for the current year + 6 years, at which time retention should be reviewed. If required, records may be kept for longer.</p>	Yes, contains personal data.	7 years then review.