



ANGLIAN LEARNING

*Dynamic, empowered learners who thrive and lead in
their communities: locally, nationally and globally*

DOCUMENT AND PERSONAL DATA RETENTION POLICY

THIS POLICY WAS APPROVED:	SUMMER 2024
POLICY VERSION:	4.0
THIS POLICY WILL BE REVIEWED:	SUMMER 2027
MEMBER OF STAFF WITH RESPONSIBILITY FOR REVIEW:	HEAD OF GOVERNANCE, COMPLIANCE AND RISK
THIS POLICY WAS CONSULTED WITH:	CLT, DPO
THIS POLICY WAS DISTRIBUTED TO:	DPLs, CONNECT

1. Introduction

The main aim of this policy is to enable Anglian Learning to manage our records effectively and in compliance with data protection and other regulation. As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents. The Trust will take into account 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 records and record keeping systems.

2. Data Protection

- 2.1. This policy sets out how long personal data will normally be held by the Trust and its schools 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.
- 2.2. Data will be stored and processed to allow for the efficient operation of the Trust and its schools. The Trust's Data Protection Policy outlines its duties and obligations under the UK GDPR

3. Roles and Responsibilities

- 3.1. Each school within the Trust is individually responsible for the management of their records generated by its activities.
- 3.2. The Headteacher at each academy, and Head of Governance, Compliance and Risk for the Trust, are responsible for ensuring this policy is implemented and that all records are stored securely, in accordance with the retention periods outlined, recorded, and are disposed of correctly.
- 3.3. All Trust staff are responsible for ensuring that any records for which they are responsible or which they process are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.
- 3.4. The Data Protection Officer, in conjunction with the Trust 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.

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

4. Individual Responsibility

Much of the retention and deletion of documents will be automatic, but when faced with a decision about an individual document, you should ask yourself the following:

- Has the information come to the end of its useful life?
- Is there a legal requirement to keep this information or document for a set period?
- Would the information be likely to be needed in the case of any legal proceedings? In particular, is it potentially relevant to an historic child abuse enquiry? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)
- Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
- Is the document of historic or statistical significance?

If the decision is made to keep the document, this should be referred to the Head of Governance, Compliance and Risk and reasons given.

5. Retention Schedule

- 5.1. Retention schedules for personal information and other documents can be found in appendices A and B. The schedules set out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.
- 5.2. The policy applies to all physical and digital information, regardless of storage location.

6. Destruction of Documents

- 6.1. Where records have been identified for destruction, they should be disposed of in an appropriate way.
- 6.2. 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.
- 6.3. All paper records containing personal information or sensitive policy information should be shredded before disposal.
- 6.4. All other paper records should be disposed of by placing in recycling bins

- 6.5. All electronic information should be deleted. Please refer to Technical Services to ensure that this is carried out effectively.
- 6.6. The school maintains a log of records which have been destroyed and who authorised their destruction. When destroying 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.

7. Pupil Records

- 7.1. All schools with the exception of independent schools, are under a duty to maintain a pupil record for each pupil.
- 7.2. Early Years will have their own separate record keeping requirements.
- 7.3. 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. We may delay destruction for a further period where there are special factors such as potential litigation.

8. Retention of Safeguarding Records

- 8.1. Any allegations made that are found to be malicious must not be part of the personnel records.
- 8.2. For any other allegations, made the school must keep a comprehensive summary of an 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.
- 8.3. 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.
- 8.4. 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.
- 8.5. Guidance from the Independent Inquiry Child Sexual Abuse states that prolonged retention of personal data at the request of an Inquiry would not contravene data protection regulation provided the information is restricted to that necessary to fulfil potential legal duties that a School may have in relation to an Inquiry.

8.6. Whilst the Independent Inquiry into Child Sexual Abuse is ongoing, it is an offence to destroy any records relating to it. At the conclusion of the Inquiry, it is likely that an indication regarding the appropriate retention periods of the records will be made.

9. 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 should be maintained. 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.

10. 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.

11. Emails

Emails 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.

