



*Elmley Dray
School*

Retention Policy

Introduction and Scope

The Elmley Dray School has a responsibility to maintain its records and record keeping systems. When doing this, the school 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 stored
- The security of the record systems used
- Privacy and disclosure
- Accessibility

This policy reflects the school's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the school as required and any changes will be notified to employees within one month of the date on which the change is intended to take effect.

The school may also vary any parts of this procedure, including any time limits, as appropriate in any case.

This policy sets out how long employment-related and client data will normally be held by the school 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 school. Please also refer to the school's Data Protection and GDPR Policy, Privacy Notices and Appropriate Policy Document for further information.

Retention schedule

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule (Appendix 1). When managing records, the school will adhere to the standard retention times listed within that schedule. Paper and electronic records will

be regularly monitored by the Data Protection Officer. The schedule is a document listing the many types of records used by the school and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

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 electronic information will be deleted. The school follow the Retention Schedule (Appendix 1) for the destruction of all information. Records are checked at the end of each year and destroyed when necessary.

Record keeping of safeguarding

Any allegations made that are found to be malicious are not part of the personnel records but retained separately in a secure, restricted archive to comply with IICSA preservation orders.

For any other allegations made, the school keeps 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. 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 the school 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.

Archiving

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 school follow the Retention Schedule (Appendix 1) with regard to archiving records. The archiving of information not listed is decided by the board of directors.

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

The Headteacher has primary and day-to-day responsibility for implementing this policy. The Data Protection Officer (DPO) is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The DPO will consider the suitability and adequacy of this policy and report improvements directly to the directors. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records. The Governors are responsible for ensuring that all staff are made aware of, and understand, this policy and are given adequate and regular training.

Emails

Email 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 child 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. The school recommend the Retention Schedule for paper documents also be applied to the retention of emails.

Other documentation

This policy should be read in conjunction with:

- Data Protection and GDPR Policy
- Privacy Notices
- Retention Policy
- Acceptable IT Use Policy
- Safer Recruitment Policy
- Safeguarding, Child and Vulnerable Adult Protection Policy

Further information

For further information about this policy, please contact our Data Protection Officer – David Baines, contactable via finance@elmleydrayschool.co.uk

Version control - Approval and review

Version No.	Reviewed By	Approved By	Approval Date	Main Change	Review Period
1	Emily Hollis	Hayley Furnell	October 2024	Initial policy approved	Annually
1.1	Emily Hollis	Hayley Furnell	August 2025	Annual review	Annually
1.2	Emily Hollis	Hayley Furnell	1 April 2026	Updated to align with April 2026 Employment Rights Act reforms (Day-One SSP/Family Leave rights) and updated Home Office Right to Work retention guidance	Annually



Hayley Furnell, Director,
on behalf of Elmley Dray School
Dated: 1 April 2026
Next review: 1 April 2027

Appendix 1 - Retention Schedule

File description	Retention period
Employment records	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates
Job applications and interview records of successful candidates	Six years after employment ceases
Written particulars of employment, contracts of employment and changes to terms and conditions	Six years after employment ceases
Right to work documentation including identification documents	Three years after employment ceases
Immigration checks	Three years after employment ceases
DBS checks and disclosures of criminal records forms	As soon as practicable after the check has been completed & the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional circumstances (e.g. to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than six months.
Change of personal details notifications	No longer than six months after receiving this notification
Emergency contact details	Destroyed on termination
Personnel 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	F or as long as the data is being processed and up to six years afterwards
Working Time Regulations: Opt out forms	Two years from the date which they were entered
Records of compliance with WTR	Two years after the relevant period
Disciplinary records	Six years after employment ceases

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 from personnel files but retained separately in a secure, restricted archive to comply with IICSA preservation orders. It is a criminal offence to destroy any records relating to an ongoing Inquiry.
Financial and Payroll Records	
Pension records	12 years
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	Six years from the end of the scheme year in which the event took place
Payroll and wage records	Six years after end of tax year they relate to
Maternity/Adoption/Paternity Leave records	Three years after end of tax year they relate to Service-length checks (previously 26 weeks or 1 year) are no longer required for these leave types. Retention of "proof of service" specifically for these leave triggers is no longer necessary.
Statutory Sick Pay	Three years after end of tax year they relate to
Current bank details	No longer than necessary
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
Development Plans	Three years from the life of the plan
Visitors Book and Signing In Sheets	Two years
Newsletters /circulars	One year (the school may decide to archive one copy)
Health and Safety Records	
Health and Safety consultations	Permanently
Health and Safety Risk Assessments	Three years from the life of the risk assessment
Any reportable accident, death or injury in connection with work	12 years+ from the date the report was made

Accident reporting	Adults – Six years from the date of the incident Children – when the child attains 25 years of age
Medical records and details of (where applicable): <ul style="list-style-type: none"> • 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
COSHH Records	Five years from the date on which the record was made
Safeguarding Records	
Child protection information	DOB of the child plus 25 years then review. There may be exceptions in some cases, when records can be kept for longer periods of time. Note: These records will be subject to any instruction given by IICSA.
Allegations of sexual abuse	For the time period of an inquiry by the Independent Inquiry into Child Sexual Abuse
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).
Temporary and Casual Workers	
Records relating to hours worked and payments made to workers	Three years
Board Documents	
Meetings schedule	Current year
Minutes – principal set (signed)	Generally kept for the life of the organisation
Agendas – principal copy	Where possible the agenda should be stored with the principal set of the minutes
Policy documents created and administered by the board	Until replaced
Register of attendance at full board meetings	Date of last meeting in the book plus six years
Annual reports	Date of report plus 10 years

Records relating to complaints made to and investigated by the board	Major complaints: current year plus six years. If negligence involved: current year plus 15 years. If child protection or safeguarding issues are involved then: current year plus 40 years.
Correspondence sent and received by the board	General correspondence should be retained for current year plus three years
Records relating to the terms of office of serving board members, including evidence of appointment	Date appointment ceases plus six years
Register of business interests	Date appointment ceases plus six years
Records relating to the training required and received by the board	Date appointment ceases plus six years
Board personnel files	Date appointment ceases plus six years
Other Records	
Emails	Seven years in total on deleted emails
CCTV	30 days maximum
Privacy Notices	Until replaced plus six years
Inventories of furniture and equipment	Current year plus six years
All maintenance records	Whilst the building belongs to the school
Lettings records	Current financial year plus six years
Contact data sheets	Current year then review, if contact is no longer active then destroy
Consent to circulars	For duration consent is given / until consent is removed
Consent to activities	Until the end of the activity
Consent to photography	For the time the individual is involved in the school
Consent forms/permission slips where there has been a major incident	Date of birth of the individual involved in the incident plus 25 years
Photographs	For the time the individual is involved in the school and for a short while after. Please note select images may also be kept for longer (for example to illustrate the history of the school)