



St Anne's Catholic Primary School

Data Retention Schedule

Adopted by FGB	07.07.26
Last Review	
Next Review	Autumn 2027

1. Introduction

This retention schedule sets out how long [School Name] retains records and the action taken at the end of the retention period. It applies to all records held by the school in any format (paper, electronic, audio, video, or other media).

The schedule is based on statutory requirements, sector guidance, and best practice. It ensures compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025, and the Freedom of Information Act 2000.

Records must not be kept longer than necessary. Retaining records beyond their retention period creates unnecessary risk, storage costs, and potential data protection breaches. Equally, disposing of records too early may breach legal requirements or prejudice the school's interests.

2. Key Principles

Accountability — The school must be able to demonstrate compliance with data protection law, including appropriate retention and disposal.

Minimisation — Personal data should only be kept for as long as necessary for the purposes for which it was collected.

Security — Records awaiting disposal must remain secure until destruction is complete.

Consistency — This schedule applies across all departments and to all staff. Local variations are not permitted without approval from the Data Protection Lead.

Legal holds — Where records are subject to litigation, regulatory investigation, audit, or subject access request, normal disposal must be suspended until the matter is resolved. The Data Protection Lead will issue legal hold notices as required.

3. Responsibilities

Role	Responsibility
Governing Body / Trust Board	Approve retention schedule; ensure adequate resources for compliance
Headteacher	Overall accountability for records management
Data Protection Lead	Maintain schedule; advise staff; oversee annual review; authorise disposal
Data Protection Officer	Independent advice on compliance; review schedule changes
All staff	Follow the schedule; flag records for disposal; report concerns

4. Retention Schedule by Category

4.1 Governance and Management

Record Type	Retention Period	Action at End	Legal Basis / Notes
Governing body / trust board minutes	Permanent	Archive	Historical record; may transfer to local archive
Governing body / trust board agendas and papers	6 years from meeting date	Secure disposal	
Instruments of government	Permanent	Archive	
Scheme of delegation	6 years after superseded	Secure disposal	
Policy documents (approved versions)	6 years after superseded	Secure disposal	Retain current version permanently
Policy development drafts	1 year after policy approved	Secure disposal	

Annual reports	Permanent	Archive	
Prospectus	3 years from publication	Secure disposal	Retain one copy permanently for archive
School development / improvement plans	6 years after plan period ends	Secure disposal	
Self-evaluation forms (SEF)	6 years after superseded	Secure disposal	
Ofsted reports	Permanent	Archive	
Complaints (non-safeguarding)	6 years from resolution	Secure disposal	Limitation Act 1980
Complaints (safeguarding-related)	See safeguarding section		
Freedom of Information requests and responses	3 years from response	Secure disposal	
Subject Access Requests and responses	6 years from response	Secure disposal	Limitation Act 1980
Data Protection Impact Assessments	6 years after project completion or system decommissioned	Secure disposal	
Data breach records	6 years from resolution	Secure disposal	ICO expectation
Contracts and agreements (under seal / deed)	12 years after expiry	Secure disposal	Limitation Act 1980
Contracts and agreements (simple contracts)	6 years after expiry	Secure disposal	Limitation Act 1980
Insurance policies	Permanent	Archive	Potential long-tail claims

Insurance certificates (Employers' Liability)	40 years from date of issue	Secure disposal	Required by regulation
Asset registers	6 years after disposal of asset	Secure disposal	
Inventories	6 years after superseded	Secure disposal	

4.2 Pupil Records

Record Type	Retention Period	Action at End	Legal Basis / Notes
Pupil educational record (main file)	DOB + 25 years	Secure disposal	Limitation Act 1980; includes admissions, attendance summaries, reports, SEN records
Pupil educational record (child protection / safeguarding content)	DOB + 35 years (or until age 35 if in care or had a child protection plan)	Secure disposal	Independent Inquiry into Child Sexual Abuse recommendation
Admission register	Last entry + 6 years	Secure disposal	Education (Pupil Registration) Regulations
Attendance registers	6 years from end of academic year	Secure disposal	Education (Pupil Registration) Regulations
Pupil attendance certificates	6 years from date of issue	Secure disposal	
Examination entries	6 years from end of academic year	Secure disposal	
Examination results (school copy)	6 years from end of academic year	Secure disposal	Awarding bodies retain originals
Internal examination scripts	End of academic year + appeals period	Secure disposal	Typically end of autumn term

