



Data Retention Policy

Approved by the Trust Board's Audit and Risk Committee on 2 October 2025

Applicable from 3 October 2025

Appendix 5 of Data Protection Policy

Last Reviewed:	September 2025 (in preparation to seek approval in October 2025)
Reviewed by:	Tammy Pyszky, Head of Data Protection
Next Review Date:	October 2026

This document will be reviewed annually, or sooner when significant changes are made to the law.

Version	Version changes
V2-produced August 2024	<p>Small amendment to language has been made following changes to the scheme of delegation and introduction of community council members to the governance structure.</p> <p>Changes to the retention period for admissions and attendance data (changed from 3 years to 6 years from point of entry)</p> <p>Added a retention period for biometric data and photography.</p> <p>Added a retention period for external candidate files.</p> <p>Added a retention period for student files for external candidates.</p> <p>Increased retention period for data collected following a SAR or FOI.</p>
V3 produced September 2025	<p>Repositioned details concerning our email deletion policy.</p> <p>Changed format of schedule to landscape</p> <p>Added clarity around what should happen to SEND information when a child changes school.</p> <p>Added information about requests for information where information should have been destroyed.</p> <p>Added retention/deletion periods for Google accounts for both pupils and staff.</p>

	<p>Further clarity around retention rules on bump notes and accident forms.</p> <p>Replaced Data Protection Officer with Head of Data Protection throughout.</p> <p>Amended retention period for successful admissions</p>
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Co-op Academies Trust Data Protection Policy

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1. Introduction

- 1.1. In line with the UK General Data Protection Regulations (UK GDPR), the Co-op Academies Trust (the Trust) has a responsibility to ensure that all records are only kept for as long as is necessary. This policy sets out the periods of retention for the information or records that we process and applies to all information, regardless of format.

2. Roles and Responsibilities

- 2.1. The Trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The Head of Data Protection has overall responsibility for this policy.
- 2.2. The Data Protection Ambassador in each academy will give guidance to staff in regard to good records management practice and will promote compliance with this policy.
- 2.3. All employees must ensure that records for which they are responsible are accurate and maintained. At the end of their retention period, it is their responsibility to ensure that such records are disposed of in accordance with this policy

3. How long should we keep our records

- 3.1. Records should be kept for as long as they are needed to meet the operational needs of the Trust, together with legal and regulatory requirements. We have assessed our records to:
 - 3.1.1. Determine their value as a source of information about the Trust, its operations, relationships and environment
 - 3.1.2. Assess their importance as evidence of business activities and decisions
 - 3.1.3. Establish whether there are any legal or regulatory retention requirements (including: Public Records Act (1958), the Freedom of Information Act (2000), the Limitation Act (1980), the Data Protection Act (2018).
- 3.2. Where records are likely to have a historical value, or are worthy of permanent preservation, we may choose to archive them at the end of any retention period.

- 3.3. Where information is to be archived or destroyed, schools must carry out such processing by no later than the August after the expiration of the retention period.

4. Retention schedule

- 4.1. The retention schedule (below) has been produced in line with legislation, regulations affecting schools, and best practice as promoted by the Information Record Management Society (IRMS). This may not be an exhaustive list and where academies are unsure of particular retention periods, they should seek further guidance from the Trust's Head of Data Protection.
- 4.2. The schedule suggests a number of actions that can be taken to dispose of information once it has reached the end of its retention period:
- 4.2.1. Regular disposal - Records can be placed in a normal rubbish bin or skip.
 - 4.2.2. Secure disposal - For information to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed. Skips and regular waste disposal will not be considered secure.

Paper records must be shredded using a cross-cutting shredder, pulped or burned.

CDs/ DVDs and other storage media should be destroyed to particles no larger than 6mm.

Any electronic data should be deleted alongside any back-ups.
 - 4.2.3. Secure disposal 'must be shredded' - Information is likely to be so sensitive it must be shredded on site, by a member of staff, and not left waiting for collection by an external company.
 - 4.2.4. Review: At the end of the retention period, a review may be necessary to ascertain whether a further retention period is required to the one advised. If a further retention period isn't necessary, the information must be securely disposed of.
 - 4.2.5. Transfer: At the end of the retention period the information may be transferred to a different company or establishment. Where this is the case the information should be sent securely via encrypted email or other secure electronic means; by recorded delivery; or delivered by hand.
- 4.3. If the Trust receives a request for records that have not yet been destroyed, even if they should have been destroyed, that record will still be made

available to the requestor, unless a legal exemption to disclosure is appropriate.

