



CLARENDON PRIMARY SCHOOL

Together we shine



Information Management, Data Protection and Retention Policy

Reviewed:	Full Governing Board
Agreed (FGB):	Autumn 2026
Next Review Due:	Spring 28

Headteacher:

Mrs V. Chatterjee

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1. Introduction

- 1.1 The school 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.
- 1.2 As a public authority, the school 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.
- 1.3 This policy provides the framework to achieve effective management and audit of records.
- 1.4 The security of data and appropriate measures will be implemented to protect breach, loss, or unauthorised sharing of information.
- 1.5 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.

2. Code of Practice on Management of Records

- 2.1 A statutory Code of Practice ("the Code") (<https://www.gov.uk/government/publications/code-of-practice-on-the-management-of-records-issued-under-section-46-the-freedom-of-information-act-2000>) under the Freedom of Information Act (FOIA) was produced in 2021 by the Secretary of State for Digital, Culture, Media and Sport and applies to schools and academies.
- 2.2 Whilst the Code does not have an exhaustive set of guidelines, it sets out a principles-based approach, which is organisation, record format and medium agnostic. The Information Commissioner has a statutory duty to promote good practice and to promote compliance with the Code and may issue a 'practice recommendation' under section 48 FOIA to public authorities whose practice does not conform to the Code.
- 2.3 The statutory code contains strong guidance for public authorities on the management of records which make it clear that governance measures must be more comprehensive and should include:
 - written rules on what to keep and when to destroy information;
 - clear responsibility for information and records management at an appropriately senior level; and
 - a governance framework that takes into account how senior management addresses information risks including inappropriate hoarding and loss of information.

3. Scope of the policy

- 3.1 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 in the course of carrying out its functions.
- 3.2 Records are defined as all those documents which facilitate the business carried out by the school 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.

4. Responsibilities

- 4.1 The governing body of the school has a statutory responsibility to maintain the records and record keeping systems in accordance with the regulatory environment specific to the school.

- 4.2 The Information Manager (supported by the DPO) 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.
- 4.3 Information will be managed in line with the Records Retention Schedule set out below. This will help to ensure that the school can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (Subject Access Requests 'SARS').
- 4.4 Individual staff and employees must ensure, with respect to records for which they are responsible, that they:
- 4.4.1 Create and maintain full and accurate records of their activities and file and maintain the same.
 - 4.4.2 Manage all records to which they have access consistently in accordance with the school's policies and procedures.
 - 4.4.3 Properly document their actions and decisions.
 - 4.4.4 Hold both physical and electronic records, particularly those that contain personal or confidential information, securely.
 - 4.4.5 Only share records appropriately and do not disclose them to any unauthorised third party.
 - 4.4.6 Dispose of records securely in accordance with the school's Records Retention Schedule.

5. Relationship with existing policies

5.1 This policy has been drawn up within the context of:

- The Data Protection policy.

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 • Petty cash books	Current year + 6 years	End of financial year	Common practice
1.3.2	Debtor's records	Current year + 6 years	End of financial year	Limitation Act 1980
1.3.3	Loans and grants managed by the school	Date of last payment on the loan + 12 years then review	End of financial year	Common practice
1.3.4	Student Grant applications	Current year + 6 years	End of financial year	Common practice
1.4 Finance School Meals				
1.4.1	All financial records relating to school meals and FSM 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
1.5 Finance - Strategy and Budget				

Reference	File Description	Retention Period	Trigger	Basis
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, including: • Funding Records Capital Grant • Funding Records Earmarked Annual Grant (EAG) • Funding Records General Annual Grant (GAG) • Per pupil funding records • Gift Aid and Tax Relief • Exclusions agreement	Date of last payment of funding + 6 years	End of financial year	Common practice
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

Reference	File Description	Retention Period	Trigger	Basis
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
1.7.2	All records relating to the maintenance of the school, including work carried out by contractors and contractors' reports 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 N.B. These should be offered to the Local Authority Record Office if school closes

Reference	File Description	Retention Period	Trigger	Basis
1.8.2	Constitution (including resolutions to amend the Constitution)	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 • Trustee/governor declaration against disqualification criteria • Training required, and received, by trustees and governors • Induction programme for new trustees/governors	End of term of office + 6 years	End of term of office	Companies Act 2006