External examination scripts	Returned to awarding body or disposed per awarding body instructions		
Coursework / controlled assessment (moderated)	Until moderation complete + 6 months	Secure disposal	Check awarding body requirements
Special educational needs (SEN) files	DOB + 25 years (DOB + 35 years if child protection involvement)	Secure disposal	Part of educational record
Education, Health and Care Plans (EHCPs)	DOB + 25 years (DOB + 35 years if child protection involvement)	Secure disposal	
SEN tribunal records	DOB + 25 years	Secure disposal	
Exclusion records (permanent)	DOB + 25 years	Secure disposal	
Exclusion records (fixed-term / suspension)	DOB + 25 years	Secure disposal	Part of educational record
Behaviour logs	6 years from end of academic year (longer if safeguarding content)	Secure disposal	Review for safeguarding content
Pupil photographs (official school photos)	Duration of enrolment + 1 year	Secure disposal or return to family	
Pupil photographs (identification / MIS)	Duration of enrolment + 6 years	Secure disposal	May be needed for references
Video / photographs (events, marketing)	5 years from capture (or until consent withdrawn)	Secure disposal	Subject to consent

Free school meal eligibility records	6 years from end of eligibility	Secure disposal	Audit requirements
Pupil premium records	Current year + 6 years	Secure disposal	Audit requirements
Parental consent forms (trips, medical, photos)	DOB + 25 years (DOB + 35 years if incident occurred)	Secure disposal	Limitation Act 1980
Trips and educational visits records	DOB + 25 years (of youngest participant)	Secure disposal	Limitation Act 1980
Accident and injury reports (pupils)	DOB + 25 years	Secure disposal	Limitation Act 1980; claims can be brought until age 21 (3 years from 18th birthday)
Medical records held by school	DOB + 25 years	Secure disposal	
Administration of medication records	DOB + 25 years	Secure disposal	

4.3 Safeguarding and Child Protection

Record Type	Retention Period	Action at End	Legal Basis / Notes
Child protection files	DOB + 35 years	Review for archive or secure disposal	IICSA recommendation; longer if ongoing proceedings
Safeguarding concerns (not progressed to CP file)	DOB + 25 years	Secure disposal	May be relevant to later disclosure
Referrals to children's social care	DOB + 35 years	Secure disposal	Retain with CP file
Referrals to LADO (Local Authority Designated Officer)	See staff allegations		

Multi-agency meeting records (held by school)	DOB + 35 years	Secure disposal	
Single Central Record	Permanent (rolling record)	Archive	Statutory requirement
DBS certificate details (workforce)	6 months from recruitment decision	Secure disposal	DBS Code of Practice
Risk assessments (safeguarding-related)	DOB + 35 years	Secure disposal	
Records of visitors to school	6 years	Secure disposal	Safeguarding and fire safety

4.4 Staff Records

Record Type	Retention Period	Action at End	Legal Basis / Notes
Personnel file (main record)	Termination + 6 years	Secure disposal	Limitation Act 1980
Personnel file (staff working with children — no allegations)	Termination + 6 years	Secure disposal	
Personnel file (staff working with children — substantiated allegation)	Normal pension age or 10 years from allegation, whichever is longer; then review	Secure disposal after review	KCSIE; may need longer retention
Application forms (successful candidates)	Part of personnel file		
Application forms (unsuccessful candidates)	6 months from recruitment decision	Secure disposal	
Interview notes (successful candidates)	Part of personnel file		

Interview notes (unsuccessful candidates)	6 months from recruitment decision	Secure disposal	
Pre-employment vetting documents (proof of identity, right to work, qualifications)	Termination + 6 years	Secure disposal	Copy retained; originals returned
DBS certificate information	6 months from recruitment decision	Secure disposal	DBS Code of Practice; do not retain certificate
Single Central Record entries	Permanent (rolling record)	Archive	Statutory requirement
References given	6 years from date provided	Secure disposal	
References received	Termination + 6 years	Secure disposal	Part of personnel file
Contracts of employment	Termination + 6 years	Secure disposal	
Changes to terms and conditions	Termination + 6 years	Secure disposal	
Payroll records	Current year + 6 years	Secure disposal	HMRC requirements
Tax records (P60, P45, P11D)	Current year + 6 years	Secure disposal	HMRC requirements
National Insurance records	Current year + 6 years	Secure disposal	HMRC requirements
Pension records	6 years after last payment from scheme	Secure disposal	May need longer for ongoing benefits
Statutory Maternity/Paternity/Adoption Pay records	Current year + 6 years	Secure disposal	