5. Child Protection Records

- 5.1. Regardless of the suggested retention timescales set out below, the Trust may at its discretion extend the retention period to any information if, upon review, it is felt that a child's safety may be at risk should the information be destroyed. Where such a decision is made, this will be documented and reviewed on a regular basis.

6. Email

- 6.1 Whilst emails are not considered to be anything more than a communication tool, the Trust has applied a 14 month rolling auto deletion policy to our Google Mail for members of staff. This means that any email older than 14 months will be deleted. Where the email has content that forms part of a record, information must be transferred to the appropriate record (e.g. the HR file, Arbor, CPOMs etc) as soon as possible and retained in line with the schedule below.

7. Using a third party

- 7.1. Academies may choose to use an external company to support them with their secure disposal. If doing so, academies must carry out checks to ensure that the company is reputable and will destroy the documents securely.
- 7.2. There should be a contract and a data processing agreement in place with the company to provide assurance that they will comply with the Data Protection Act and UK GDPR.
- 7.3 A record of disposal should also be maintained (see record keeping).

8. Record-Keeping

- 8.1. It is not necessary to document the disposal of records when it has been done in line with the records retention schedule below, unless a third party provider has been used.
- 8.2. Where equipment and confidential waste has been sent for disposal or destruction by a third party, a log should be kept of the date the waste was collected, the company used, and a brief description of the files destroyed. The third party may provide you with a certificate of destruction which should also

be recorded.

- 8.3. Documents disposed of outside the retention schedule, either by being disposed of earlier or kept for longer than listed, will also need to be recorded. A log should be kept of the date the decision was made, the authorising officer, a brief description of the files involved and the reason for the decisions made.
- 8.4. These records will provide an audit trail for any inspections conducted by the Information Commissioner's Office and will aid in addressing Freedom of Information requests, where we no longer hold the information.

9. Monitoring

- 9.1. The Head of Data Protection will review this policy on an annual basis, or more often if required.

10. Retention Schedule

Pupils, Curriculum and Outcomes

Basic File Description	Retention Period	Action Required At End Of Retention Period
All records relating to creation and implementation of the Admissions Policy	Life of the policy + 3 years	Review
Paperwork relating to successful admissions	Add to pupil file	Secure disposal
Paperwork relating to unsuccessful admissions	Resolution of case + 1 year	Secure disposal
Register of admissions	For each entry - date of entry + 6 years	Secure disposal
Proof of address supplied by parents as part of the admissions process	Current year + 1 year	Secure disposal
Supplementary information supplied for admission process such as information regarding religion and medical conditions	Successful admissions - add to pupil file Unsuccessful admission - retain until appeal process complete	Successful admissions - see retention period for pupil file Unsuccessful admissions - secure disposal

Published Admission Number reports	Current year + 6 years	Secure disposal
Pupil File (Primary)	Retain whilst at primary school	Follow the pupil when they leave the primary school to either: - Another primary - Secondary school - Pupil referral unit If the pupil leaves under any other circumstance, the file should be sent to the local authority to retain.
Pupil Education Record (Secondary) or last known school)	Date of birth of pupil + 25 years	Secure disposal
External Candidate Records (College)	Date candidate left the college + 7 years	Secure disposal
Secondary transfer sheets	Current year + 2 years	Secure disposal
Records regarding exclusions	Date of birth of pupil + 25 years	Secure disposal
Attendance registers	Every entry in the register must be preserved for 6 years after the date of the entry	Secure disposal
Attendance returns to the local authority	Current year + 1 years	Secure disposal
School census returns	Current year + 5 years	Secure disposal
Walking bus registers	Date of register + 3 years.	Secure disposal

	If an accident occurs, the register will be submitted with the accident report form and retained for the period of time specified for accident reporting.	
SEND files (including reviews, individual education plans, EHCPs and any amendments made to the plan (primary))	Retain whilst at primary school	Follow the pupil when they leave the primary school to either: - Another primary - Secondary school - Pupil referral unit If the pupil leaves under any other circumstance, the file should be sent to the local authority to retain.
SEND files (including reviews, individual education plans , EHCPs and any amendments made to the plan (secondary or last known school))	Date of birth + 25 years	Secure disposal
Management of exam registrations	Each exam board will have their own retention period that should be followed	Refer to exam board for retention period
Public examination results (pupil copy)	Certificates given to pupils and outcomes recorded on their pupil file	Refer to retention periods for pupil files. All uncollected certificates to be returned to the examination board after date of exam + 1 year