Appendix A – Document and Data Retention of the Academy Trust

DOCUMENT CATEGORY	RETENTION PERIOD	STATUTORY PROVISIONS
Governance		
Governance Statement	6 years from end of relevant year	Companies Act 2006
Articles of Association	Permanent	Companies Act 2006 Charities Act 2011
Member, Trustee and minutes of meetings and written resolutions	10 years	Companies Act 2006 Charities Act 2011
Register of attendance at Trust Board meetings	Date of last meeting in the book plus 6 years	
Records relating to the terms of office of serving trustees, including evidence of appointment	Date appointment ceases plus 6 years	Companies Act 2006 Charities Act 2011
Correspondence sent and received by the Trust Board	General correspondence should be retained for current year plus 3 years	
Trustee personnel files	Date appointment ceases plus 6 years	
DBS checks and disclosures of criminal records forms	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	Part 4 Schedule to the Education (Independent School Standards) Regulations 2014

	consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months	
Photographs of Trustees	Whilst in role and for a short while after. Please note select images may also be kept for longer (for example to illustrate history of the Trust)	
Records relating to the training required and received by trustees	Date appointment ceases plus 6 years	
Applications relating to unsuccessful Trustee applications	6 months from notification of outcome	
Register of business interests	Date appointment ceases plus 6 years	Charities Act 2011
Documents of clear historical/archival significance	Permanent	
Funding and Finance		
Academy funding agreement and any supplemental agreements	Permanent	Companies Act 2006 Charities Act 2011
Annual accounts and review (inc transferred records on amalgamation)	Permanent	Companies Act 2006 Charities Act 2011
Tax and accounting records	6 years from end of relevant year	Finance Act 1998 Taxes Management Act 1970
Information relevant for VAT purposes	6 years from end of relevant year	Finance Act 1998

		HMRC Notice 700/21
Banking records/receipts books/sales ledger	6 years from transaction	Companies Act 2006 Charities Act 2011
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	
Insurance		
Employer's Liability Insurance	40 years	Employers' Liability (Compulsory Insurance Regulations) 1998
Policies	3 years after lapse	Commercial
Claims Correspondence	3 years after settlement	Commercial
Payroll Records		
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 Regulations

Statutory Sick Pay	3 years after the end of the tax year they relate to	Statutory Sick Pay
Current bank details	Until updated plus 3 years	
National Insurance (schedule of payments)	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
Pension records	15 years after employment ceases	
Employment Records		
Written particulars of employment, contracts of employment and changes to terms and conditions	6 years after employment ceases	Limitation Act 1980 Data Protection Regulations
Immigration checks/ Foreign national ID documents	2 years from the end of employment	Immigration (Restrictions on Employment) Order 2007
Personnel records	While employment continues and up to six years after employment ceases	(Limitation Act 1980)
Change of personal details notifications	No longer than 6 months after receiving this notification	
Photographs of staff	While employment continues and for a short while after. Please note select images may also be kept for longer (for example to illustrate history of the school)	

Emergency contact details	Destroyed on termination	
Disciplinary records	6 years after employment ceases	
Training	6 years after employment ceases 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 6 years	
Professional Development Plans	6 years from the life of the plan	
Allegations of a child protection nature against a member of staff including where the allegation is founded	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.	
Annual leave records	Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year	
Records re working time <ul style="list-style-type: none"> • Opt out forms • Records of compliance with WTR 	<ul style="list-style-type: none"> • Two years from the date on which they were entered into • Two years after the relevant period 	Working Time Regulations 1998 as amended
Job applications of successful applicants (CVs and related materials)	6 years from the end of employment	Limitation Act 1980 Data Protection Regulations

