

**Remarkable Autism Ltd**  
**The Autism Specialists**

**Data Retention Policy**  
April 2025

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**Remarkable**

<b>Reviewer:</b>	IT Manager
<b>Co-Reviewer:</b>	Deputy CEO
<b>Updated:</b>	April 2025
<b>Next Review:</b>	April 2028
<b>Committee:</b>	Finance & Business Resources
<b>Approved by the full Governing Body/Board of Trustees:</b>	30.04.25

Commented [Gv1]: As per previous policy

**This policy should be read in conjunction with the following policies:**

1	Data Protection
2	Data Breach
3	Cyber Security
4	CCTV

**Change History Record**

<b>Current Version</b>	<b>Previous Version</b>	<b>Summary of changes made</b>	<b>Section Heading &amp; Page Number</b>
April 2025	April 2023	Added Roles and Responsibilities table	Roles and Responsibilities – Page 4
		Separated Policy and Procedure sections	Throughout
		Updated Retention Table to reflect latest best practice	Appendix B – Page 10

Contents

Introduction ..... 4

Policy ..... 4

Retention Schedule Management ..... 4

Roles and Responsibilities ..... 4

Policy Review..... 6

Procedure ..... 7

Appendix A..... 7

Retention Schedule Management ..... 7

Destruction of Records ..... 7

Retention of Safeguarding Records ..... 7

Archiving and Transferring Information..... 8

Learner/Student Records ..... 8

Monitoring and Compliance ..... 9

Emails..... 9

Appendix B. .... 10

Retention Schedule ..... 10

Policy Impact ..... 13

## Introduction

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

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

The organisation has a responsibility to maintain accurate records and manage record-keeping systems effectively. When doing so, it considers:

- 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 and may be amended at any time. Employees will be notified of any changes within one month of implementation.

## Policy

### Retention Schedule Management

- Data will only be retained for as long as necessary, in line with business, legal, and regulatory requirements.
- Records will be stored securely, and access will be restricted to authorised personnel.
- Personal and sensitive data will be handled in accordance with UK GDPR.
- When records are no longer needed, they will be securely deleted or disposed of.
- Special categories of data, including safeguarding records, will have extended retention periods where necessary.

### Roles and Responsibilities

Role	Responsibility
Trustees & Governors	Provide strategic oversight and ensure data retention and disposal

	are embedded in governance and risk management frameworks.
CEO	Holds overall accountability for compliance with data retention requirements. Delegates responsibility to senior leaders while remaining answerable to the Board.
Deputy CEO	Oversees implementation across departments. Ensures senior leaders (e.g. SLT, People & Culture Manager, Finance Manager) are aware of their obligations and supported in meeting them.
Data Protection Officer (DPO)	Advises on legal requirements and best practice. Monitors compliance and supports departments with applying the retention schedule correctly.
IT Manager	Implements and maintains systems to enforce retention schedules and support secure deletion. Raises awareness of digital data retention responsibilities and supports training efforts.
School Administrators	Responsible for day-to-day management of school records, ensuring accurate retention and secure disposal in accordance with policy.
Departmental Leads (e.g. SLT, P&C Manager, Finance Manager)	Ensure teams apply the retention policy to the data they manage. Act as champions within their area and support staff to comply.
All Employees	Must follow the retention policy, understand what records they are responsible for, and ensure timely disposal of data. Must report concerns or uncertainty to their line manager or the DPO.

### Policy Review

This policy is subject to an annual review to ensure compliance with UK GDPR and other relevant legislation. Updates will be approved by the full Governing Body/Board of Trustees.

## Procedure

### Appendix A.

#### Retention Schedule Management

The organisation follows a defined retention schedule specifying retention periods for different record types (See table below).

Regular internal reviews ensure compliance with retention schedules.

#### Destruction of Records

Before destruction, all records must be reviewed to ensure there are no legal, regulatory, safeguarding, or business reasons to retain them.

Destruction of records must be carried out in accordance with the approved retention schedule and documented using the organisation's Data Destruction Record.

Each year, the IT Manager will remind all departments to review and act upon their retention schedules.

Departmental leads must confirm when data is due for destruction. Final authorisation must be recorded using the Data Destruction Record and will be overseen by the Data Protection Officer (DPO) to ensure compliance and accountability.

Where appropriate, managers should review and confirm that records are due for destruction before the process takes place.

- Paper records containing personal or sensitive information must be securely shredded.
- Electronic records must be permanently deleted from all locations, including backups where possible.

The Data Destruction Record must include:

- File reference or identifier
- Description of the record
- Date of destruction
- Authorising officer
- Person responsible for destruction

#### Retention of Safeguarding Records

**Commented [Gv2]:** Assuming Appendix A is a procedure but not very clear. Suggest as with previous policy to separate out more

**Commented [SL3R2]:** Missed the heading, now fixed.

**Commented [Gv4]:** What is the process though? Surely we shouldn't be getting rid of anything without a proper approval process?