Internal examination results (pupil copy)	Added to pupil file	Refer to retention period for pupil file
Examination results (schools copy)	Current year + 6 years	Secure disposal
Curriculum returns	Current year + 3 years	Secure disposal
SATs exam papers	Retain until any appeal/validation process is complete	Secure disposal
Value added and contextual data	Current year + 6 years	Secure disposal
Schemes of work	Current year + 1 year	Secure disposal
Timetable	Current year + 1 year	Secure disposal
Class lists	Current year + 1 year	Secure disposal
Mark books	Current year + 1 year	Secure disposal
Record of homework set	Current year + 1 year	Secure disposal
Pupils work	Where possible all work should be returned to pupil at the end of the academic year. If not possible, retain for current year + 1 year	Secure disposal
Records created in order to obtain approval for educational trips	Primary - Date of visit + 14 years Secondary - Date of visit + 10 years	Secure disposal
Parental consent forms for non-residential	Conclusion of the trip	Secure disposal

trips where no major incident		
Parental consent forms for non-residential trips where major incident occurred	Consent forms for all pupils on the trip should be retained for - date of birth of pupil involved + 25 years	Review
Parental consent for residential trips	Date of birth of youngest pupil involved + 25 years	Secure disposal
Pupil Google Account (including GMail, Google Classroom, Google Drive and any other associated apps)	Date of leaving + 3 years	Deleted by Central IT
Safeguarding		
Safeguarding records where child is not looked after, and leaves and doesn't transfer to another school	Concerns were at low level / threshold for referral to social care not met / no inter-agency involvement - Date of birth + 25 years A referral was made / social care involved / other agencies involved - date child left school + 35 years	Secure disposal
Safeguarding records where child who is not looked after, leaves school and moves to another school; or where the child is under 18 and leaves to attend college	Chronology of events should be retained as above. Where new school has CPOMS - no action required (other than to retain	Secure disposal.

	<p>chronology) as new school can access this once child on roll</p> <p>Where the new school doesn't have CPOMS, or where we hold other safeguarding records, these should be hand delivered to the DSL of the new school. If it is necessary to post the file, this should be by recorded delivery and a copy of the entire file should be kept until the new setting confirms safe receipt.</p>	
Safeguarding records for child who is looked after	Date child leaves school + 75 years	Secure disposal
Allegation which is child protection in nature against a visitor/volunteer, including where the allegation is unfounded	Until the person's normal retirement age or 10 years from the date of the allegation (whichever is longer)	Review
Hard copy cause for concern forms (completed by colleagues/visitors who don't have access to CPOMS)	Scanned to CPOMS where appropriate and hard copies retained in line with the retention periods detailed above	Review then secure disposal.
Human Resources		
Basic File Description	Retention Period	Action Required At End Of Retention

		Period
All records leading up to the appointment of a new Headteacher	All relevant information added to the personnel file (see below) and all other information retained from date of appointment + 6 years	Secure disposal
All records leading up to the appointment of a new member of staff - successful candidate	All relevant information added to the personnel file (see below) and all other information retained for 6 months	Secure disposal
All records leading up to the appointment of a new member of staff - unsuccessful candidates	Date of appointment of successful candidate + 6 months	Secure disposal
Pre-employment vetting information - DBS checks	<p>A copy of the DBS certificate should only be kept in the following circumstances:</p> <p>It isn't usual practice to keep a copy of the DBS certificate. However, it is sometimes kept for a period of time:</p> <p>a) if there is a formal risk assessment (positive disclosure form) in place. DBS is kept for the duration of the risk assessment or until such time that the convictions would be filtered by DBS (whichever is sooner)</p>	Secure disposal

	b) If we are waiting for a new starter's DBS to arrive, we may keep a copy of a DBS from a previous employer (if one has been provided), until the new DBS has been received.	
Proof of ID collected for DBS check	Checked and a note made of what was seen. If felt necessary copy documents can be added to personnel file.	Secure disposal
Evidence of right to work in the UK	Where possible, these documents should be added to the personnel file, but if they are kept separately, Home Office requires that they are kept for 2 years from termination of employment.	Secure disposal
Records relating to TUPE	Date last member of staff transfers or leaves the organisation + 6 years	Secure disposal
Staff personnel files, including contract and training records	Termination of employment + 6 years	Secure disposal
Time sheets	Current year + 6 years	Secure disposal
Performance management records	Current year + 5 years	Secure disposal
Records relating to the agreement of pay and conditions	Date pay and conditions superseded + 6 years	Secure disposal

