CHANCERY EDUCATION TRUST

DATA RETENTION & DISPOSAL OF RECORDS POLICY

JANUARY 2026

Next Review Date: January 2027

Staff should make themselves aware of all policies and amendments or updates to policies and adhere to the same, which will be made available on relevant websites and internal data and computer systems.

Summary of the CET Data Retention & Disposal of Records Policy January 2026

Purpose and scope

- The policy explains how long records must be kept and how they should be securely disposed of.
- It applies to all trust and academy schools and covers paper and electronic records, including staff, pupil, safeguarding, governance, finance, health & safety and operational records

Legal and regulatory framework

- The policy supports compliance with UK GDPR, the freedom of information act 2000, and other relevant legislation.
- It aligns with the trust's data protection policy and reflects current legal and best-practice requirements

Key principles for record management

- Records must be managed to ensure:
    - Confidentiality
    - Security
    - Accessibility
    - Efficient storage and retrieval
- Records must only be retained for as long as there is a legal or operational need and must be reviewed regularly

Retention schedule

- A detailed retention schedule sets out how long different categories of records must be kept.
- Retention periods apply regardless of format (paper, electronic, photographs, etc.).
- Timeframes are based on statutory requirements and business needs

Secure disposal of records

- Before destruction, records must be checked to ensure they are not needed for litigation, complaints, or investigations.
- Disposal requirements:
    - Paper records containing personal or sensitive data must be shredded.
    - Electronic records must be securely deleted.
- All destruction must be recorded in a data destruction log, including authorisation and method of disposal

Safeguarding and child protection records

- Malicious allegations must not be retained on personnel files.
- Substantiated safeguarding allegations must be summarised and retained appropriately.

- Records relating to child sexual abuse are retained for a very long period (up to 75 years or indefinitely), in line with IICSA recommendations, pending further ICO guidance

Archiving

- Records with long-term historical or evidential value may be archived instead of destroyed.
- Archived records must be logged, showing what was archived and who authorised it

Transferring records

- Pupil records must be transferred to the next school when a pupil leaves.
- Responsibility for retention then passes to the receiving school.
- Long-term paper records may be digitised, provided data integrity and accessibility are maintained

Emails and CCTV

- Emails are not records in themselves; retention depends on content, but generally no longer than 3 years.
- CCTV footage is retained for up to 31 days, unless required for investigation purposes

Roles, responsibilities and monitoring

- CEO and Headteacher/Principal: overall responsibility for implementation.
- Data protection officer (DPO): monitors compliance and advises on effectiveness.
- Managers must ensure staff are aware of the policy and receive appropriate training.
- The policy is reviewed annually

CHANCERY EDUCATION TRUST

DATA RETENTION & DISPOSAL OF RECORDS POLICY

Chancery Education Trust and the Academy Schools within the Trust have a responsibility to maintain its records and record keeping systems. When doing this, we 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 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 Trust and Academy Schools current practice, the requirements of current legislation and best practice and guidance. It may be amended by the Trust 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 Trust 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 us 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 Trust and Academy Schools. The Trust and Academy 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 Trust and Academy Schools 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.

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

DESTRUCTION OF RECORDS

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 waste paper merchant. All electronic information will be deleted.

The Trust and Academy Schools maintain a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in this list at least: -

- 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 Trust/Academy 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 Trust/Academy 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 Academy School. 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 Academy School. Once a pupil leaves the Academy School, the file should be sent to their next school. The responsibility for retention then shifts onto the next school.

We may delay destruction where there are special factors such as potential litigation.

RESPONSIBILITY AND MONITORING

The Chief Executive Officer (CEO), Headteacher/Principal has primary and day-to-day responsibility for implementing this policy. The Data Protection Officer, in conjunction with the Trust and Academy Schools, 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 are 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

Emails accounts are not a case management tool in itself. 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.

PUPIL RECORDS

All schools with the exception of independent schools, are under a duty to maintain a pupil record for each pupil. Early Years will have their own separate record keeping requirements. If a child changes schools, the responsibility for maintaining the pupil record moves to the next school.

