

Data Retention Policy and Schedule

Review Date	February 2025	Next Review by Date	February 2026
Reviewed By	CEO		
Approved by Governing Body	Chris Westbury		
Date Approved	24.03.2025		

1. Introduction

Pathways Education Ltd recognises that effective **records management** is essential for **legal compliance, operational efficiency, and safeguarding obligations**. This policy ensures that all **records created, received, or maintained** by the school are securely, **accurately stored and retained for the required period, and securely disposed of** in line with:

- **UK GDPR & Data Protection Act 2018**
- **Education Act 1996**
- **Keeping Children Safe in Education (KCSIE)**
- **Limitation Act 1980**
- **School Admissions Code**
- **DBS Code of Practice**
- **HMRC & Companies Act 2006**
- **Health & Safety at Work Act 1974**

This policy applies to **physical and electronic records** and covers all **staff, governors, and third-party data processors**.

2. Responsibilities

- **Board of Governors:** Responsible for ensuring compliance with **data protection and retention laws**.
- **Headteacher:** Oversees the implementation of **records management processes**.
- **Data Protection Officer (DPO):** Monitors **data retention and disposal procedures**.
- **All Staff:** Ensure that records are stored securely and disposed of in line with this policy.

3. Retention Periods for School Data Pupil Records & Admissions

Record Type	Retention Period	Action at End of Retention	Legal Basis
Pupil Educational Record (General)	Until pupil turns 25	Secure Disposal	Limitation Act 1980
Admissions Forms (Unsuccessful)	6 months	Secure Disposal	School Admissions Code
Proof of Address (Admissions)	1 year	Secure Disposal	School Admissions Code
Attendance Registers	3 years	Secure Disposal	Education Act 1996

Safeguarding & SEN Records

Record Type	Retention Period	Action at End of Retention	Legal Basis
Child Protection Records	DOB + 25 years	Secure Disposal	KCSIE & IICSA
SEND Files (EHCPs)	Until pupil turns 25	Secure Disposal	Special Educational Needs and Disability Act 2001
Therapy & Medical Records	Until pupil turns 25	Secure Disposal	Special Educational Needs and Disability Act 2001

Health & Safety

Record Type	Retention Period	Action at End of Retention	Legal Basis
Accident Reports (Adults)	6 years	Secure Disposal	Limitation Act 1980
Accident Reports (Children)	DOB + 25 years	Secure Disposal	Children's Act 1989
COSHH & Asbestos Exposure	40 years	Secure Disposal	Health & Safety at Work Act

Staff Records & HR

Record Type	Retention Period	Action at End of Retention	Legal Basis
DBS Certificates	6 months max	Secure Disposal	DBS Code of Practice
Disciplinary Records	6-18 months (unless safeguarding)	Secure Disposal	ACAS Guidelines
Payroll & Pension Data	6 years post-employment	Secure Disposal	HMRC Regulations

Staff Training Records (General)	Duration of employment + 6 years	Secure Disposal	ACAS Best Practice
Staff Training Records (Safeguarding, First Aid)	40 years	Secure Disposal	Keeping Children Safe in Education (KCSIE)
Job Applications (Unsuccessful Candidates)	6 months	Secure Disposal	UK GDPR
Job Applications (Successful Candidates)	Duration of employment + 6 years	Secure Disposal	ACAS Best Practice

Governance & Meeting Records

Record Type	Retention Period	Action at End of Retention	Legal Basis
Governing Body Meeting Minutes	10 years	Secure Disposal	Education Act 2002
Senior Leadership Team (SLT) Meeting Minutes	5 years	Secure Disposal	School Policy
Governor Attendance Records	6 years	Secure Disposal	Companies Act 2006
Policies & Procedures	5 years after replacement	Secure Disposal	Ofsted & ISI

Parent & Carer Communications

Record Type	Retention Period	Action at End of Retention	Legal Basis
Complaints & Concerns	6 years	Secure Disposal	Limitation Act 1980
General Correspondence	1 year	Secure Disposal	School Policy

School Trips & Extra-Curricular Activity Records

Record Type	Retention Period	Action at End of Retention	Legal Basis
Parental Consent Forms	1 year after trip	Secure Disposal	School Policy
Risk Assessments	6 years	Secure Disposal	Health & Safety at Work Act
Incident Reports (if applicable)	6 years	Secure Disposal	Limitation Act 1980

Alumni & Former Pupil Records

Record Type	Retention Period	Action at End of Retention	Legal Basis
Alumni Contact Information	Until request for removal	Secure Disposal	UK GDPR

IT Systems & Communications

Record Type	Retention Period	Action at End of Retention	Legal Basis
Staff & Student Email Logs	12 months	Secure Deletion	IT & Security Policy

4. Data Review & Disposal Procedures

- The **DPO & Headteacher** will **review all stored data** annually to identify records eligible for deletion.
- Secure disposal methods will be followed in line with legal and policy requirement

