Sandy Lane Nursery and Forest School
"Nurturing curiosity and inspiring imagination"



2025-28

Data Retention Policy

DOCUMENT STATUS

Produced By	Version	Date	Action
Judicium Education	6	Sept 2025	Approved by school's full governing body

Good Practice

Legislation and Guidance

- General Data Protection Regulation 2018
- UK Data Protection Act 2018
- Freedom of Information Act 2000
- Employer's guide to right to work checks, 21.06.24
- Companies Act 2006
- Control of Substances Hazardous to Health Regulations (COSHH)
- Control of Asbestos at Work Regulations
- DfE Running and Managing Schools, Data Protection in Schools (Record Keeping and Management March 2025)
- Education Act 1996, s7
- Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002
- Income and Corporation Taxes 1988
- Independent Inquiry into Child Sexual Abuse (IICSA) 2022
- Keeping Children Safe in Education (KCSIE)
- Limitation Act 1980
- Social Security Administration Act 1992, s8
- Social Security (Claims and Payments) Regulations 1979 Regulation 25
- Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960) revised 1999 (SI1999/567)
- Taxes Management Act 1970
- Working Together to Improve Attendance, s36, Statutory Guidance
- Working Together to Safeguard Children 2023

This list is not exhaustive

Approval

Governing body free to delegate to a committee of the governing body, an individual governor or the headteacher

Review Frequency

Every three years or sooner if required

Data Retention Policy

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

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Accessibility of transfer records and record keeping systems.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the school's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the school from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect. The school may also vary any parts of this procedure, including any time limits, as appropriate in any case.

Data Protection

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

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

Retention Schedule

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the school will adhere to the standard retention times listed within that schedule.

The retention schedule refers to all records regardless of the media (e.g., paper, electronic, microfilm, photographic etc) in/on which they are stored. All records will be regularly monitored by the headteacher and DPO liaison officer.

Destruction of Records

The schedule is a relatively lengthy document listing the many types of records used by the school and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

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

All paper records containing personal information or sensitive policy information should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate wastepaper merchant. All electronic information will be deleted.

The school maintains a database of records which have been destroyed and who authorised their destruction. When completing large scale or bulk destruction of documents, the appropriate staff member should record in this list the following:

- File reference (or other unique identifier);
- File title/description;
- Number of files;
- Name of the authorising officer;
- Date destroyed or deleted from system; and
- Person(s) who undertook destruction.

Retention of Safeguarding Records

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

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

Any allegations made of sexual abuse should be preserved by the school for the term of an inquiry by the Independent Inquiry into Child Sexual Abuse. All other records (for example, the personnel file of the accused) should be retained until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. In 2022 the Independent Inquiry into Child Sexual Abuse (IICSA) concluded and published their final report, leaving a recommendation that all records relating to child sexual abuse should be retained for a period of 75 years.

The ICO has not currently produced guidance or frameworks regarding retention as recommended by the inquiry. Until this has been produced, records will still be retained for a prolonged period as recommended initially by IISCA in order to fulfil potential legal duties that a school may have in relation to the inquiry or any further guidance.

Archiving

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. A database of the records sent to the archives is maintained by the relevant leads for the school. This includes school's DPO liaison officer, administrative/finance staff, DSL and lead classroom staff. The appropriate staff member, when archiving documents should record in this list the following information:

- File reference (or other unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising officer.

Transferring Information to Other Media

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

Transferring Information to Another School

We retain the pupil's educational record whilst the child remains at the school. Once a pupil leaves the school, the file should be sent to their next school. The responsibility for retention then shifts onto the next school. We retain the file for a year following transfer in case any issues arise as a result of the transfer.

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

Responsibility and Monitoring

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

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

Management at all levels is responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Emails

Email accounts are not a case management tool in themselves. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost. Emails that are part of a child's records, including any attached documents are logged on CPOMS (Child Protection Online Monitoring System) and transferred to the receiving school. Where relevant, for example senior leaders, staff are advised to create an 'emails to keep' file within their email account. This will ensure there is a system for any emails needing to be retained. Where relevant, an email is downloaded and stored in the relevant file, eg, H&S.

Pupil Records

All schools, with the exception of independent schools, are under a duty to maintain a pupil record for each pupil. If a child changes schools, the responsibility for maintaining the pupil record moves to the next school. We retain the file for a year following transfer in case any issues arise as a result of the transfer. DfE guidance says all records should follow the child. In line with this guidance, all documents are logged on CPOMS

and securely transferred electronically to the receiving school. A copy of the transfer receipt is retained and the CPOMS archive log for the child is maintained for a year. SEND related information on CPOMS is also retained in the child's file for a year. Both the CPOMS archive and the child's file is then deleted with the exception on EHCP related documentation with is retained as per the retention schedule.