Monitoring and Implementation Policy

The policy is reviewed annually, although the Trust may vary or amend it periodically to ensure that we fulfil our obligation around the Retention & Disposal Records Policy. All proposed changes to this policy would be made following the approval from the Committee.

	Name	Date
Policy written by	CET Board	January 2026
Review by Committee	CET Board	January 2026
Approved by Committee	CET Board	March 2026
Adopted by Governing Board	Local Governing Board	June 2026
To be reviewed annually		
Review by	January 2027	

RETENTION SCHEDULE

FILE DESCRIPTION	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
Employment Records		
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates, unless the Academy 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	SHRED/DELETE
Job applications and interview records of successful candidates	6 years after employment ceases	SHRED/DELETE
Written particulars of employment, contracts of employment and changes to terms and conditions	6 years after employment ceases	SHRED/DELETE
Right to work documentation including identification documents	6 years after employment ceases	SHRED/DELETE
Immigration checks	Two years after the termination of employment	SHRED/DELETE
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.	SHRED/DELETE
Change of personal details notifications	No longer than 6 months after receiving this notification	SHRED/DELETE
Emergency contact details	Destroyed on termination	SHRED/DELETE
Personnel records	While employment continues and up to six years after employment ceases (Limitation Act 1980)	SHRED/DELETE
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	SHRED/DELETE
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards	SHRED/DELETE
Working Time Regulations: • Opt out forms • Records of compliance with WTR	• Two years from the date on which they were entered into • Two years after the relevant period	SHRED/DELETE
Disciplinary records	6 years after employment ceases	SHRED/DELETE
Training	6 years after employment ceases or length of time required by the professional body	SHRED/DELETE

FILE DESCRIPTION	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
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)	SHRED/DELETE
Annual appraisal/assessment records	Current year plus 6 years	SHRED/DELETE
Professional Development Plans	6 years from the life of the plan	SHRED/DELETE
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.	SHRED/DELETE
Staff Risk Assessments	6 years after employment ceases	SHRED/DELETE
Financial and Payroll Records		
Pension records	12 years	SHRED/DELETE
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	SHRED/DELETE
Payroll and wage records	6 years after end of tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988)	SHRED/DELETE
Maternity/Adoption/Paternity Leave records	3 years after end of tax year they relate to	SHRED/DELETE
Statutory Sick Pay	3 years after the end of the tax year they relate to	SHRED/DELETE
Current bank details	Until updated plus 3 years	SHRED/DELETE
Bonus Sheets	Current year plus 3 years	SHRED/DELETE
Time sheets/clock cards/flexitime	Current year plus 3 years	SHRED/DELETE
Pupil Premium Fund records	Date pupil leaves the provision plus 6 years	SHRED/DELETE
National Insurance (schedule of payments)	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)	SHRED/DELETE
Insurance	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)	SHRED/DELETE
Overtime	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)	SHRED/DELETE
Annual Accounts	Current year + 6 years	Offer to archives
Loans & grants managed by the Trust/Academy School	Date of last payment on loan + 12 years	Transfer to archives
All records relating to the creation and management of budgets	Life of the budget plus 3 years	SHRED/DELETE

