

# Data Retention Policy

<b>Document Title</b>	TPT Data Retention Policy
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## Document Control Table

<b>Document History</b>			
<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Note of Revisions</b>
V1	June 2024	K Thomlinson	First Trust-wide Data Retention policy
V1.1	Sept 2024	K Thomlinson	Addition of 'Exam assessment records and learner evidence' under Curriculum Management within the Retention Schedule
V1.2	July 2025	K Thomlinson	Review period changed to 2 years DPO contact details updated
V1.3	Nov 2025	K Thomlinson	Addition of St Mark's

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## 1. Introduction and Scope

The Prospect Trust (the Trust) has a responsibility to maintain its records and record keeping systems. When doing this, the Trust 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 applies to all academies within the Trust and the Central Services Team.

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's 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 policy, including any time limits, as appropriate in any case.

## 2. Data Protection

This policy sets out how long data will normally be held by the Trust 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. The Trust's [Data Protection Policy](#) outlines its duties and obligations under the UK GDPR.

## 3. 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 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.

## 4. Destruction of Records

The schedule is a relatively lengthy document listing the many types of records used by the Trust 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 are disposed of via a secure shredding service. All electronic information is deleted.

## 5. 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 record of data sent to the archives is maintained by the appropriate department. Archiving should be kept to a minimum.

## 6. Responsibility and Monitoring

The Headteachers, Principals and COO are responsible for the implementation of this policy in conjunction with the GDPR Leads. The GDPR Leads are:

- St Mark's CofE Primary School; Rachel Jones, Deputy Headteacher: [adminoffice@st-marks.hants.sch.uk](mailto:adminoffice@st-marks.hants.sch.uk)
- Frimley CofE Junior School: Clare Wright, Headteacher: [info@frimley.surrey.sch.uk](mailto:info@frimley.surrey.sch.uk)
- Tomlinscote School: Rob Major, Principal: [rmajor@tomlinscoteschool.com](mailto:rmajor@tomlinscoteschool.com)
- Sixth Form College Farnborough: Nicola Mullan, Executive Office Manager [executive\\_office@farnborough.ac.uk](mailto:executive_office@farnborough.ac.uk)
- Trust Central Team: Kate Thomlinson. Project Support Officer: [kate.thomlinson@theprospecttrust.org.uk](mailto:kate.thomlinson@theprospecttrust.org.uk)

However, all staff are responsible for ensuring the retention schedule is adhered to. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.

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.

The Trust employs Judicium Consulting to fulfil the role of Data Protection Officer and the details are set out below;

**Data Protection Officer:** Judicium Consulting Limited

Address: 72 Cannon Street, London, EC4N 6AE

Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)

Telephone: 020 7336 8403

## 7. 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 learner 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 will be deleted automatically (where systems allow) after 5 years. However emails of staff leavers will not be retained see Section 10 below.

Learner's electronic accounts (email, calendar, files etc.) are categorised as 'Learner Work' and as such are retained for the current academic year plus one full academic year.

## 8. Internal Chat Systems

Internal chat systems such as Microsoft Teams and Google chat will be subject to a 3-month data retention period, where the system allows.

## 9. Learner Records

Academies are under a duty to maintain a record for each learner. If a learner changes school/college, the responsibility for maintaining the learner record moves to the next school/college. The file is retained for a year following transfer in case any issues arise as a result of the transfer.

Destruction of the learner record may be delayed where there are special factors such as potential litigation.

## 10. Staff Leavers

When a staff member leaves, all electronic accounts (email, calendar, files etc.) will be deleted within 20 working days from their leaving date, unless a specific request to keep the data is made by the line-manager to the academy Headteacher/Principal or the COO, as appropriate.

The request must include a valid reason for keeping the data beyond the standard 20-day period and must specify how long the data should be kept for. This period should only be as long as it takes to extract the required data from the accounts, i.e. no longer than 6 months.

All staff should be reminded that email accounts are not to be used as filing systems and data should be stored where it can be shared with those who need access. Staff who are working their notice periods need to ensure that data is shared with co-workers as part of the leaving process and managers need to enforce this.

## 11. Retention Schedule

FILE DESCRIPTION	RETENTION PERIOD
<b>Employment Records (including records of employees, volunteers and contractors, noting not all data listed is held for each category of individual)</b>	
Job applications and interview records of unsuccessful candidates	6 months after notifying unsuccessful candidates, unless the Trust has applicant's consent to keep their CVs for future reference.
Personnel records, including (but not limited to), the following data:	6 years following the end of the academic year in which the individual leaves the Trust

<ul style="list-style-type: none"> <li>• Written particulars of employment, contracts of employment and changes to terms and conditions</li> <li>• Training records</li> <li>• Disciplinary records</li> <li>• Annual appraisal/assessment records</li> <li>• Professional Development Plans</li> <li>• Annual leave records</li> </ul>	
<p>Personnel records</p> <ul style="list-style-type: none"> <li>• Job applications, interview records and references of successful candidates</li> <li>• Right to work documentation including identification documents</li> <li>• DBS approval number</li> <li>• Safeguarding training records</li> </ul>	20 years following the end of the academic year in which the individual leaves the Trust
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
Change of personal details notifications	No longer than 6 months after receiving this notification
Emergency/ next of kin contact details	Destroyed on termination
Consents for the processing of personal and sensitive data	6 years following the end of the academic year in which the individual leaves the Trust
Staff training where it relates to safeguarding or other learner-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)
Allegations of a child protection nature against a member of staff including where the allegation is founded	20 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.