Retention Schedule

FILE DESCRIPTION	RETENTION PERIOD
Employment Records	
Job applications and interview records of unsuccessful candidates	6 months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference. In this case, application forms will give applicants the opportunity to object to their details being retained
Job applications and interview records of successful candidates	Added to staff personnel file and retained in line with that record (6 years after employment ceases)
Written particulars of employment, contracts of employment and changes to terms and conditions	Added to staff personnel file and retained in line with that record 6 years after employment ceases.
Right to work documentation including identification documents and immigration checks	Kept separately from personnel file and retained for 2 years after employment ceases (Employer's guide to right to work checks: 21 June 2024)
DBS checks and disclosures of criminal records forms	DBS certificates should be destroyed as soon as practicable after the check has been completed and the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional circumstances (for example, to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months
Change of personal details notifications	No longer than 6 months after receiving this notification
Emergency contact details	Destroyed on termination
Personnel records	While employment continues and up to 6 years after employment ceases (Limitation Act 1980)
Annual leave records	6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year
Working Time Regulations: • Opt out forms • Records of compliance with WTR	 • 2 years from the date on which they were entered into • 2 years after the relevant period

FILE DESCRIPTION	RETENTION PERIOD
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards
Disciplinary records	6 years after employment ceases (Limitation Act 1980)
Grievance records	6 years after employment ceases (Limitation Act 1980)
Training	6 years after employment ceases (Limitation Act 1980) or length of time required by the professional body
Staff training where it relates to safeguarding or other child related training	Date of the training plus 40 years (this retention period reflects that the IICSA may wish to see training records as part of an investigation)
Annual appraisal/assessment records	Current year plus 3 years
Professional Development Plans	Life of the plan or plan superseded + 6 years
Allegations of a child protection nature against a member of staff including where the allegation is unfounded	10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review Malicious allegations should be removed
Financial and Payroll Records	
Pension records	12 years
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	6 years from the end of the scheme year in which the event took place
Payroll and wage records	6 years after end of tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Maternity/Adoption/Paternity Leave records	3 years after end of tax year they relate to (Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567))
Statutory Sick Pay	3 years after the end of the tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Current bank details	Until updated plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)

FILE DESCRIPTION	RETENTION PERIOD
Bonus Sheets	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Time sheets/clock cards/flexitime	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Pupil Premium Fund records	Date pupil leaves the provision plus 6 years
National Insurance (schedule of payments)	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Insurance	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Overtime	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Annual accounts	Current year plus 6 years
Loans and grants managed by the school	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
All records relating to the creation and management of budgets	Life of the budget plus 3 years
Invoices, receipts, order books and requisitions, delivery notices	Current financial year plus 6 years
Student Grant applications	Current year plus 3 years
Pupil Premium Fund records	Date pupil leaves the provision or school plus 6 years
School fund documentation (including but not limited to invoices, cheque books, receipts, bank statements, etc)	Current year plus 6 years
Free school meals registers (where the register is used as a basis for funding)	Current year plus 6 years
School meal registers and summary sheets	Current year plus 3 years

FILE DESCRIPTION	RETENTION PERIOD
Agreements and Administration Paperwork	
Collective workforce agreements and past agreements that could affect present employees	Permanently
Trade union agreements	10 years after ceasing to be effective
Strategic Plan or School Development Plans	Life of plan or until plan superseded + 3 years. If major changes are made to the plan then an archive copy of previous plans should be retained
Visitor Signing-in Records	6 years
Newsletters and circulars to staff, parents and pupils	One year (and the school may decide to archive one copy)
Minutes of Senior Management Team meetings	Date of the meeting plus 3 years or as required
Reports created by the Head Teacher or the Senior Management Team.	Date of the report plus a minimum of 3 years or as required
Records relating to the creation and publication of the school prospectus	Current academic year plus 3 years
Health and Safety Records	
Health and Safety consultations	Permanently
Health and Safety Risk Assessments	Life of the risk assessment plus 3 years
Health and Safety Policy Statements	Life of policy plus 3 years
Any records relating to any reportable death, injury, disease or dangerous occurrence	Date of incident plus 3 years provided that all records relating to the incident are held on personnel file
Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	Until the child reaches the age of 21 (Limitation Act 1980) THIS RELATES TO ANY ACCIDENT REPORT INCLUDING MINOR BUMPS AND SCRAPES
Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	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. (Social Security (Claims and Payments) Regulations 1979 Regulation 25; Social Security

FILE DESCRIPTION	RETENTION PERIOD
	Administration Act 1992 Section 8; Limitation Act 1980)
Fire precaution log books	Current year plus 6 years
Medical records and details of: • control of lead at work • employees exposed to asbestos dust • records specified by the Control of Substances Hazardous to Health Regulations (COSHH)	40 years from the date of the last entry made in the record (Control of Substances Hazardous to Health Regulations (COSHH); Control of Asbestos at Work Regulations)
Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made
Temporary and Casual Workers	
Records relating to hours worked and payments made to workers	3 years
Governing Body Documents	
Instruments of government	For the life of the school. Consult local archives before disposal
Meetings schedule	Current year
Minutes – principal set (signed)	Date of meeting + 10 years
Agendas – principal copy	Where possible, the agenda should be stored with the principal set of the minutes
Agendas – additional copies	Date of meeting
Policy documents created and administered by the governing body	Until replaced
Register of attendance at full governing board meetings	Date of last meeting in the book plus 6 years
Annual Reports created under the requirements of the Education (Governors Annual Reports) (England) (Amendment) Regulations 2002	Date of report plus 10 years
Records relating to complaints made to and investigated by the governing body or head teacher	Major complaints: current year plus 6 years If negligence involved: current year plus 15 years If child protection or safeguarding issues are involved, then: current year plus 40 years. If the complaint relates to