FILE DESCRIPTION	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
Invoices, receipts, order books and requisitions, delivery notices	Current financial year plus 6 years	SHRED/DELETE
Student Grant applications	Current year plus 3 years	SHRED/DELETE
Pupil Premium Fund records	Date pupil leaves the school plus 6 years	SHRED/DELETE
School fund documentation (including but not limited to invoices, cheque books, receipts, bank statements etc).	Current year plus 6 years	SHRED/DELETE
Free school meals registers (where the register is used as a basis for funding)	Current year plus 6 years	SHRED/DELETE
School meal registers and summary sheets	Current year plus 3 years	SHRED/DELETE
Agreements and Administration Paperwork		
Collective workforce agreements and past agreements that could affect present employees	Permanently	Archive
Trade union agreements	10 years after ceasing to be effective	SHRED/DELETE
Professional Development Plans	6 years from the life of the plan	SHRED/DELETE
Visitors Book and Signing in Sheets	6 years	
Newsletters and circulars to staff, parents and pupils	1 year (and the Trust/Academy School may decide to archive a copy)	Transfer to archives
School brochure / prospectus and records relating to the creation and publication	Current academic year plus 3 years	Transfer to archives
Minutes of Senior Management Team meetings	Date of the meeting plus 3 years or as required	Transfer to archives
Reports created by the Head Teacher or the Senior Management Team.	Date of the report plus a minimum of 3 years or as required	Transfer to archives
Correspondence created by HT/Principal, deputy headteachers, heads of year and other members of staff with administrative responsibilities	Date of correspondence + 3 years	SHRED/DELETE
Log Books	Date of last entry in the book + 6 years	Transfer to archives
PTA/Old Pupils Associations	Current year + 6 years	Transfer to archives
Premises		
Premises files (relating to maintenance)	Cessation of use of building + 7 years then review	Archive

FILE DESCRIPTION	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
Employer's Liability certificate	Closure of school + 40 years	Archive
Inventories of equipment and furniture	Current year + 6 years	SHRED/DELETE
Claims made against insurance policies – damage to property	Case concluded + 3 years	Archive
Claims made against insurance policies – personal injury	Case concluded + 6 years	Archive
Title Deeds / Plans	Permanent *Deeds* should follow the property unless the property has been registered at the Land Registry *Plans* should be retained in school whilst operational	Offer to archives if the deeds are no longer needed
Maintenance and contractors / Contractor's reports / Leases	Current year + 6 years	SHRED/DELETE
Lettings	Current year + 3 years	SHRED/DELETE
Burglary, theft and vandalism report forms	Current year + 6 years	SHRED/DELETE
Maintenance log books	Last entry + 10 years	SHRED/DELETE
Health and Safety Records		
Health and Safety consultations	Permanently	Archive
Health and Safety Risk Assessments	Life of the risk assessment plus 3 years	SHRED/DELETE
Health and Safety Policy Statements	Life of policy plus 3 years	SHRED/DELETE
Any records relating to reportable death or injury, disease or dangerous occurrence	Date of incident plus 3 years provided that all records relating to the incident are held on personnel file	Archive
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	Archive
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)	Archive This means that if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry.
Fire precaution log books	Current year plus 6 years	SHRED/DELETE
Medical records and details of: - • control of lead at work • employees exposed to asbestos dust • records specified by the Control of Substances	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)	SHRED/DELETE

FILE DESCRIPTION	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
Hazardous to Health Regulations (COSHH)		
Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made	SHRED/DELETE
Temporary and Casual Workers		
Records relating to hours worked and payments made to workers	3 years	SHRED/DELETE
Governance		
Instruments of Government	Permanent Retain in school	Transfer to archives when school has closed
Meetings schedule	Current year	
Minutes of meetings (signed)	Generally kept for the life of the organisation	Transfer to archives
Agendas	Where possible the agenda should be stored with the principal set of the minutes	Transfer to archives
Meeting reports/papers	Date of meeting + 6 years	SHRED/DELETE
Policy documents	Expiry of policy Retain in school whilst policy is operational	SHRED/DELETE
Register of attendance at LGB/Trust Board meetings	Date of last meeting in the book plus 6 years	Transfer to archives
Annual reports required by the DfE and Skills	Date of report + 10 years	Transfer to archives
Records relating to complaints made to and investigate by the LGB/HT/Principal/Trust	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.	SHRED/DELETE
Correspondence sent and received by the governing body or head teacher	General correspondence should be retained for current year plus 3 years	Transfer to archives
Records relating to the terms of office of serving governors, including evidence of appointment	Date appointment ceases plus 6 years	Transfer to archives
Register of business interests	Date appointment ceases plus 10 years	Transfer to archives
Records relating to the training required and received by governors	Date appointment ceases plus 6 years	SHRED/DELETE