Annual leave records	Current year + 6 years	Secure disposal	
Sickness absence records	Termination + 6 years	Secure disposal	
Occupational health records	Termination + 40 years	Secure disposal	COSHH; potential long-latency conditions
Fit notes	Termination + 6 years	Secure disposal	
Performance appraisals	Termination + 6 years	Secure disposal	
Training records	Termination + 6 years	Secure disposal	
Disciplinary records (no warning)	6 months from hearing	Secure disposal	
Disciplinary records (written warning — expired)	Duration of warning + 6 months	Secure disposal	Per school policy
Disciplinary records (final written warning — expired)	Duration of warning + 6 months	Secure disposal	Per school policy
Disciplinary records (dismissal)	Termination + 6 years	Secure disposal	
Grievance records	6 years from resolution	Secure disposal	
Staff allegations (unsubstantiated, unfounded, malicious, or false)	Until normal pension age or 10 years from allegation, whichever is longer	Review and secure disposal	KCSIE; record kept but with limited access

Staff allegations (substantiated)	Until normal pension age or 10 years from allegation, whichever is longer; then review	Secure disposal after review	KCSIE; may need to retain longer
Capability records	Termination + 6 years	Secure disposal	
Redundancy records	Termination + 6 years	Secure disposal	
Settlement agreements	Termination + 6 years	Secure disposal	Limitation Act 1980
Tribunal records	6 years from final judgment or settlement	Secure disposal	

4.5 Health and Safety

Record Type	Retention Period	Action at End	Legal Basis / Notes
Health and safety policy	3 years after superseded	Secure disposal	
Risk assessments	3 years after superseded (longer if incident occurred)	Secure disposal	
Fire risk assessments	3 years after superseded	Secure disposal	
Fire drill records	6 years	Secure disposal	
Fire safety equipment maintenance logs	6 years	Secure disposal	
Accident reports (adults — staff, visitors)	6 years from incident	Secure disposal	Limitation Act 1980
Accident reports (pupils)	DOB + 25 years	Secure disposal	Limitation Act 1980

Accident reports (RIDDOR reportable)	6 years from incident (adults) / DOB + 25 years (pupils)	Secure disposal	
First aid records	6 years from treatment (adults) / DOB + 25 years (pupils)	Secure disposal	
COSHH assessments	40 years from date of assessment	Secure disposal	COSHH Regulations
Hazardous substances exposure records	40 years from last exposure	Secure disposal	COSHH Regulations
Asbestos management records	Retain for life of building + 40 years	Secure disposal	Control of Asbestos Regulations
Water testing records (Legionella)	5 years	Secure disposal	
Electrical testing certificates	6 years	Secure disposal	
Gas safety certificates	6 years	Secure disposal	
PAT testing records	6 years	Secure disposal	
Lift inspection records	Life of equipment + 6 years	Secure disposal	
Playground equipment inspection records	21 years from inspection	Secure disposal	Limitation Act 1980 (minors)
Building condition surveys	Life of building	Archive or secure disposal	
Security incident logs	6 years	Secure disposal	

4.6 Finance

Record Type	Retention Period	Action at End	Legal Basis / Notes
Annual accounts / audited financial statements	Permanent	Archive	
Budget reports and monitoring	Current year + 6 years	Secure disposal	
Invoices (received and issued)	Current year + 6 years	Secure disposal	HMRC; Limitation Act 1980
Purchase orders	Current year + 6 years	Secure disposal	
Receipt books / records	Current year + 6 years	Secure disposal	
Petty cash records	Current year + 6 years	Secure disposal	
Bank statements	Current year + 6 years	Secure disposal	
Bank reconciliations	Current year + 6 years	Secure disposal	
Cheque book stubs	Current year + 6 years	Secure disposal	
BACS records	Current year + 6 years	Secure disposal	
Credit card statements and receipts	Current year + 6 years	Secure disposal	
Grants received — applications and correspondence	Current year + 6 years after final payment	Secure disposal	May be longer per funder requirements
Grants received — financial records	Current year + 6 years after final payment	Secure disposal	

