



Full Governors

03.12.25

Signed
T. A.

Data Retention Policy

Portway Infant School is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible to the appropriate individuals. In line with the requirements of the UK GDPR, the school also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The school has created this policy to outline how records are stored, accessed, monitored, retained and disposed of to meet the school's statutory requirements.

This document complies with the requirements set out in the UK GDPR and Data Protection Act 2018 and is used in conjunction with a full Data Retention Schedule (below is a summary of that schedule).

Basic file description	Who is responsible for managing this data?	Retention Period	Destruction Method	Additional Notes
Pupil Management				
Admissions and Attendance				
Admission Registers		Permanent		
Records relating to the admissions process – if the admission is successful		Admission + 1 year		
Admissions – if the appeal is unsuccessful		Resolution of case + 1 year		
Admissions – Secondary Schools – Casual		Current year + 1 year		
Exclusions & Suspension		DOB of the pupil + 25 years		

Pupil Educational Record				
Proofs of address supplied by parents as part of the admissions process		Current year + 1 year		
Attendance registers		Date of register + 6 years		
Medical and allergy information (including IHCP & PEEP)		DOB of pupil + 25 years then review unless legal action is pending. If so, it may be appropriate to add an additional retention period.		
Letters authorising absence		Date of absence + 2 years		
Pupil Files and/or record cards - Primary		Retain for the time which the pupil remains at the Primary School Transfer to the Secondary School (or other Primary School) when the child leaves the school		In the case of exclusion it may be appropriate to transfer the record to the Local Authority Behaviour Service. If the pupil has left the school and there is no information about which school the pupil has moved onto, or they have moved onto elective home education, or the pupil has moved abroad or to an independent school, then a recorded conversation with the LA about where the records are to be stored must take place.
Pupil Files and/or record cards - Secondary		DOB of the pupil + 25 years		See above
Examination results - Public		Year of examinations + 6 years		Any certificates left unclaimed should be returned to the appropriate Examination Board.
Examination results - Internal examination results		Current year + 5 years if these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary		

Any other records created in the course of contact with pupils		Current year + 3 years then review		
Images held of pupils together with any consents and permissions to publish		All records relating to the image should be retained for the life of the image. The length of time the image is to be retained should be included on the privacy statement		
Special Educational Needs				
Special Educational Needs files, reviews and Individual Education Plans		DOB of the pupil + 35 years		
Statement of Special Educational Needs or EHCP		DOB + 35 years Unless legal action is pending		
Proposed EHCP or Draft Plan		DOB + 35 years Unless legal action is pending		
Advice and information to parents regarding educational needs		DOB + 35 years Unless legal action is pending		
Pupil SEN Files		DOB of pupil + 35 years then review unless legal action is pending. If so, it may be appropriate to add an additional retention period.		
School Trips and Extra Curricular Activities				
Educational Visits outside the Classroom				
Day Trips				
Parental permission slips for school trips – where there has been no major incident		Conclusion of the trip		

Parental permission slips for school trips – where there has been a major incident. Major incident e.g. reportable to HSC, potential claim injury.		DOB of the pupil involved in the incident + 25 years The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils		
Residential Trips				
All records relating to the organization of school residential trips		Date of the residential visit + a minimum of 6 years then review		
Walking Bus				
Walking Bus registers		Date of register + 3 years		This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting
Management of School - Safeguarding				
Adults				
Records of allegations about workers who have been investigated and found to be without substance		These records should not normally be retained once an investigation has been completed.	-	There are some exceptions to this where for its own protection the employer has to keep a limited record that an allegation was received and investigated, for example where the allegation relates to abuse and the worker is employed to work with children or other vulnerable adults
Outcome of an allegation made against a staff member		Until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer		
Children				
Child abuse records (IISCA)		retained for 75 years		any record that relate or could relate to sexual abuse
Local Authority				

Secondary transfer sheets (Primary)		Current year + 2 years		
School Management - Teaching and Curriculum				
Senior Management Team				
Minutes of the Senior Management Team and other internal administrative bodies		Date of meeting + 5 years		
Reports made by the Head Teacher or the management team		Date of report + 3 years		
Records created by Head Teachers, Deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities		Closure of file + 6 years		
Correspondence created by Head Teachers, Deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities		Date of correspondence + 3 years		
Professional development plans		Closure + 6 years		
Curriculum Management				
SATS records including examination results. Exam papers should only be retained if they are required to evidence the results		Current year + 6 years		
School Management - HR, Administration, Finance, Premises and Health & Safety				
Personnel Management				
Staff Personal files		Termination + 6 years		This includes online recruitment checks.