FILE DESCRIPTION	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
Records relating to the appointment of a clerk to the governing body	Date on which clerk appointment ceases plus 6 years	SHRED/DELETE
Governor personnel files	Date appointment ceases plus 6 years	SHRED/DELETE
Proposals for schools to become, or be established as specialist status schools	Current year + 3 years	Transfer to archives
Trust and endowments	Permanent Retain in school whilst operationally required	Transfer to archives
Pupil Records *If a child changes schools, the responsibility for maintaining the pupil records moves to the next school.*		
Details of whether admission is successful/unsuccessful	1 year from the date of admission/non-admission	SHRED/DELETE
Proof of address supplied by parents as part of the admissions process	Primary – Whilst the child attends the School	SHRED/DELETE
Admissions/Attendance registers	6 years from date of entry	Transfer to new school. Where not possible, kept until DOB plus 25 years
Correspondence relating to any absence (authorised or unauthorised)	Current academic year plus 2 years (Education Act 1996)	SHRED/DELETE
Special Educational Needs files, reviews and EHCP, 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). (Children and Family's Act 2014; Special Educational Needs and Disability Act 2001)	SHRED/DELETE
Child protection information (to be held in a separate file).	Until the child's 25th birthday. If the file relates to child sexual abuse, retain indefinitely (The Report of the Independent Inquiry into Child Sexual Abuse).	SHRED/DELETE
Examination results / SATs records (Internal and public)	Year of examination + 6 years	SHRED/DELETE
Allegations of sexual abuse	Indefinitely	Transfer to new school and kept indefinitely
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)	Transfer to new school. Where not possible, kept until DOB plus 25 years
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.	Transfer to new school. Where not possible, kept until DOB plus 25 years
Pupil's work	Where possible, returned to pupil at the end of the academic year (provided the School have their own	SHRED/DELETE

FILE DESCRIPTION	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
	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	SHRED/DELETE
Schemes of work	Current year plus 1 year	SHRED/DELETE
Timetable	Current year plus 1 year	SHRED/DELETE
Class record books	Current year plus 1 year	SHRED/DELETE
Record of homework set	Current year plus 1 year	SHRED/DELETE
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).	SHRED/DELETE
Parental permission slips 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)	SHRED/DELETE
Parental permission slips for school trips – where there has been a major incident	DOB of pupil involved in the incident + 25 years. The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils.	SHRED/DELETE
Emails		
All emails	No longer than 3 years	DELETE
CCTV		
CCTV and Thermal Imaging	Up to 30 days	DELETE
Other Records		
Privacy Notices	Until replaced plus 6 years	
Local Authority		
Secondary transfer sheets (Primary)	Current year + 2 years	SHRED/DELETE
Attendance returns	Current year + 1 year	SHRED/DELETE

FILE DESCRIPTION	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
Circulars from LA	Whilst required operationally Review to see whether a further retention period is required	Transfer to archive
Department for Education		
HMI reports	These do not need to be kept any longer	Transfer to archive
OFSTED reports and papers	Replace former report with any new inspection report Review to see whether a further retention period is required	Transfer to archive
Returns	Current year + 6 years	SHRED/DELETE
Circulars from Department for Education	Whilst operationally required Review to see whether a further retention period is required	Transfer to archive
Connexions / Prospects		
Service level agreements	Until superseded	SHRED/DELETE
Work Experience agreement	DOB of child + 18 years	SHRED/DELETE

Appendix 1 - Data Destruction Log

Guidance note: It is important to record any large destruction of data (both electronic and hard copy based). Utilising a data destruction log is an effective way to evidence compliance. Be mindful to not add personal data of data subjects whose data you are destroying.

File Reference Number	Description of Record/Document	Number/Detail of Documents Included	Details of Action Carried Out and Date Destroyed	Name of Staff Member and Date
Example: Staff2016	***Job description, CV, contract, qualifications and certifications***	***5 ex-staff members***	***Shred-It – Data Destruction certificate: ShredIt2701***	***John Smith – 01/01/01***