Job applications of unsuccessful applicants (CVs and related materials)	6 months from notification of outcome	ICO Employment Practices Code (Recruitment and Selection), Disability Discrimination Act 1995 and Race Relations Act 1976
Pre-employment/volunteer vetting	6 months	ICO Employment Practice Code Independent School Standards Regulations
DBS checks and disclosures of criminal records forms	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	Part 4 Schedule to the Education (Independent School Standards) Regulations 2014
Temporary and Casual Workers: Records relating to hours worked and payments made to workers	3 years	
Claim for wages through the Coronavirus Job Retention Scheme (Furlough) records	6 years	
Whistleblowing reports and documents linked to an investigation which is wholly or partially substantiated	6 months following the outcome of the report or any remedial action taken as a result of the report	Public Interest Disclosure Act 1998 ('PIDA 1998') Employment Rights Act 1996
Agreements and Administration Paperwork		

Collective workforce agreements and past agreements that could affect present employees	10 years after ceasing to be effective	
Newsletters and circulars to staff, parents and pupils	1 year (and the Trust 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 CEO or the Senior Management Team.	Date of the report plus a minimum of 3 years or as required	

Appendix B – Document and Data Retention of Individual Academies

DOCUMENT CATEGORY	RETENTION PERIOD	STATUTORY PROVISIONS
Governance		
Minutes of Governor meetings	10 years	Companies Act 2006 Charities Act 2011
Membership lists for Governors	Life of appointment + 6 years	Companies Act 2006 Charities Act 2011
Records relating to the terms of office of serving trustees, including evidence of appointment	Date appointment ceases plus 6 years	
Governor personnel files	Date appointment ceases plus 6 years	
DBS checks and disclosures of criminal records forms	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	Part 4 Schedule to the Education (Independent School Standards) Regulations 2014
Photographs of Governors	Whilst in role and for a short time afterwards. Please note select images may also be kept for longer (for example to illustrate history of the school)	

Register of attendance at full governing board meetings	Date of last meeting in the book plus 6 years	
Correspondence sent and received by the governing body or head teacher	General correspondence should be retained for current year plus 3 years	
Applications relating to unsuccessful Governor applications	6 months from notification of outcome	
Register of business interests	Date appointment ceases plus 6 years	
Documents of clear historical/archival significance	Permanent	
Funding and Finance		
Tax and accounting records	6 years from end of relevant year	Finance Act 1998 Taxes Management Act 1970
Information relevant for VAT purposes	6 years from end of relevant year	Finance Act 1998 HMRC Notice 700/21
Banking records/receipts books/sales ledger	6 years from transaction	Companies Act 2006 Charities Act 2011
Loans and grants managed by the School	Date of last payment on the loan plus 12 years	
Pupil Premium Fund records	Date pupil leaves the provision plus 6 years	
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	
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	
Insurance		
Employer's Liability Insurance	40 years	Employers' Liability (Compulsory Insurance Regulations) 1998
Policies	3 years after lapse	Commercial
Claims Correspondence	3 years after settlement	Commercial
Health & Safety		
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	Reporting of injuries, Diseases and Dangerous occurrences Regulations 1995
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.	Reporting of injuries, Diseases and Dangerous occurrences Regulations 1995
Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	Accident book should be retained 3 years after last entry in the book.	Social Security (Claims and Payments) Regulations 1979; Social Security Administration Act 1992; Limitation Act 1980
Fire precaution log books	Current year plus 3 years	
Medical records and details of: - <ul style="list-style-type: none"> • 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	
Payroll Records		
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 Regulations
Statutory Sick Pay	3 years after the end of the tax year they relate to	Statutory Sick Pay
Current bank details	Until updated plus 3 years	
National Insurance (schedule of payments)	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
Pension records	15 years after employment ceases	The Pension Regulator's code of practice 14 for public service pension schemes.
Employment		
Written particulars of employment, contracts of employment and changes to terms and conditions	6 years after employment ceases	Limitation Act 1980 Data Protection Regulations
Immigration checks/ Foreign national ID documents	2 years from the end of employment	Immigration (Restrictions on Employment) Order 2007
Personnel records	While employment continues and up to six years after employment ceases	Limitation Act 1980

Change of personal details notifications	No longer than 6 months after receiving this notification	
Photographs of staff	While employment continues and for a short while after. Please note select images may also be kept for longer (for example to illustrate history of the school)	
Emergency contact details	Destroyed on termination	
Disciplinary records	6 years after employment ceases	
Training	6 years after employment ceases 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 6 years	
Professional Development Plans	6 years from the life of the plan	
Allegations of a child protection nature against a member of staff including where the allegation is founded	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.	

