



DOCUMENT AND ELECTRONIC DATA RETENTION POLICY

Adopted by Kirkstall Valley Governing Body on 30 January 2025

To be reviewed by Governors on January 2026

Contents

1	Introduction	2
2	Scope	3
3	Legal obligation	4
4	Retention Procedure	4
5	Retention of Encrypted Data	4
6	Retention of Digital Data	5
7	Archiving and Retention of Documentation	5
8	Archiving Process	5
9	Disposal of Records	6
10	Disposal of Electrical Hardware	6
11	Document Owner	7

1 Introduction

This Retention (“Policy”) applies to Kirkstall Valley Primary School.

This Policy covers all records and documentation, whether analogue or digital and are subject to the retention requirements of this Policy.

For the purpose of this Policy, the terms 'document' and 'records' include information in both hard copy and electronic form and have the same meaning hereby referred to as Documents or Documentation.

In certain circumstances it will be necessary to retain specific records in order to fulfil statutory or regulatory requirements and to meet operational needs. Any retention of specific records should be retained under the retention period specified in Retention of Records Schedule 1 and Retention of Digital Records Schedule 2.

Data Protection Legislation means the Data Protection Act 2018 which incorporates the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the General Data Protection Regulation which is the governing legislation that regulates data protection across the EEA. This includes any replacement legislation coming into effect from time to time.

Throughout this document we refer to the General Data Protection Regulation (GDPR) as the governing legislation that regulates data protection regulation across the EEA.

2 Scope

Kirkstall Valley Primary School is bound by various obligations with regard to the Documentation and electronic data it retains. These obligations include the period of retention for Documentation and when and how this Documentation is disposed.

Article 5 of GDPR provides "personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed". The purpose of this Policy is to ensure that necessary records, documents and electronic data of Kirkstall Valley Primary School are adequately protected, archived and disposed of at the correct retention period, and to provide all staff with clear instructions regarding the appropriate retention and disposal of Documentation.

This Policy will also aid paper records and electronic data storage issues identified throughout the business and to eliminate the need to retain paper and electronic records unnecessarily.

Kirkstall Valley Primary School will ensure that information is not kept longer than is necessary and will retain the minimum amount of information that it is required to hold to meet its statutory functions and the provision of its services.

3 Legal obligation

General Data Protection Regulation (GDPR)

Data Protection Act 2018 (DPA)

Freedom of Information Act 2000 (FOI)

Limitation Act 1980

Companies Act 2006

The Waste Electric and Electronic Equipment Regulations 2013

4 Retention Procedure

All decisions relating to the retention and disposal of Documents should be taken in accordance with this Policy in particular:

Schedule 1 – Retention of Records Schedule - Provides the required retention periods, including the statutory minimum retention period for specific Documents.

Schedule 2 – Retention of Digital Records – Provides the required retention periods for all digital Documents.

In circumstances where a retention period of a specific document has expired, a review should always be carried out prior to a decision being made to dispose of the record.

5 Retention of Encrypted Data

Any information retained under this Policy that is in an encrypted format, consideration must be taken for the secure storage of any encryption keys. Encryption keys must be retained as long as the data that the keys decrypt is retained.

6 Retention of Digital Data

Any digital data including media and e mail files are retained within individual staff profiles on the school's secure server. The backup of electronic data is kept on an encrypted external hard drive.

All portable / removeable storage media are destroyed by being low level formatted by the IT department.

7 Archiving and Retention of Documentation

Archiving is defined as the process by which inactive data, in any format is securely stored for long periods of time in accordance with a retention schedule.

Kirkstall Valley Primary School archives paper records onsite.

All documentation should be retained for twelve (12) months on site in a secure location, at the end of the twelve (12) month period all documentation will be collected by the school's nominated shredding company.

There may be exceptions where documentation will need to be retained for longer periods at site, in these instances the Office Manager will be responsible for ensuring that the documentation is held in a safe and secure location.