Pupil Premium records	Current year + 6 years	Secure disposal	
School Fund / unofficial fund records	Current year + 6 years	Secure disposal	
Procurement records (tenders, evaluations)	Contract end + 6 years	Secure disposal	
VAT records	Current year + 6 years	Secure disposal	HMRC
Gift Aid records	Current year + 6 years	Secure disposal	HMRC
Donation records	Current year + 6 years	Secure disposal	
Audit reports (internal and external)	Current year + 6 years	Secure disposal	
Asset disposal records	6 years from disposal	Secure disposal	

4.7 Curriculum and Teaching

Record Type	Retention Period	Action at End	Legal Basis / Notes
Schemes of work	3 years after superseded	Secure disposal	
Lesson plans	1 year after academic year	Secure disposal	
Curriculum policies	3 years after superseded	Secure disposal	
Timetables	Current year + 1 year	Secure disposal	

INSET / CPD materials	3 years	Secure disposal	
Educational visit planning documents	DOB + 25 years (of youngest participant)	Secure disposal	Limitation Act 1980
Parental consent for educational visits	DOB + 25 years (of youngest participant)	Secure disposal	
External speaker records	6 years	Secure disposal	Prevent duty; safeguarding

4.8 Admissions

Record Type	Retention Period	Action at End	Legal Basis / Notes
Admissions policy	6 years after superseded	Secure disposal	School Admissions Code
Admission appeals (successful)	Incorporated into pupil file		
Admission appeals (unsuccessful — offered place elsewhere)	Resolution + 1 year	Secure disposal	
Admission appeals (unsuccessful — no place offered)	Resolution + 1 year	Secure disposal	
Supplementary information forms (admitted pupils)	Incorporated into pupil file		
Supplementary information forms (not admitted)	Resolution + 1 year	Secure disposal	
Proof of address / supporting documentation (not admitted)	Resolution + 1 year	Secure disposal	
Waiting list records	Until academic year intake complete + 1 year	Secure disposal	

4.9 Information Technology and Data

Record Type	Retention Period	Action at End	Legal Basis / Notes
CCTV footage	30 days (unless incident under investigation)	Automatic overwrite / secure disposal	ICO Code of Practice
CCTV footage (incident-related)	6 years from resolution (DOB + 25 years if pupil involved)	Secure disposal	
Network access logs	12 months	Secure disposal	
User account records	Termination + 12 months (staff) / DOB + 6 years (pupils)	Secure disposal	
Email accounts (leavers)	90 days after departure	Secure disposal	Notify user to retrieve personal items
Email retention (operational)	3 years	Secure disposal	Subject to legal hold
Website content	Remove when superseded; archive significant content		
Social media content	Review annually; remove when no longer relevant		
System backups	90 days rolling	Secure overwrite	Shorter than source data retention
Software licences	Life of software + 6 years	Secure disposal	
Data processing agreements	Contract end + 6 years	Secure disposal	
Data sharing agreements	Agreement end + 6 years	Secure disposal	

Privacy Impact Assessments / DPIAs	6 years after system decommissioned or project ended	Secure disposal
Records of Processing Activities (ROPA)	Current version permanent; superseded versions 6 years	Archive / secure disposal
Consent records (data protection)	Duration of processing + 6 years	Secure disposal
Subject Access Request log	6 years from response	Secure disposal
Data breach log	6 years from resolution	Secure disposal
FOI request log	3 years from response	Secure disposal

4.10 Biometric Data

Record Type	Retention Period	Action at End	Legal Basis / Notes
Biometric data (pupils)	End of enrolment or withdrawal of consent, whichever is sooner	Secure disposal	Protection of Freedoms Act 2012
Biometric data (staff)	Termination of employment or withdrawal of consent, whichever is sooner	Secure disposal	
Biometric consent records	Duration of enrolment/employment + 6 years	Secure disposal	Evidence of lawful processing