Annual leave records	Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year	
Records re working time <ul style="list-style-type: none"> Opt out forms Records of compliance with WTR	<ul style="list-style-type: none"> Two years from the date on which they were entered into Two years after the relevant period	Working Time Regulations 1998 as amended
Job applications of successful applicants (CVs and related materials)	6 years from the end of employment	Limitation Act 1980 Data Protection Regulations
Job applications of unsuccessful applicants (CVs and related materials)	6 months from notification of outcome	ICO Employment Practices Code (Recruitment and Selection), Disability Discrimination Act 1995 and Race Relations Act 1976
Pre-employment/volunteer vetting	6 months	ICO Employment Practice Code Independent School Standards Regulations
DBS checks and disclosures of criminal records forms	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	Part 4 Schedule to the Education (Independent School Standards) Regulations 2014

Temporary and Casual Workers: Records relating to hours worked and payments made to workers	3 years	
Claim for wages through the Coronavirus Job Retention Scheme (Furlough) records	6 years	
Whistleblowing reports and documents linked to an investigation which is wholly or partially substantiated	6 months following the outcome of the report or any remedial action taken as a result of the report	Public Interest Disclosure Act 1998 ('PIDA 1998') Employment Rights Act 1996
Agreements and Administration Paperwork		
School Development Plans	3 years from the life of the plan	
Visitors Book and Signing In Sheets	6 years	
Newsletters and circulars to staff, parents and pupils	1 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	
Pupil Records		

Details of whether admission is successful/unsuccessful	1 year from the date of admission/non-admission	
Personal data of non-enrolling applicants	3 months after decision not to enrol	Data Protection Regulation
Proof of address supplied by parents as part of the admissions process	Current year plus 1 year	
Parent contact Information	Duration of student's attendance. 3 months where students do not enrol.	Data Protection Regulation
Admissions register	Entries to be preserved for three years from date of entry	
Educational Record	Primary – Whilst the child attends the School Secondary – until the child reaches the age of 25	Pupil Information Regulations 2005 Data Protection Regulation Limitation Act 1980
Correspondence relating to any absence (authorised or unauthorised)	Current academic year plus 2 years	Education Act 1996
Safeguarding and Child protection information (to be held in a separate file).	DOB of the child plus 25 years then review Note: These records will be subject to any instruction given by IICSA	KCSIE
Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Date of birth of the pupil plus 31 years (Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan).	Limitation Act 1980 SEN and Disability Regulations 2014 Children and Families Act 2014, pt 3

Physical intervention logs	DOB of the child plus 25 years	Limitation Act 1980
Attendance registers	3 years after end of academic year	Pupil Registration Regulations 2006 Regulation 14
Any other records created in the course of contact with pupils	3 years after end of academic year	
Examination results (school's copy)	Current year plus 6 years	
Examination certificates	12 months	Exam boards
Records relating to any allegation of a child protection nature against a member of staff	Until the accused normal retirement age or 10 years from the date of the allegation (whichever is the longer)	
Consents relating to school activities as part of UK GDPR compliance (for example, consent to be sent circulars or mailings)	Consent will last whilst the pupil attends the school	
Pupil's work	Where possible, returned to pupil at the end of the academic year (provided the school have their own internal policy to this effect). Otherwise, the work should be retained for the current year plus 1 year	
Mark books	Current year plus 1 year	
Schemes of work	Current year plus 1 year	
Timetable	Current year plus 1 year	

Class record books	Current year plus 1 year	
Record of homework set	Current year plus 1 year	
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 to illustrate history of the school)	
Consent forms for trips/extended school activities	End of the trip or end of the academic year (subject to a risk assessment carried out by the school)	
Parental consent 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	Limitation Act 1980
Other Records		
CCTV	1 calendar month	
Privacy notices	Until replaced plus 6 years	
Inventories of furniture and equipment	Current year plus 6 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.	

Subject Access Request data	1 year	
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	