8 Archiving Process

The method of archiving selected for a particular Document will vary between departments and services. Any questions regarding archiving should be raised in the first instance with the department manager.

In all cases identify the documents that need to be retained in accordance with the Retention of records Schedule (attached at Schedule 1). Remove all duplicates and any unnecessary papers. Obtain the agreed Standard Archiving Box, clearly label the box and ensure it is correctly sealed.

9 Disposal of Records

Any record containing confidential information must either be disposed of in a confidential waste bin or shredded using a cross-cut shredder.

Disposal of documents that do not contain confidential information may be disposed of in the normal way or recycled.

Records of disposal should be maintained by each department and should detail as a minimum the document disposed of, the date of disposal and the disposal authority.

10 Disposal of Electrical Hardware

IT equipment and devices that have the ability and capability to store personal data include:

- PC's
- Laptops
- Mobile Phones
- Multi-Functional Devices – printers / scanners
- Servers
- USB Memory Sticks and external hard drives.

IT equipment disposal must be managed by the Office Manager.

All computer equipment, recycling or refurbishing must be disposed of in accordance with the Waste Electric and Electronic Equipment Regulations 2013.

11 Document Owner

The Office Manager is the owner of this document and is responsible for ensuring that this Policy is reviewed in line with the review requirements of GDPR.

SCHEDULE 1
Management & Organisation

FILE DISCRIPTION	DATA PROTECTION ISSUES	RETENTION PERIOD	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD	
Senior Leadership Team meeting minutes	Yes	Current school year + 6 years	Shred	May contain personal information
Staff meeting minutes	Yes	Current school year + 6 years	Shred	May contain personal information
School Development Plan	No	Closure + 6 years	Destroy	Review before destruction for relevance to any current actions/decisions
School Policies	No	Permanent	Archive	Transfer to Archive for retention when new policy implemented.
Staff Professional Development Plans	Yes	Closure + 6 years	Shred	May contain personal information
PTA Minutes and general correspondence	Yes	Current school year + 6 years	Shred	May contain personal information
Correspondence to Staff, Parents and Pupils	No	Current school year + 2 years		
Records created by the Head, Deputy Head and other members of staff with administrative responsibilities	Yes	Closure of file +6 years	Shred	May contain personal information

Correspondence created by Head, Deputy Head and other members of staff with administrative responsibilities	No	Date of correspondence + 3 years	Shred	May contain personal information
Admission Registers (including application forms, assessments and records of decision)	Yes	Date of pupil leaving school +6 years	Shred	
Attendance registers	Yes	Date of register +6 years	Shred	If these records are retained electronically any backup copies should be destroyed at the same time.
Pupil files – Primary	Yes	Retain for the time that the pupil remains at the primary school	Transfer to the receiving school when the child leaves	
Pupil Files – Special Educational Needs and Individual Education Plans	Yes	DOB of the pupil + 25 years	Shred	In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service
Letters authorising absence	No	Date of absence + 2 years	Destroy	

SCHEDULE 1

Governors & School Committee Meetings

FILE DISCRIPTION	DATA PROTECTION ISSUES	RETENTION PERIOD	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD	
School Committee Minutes – Final Version	No	Permanent	Archive	Transfer to archive for permanent retention after 6 years
School Committee Minutes – inspection copies	No	Date of meeting + 3 years	Shred	Minutes may contain personal information.
Agendas	No	Permanent	Archive	Transfer to archive for permanent retention after 6 years
Reports (including annual report)	No	Permanent	Archive	Transfer to archive for permanent retention after 6 years
Action Plans	No			
Policy Documents	No			
School Fund	No			

Pupils

FILE DISCRIPTION	DATA PROTECTION ISSUES	RETENTION PERIOD	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD	
Pupil Admission Data - Applications for enrolment	Yes	2 years after enrolment	Shred/delete if digital	May contain personal information