<b>Financial and Payroll Records</b>	
Pension records	12 years
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	7 academic years
Payroll and wage records	7 academic years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Maternity/Adoption/Paternity Leave records	4 academic years
Statutory Sick Pay	4 academic years
Current bank details	Until updated plus 3 years
Bonus Sheets	4 academic years

Time sheets/clock cards/flexitime	4 academic years
Pupil Premium Fund records	7 academic years
National Insurance (schedule of payments)	7 academic years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Insurance	7 academic years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Overtime	7 academic years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Annual accounts	7 academic years
Loans and grants managed by the Trust	Date of last payment on the loan plus 12 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	7 academic years
Student Grant applications	4 academic years
Trust fund documentation (including but not limited to invoices, cheque books, receipts, bank statements etc.).	7 academic years
Free school meals registers (where the register is used as a basis for funding)	7 academic years
School meal registers and summary sheets	4 academic years

<b>Agreements and Administration Paperwork</b>	
Collective workforce agreements and past agreements that could affect present employees	Permanently
Trade union agreements	10 years after ceasing to be effective
Development Plans	3 years from the life of the plan
Visitors Book and Signing In Sheets	5 months
Newsletters and circulars to staff, parents and learners	1 year
Minutes of Senior Leadership Team meetings	Date of the meeting plus 3 years or as required
Reports created by the Headteacher/Principal or the Senior Leadership Team.	Date of the report plus a minimum of 3 years or as required
Records relating to the creation and publication of the academy prospectus	Current academic year plus 3 years

<b>Health and Safety Records</b>	
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. After this time period, records relating to the incident should be transferred to the personnel file and kept accordingly (i.e. 7 academic years)
Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	Until the learner reaches the age of 21.
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: - 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

<b>Governing Body Documents</b>	
Instruments of government	For the life of the Trust
Meetings schedule	Current year
Minutes – principal set (signed)	Generally kept for the life of the organisation
Agenda	Where possible the agenda should be stored with the principal set of the minutes
Register of attendance at full Trust board meetings and AQC meetings	Date of last meeting in the book plus 6 years
Annual reports required by the Department for Education	Date of report plus 10 years
Records relating to complaints made to and investigated by the senior management and/or the AQC	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.
Correspondence sent and received by the Trust Board, AQC or Headteacher /Principal	General correspondence should be retained for current year plus 3 years
Records relating to the terms of office of serving governors, including evidence of appointment	Date appointment ceases plus 6 years

Register of pecuniary interests	Date appointment ceases plus 6 years
Records relating to the appointment of a Governance Professional	Date on which appointment ceases plus 6 years

<b>Learner Records</b>	
Details of unsuccessful application	1 year from date of the closure of that application cycle.
Proof of address supplied by parents as part of the admissions process in the Schools.	Current year plus 1 year
Schools Admissions register. Not applicable to the College.	Entries to be preserved for three years from date of entry
Learner Record	Primary – Whilst the learner attends the School Secondary/College – until the learner reaches the age of 25 (Limitation Act 1980)
Attendance Registers	Schools: 3 years from the date of entry College: 7 years from the date of entry
Correspondence relating to any absence (authorised or unauthorised)	Current academic year plus 2 years ( <i>Education Act 1996</i> )
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 learner 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)
Exam Access Arrangements applications and evidence from school, e.g. Form 8 / diagnostic / medical reports	3 years plus current year
SEND diagnostic reports and diagnostic referrals to outside agencies	3 years plus current year
Medication Administration Records	Date of birth of the learner plus 25 years
Personal Emergency Evacuation Plans	Date of birth of the learner plus 25 years
Medication Administration Records	Date of birth of the learner plus 25 years
Individual Healthcare Plans	Date of birth of the learner plus 25 years
Bursary Learners	Date learners leaves plus 6 years
Child protection information (to be held in a separate file).	DOB of the learner plus 25 years then review Note: These records will be subject to any instruction given by IICSA
Safeguarding Policy	20 years
Examination results (school's copy)	7 years from issuance of results
Allegations of sexual abuse	For the time period of an inquiry by the Independent Inquiry into Child Sexual Abuse

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)
Photographs of learners	As set out in the academies photo consent form (Schools: For the time the learner is at the school and for a short while after. College: 7 years) Please note select images may also be kept for longer (for example to illustrate history of the academy)
Parental consent forms for trips (including Duke of Edinburgh) 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 academy)
Parental permission slips for trips where there has been a major incident	Date of birth of the learner involved in the incident plus 25 years. (Permission slips for all the learners on the trip should be retained for this period to demonstrate the rules had been followed for all learners)
Video auditions as part of applications process	On completion of enrolment for all applicants

<b>Curriculum Management</b>	
Learner's work (excluding exam assessment records and learner evidence – see below)	Where possible, returned to learner at the end of the academic year (provided the academy has its own internal policy to this effect). Otherwise, the work should be retained for the current year plus 1 year
Exam assessment records and learner evidence (i.e. coursework and portfolio work)	Current year plus 3 years
Mark books	Current year plus 1 year
Schemes of work	Current year plus 1 year
Timetable	7 years
Class record books	Current year plus 1 year
Record of homework set	Current year plus 1 year

<b>Other Records</b>	
Emails	5 years. Emails will be automatically deleted, where the system allows, after this time.
Messages on internal chat systems	3 months
CCTV	No longer than 30 days unless there is an ongoing investigation or footage is required for legal reasons

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 Trust carried out by contractors or employees of the Trust	Whilst the building belongs to the Trust
Records relating to the letting of Trust 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