**Commented [SL5R4]:** I've adapted the policy to work for now but we should talk about the procedure moving forward. Sign off can be applied to our existing register.

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

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

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

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

### Archiving and Transferring Information

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. 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.

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

### Learner/Student Records

Parents/Carers/those with parental responsibility, have a legal right to free access to their child's educational record (which includes most information about a learner/student) within 15 working days of receipt of a written request.



### Monitoring and Compliance

The IT Manager holds day-to-day responsibility for implementing this policy and ensuring that technical systems support effective data retention and secure deletion. The Data Protection Officer (DPO), supported by the IT Manager, is responsible for reviewing the policy's effectiveness, advising on legal compliance, and recommending improvements to management.

Where appropriate, internal audits may be carried out to assess whether retention practices are being followed and whether control measures around data creation, storage, and disposal are working effectively.

Management at all levels are responsible for ensuring that staff understand their responsibilities under this policy and receive suitable and regular training to support compliance. These duties are also reflected in the Roles & Responsibilities table.

### 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.

### Policy Impact

We have a rolling programme for reviewing our Company policies. We regularly review the impact of our policies on the needs, entitlements and outcomes for students, service users, staff, trustees, governors and parents.

## Appendix B.

## Retention Schedule

File Description	Retention Period
<b>Employment Records</b>	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference. In this case, application forms will give applicants the opportunity to object to their details being retained
Job applications and interview records of successful candidates	Added to staff personnel file and retained in line with that record (6 years after employment ceases)
Written particulars of employment, contracts of employment and changes to terms and conditions	Added to staff personnel file and retained in line with that record 6 years after employment ceases.
Right to work documentation including identification documents and immigration checks	Kept separately from personnel file and retained for 2 years after employment ceases. <b>Employer's guide to right to work checks: 21 June 2024</b>
DBS checks and disclosures of criminal records forms	DBS certificates should be destroyed as soon as practicable after the check has been completed and the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months
Change of personal details notifications	No longer than 6 months after receiving this notification
Emergency contact details	Destroyed on termination
Personnel records	While employment continues and up to six years after employment ceases (Limitation Act 1980)

**Commented [Gv6]:** Does this mirror a national/approved schedule for charities or educational establishments? If so this should be listed

**Commented [SL7R6]:** There isn't a single national/approved schedule, we just follow GDPR guidance. The schedule used here is an up to date list provided by Judicium.

**Commented [Gv8]:** Have we also checked that this schedule agrees to the national/approved schedule

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
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards
Working Time Regulations: <ul style="list-style-type: none"> <li>• Opt out forms</li> <li>• Records of compliance with WTR</li> </ul>	<ul style="list-style-type: none"> <li>• Two years from the date on which they were entered into</li> <li>• Two years after the relevant period</li> </ul>
Disciplinary records	6 years after employment ceases (Limitation Act 1980)
Grievance records	6 years after employment ceases (Limitation Act 1980)
Training	6 years after employment ceases (Limitation Act 1980) or length of time required by the professional body
Staff training where it relates to safeguarding or other child related training	Date of the training plus 40 years (This retention period reflects that the IICSA may wish to see training records as part of an investigation)
Annual appraisal/assessment records	Current year plus 3 years
Professional Development Plans	Life of the plan or plan superseded + 6 years
Allegations of a child protection nature against a member of staff including where the allegation is unfounded	10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed.
<b>Financial and Payroll Records</b>	
Pension records	12 years
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	6 years from the end of the scheme year in which the event took place
Payroll and wage records	6 years after end of tax year they relate to (Taxes Management Act

	1970; Income and Corporation Taxes 1988)
Maternity/Adoption/Paternity Leave records	3 years after end of tax year they relate to (Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567))
Statutory Sick Pay	3 years after the end of the tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Current bank details	Until updated plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Bonus Sheets	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Time sheets/clock cards/flexitime	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Pupil Premium Fund records	Date pupil leaves the provision plus 6 years
National Insurance (schedule of payments)	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Insurance	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Overtime	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Annual accounts	Current year plus 6 years
Loans and grants managed by the School	Date of last payment on loan + 6 years if the loan is under 10,000 or date of last payment on loan + 12 years if the loan is over 10,000
All records relating to the creation and management of budgets	Life of the budget plus 3 years
Invoices, receipts, order books and requisitions, delivery notices	Current financial year plus 6 years
Student Grant applications	Current year plus 3 years