FILE DESCRIPTION	RETENTION PERIOD
	child sexual abuse, then indefinitely (based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)
Correspondence sent and received by the governing body or headteacher	Correspondence between the governing body and the headteacher – only general emails exchanged between these two parties will be retained for the current year plus 3 years. This does not include all emails sent or received by the school and only relates to those solely between the governing body and the headteacher
Records relating to the terms of office of serving governors, including evidence of appointment	Date appointment ceases plus 6 years except where there have been allegations concerning children. In this case retain for 25 years
Register of business interests	Date appointment ceases plus 10 years (Companies Act 2006)
Records relating to the training required and received by governors	Date appointment ceases plus 6 years
Records relating to the appointment of a clerk to the governing body	Date on which clerk appointment ceases plus 6 years
Governor personnel files	Date appointment ceases plus 6 years
Pupil Records	
Details of whether admission is successful/unsuccessful	Retained from receipt of application until the summer term before the child becomes of statutory school age
Proof of address supplied by parents as part of the admissions process	Current year plus 1 year (School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels)
Admissions register	Entries to be preserved for 6 years from date of entry (Working together to improve school attendance, Section 36, 2024 Statutory Guidance)
Pupil Record, including non-child protection safeguarding records	All information on CPOMS and the child's folder are transferred to the receiving school and retained for 1 year

FILE DESCRIPTION	RETENTION PERIOD
Attendance Registers	6 years from the date of entry (Working together to improve school attendance, Section 36, 2024 Statutory Guidance)
Correspondence relating to any absence (authorised or unauthorised)	Current academic year plus 2 years (Education Act 1996, Section 7)
Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	All information on CPOMS and the child's folder are transferred to the receiving school and retained for 1 year
Child protection information (to be held in a separate file).	This information is currently logged on CPOMS and transferred to the receiving school. CPOMS archive is retained for 12 months If aspects of the record relate to child sexual abuse, then these records should be retained indefinitely (based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)
Allegations of sexual abuse	If the complaint relates to child sexual abuse, then indefinitely (based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)
Records relating to any allegation of a child protection nature against a member of staff	Until the accused's normal retirement age or 10 years from the date of the allegation (whichever is the longer) (retention period informed by the guidance of KCSIE)
Consents relating to school activities as part of UK GDPR compliance (for example, consent to be sent circulars or mailings)	Evidence of consent will be retained whilst the pupil attends the school, or until withdrawn, whichever the shorter
Pupil's work	Children's photos and observations are logged on Tapestry which parents can download when the child leaves. Tapestry is then deleted 90 days after the child leaves school
Schemes of work	Current year plus 1 year
Timetable	Current year plus 1 year
Class Lists	Current year plus 1 year

FILE DESCRIPTION	RETENTION PERIOD
Photographs of pupils	For the time the child is at the school and for a short while after Please note select images may also be kept for longer (for example those used for marketing and information purposes such as the school website, Facebook page or parental guidance materials)
Parental consent forms for school trips where there has been no major incident	End of the trip or end of the academic year (subject to a risk assessment carried out by the school)
Parental consent forms for administering medication	Retain for the academic year they relate to, plus one additional year Securely dispose of after this period, unless required longer for safeguarding, health and safety or legal reasons Forms should be stored with the pupil record whilst valid. They do not transfer to the next school unless there is a real need
Medication administration logs	Retain until the pupil's date of birth, plus 25 years Securely dispose of after this period, unless required longer for safeguarding, health and safety or legal reasons
Parental permission slips for school trips where there has been a major incident	Date of birth of the pupil involved in the incident plus 25 years. Permission slips for all the pupils on the trip should be retained to demonstrate the rules had been followed for all pupils
Other Records	
Emails	Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different timeframe to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email. Day-to-day emails sent and received by staff are deleted when no longer necessary. All staff delete such

FILE DESCRIPTION	RETENTION PERIOD
	at least on an annual basis although usually on a half termly basis.
Privacy notices	Until replaced plus 6 years
Inventories of furniture and equipment	Current year plus 6 years
All records relating to the maintenance of the school carried out by contractors or employees of the school	Whilst the building belongs to the school
Records relating to the letting of school premises	Current financial year plus 6 years
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	Current year plus 6 years then review
Referral forms	While the referral is current
Contact data sheets	Current year then review, if contact is no longer active then destroy