Training needs analysis	Current year + 1	Secure disposal
Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded	Until the person's normal retirement age or 10 years from the date of the allegation (whichever is longer)	Review
Other disciplinary records where case not found	If the incident is child protection related see above; otherwise dispose of at conclusion of the case	Secure disposal
Disciplinary sanctions	Remain on personnel File	See retention period for personnel file.
Staff Google Accounts (including GMail, Google Drive, Calendar and any other associated apps)	Date of leaving + 2 years	Central IT will delete.
Finance		
Basic File Description	Retention Period	Action Required At End Of Retention Period
All records relating to the creation and management of budgets	Life of the budget + 3 years	Secure disposal
Trustees Annual Report and Financial Statements	Date of report + 10 years	Secure disposal
Independent auditors report on regularity and report on financial	Financial year report relates to + 6 years	Secure disposal

statements		
Funding agreements	Date of last payment of funding + 6 years	Secure disposal
Funding records (capital grants, EAG, GAG etc)	Date of last payment of funding + 6 years	Secure disposal
Gift aid and tax relief	Date of last payment + 6 years	Secure disposal
Loans and Grants	Date of last payment on loans + 12 years	Secure disposal
Student grant applications	Current year + 3 years	Secure disposal
School fund records	Current financial year + 6 years	Secure disposal
School meal registers, including evidence of successful FSM eligibility checks	FSM - current year + 6 years; Other - current year + 3 years	Secure disposal
All other financial records and documents	Current financial year + 6 years	Secure disposal
Payroll		
Basic File Description	Retention Period	Action Required At End Of Retention Period
Maternity pay records	Current year + 3 years	Secure disposal

Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	From the end of the year in which the accounts were signed + 6 years	Secure disposal
Records relating to pensions	Date of last payment on the pension + 6 years	Secure disposal
Payroll records	Date of payroll run + 6 years	Secure disposal
Contracts and Licences		
Basic File Description	Retention Period	Action Required At End Of Retention Period
All records relating to the management of contracts under seal (executed as a deed, signed and witnessed)	Last payment on contract + 12 years	Secure disposal
All records relating to the management of any other contract	Last payment on contract + 6 years	Secure disposal
Records relating to the monitoring of contracts	Current year + 2 years	Secure disposal
Records relating to software licences	Date licence expires + 6 years	Secure disposal
Risk Management and Insurance		
Basic File Description	Retention Period	Action Required At End Of Retention

		Period
Visitors books and signing in records	Current year + 6 years	Secure disposal
Insurance policies	Date policy expires + 6 years	Secure disposal
Records relating to the settlement of insurance claims	Date claim settled + 6 years	Secure disposal
Employers liability insurance certificate	Closure of the Trust + 40 years	Secure disposal
Risk and control framework/Risk Register	Life of framework + 6 years	Secure disposal
H&S risk assessments (not fire - see below)	Life of risk assessment + 3 years	Secure disposal
Records of all minor injuries where no action is needed other than an icepack, wet paper towel, plaster etc i.e. bump notes	Date of incident + 6 months	Secure disposal
Accident books	3 years after last entry	Secure disposal
Records of accidents to child where action is taken (child collected, child taken to hospital etc)	Date of birth + 25 years	Secure disposal
Accident Reporting Forms for adults (for injuries where action is needed - such reports may be filed on Parago for example)	Date of incident + 7 years and review. If injury was serious enough for a RIDDOR report to be filed, follow the	Secure disposal

	retention period below for records relating to an accident/injury at work.	
Records relating to accident/injury at work	Date of incident + 12 years	Review (in the case of serious accidents, a further retention period may need to be applied, if not - secure disposal)
Other incident reports	Current year + 20 years	
Control of substances hazardous to health	Current year + 10 years	Review
Asbestos monitoring/management	Last action + 40 years	Secure disposal
Radiation monitoring/management	Last action + 50 years	Secure disposal
Fire precaution log books	Current year + 6 years	Secure disposal
Fire risk assessments	Life of the risk assessment + 6 years	Secure disposal
Business Continuity Plans	Date the plan was superseded + 3 years	Secure disposal
Property and Asset Management		
Basic File Description	Retention Period	Action Required At End Of Retention Period

Land and building valuations	Date valuation superseded + 6 years	Secure disposal
Leases for land and other property.	Date lease expires + 6 years	Secure disposal
Transfer of land	Life of land ownership	Transfer to new owner
Property plans	Life of land ownership	Transfer to new owner
Records relating to the letting of school premises	Current year + 6 years	Secure disposal
Inventories of furniture and equipment	Current year + 6 years	Secure disposal
Disposal of assets	Date asset disposed of + 6 years	Secure disposal
Burglary, theft and vandalism reports forms	Current year + 6 years	Secure disposal
Property maintenance records	Current year + 6 years	Secure disposal
Acquiring, disposing of and maintenance of vehicles	Disposal of the vehicle + 6 years	Secure disposal
Service logs for vehicles	Leased vehicle - return to lease company with vehicle	Return to lease company
	Owned vehicle - Life of vehicle + 6 years	Secure disposal
GPS tracking data	Date of journey + 6 years	Secure disposal