Reference	File Description	Retention Period	Trigger	Basis
	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
1.8.9a	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
1.8.9b	Minutes of Trustee or Governing Body meetings and agenda – inspection copies	Date of meeting + 3 years	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
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	Conclusion of complaint process	Common practice

Reference	File Description	Retention Period	Trigger	Basis
		+ 15 years. If child sexual abuse issues are involved then for 75 years in line as per IICSA recommendations.		
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	Restrictive interventions - governors' monitoring reports and data analysis: Reports provided to the governing body or proprietor arising from review and analysis of the institutional incident log, including any reports addressing disproportionality in relation to SEND or protected characteristics. (Note- the use of personal data should be avoided as far as possible in the creation of these reports and analysis, but due to the likelihood of small numbers, there is a risk that individuals could be identifiable in these reports, so care should be taken before any publication for FOIA purposes)	Date of report + 6 years (Note - Additional information is provided in a "Guidance Note: Management and retention of Force and Intervention Records")	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				
1.9.2	Minutes and reports of Senior Management Team meeting and the meetings of other internal	Date of the meeting + 3 years	Date of the meeting	Common practice

Reference	File Description	Retention Period	Trigger	Basis
	administrative bodies			
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.	Personal data should only be retained whist necessary	Date of log	Management decision
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

Reference	File Description	Retention Period	Trigger	Basis
				Security Administration Act 1992 Section 8. Limitation Act 1980
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)	Date of incident	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 administration	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 radiation	Last action + 50 years	Last action on file	The Ionising Radiations Regulation 2017
1.10.12	Fire Precautions log books	Current year + 6 years	End of calendar year	Common practice

Reference	File Description	Retention Period	Trigger	Basis
1.10.13	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)
1.10.14	Restrictive 1s 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. <i>(Note: Additional information is provided in a "Guidance Note: Management and retention of Force and Intervention Records")</i>	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.
1.11 Local Authority				
1.11.1	Secondary transfer sheets (primary)	Current year + 2 years	End of the academic year	Common practice
1.11.2	Attendance Returns	Current year + 1 year	End of the academic year that the record was created	Common practice

Reference	File Description	Retention Period	Trigger	Basis
			in	
1.11.3	School Census Returns	Current year + 5 years	Completion of return	Common practice
1.11.4	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
1.13.4	Policy documentation	Life of the policy or policy superseded + 3 years. If major changes are made to the	Expiration of the policy	Common practice

Reference	File Description	Retention Period	Trigger	Basis
		policy then an archive copy of previous policies should be retained.		
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				
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

Reference	File Description	Retention Period	Trigger	Basis
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
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 + 28 days	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	Where forming part of a record, information in these must be transferred to appropriate record keeping (e.g. staff file, pupil record, MIS safeguarding/behaviour log) as soon as possible. Meeting recordings should be retained for a minimal period until minutes are prepared and agreed by all parties.		Management decision
1.14.13	Website – pictures/news stories	End of academic year	End of academic year	Management decision
1.14.14	Teacher diaries & notebooks	Contents to 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 Curriculum

Reference	File Description	Retention Period	Trigger	Basis
1.15.1	Schemes of Work and School syllabus	Current year + 1 year	End of the academic year that the record was created in	Common practice
1.15.2	Timetable	Current year + 1 year	End of the academic year that the record was created in	Common practice
1.15.3	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
1.15.4	Other curriculum records including returns and development plans	Current year + 3 years	End of the academic year that the record was created in	Common practice
1.16 Extra curriculum				
1.16.1	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)
1.16.2	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)
1.16.3	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
1.16.4	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
1.16.5	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
1.16.6	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
1.16.7	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
1.17 Other support work (non-teaching and where not required for addition to pupil record or pupil child protection record e.g. family liaison work)				
1.17.1	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
1.17.2	Referral forms	While the referral is current then add to pupil record	End of the academic year that the record was created in	Common practice
1.17.3	Contact data sheets and data base entries	Current year then review, if contact is no longer active destroy	End of the academic year that the record was created in	Common practice

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.

A clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, should be kept on a person's confidential personnel file, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. It will provide clarification in cases where a future DBS Disclosure reveals information from the police about an allegation that did not result in a criminal conviction. And it will help to prevent unnecessary reinvestigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer."

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 grievance 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.