4.11 Communications and Marketing

Record Type	Retention Period	Action at End	Legal Basis / Notes
Press releases	5 years	Secure disposal	

Newsletters	Permanent	Archive	Historical record
Marketing consent records	Duration of consent + 6 years	Secure disposal	PECR; UK GDPR
Marketing materials	3 years after campaign ends	Secure disposal	
Media consent forms	Duration of use + 6 years	Secure disposal	
Photographs / video for marketing	5 years from capture or until consent withdrawn	Secure disposal	

4.12 Legal and Litigation

Record Type	Retention Period	Action at End	Legal Basis / Notes
Legal correspondence	6 years from matter conclusion	Secure disposal	Limitation Act 1980
Legal advice	6 years from matter conclusion	Secure disposal	Consider legal professional privilege
Court orders (affecting pupils)	DOB + 25 years	Secure disposal	
Employment tribunal records	6 years from judgment	Secure disposal	
Insurance claims	6 years from settlement	Secure disposal	
Personal injury claims	6 years from settlement (DOB + 25 years if claimant was a minor)	Secure disposal	Limitation Act 1980

5. Secure Disposal Methods

All records containing personal or confidential information must be disposed of securely.

Format	Disposal Method
Paper records	Cross-cut shredding (DIN 66399 Level P-4 or above) or confidential waste service with certificate of destruction
Electronic records	Secure deletion using overwrite software; physical destruction of storage media where appropriate
Emails	Permanent deletion from mailbox and recoverable items
Backup media	Secure overwrite or physical destruction
CCTV footage	Automatic overwrite; manual secure deletion if extracted
Biometric data	Deletion from system with confirmation record
Photographs / video	Secure deletion from all storage locations including cloud services
Hardware (end of life)	Data wiping to NCSC standards or physical destruction with certificate

A record of destruction should be maintained, including date, description of records, method of disposal, and authorising officer.

6. Annual Review Process

The Data Protection Lead will coordinate an annual review of records held across the school. This includes:

1. Notification — Remind all departments of the review timetable (typically summer term)
2. Audit — Each department identifies records due for disposal
3. Authorisation — Data Protection Lead reviews and authorises disposal
4. Legal hold check — Confirm no records are subject to ongoing litigation, investigation, or request
5. Disposal — Secure destruction completed with certificates retained
6. Logging — Destruction records updated
7. Reporting — Summary report to Headteacher and governing body

7. Legal Holds and Exceptions

Normal retention and disposal schedules are suspended when records may be relevant to:

- Ongoing or anticipated litigation
- Regulatory investigation
- Subject Access Request (until fulfilled)
- Freedom of Information request (until fulfilled)
- Internal investigation
- Audit (internal or external)
- Police investigation
- Safeguarding inquiry

The Data Protection Lead will issue a legal hold notice specifying the records affected. Disposal may only resume once the hold is lifted in writing.

8. Associated Documents

- Data Protection Policy
- Data Protection Complaints Policy
- Privacy Notice (Pupils)
- Privacy Notice (Staff)
- Privacy Notice (Parents/Carers)
- Records of Processing Activities (ROPA)
- Subject Access Request Procedure
- Data Breach Procedure
- CCTV Policy
- Acceptable Use Policy
- Freedom of Information Policy

9. Document Control

Field	Details
Policy Owner	Data Protection Lead
Approved By	[Insert Governing Body / Trust Board]
Version	1.0
Last Reviewed	May 2026

Next Review Date May 2027 (or sooner if legislation changes)

Appendix A: Quick Reference — Key Retention Periods

Record Category	Standard Retention
Pupil educational record (main file)	DOB + 25 years
Pupil record with safeguarding content	DOB + 35 years
Staff personnel file	Termination + 6 years
Staff allegation records	Normal pension age or 10 years (whichever longer)
DBS certificate details	6 months
Financial records (general)	Current year + 6 years
Contracts	6 years after expiry (12 years if deed)
Accident records (pupils)	DOB + 25 years
Accident records (adults)	6 years from incident
CCTV	30 days
Governing body minutes	Permanent
Single Central Record	Permanent
Examination results	6 years
Health & safety risk assessments	3 years after superseded
COSHH / hazardous substances	40 years

Insurance (Employers' Liability
certificates)

40 years