Pupil Premium Fund records	Date pupil leaves the provision or school plus 6 years
School fund documentation (including but not limited to invoices, cheque books, receipts, bank statements etc).	Current year plus 6 years
Free school meals registers (where the register is used as a basis for funding)	Current year plus 6 years
School meal registers and summary sheets	Current year plus 3 years
<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
Strategic Plan or School Development Plans	Life of plan or until plan superseded + 3 years. If major changes are made to the plan, then an archive copy of previous plans should be retained
Visitor Signing-in Records	6 years
Newsletters and circulars to staff, parents and pupils	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
<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 provided that all records relating to the incident are held on personnel file
Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	Until the child reaches the age of 21. (Limitations Act 1980)
Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	Date of last entry in the accident book + 3 years but if there is possibility of negligence allegation then date of incident + 15 years or date of settlement + 6 years. (Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980)
Fire precaution log books	Current year plus 6 years
Medical records and details of: - <ul style="list-style-type: none"> <li>control of lead at work</li> <li>employees exposed to asbestos dust</li> <li>records specified by the Control of Substances Hazardous to Health Regulations (COSHH)</li> </ul>	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>Temporary and Casual Workers</b>	
Records relating to hours worked and payments made to workers	3 years
<b>Governing Body Documents</b>	
Instruments of government	For the life of the School. Consult local archives before disposal
Meetings schedule	Current year
Minutes – principal set (signed)	Date of meeting + 10 years

Agendas – principal copy	Where possible the agenda should be stored with the principal set of the minutes
Agendas – additional copies	Date of meeting
Policy documents created and administered by the governing body	Until replaced
Register of attendance at full governing board meetings	Date of last meeting in the book plus 6 years
Annual Reports created under the requirements of the Education (Governors Annual Reports) (England) (Amendment) Regulations 2002	Date of report plus 10 years
Records relating to complaints made to and investigated by the governing body or head teacher	Major complaints: current year plus 6 years. If negligence involved: current year plus 15 years. If child protection or safeguarding issues are involved then: current year plus 40years. If the complaint relates to child sexual abuse, then indefinitely. (Based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)
Correspondence sent and received by the governing body or head teacher	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 except where there have been allegations concerning children. In this case retain for 25 years.
Register of business interests	Date appointment ceases plus 10 years (Companies Act 2006)
Records relating to the training required and received by governors	Date appointment ceases plus 6 years
Records relating to the appointment of a clerk to the governing body	Date on which clerk appointment ceases plus 6 years
Governor personnel files	Date appointment ceases plus 6 years

<b>Pupil Records</b>	
Details of whether admission is successful/unsuccessful	1 year from the date of admission/non-admission (School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels)
Proof of address supplied by parents as part of the admissions process	Current year plus 1 year ( School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels)
Admissions register	Entries to be preserved for six years from date of entry (Working together to improve school attendance, Section, 36, 2024 Statutory guidance)
Pupil Record, including non-child protection safeguarding records.	Primary – Whilst the child attends the School (The Education (Pupil Information) (England) Regulations 2005, The Pupil Information (Wales) Regulations 2011) Secondary – until the child reaches the age of 25 (Limitation Act 1980, Section 2)
Attendance Registers	Six years from the date of entry (Working together to improve school attendance, Section 36, 2024 Statutory guidance)
Correspondence relating to any absence (authorised or unauthorised)	Current academic year plus 2 years (Education Act 1996, Section 7)
Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Primary school - whilst the child attends the school. Secondary - 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)
Child protection information (to be held in a separate file).	DOB of the child plus 25 years then review. If aspects of the record relate to child sexual abuse, then these records should be retained indefinitely. (Based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)
Exam results (pupil copy)	This information should be added to the pupil file and retained in line with that record.
Examination results (school's copy)	Current year plus 6 years
Allegations of sexual abuse	If the complaint relates to child sexual abuse then indefinitely. (Based on recommendations left by the IICSA, will be reviewed upon publication of ICO guidance)
Records relating to any allegation of a child protection nature against a member of staff	Until the accused normal retirement age or 10 years from the date of the allegation (whichever is the longer) (Retention period informed by the guidance of KCSIE)
Consents relating to school activities as part of UK GDPR compliance (for example, consent to be sent circulars or mailings)	Evidence of consent will be retained whilst the pupil attends the school, or until withdrawn, whichever the shorter.
Pupil's work	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)
Parental consent forms for school trips where there has been no major incident	End of the trip or end of the academic year (subject to a risk assessment carried out by the School)
Parental permission slips for school trips where there has been a major incident	Date of birth of the pupil involved in the incident plus 25 years. Permission slips for all the pupils on the trip should be retained to demonstrate the rules had been followed for all pupils
<b>Other Records</b>	
Emails	2-5 years
CCTV	No more than one calendar month
Privacy notices	Until replaced plus 6 years
Inventories of furniture and equipment	Current year plus 6 years
All records relating to the maintenance of the School carried out by contractors or employees of the school	Whilst the building belongs to the school
Records relating to the letting of school premises	Current financial year plus 6 years
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	Current year plus 6 years then review
Referral forms	While the referral is current
Contact data sheets	Current year then review, if contact is no longer active then destroy