TABLE 2: HR

Reference	File Description	Retention Period	Trigger	Basis
2.1 Recruitment				
2.1.1	All records (including interview notes) leading up to the appointment of a new member of staff (unsuccessful candidate)	Date of appointment + 6 months	Date of appointment	Common practice
2.1.2	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
2.1.3	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
2.1.4	Single Central Record	Retain until school closure	Date of recruitment	ISA guidelines

Reference	File Description	Retention Period	Trigger	Basis
2.2 Operational				
2.2.1	Staff Personal File, including recruitment information, employment contract, staff training records, policy acknowledgements, data protection consents	Termination of employment + 6 years	Termination of employment	Limitation Act 1980
2.2.2	Sickness absence monitoring and sick pay	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
2.2.3	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
2.2.4	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
2.2.5	Records relating to any TUPE process	Date last member of staff transfers or leaves the organisation + 6 years		Common practice (minimum retention 3 years as per National Minimum Wage Act 1998)

Reference	File Description	Retention Period	Trigger	Basis
2.2.6	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
2.2.7	Appraisal/assessment records	Current year + 5 years	Date of appointment	Common practice
2.2.8	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. see Appendix 2	Permanent. These form part of the historical archives of the school.	Archive on closure of the school.	Management decision
2.3 Disciplinary and Grievance				
2.3.1	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
2.3.2	Disciplinary Proceedings: Oral warning	Date of warning + 6 months	Date of warning	Common practice
2.3.3	Disciplinary Proceedings: Written warning level 1	Date of warning + 6 months. See information above regarding ACAS Code	Date of warning	Common practice
2.3.4	Disciplinary proceedings: Written warning (level 2)	Date of warning + 12 months	Date of warning	Common practice
2.3.5	Disciplinary proceedings: Final warning	Date of warning + 18 months	Date of warning	Common practice

Reference	File Description	Retention Period	Trigger	Basis
2.4 Payroll & Pensions				
2.4.1	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
2.4.2	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
2.4.3	Batches, bonus sheets, car loans, car mileage output, insurance, Members Allowance 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	Current year + 6 years	End of the financial year	Common practice
2.4.4	Pensions management	Date of last payment on the pension + 6 years		
2.4.5	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
2.4.6	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
2.4.7	Absence records, sickness records, staff returns, time sheets/clock cards/flexitime (excluding annual leave records)	Current year + 3 years	End of the financial year	Common practice

Reference	File Description	Retention Period	Trigger	Basis
2.4.8	Statutory Sick Pay	Current year + 3 years	End of the financial year	Common practice 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.

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.

TABLE 3: STUDENT RECORDS

Reference	File description	Retention	Trigger	Basis
3.1 Admissions				
3.1.1	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
3.1.2	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
3.1.3	Admissions Appeals - unsuccessful	Resolution of case + 1 year	Resolution of case	School Admissions Code Statutory Guidance
3.1.4	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
3.1.5	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
3.1.6	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
3.2 Attendance				
3.2.1	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
3.2.2	Correspondence relating to absence	Date of absence + 2 years. Information should	Date of absence	Common practice

Reference	File description	Retention	Trigger	Basis
		normally be added to the pupil file.		
3.3 Exams				
3.3.1	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
3.3.2	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
3.3.3	Examination results (pupil copies - internal)	Recorded on the pupil's educational record (see below).	Date of exam	Common practice
3.3.4	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
3.3.5	Management of examination registrations	[The examination boards will usually mandate how long these records need to be retained]	Set by exam board	n/a
3.4 Pupil Education Record				

Reference	File description	Retention	Trigger	Basis
3.4.1	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
3.4.2	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
3.4.3	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.
3.5 Pupil work				
3.5.1	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
3.5.2	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
3.6 Child Protection/Safeguarding				
3.6.1	Child Protection/Safeguarding Records - Primary	Transferred to the new school, either in advance or at the latest within 5 days of the pupil starting	Date pupil starts at new school	Keeping Children Safe in Education statutory

Reference	File description	Retention	Trigger	Basis
		at the new school		guidance
3.6.2	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
3.7 Special Educational and Disability (SEND)				
3.7.1	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	Date pupil starts at a new school	The Limitation Act 1980
3.7.2	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
3.7.3	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.	Pupil's date of birth	Special Educational Needs and Disability Act 2001, Children and Families Act 2014 & The Limitation Act 1980
3.7.4	Advice and information to parents regarding educational needs	Closure + 12 years	Date concern identified	Special Educational Needs and Disability Act 2001 section 2