Transfer applications	Yes	2 years after enrolment	Shred/delete if digital	May contain personal information
Pupil Attendance Information/Registers	Yes	Current year + 6 years	Shred/delete if digital	May contain personal information
Pupil Education Records - School/Progress Reports etc. (SEN)	Yes	Current year + 6 years	Shred/delete if digital	May contain personal information
Disciplinary Action (Suspension/Expulsion) Offences – Bullying	Yes	Until the pupil is 23 years old	Shred/delete if digital	May contain personal information
Disciplinary Action (Suspension/Expulsion) Offences – Bullying (Special Educational Needs)	Yes	Until the pupil is 26 years old	Shred/delete if digital	May contain personal information
Examination Results	Yes	Current year + 7 years	Shred/delete if digital	
School Trips – Financial and Administration details	Yes	Date of Trip +2 years	Shred/delete if digital	Also see health and safety with regards to risk assessments. Records should be retained for longer if an incident occurs.
School Trips Attendance/Staff Supervision	Yes	Date of Trip +2 years	Shred/delete if digital	
Medical Records – records of pupils with medical conditions and details of	Yes	DOB of the pupil + 25 years	Shred/delete if digital	

the administration of drugs when necessary				
Any other records created in the course of contact with pupils	Yes/no	Current year + 3 years	Shred/Review	Review at the end of 3 years and either allocate a further retention period or destroy.
Statement maintained under the Education Act 1996 – Section 324	Yes	DOB + 30 years	Shred	Unless legal action is pending, in which case retain
Purposed statement or amended statement	Yes	DOB + 30 years	Shred	Unless legal action is pending, in which case retain
Advice and information to parents regarding educational needs	Yes	Closure + 12 years	Shred	Unless legal action is pending, in which case retain
Accessibility Strategy	Yes	Closure + 12 years	Shred	Unless legal action is pending, in which case retain
Children's SEN files	Yes	DOB + 35 years	Shred	Unless legal action is pending, in which case retain

Curriculum

FILE DISCRIPTION	DATA PROTECTION ISSUES	RETENTION PERIOD	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD	
Curriculum Development	No	Current year + 7 years	Destroy	

Curriculum returns	No	Current year + 3 years	Destroy	
School Syllabus	No	Current year + 1 year	Destroy	Review these records at the end of each year ad allocate a new retention period or destroy.
Schemes of work	No	Current year + 1 year	Destroy	Review these records at the end of each year ad allocate a new retention period or destroy.
Class record books	No	Current year + 1 year	Destroy	Review these records at the end of each year ad allocate a new retention period or destroy.
Mark books	No	Current year + 1 year	Destroy	Review these records at the end of each year ad allocate a new retention period or destroy.
Pupils' work	No	Current year + 1 year	Shred	Review these records at the end of each year ad allocate a new retention period or destroy.
SATS records	Yes	Current year + 7 years	Shred	

Staff

FILE DISCRIPTION	DATA PROTECTION ISSUES	RETENTION PERIOD	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD	
Contracts of employment	Yes	End of contract + 7 years	Shred	
Timesheets/sick pay	Yes	Current year + 6 years	Shred	
Staff Personnel files	Yes	Termination + 7 years	Shred	Including leave and training records
Interview notes and recruitment records	Yes	Termination +3 years	Shred	But see separate note on retention of DBS certificates. Notes on unsuccessful candidates can be destroyed after 6 months.
Pre-employment vetting information (including unsuccessful DBS checks)	Yes	Date of check + 6 months	Shred	To be done by the designated member of staff. This information should be placed on the personnel file if the applicant is successful and managed according to this policy.
Staff sickness records	Yes	Current year + 6 years	Shred	
Annual appraisal/assessment records	Yes	Duration of employment + 7 years		
Salary cards/overtime records etc.	Yes	Last date of employment + 6 years	Shred	

