



**Southern
Education
Trust**

Data Retention Policy

Next Review: Feb 2028

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;
- The security of the record system;
- Privacy and disclosure;
- Accessibility.

This policy reflects 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 may vary any parts of this procedure, including any time limits, as appropriate in any particular case.

Data Protection

This policy sets out how long employment-related and pupil data will normally be held by the Trust and when that information will be confidentially destroyed in compliance with the terms of the General Data Protection Regulation (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 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 will adhere to the standard retention times listed within that schedule.

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. All other paper records should be disposed of by an appropriate waste paper merchant. All electronic information will be deleted.

Record Keeping of Safeguarding

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

For any other allegations made, the Trust 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 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. 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 Trust may have in relation to an Inquiry.

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.

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.

Responsibility and Monitoring

Headteachers and those in schools responsible for data protection, in conjunction with the Trust and the DPO, are responsible for monitoring the use of this policy.

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 Trusts, via their schools, are under a duty to maintain a pupil record for each pupil. If a child changes Trusts, the responsibility for maintaining the pupil record moves to the next Trust. We retain the file for a year following transfer in case any issues arise as a result of the transfer.

Retention Schedule

Retention schedule file description	Retention period
Employment Records	
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	6 years after employment ceases
Written particulars of employment, contracts of employment and changes to terms and conditions	6 years after employment ceases
Right to work documentation including identification documents	6 years after employment ceases
Immigration checks	
DBS checks and disclosures of criminal records forms	Two years after the termination of employment
	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, disciplinary and training records	While employment continues and up to six years after employment ceases
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:	
• Opt out forms	• Two years from the date on which they were entered into
• Records of compliance with WTR	• Two years after the relevant period
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.
Financial and Payroll Records	
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
Maternity/Adoption/Paternity Leave records	3 years after end of tax year they relate to
Statutory Sick Pay	3 years after the end of the tax year they relate to
Current bank details	Until replaced/updated plus 3 years
Agreements and Administration Paperwork	
Collective workforce agreements and past agreements that could affect present employees	Permanently
Trade union agreements	10 years after ceasing to be effective
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)

Health and Safety Records

Health and Safety consultations	Permanently
Health and Safety Risk Assessments	Life of the risk assessment 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
Fire precaution log books	6 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
Records of tests and examinations of control systems and protection equipment under COSHH	Records of tests and examinations of control systems and protection equipment under COSHH

Temporary and Casual Workers

Records relating to hours worked and payments made to workers	3 years
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Pupil Records

Details of whether admission is successful/unsuccessful	1 year from the date of admission/non-admission
Admissions register	Entries to be preserved for three years from date of entry
School Meals Registers	Current year plus 3 years
Free School Meals Registers	Current year plus 6 years
Pupil Record	Secondary – until the child reaches the age of 25
Attendance Registers	6 years from the date of the register entry (was 3 years prior to Sept 2024)
Special Educational Needs files, reviews and individual education plans (this includes any statement and all advice and information shared regarding educational needs)	Until the child turns 25
Emails	Date of receipt plus 1 year

Other Records – Teaching School

Applications for School Direct 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
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	the opportunity to object to their details being retained
School Direct applications and interview records of successful candidates	6 years after employment ceases
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.
Emergency contact details	Destroyed on termination
Applications for TSST/Internship Programmes 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
Applications for TSST/Internship Programmes and interview records for successful candidates	6 years after employment ceases
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.
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