Reference	File description	Retention	Trigger	Basis
3.7.5	Accessibility strategy	Closure + 12 years	Date strategy put in place	Special Educational Needs and Disability Act 2001 section 14
3.8 Restrictive Interventions — Pupil Records <i>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.</i> <i>Note: Additional information is provided in a "Guidance Note: Management and retention of Force and Intervention Records"</i>				
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 safeguarding or educational record. This record must travel with the child to their new educational setting.	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). Where records are retained in copy form after transfer, they should be destroyed securely once the transfer has been confirmed.	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 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	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

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Reference	File description	Retention	Trigger	Basis
	independent or home education, goes missing from education, or has died).			Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.
3.8.3	Record of parental notification of a restrictive 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.	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 and Restraint) (No. 2) (England) Regulations 2025; section 93A of the Education and Inspections Act 2006.

Appendix 1. Guidance Note on Pupil records

Pupil records are essential for maintaining continuity in education and safeguarding. These records fall into four main categories, each requiring specific handling during transfer:

1. **Management Information System (MIS) Data:** This data is usually transferred using the Common Transfer File (CTF) mechanism as outlined in The Education (Pupil Information) Regulations and its amendments. The CTF only includes [specific datasets](#), so any additional information also stored in the MIS must be transferred separately and securely.
2. **Safeguarding/child protection records:** These are often managed and transferred via vendor edtech products, which allow for electronic transfer and receipt confirmation. If the receiving school does not use the same edtech product, alternative secure methods must be used.
3. **Special Educational Needs (SEND) Records:** Increasingly managed through edtech products, these records must be comprehensively compiled by the SEND coordinator and securely passed on to the next school.
4. **The Pupil Record 'Buff' files:** Traditionally, these files contained various documents and were transferred physically. However, as schools have moved towards digital storage, the relevance of physical 'buff' files has decreased. Nonetheless, any documentation not included in the CTF or other specific records should still be securely transferred to the new setting e.g. annual reports, whether in digital or paper format.

A Pupil Record may include the following:

- Record of transfer from Early Years setting
- Personal data collected at admission
- Annual written report to parents
- Any information relating to a major incident involving the child
- Plans, reports, etc. for educational support not meeting SEND thresholds, e.g. Speech and Language, play-based support
- Any additional information not held in the MIS relating to exclusions or suspensions
- Specific correspondence with parents or outside agencies relating to major issues
- Summary details of complaints made by the parents or the pupil relevant to the child's on-going education/behaviour (this will depend on the nature of the complaint and should be considered on a case-by-case basis)
- Examination Results – pupil copy
- SATS results
- Destination data.

The following list may be retained whilst a pupil attends the school, but do **not** normally form part of the record for forwarding to the next school:

- Attendance Registers and Information (this would already be included in the CTF file)
- Absence notes and routine correspondence
- Parental consent forms for trips/outings
- Accident forms (a copy can be placed on the pupil record if it is a major incident)
- Medicine consent and administering records (this is the school's record)
- Copies of birth certificates, passports, etc.
- Generic correspondence with parents about minor issues (i.e. 'Dear Parent')
- Pupil work, drawings, etc.

- Data collection/checking forms
- Photography consents (this is the school's record).

When a student departs from a school, it is essential that all their educational and safeguarding records are securely transferred to the new educational institution. For records relating to safeguarding, [Keeping Children Safe in Education](#) (KCSIE) statutory guidance specifies that the Designated Safeguarding Lead should promptly transfer the child protection file to the new school, and within 5 days for mid-year transfers or within the first 5 days of a new term, ensuring secure delivery and receipt confirmation. However, this overlooks the importance of ensuring that the receiving school has important information in advance of a new student joining.

Whilst it isn't a statutory requirement, schools should work with each other to make appropriate arrangements for the sharing of relevant and limited student information in advance of student(s) starting at a new school, where this will help to ensure adequate arrangements are made in readiness for the student(s') move. However, schools should note the School Admissions Code 2021, which prohibits schools from taking into account *"reports from previous schools about children's past behaviour, attendance, attitude, or achievement, or that of any other children in the family"* in relation to decisions about the admission itself.

The lawful basis for any data sharing in advance of a pupil move is likely to either be 'public task' or 'recognised legitimate interests' ("RLI"). Public task is likely to be most relevant where you determine that it is important for the next school to receive information in order to ensure continuity of safeguarding or educational arrangements for that student. RLI is the appropriate lawful basis where the receiving school requests that you share data with them, in order for them to effectively carry out their **own** public task. This means that information could be shared well in advance of a child moving school. Some schools are worried about sending information to the next school, particularly where schools request information shortly after National Offer Day, rather than waiting until late in the summer term. However, the RLI basis provides useful reassurance for such schools- the receiving school can explain that they need that information for their public task, and then the departing school can share personal data with confidence of an appropriate lawful basis.