Policies		
Basic File Description	Retention Period	Action Required At End Of Retention Period
Accessibility Plan	Date policy superseded + 3 years	Secure disposal
Charging and Remissions; Data Protection Policies and associated appendices; Freedom of Information; Special Educational Needs; Complaints and Home School Agreement	Date policy superseded + 6 years	Secure disposal
Equality Information and Objectives (PSED) Statement for Publication	Date of statement + 6 years	Secure disposal
Health and Safety Policy and Admissions Policy	Life of policy + 3 years	Secure disposal
All other policies	Destroy when policy superseded	Secure disposal
Management		
Basic File Description	Retention Period	Action Required At End Of Retention Period
Minutes of meetings	For governance meetings see governance retention periods. For all other meetings - date of meeting + 3	Review

	years	
Reports created by the academy or the Trust	Date of report + 3 years	Secure disposal
Records created by the academy trust	Current academic year + 6 years	Secure disposal
Correspondence created by the academy trust	Date of correspondence + 3 years	Secure disposal
Professional Development Plans	Life of the plan + 6 years	Secure disposal
Self-evaluation forms	Current year + 6 years	Secure disposal
Management of complaints	Stage 1 and 2 complaints - date complaint resolved + 3 years. Stage 3 complaint - date complaint resolved + 6 years	Secure disposal
Records relating to the creating and publication of academy and Trust brochure or prospectus	Current year + 3 years	Secure disposal
Records relating to the creation and distribution of circulars and newsletters	Current year + 1 year	Secure disposal
Records relating to the creation and management of Parent Teacher Association and other parent forums	Current year + 6 years	Secure disposal

Ofsted reports and papers	Life of the report	Review
Returns made to central government	Current year + 6 years	Secure disposal
Governance		
Basic File Description	Retention Period	Action Required At End Of Retention Period
Articles of Association	Life of the Academy Trust	Regular disposal
Memorandum of Association	Life of the Academy Trust	Secure disposal
Constitution	Life of the Academy Trust	Regular disposal
Special Resolutions	Life of the Academy Trust	Secure disposal
Written Scheme of Delegation (SoD)	Life of the SoD + 10 years	Secure disposal
Rules and Bylaws	Date rules/bylaws superseded + 6 years	Secure disposal
Statutory registers (including directors/trustees, members, secretaries, register of interests, registers of gifts and hospitality)	Life of the Trust + 6 years	Secure disposal
Appointment and removal of members, trustees and Community Council Members or equivalent	Life of appointment + 6 years	Secure disposal

Director/trustee disqualification	Date of disqualification + 15 years	Secure disposal
Trustees Annual Report and Financial Statements	Date of report + 10 years	Secure disposal
Annual return/confirmation statement	Date of report + 10 years	Secure disposal
Strategic plans and reviews	Life of plan + 6 years	Secure disposal
Agendas, Minutes and meeting papers	One copy to be retained for the life of the Trust	Secure disposal
Annual schedule of business/agenda planner	Current year	Secure disposal
Procedures for the conduct of meetings (governance document)	Date document superseded + 6 years	Secure disposal
Other Information		
Basic File Description	Retention Period	Action Required At End Of Retention Period
Data retrieved as part of a subject access request or a freedom of information request	<p>A skeleton log will be kept of all information requests.</p> <p>A copy of any outcome letter will be placed on the relevant staff or student file.</p>	<p>N/A</p> <p>Follow retention rules for student/staff file.</p>

	The data retrieved as part of the request will be kept in a secure folder in Google Drive for 2 years following the date of the outcome letter.	Review and then Secure disposal.
Record of breaches and any data collected as part of the investigation.	A skeleton log will be kept of all breaches. Any notes, correspondence or data collated as a result of the investigation will be held for 2 years following the date the breach was realised.	N/A Review and then Secure disposal
Data Processing Agreements, Data Sharing Agreements.	Last payment on contract/date processing or sharing terminated (whichever is later) + 6 years	Secure disposal
Data Protection Impact Assessments.	Life of the DPIA + 6 years	Secure disposal
Biometric Data (e.g. fingerprints)	To be destroyed once the data subject has left the academy or when consent has been withdrawn.	Secure disposal
Photography	The date the data subject has left the academy + 3 years (unless the photograph is deemed worthy of permanent preservation due to their historical or social value (i.e. a significant	Secure disposal

	event in the life of the school; class or yearbook photographs).	
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