Maternity pay records	Yes	Current year + 7 years	Shred	
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Last payment + 6 years	Shred	
Procedures for induction of staff	Yes	Termination + 7 years	Shred	
Disciplinary proceedings for all matters except those relating to child protection issues (see below)	Yes			
Informal warning		Date of warning + 6 months	Shred	If this is placed on a personnel file, it must be removed from the file
Written warning – level one or two		Date of warning +12 months	Shred	If this is placed on a personnel file, it must be removed from the file.
Final warning		Date of warning +18 months	Shred	If this is placed on a personnel file, it must be removed from the file.
Case not found (except child protection allegations – see section 1)		Immediately at the conclusion of the case	Shred	
Records relating to accident/injury at work	Yes	Date of incident +5 years	Shred	Review at the end of this period in the case of serious accidents a further

				retention period will need to be applied.
--	--	--	--	---

Child Protection

FILE DISCRIPTION	DATA PROTECTION ISSUES	RETENTION PERIOD	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD	
Safeguarding Policies and Procedures	No	Permanent	Archive	Transfer to archive for retention when new policy implemented.
Child Protection files	Yes	DOB + 25 years but review of sensitive case files every 5-6 years thereafter	Shred	Child Protection information must be copied and sent under separate cover to new school whilst the child is still under 18. Where a child is removed from roll to be educated at home, the file should be copied to the Local Education Authority. Limitation periods can be dis-applied in criminal and civil abuse cases; to be weighted against the rights under the DPA and our insurers' requirements.

Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Until the person's normal retirement age, or 10 years from the date of the allegation if that's longer	Shred	ICO Employment Practices Code: Supplementary Guidance 2.13.1 (Discipline, grievance and dismissal). "Records of allegations about workers who have been investigated and found to be without substance 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 individuals". Summary record to be retained on confidential personnel file, and a copy
--	-----	--	-------	---

				given to the person concerned.
DBS Disclosure certificates	Yes	No longer than 6 months from the decision on recruitment unless DBS specifically consulted	Shred	Keep a record in the Single Central Register of the fact that all checks were undertaken, with relevant reference details (Disclosure number, date, who checked it).

Health and Safety

FILE DESCRIPTION	DATA PROTECTION ISSUES	RETENTION PERIOD	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD	
Accessibility Plans	No	Current year + 6 years	Destroy	
Accident reporting – Adults	Yes	Last entry in the accident book + 4 years	Shred	Latent injury's can take years to manifest and the limitation period for claims reflects this: so keep a note of all procedures as they were, and keep a record that they were followed. Review each case before destruction, especially if a claim is live.
Accident reporting – Children	Yes	DOB +25 years	Shred	A child may make a claim for negligence from 7 years from their 18 th birthday. To ensure that all records are

				kept until the pupil reaches the age of 25 this retention period has been applied.
COSHH	No	Current year + 10 years	Destroy	Review and where appropriate an additional retention period may be allocated.
Policy Statements	No	Date of expiry +3 years	Destroy	Version control is important.
Risk Assessments	No	7 years from the completion of project incident, event or activity	Destroy	Retain if risk assessment relates to a visit during which an incident occurred and a claim is ongoing. Review if an incident occurred but there was no claim. Risk assessments for trips can be destroyed 3 years after the trip if no incidents occurred.
Fire Precaution Log Books		Current year + 6 years	Destroy	

Finance

FILE DISCRIPTION	DATA PROTECTION ISSUES	RETENTION PERIOD	ACTION AT THE END OF THE ADMINISTRATIVE LIFE OF THE RECORD	
Annual budget and budget deployment	No	Current financial year +6 years	Shred	May contain confidential information

Budget monitoring	No	Current financial year +6 years	Shred	May contain confidential information
Annual Statement of Accounts	No	Current financial year +6 years	Shred	May contain confidential information
Order Books, Invoices, Bank Records, Cash Books etc.	No	Current financial year +6 years	Shred	May contain confidential information
Audit Reports	No	Current financial year +6 years	Shred	May contain confidential information