It is recommended that schools make regular arrangements with each other to share personal data where necessary to support transition into the new educational setting. The time for this data sharing could be as soon as the weeks following the National Offer Day i.e., once places have been allocated to children or as late as when SATs results are released to schools. This enables the new setting to ensure that adequate provision is in place for any additional support for pupils, particularly to ensure that SEND and additional learning needs are provided for, and safeguarding arrangements are sufficient. Where pupils do not then attend that school (for example in the case of a successful appeal for a different school place) then the new setting should ensure that any data is promptly and securely destroyed/deleted. Simple data sharing agreements can be drawn up between schools to set out the terms of such data sharing. This pack contains a template data sharing agreement that could be utilised to support this work. Both schools should ensure that their privacy notices include details about this data sharing activity.

Once the transfer is complete, any copies of the child's data at the old school should be either securely deleted or retained according to the school's data retention schedule, unless there is a specific reason to retain it, for example, there is a legal hold, the school is continuing to deal with a parental complaint in relation to the data, or there is a reasonable expectation of litigation for which the data will be required. Schools should not make a 'just in case' decision about the retention of data unless there is a necessity to retain it. Any such data is likely to be retained under the lawful basis of 'legitimate interests' and will require a 'Legitimate Interests Assessment' to

be carried out. A limited routine retention period to allow the resolution of any file transfer issues, queries or administrative matters may be appropriate and should be detailed in the retention schedule.

Schools are required to retain a copy of the entries on their admission and attendance registers for six years from the date of entry. This information is usually contained on the MIS. Therefore, it may be most effective to retain the whole MIS record for a pupil for this period and delete it thereafter.

Whilst under no statutory obligation to do so, schools may also wish to keep some basic pupil information for a longer period, to answer queries from students about their school history, or for historical or archiving purposes. In these instances, it is less reasonable (and is costly) to retain the whole MIS record so it may be considered appropriate to hold a record of pupil basic identifiers and admission/departure dates in an alternative format, or work with the MIS provider to find an automated solution to strip all information out of the record except that minimum data for long term retention.

Whilst data protection principles require schools to only hold data where it is necessary, this does not mean that schools cannot be custodians of potentially important historical data in relation to their former pupils. Indeed, data protection laws include provision for retention of data for 'historical and archiving' purposes, and the Code of Practice also acknowledges this. The template retention schedules therefore contain provision for this long-term retention; schools must make a decision about whether to retain these records for the purpose of historical record-keeping.

The 'last-known school'

Responsibility for maintaining the pupil record passes to the 'last known school'. The Pupil Record should be retained by the last known school for 25 years from the date of birth of the pupil.

The school is the final or last known school if:

- secondary phase and the pupil left at 16 years old or for post-16 or independent education, or;
- at any point the pupil left for elective home education, they are missing from education, or have left the UK, or have died.

Tertiary colleges, depending on how they are set up, may work very differently to schools; therefore, the school will need liaise with the college to ascertain if the accept responsibility as the 'last known school' to retain the pupil record. However, the college **must** receive a copy of the child protection file, as per the requirements of KCSiE above. This leads to an unhelpful scenario where pupils who move to sixth-form settings may need to be treated differently to pupils who move to tertiary colleges; records administrators will need to be aware of the requirement for a differing approach depending on the destination of the pupil.

Again, schools and academies may wish to retain copies of pupil records for longer periods, either for a short period in case there are any failed file transfers, queries from subsequent schools or as set out above where there is a 'legitimate interest' in retaining particular/selected records for longer.

Extended records retention where not legally required does expose the setting to some risk, in cyber security and data protection risk (e.g. the data may be subject to cyber-attack or the school may receive a subject access request many years after the child has left, which they are legally required to respond to). Schools and academies will need to carefully weigh up the benefits and risks of retention beyond a child leaving for another setting. Clearly, schools cannot retain every pupil record on a 'just in case' basis, so a risk-led decision should be made.