Interview notes and recruitment records (successful candidates)		Termination + 6 years		These should be kept in staff personnel files and also include online recruitment check.
Interview notes and recruitment records (unsuccessful candidates)		Date of interview + 6 months		This includes online recruitment checks.
Pre-employment vetting information (including DBS checks). Retain DBS certificate number on SCR. (successful candidates)		Date of check + 6 years		Please note that schools must not keep copies of the documents which are checked for DBS purposes.
Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's personal file.		
Online presence pre-employment check		Termination of employment + 2 years		Please note this will not be conducted for every employee.
Right to Work in the UK checks		Termination of employment + 2 years		
Disciplinary proceedings: case not found		Take advice from HR Team if the proceedings were child protection related otherwise destroy immediately at the conclusion of the case		
Disciplinary proceedings: written warnings		The duration of the warning	-	If this information has been added to an individual's personnel file, it must be weeded from the file once the retention period has elapsed

Annual appraisal or assessment records		Current year + 5 years		
Low level concerns		Dependant on the nature of the incident - minimum 24 months of the record		
Images held of members of staff together with any consents and permissions to publish		Specify in Privacy Notice how photos of members of staff will be used and duration of use.	When no longer in use.	
Staff personal information - e.g. medical appointments		Review in line with HR guidance and school policy		
Health and Safety				
Accessibility Plans		Current year + 6 years		
Records relating to accident/injury at work		Date of incident + 12 years		
Accident Reporting – Children		Date of birth + 22 years where the injured person is a minor at the time of the accident. Severity of incident needs to be considered.		
Accident Reporting – Adults		Date of the accident + 4 years where the injured person is an adult at the time of the accident;		
Incident reports		Current year + 20 years		
Payroll and Pensions				
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995		Current year + 6 years		
Maternity pay records		Current year + 3yrs		
Timesheets, sick pay		Current year + 6 years		
Financial Records				

Debtors' Records		Current year + 6 years		
Applications for free school meals, travel, uniforms etc		Whilst child is at school		
Other financial records		Current year + 6 years		
Student grant applications		Current year + 3 years		
School Meals				
Dinner Register		Current year + 3 years		
Free school meals registers		Current year + 6 years		
Visitors book		Current year + 2 years		
Images held of pupils together with any consents and permissions to publish		Part of pupil record. Duration of pupil's attendance at school, if SEN or safeguarding duration of that whole record.		
Records relating to the management of PTA/Old Pupils Associations		Current year + 6 years		
Records relating to the management of data subject access requests		Completion date + 1 year then review		If request is of a contentious nature, keep the record for a further year then review.
Records relating to the management of freedom of information requests		Completion date + 1 year then review		If request is of a contentious nature, keep the record for a further year then review.
Governing Board				
Governance Documents				
Records relating to the appointment of foundation directors or governors		Permanent		
Records relating to the election of parent governors		Date of election + 6 months		

Records relating to the election of chair and vice chair		Once the decision has been recorded in the minutes, the records relating to the election can be destroyed		
Trust and LGB Minutes - Principal set (signed)		Permanent		
Reports made to the Trust/LGB Meeting which are referred to in the minutes		Permanent		
Register of attendance at Trust and LGB meetings		Date of last meeting in the book + 6 years		
Minutes - Inspection copies		Date of meeting + 3 years		
Records relating to Governor Monitoring Visits		Date of the visit + 3 years		
Records relating to complaints made to and investigated by the Governing Body (ie stage 3 complaints)		Date of resolution of complaint + 6 years then review for further retention in the case of contentious disputes		
Correspondence sent and received by the Governing Body		Current year + 6 years		
Appointment and termination of Trustees/Directors/Governors		Maintain all records from date of termination + 6 years		
Records relating to the appointment of a clerk to the Trust/Governing Body		Date appointment as clerk ceases + 6 years		

Records relating to the terms of office of serving directors/governors including evidence of appointment		PERMANENT		
Records relating to Director/Governor Declaration against disqualification criteria		Until the Governor steps down		
Register of Business Interests		PERMANENT		
Director/Governors Code of Conduct signed		This is expected to be a dynamic document, one copy of each version should be kept permanently		
Records relating to the training required and received by Director/ Governors		Until the Governor steps down		
Records relating to the induction programme for new directors/governors		Until the Governor steps down		
Records relating to DBS checks carried out on clerk, directors and members of the governing body (certificate number to be retained)		Date of DBS check + 6 months		
School Social Media				
Twitter, Facebook & Instagram (or similar)		Rolling delete every 24 months		A school use of social media policy is required

Lisa Kemp
 Reviewed autumn 2025
 To be reviewed autumn 2028