Retaining safeguarding records

It is important for schools to remember that transferring a pupil file from a safeguarding recording system to another institution does not necessarily automatically delete the file from their own systems, so steps should be taken to delete or archive any unnecessary copies. Schools' retention schedules have often not considered provision for retention of safeguarding records for pupils who have moved to new settings, but these are often still (unintentionally) contained within the archived area of the safeguarding recording system. This is a good example of how practices and retention policies have not been updated to reflect digital ways of working.

Retaining SEN records (retention schedule 3.7.2 and 3.7.3)

In relation to Special Educational Needs (SEN), Courts have classified 'Failure to Educate' (F2E) claims as personal injury claims, which claimants have three years from becoming aware of the alleged negligence to initiate a claim. This effectively extends the relevance of maintaining detailed SEN records well into a claimant's adult years.

Like safeguarding records, schools should transfer SEN records to the last known school, which is responsible for retaining them at least until the child reaches age 25. However, many schools, to mitigate risks of late-emerging claims, have made policy decisions that the last known school will retain these records until the individual reaches age 32 or 35, taking a pragmatic view that if the "harm" hasn't been detected by the time someone is in their 30's, then they are unlikely to be criticised for disposing of records at that point.

In conclusion, schools might choose to keep minimal data on pupils' admissions, departures, and next destinations for historical or informational purposes, or they may also retain safeguarding or SEN records beyond strict legal requirements for potential legal use. Any such retention should be clearly noted in the school's retention policy. Schools must be prepared to justify the retention of records and consider conducting a Data Protection Impact Assessment (DPIA) for any extended retention after a pupil has left.

Appendix 2 Guidance Note on staff records

As mentioned above (appendix 1) concerning the extended retention of minimal pupil records, schools might also consider keeping basic 'skeleton' records of staff members even after the full personnel/HR files are no longer retained. Such records could include the staff member's name, position, and the start and end dates of their contract and any relevant notes that would be relevant to a reference request. This could be beneficial for schools that need to address enquiries about or from staff, in cases of potential litigation or other legal matters, and for maintaining their historical archives. If schools decide to establish and preserve these records, it should be documented in their retention policy.

Appendix 3 Child Sexual Abuse Records

Records associated with child sexual abuse (CSA) should be preserved for 75 years¹, following the recommendations from the Independent Inquiry into Child Sexual Abuse (IICSA). 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 scenarios where records are maintained digitally, schools must ensure digital continuity, especially when they:

- Possess pertinent records for staff or governors,
- Are the 'last known school' tasked with this extended retention responsibility for any relevant pupil records.

In instances where there is evidence or allegations of CSA, it is generally sensible to retain the complete record - whether of a pupil, staff member, or other related documents - not merely the segments directly related to the abuse. Staff involved in reviewing or digitising records should receive training to recognise the significance of any evidence or allegations of child sexual abuse they might encounter, regardless of their initial search intent, and understand the importance of reporting these findings to school leadership and/or preserving these records.

Furthermore, 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. However, the report recommended that such a code should outline that institutions should:

- Implement retention policies that acknowledge the significance of such records to victims and survivors, who may take decades to request access to these records;
- Establish clear and accessible procedures for victims and survivors to access these records;
- Develop policies, procedures, and training for staff handling these requests to ensure they recognise the enduring impact of child sexual abuse and handle applications with empathy.

Whilst the IICSA recommendation does not have statutory status, and therefore there is no requirement to retain CSA records for this period, it does help to underpin discussions about risk and the long-term retention of safeguarding records as set out above.

¹ The Inquiry Report did not specify what the 'trigger' for the recommended retention for 75 years is. However, it can be reasonably assumed, from the context of the broader report, that the 75 years trigger date is the date of birth of the victim(s) of any such abuse.

Appendix 4 Guidance Note on File Naming and Metadata

Metadata is data that describes the context, content and structure of records and their management through time.

- **Contextual metadata** describes the provenance of the record i.e. who created the record and when;
- **content metadata** describes the content of the record i.e. subject matter; and
- **structural metadata** describes the structure and design of the record i.e. the file format.

This metadata is of significance when managing digital records, as it helps to protect the evidence (e.g. stop or hold evidence of the record being altered), supports retrieval and access over time, and migration if required. This is something that should be considered and standards for metadata should be in place, with training to support staff.

At a very basic level, even training staff to create useful and consistent file names can significantly improve digital records management. Documents could generally be titled “YYYYMMDDsurnamedocumenttitle.pdf” for example instead of “Minutes Governor meeting March25 FINAL”