



Inspire, Enjoy, Achieve

## Retention & Disposal Policy

Reviewed September 2026

Review September 2027

Chair of Governors.....

Headteacher.....

Date.....

## 1. Purpose

This policy sets out Cotton End Forest School's approach to the retention, storage, review and secure disposal of records. It ensures compliance with data protection legislation, supports effective information management, and protects the School, its staff and pupils.

## 2. Scope

This policy applies to all staff, governors, volunteers and contractors who create, use or manage School records in any format, including paper, electronic files, emails, photographs, safeguarding systems, cloud-based platforms and management information systems.

It covers all operational, administrative, educational and safeguarding records held by the School. It does **not** apply to records connected with commercial or trading activities.

## 3. Definitions

- **Record** - Any information created, received or maintained as evidence of School activities.
- **Personal data** - Information relating to an identifiable individual.
- **Retention period** - The length of time a record must be kept before review or disposal.
- **Secure deletion** - Permanent removal of information so it cannot be reconstructed.
- **Archiving** - Long-term storage of records that must be retained but are not in regular use.

## 4. Legal and Regulatory Framework

This policy supports compliance with:

- UK GDPR
- Data Protection Act 2018
- Education Act 1996
- Limitation Act 1980
- IRMS Schools Toolkit
- Statutory safeguarding guidance

Retention periods are based on IRMS guidance unless insurers specify longer periods.

## 5. Principles

The School follows the GDPR principle of **storage limitation**: personal data must not be kept longer than necessary for its purpose. Records must be:

- accurate
- stored securely

- retained only for the appropriate period
- disposed of safely and promptly

## 6. Roles and Responsibilities

- Headteacher - Overall accountability for compliance.
- Data Protection Officer (DPO) - Advises on retention, oversees compliance, and supports decision-making.
- School Business Manager - Manages secure storage, archiving and disposal processes.
- All staff - Responsible for filing records correctly, following retention periods, and ensuring secure handling.

## 7. Safeguarding Records (CPOMS)

Safeguarding records are maintained within CPOMS, the School's secure digital safeguarding system. All safeguarding concerns, chronology, actions and attachments must be stored within CPOMS.

Safeguarding records must be retained until the pupil reaches the age of 25, in line with statutory guidance.

When a pupil transfers to another school:

- the safeguarding file is transferred securely via CPOMS
- the School retains only a record of the transfer (date, receiving school, confirmation of receipt)
- duplicate safeguarding files must not be kept unless required for legal or insurance reasons

Safeguarding records are deleted from CPOMS once the retention period expires, unless legal or insurance advice requires extended retention.

Staff must not store safeguarding documents on personal devices, email inboxes, shared drives or USB sticks. All documents must be uploaded directly to CPOMS.

## 8. Retention Schedule

The School maintains the following retention schedule aligned with IRMS guidance. Where insurers specify longer retention periods, the insurer requirement prevails.

### Retention Table

| Record Category            | Retention Period           | Notes / Legal Basis |
|----------------------------|----------------------------|---------------------|
| Pupil admission records    | 1 year after pupil leaves  | IRMS guidance       |
| Pupil attendance registers | 3 years from date of entry | Education Act 1996  |

| <b>Record Category</b>                 | <b>Retention Period</b>                                  | <b>Notes / Legal Basis</b>      |
|----------------------------------------|----------------------------------------------------------|---------------------------------|
| <b>Pupil educational record</b>        | Transfer to next school; copy retained for 1 year        | IRMS guidance                   |
| <b>Pupil SEN files</b>                 | Until pupil is 25                                        | SEND Code of Practice           |
| <b>Safeguarding / CPOMS records</b>    | Until pupil is 25                                        | Statutory safeguarding guidance |
| <b>Behaviour and exclusion records</b> | 1 year after pupil leaves                                | IRMS guidance                   |
| <b>Accident / incident reports</b>     | 3 years (pupils); 6 years (staff)                        | Limitation Act 1980             |
| <b>Medical records / care plans</b>    | Until pupil leaves + 1 year                              | IRMS guidance                   |
| <b>First aid books</b>                 | 3 years                                                  | HSE guidance                    |
| <b>Staff personnel files</b>           | 6 years after employment ends                            | Limitation Act 1980             |
| <b>Staff training records</b>          | 6 years                                                  | IRMS guidance                   |
| <b>Staff disciplinary records</b>      | 6 years after case closed                                | Limitation Act 1980             |
| <b>Recruitment records</b>             | 6 months (unsuccessful); 6 years (successful)            | GDPR storage limitation         |
| <b>DBS certificates</b>                | Destroy after decision; keep record of check for 6 years | DBS Code of Practice            |
| <b>Governors' minutes</b>              | Permanent                                                | Governance regulations          |
| <b>Governors' papers</b>               | 6 years                                                  | IRMS guidance                   |
| <b>Health &amp; safety records</b>     | 6 years                                                  | HSE guidance                    |
| <b>Risk assessments</b>                | 3 years                                                  | HSE guidance                    |
| <b>Fire safety records</b>             | 6 years                                                  | Fire Safety Order               |
| <b>Financial records</b>               | 6 years                                                  | HMRC                            |
| <b>Payroll records</b>                 | 6 years                                                  | HMRC                            |
| <b>Contracts</b>                       | 6 years after end of contract                            | Limitation Act 1980             |

| <b>Record Category</b>                   | <b>Retention Period</b>                 | <b>Notes / Legal Basis</b> |
|------------------------------------------|-----------------------------------------|----------------------------|
| <b>School meal records</b>               | 3 years                                 | IRMS guidance              |
| <b>Photographs / media</b>               | Until no longer needed; review annually | GDPR                       |
| <b>Emails under retention categories</b> | As per category                         | Must be centrally filed    |
| <b>Routine emails</b>                    | 6 months                                | Then delete                |
| <b>Curriculum planning</b>               | Current year + 1 year                   | IRMS guidance              |
| <b>Assessment data</b>                   | Current year + 1 year                   | IRMS guidance              |
| <b>School census returns</b>             | Permanent                               | DfE                        |
| <b>Complaints records</b>                | 6 years                                 | Limitation Act 1980        |
| <b>Insurance records</b>                 | As required by insurer                  | Insurer requirements       |
| <b>Visitor logs</b>                      | 6 years                                 | IRMS guidance              |
| <b>Safeguarding training records</b>     | 6 years                                 | Statutory guidance         |

## **9. Secure Storage**

Records must be stored securely at all times:

- Paper files in locked cabinets or secure rooms
- Electronic files on School systems with access controls
- Cloud platforms only where approved
- No storage on personal devices

## **10. Archiving**

Records requiring long-term retention must be archived securely. The School will:

- maintain an archive register
- ensure restricted access
- review archived records annually
- store safeguarding archives separately

## **11. Secure Disposal**

When retention periods expire, records must be securely destroyed:

- Paper records shredded or disposed of via confidential waste
- Electronic records permanently deleted
- No disposal in general waste

## **12. Exceptional Circumstances**

Records may be retained longer if required for:

- legal matters
- safeguarding
- insurance
- legal advice

Decisions must be documented and approved by the Headteacher and DPO.

## **13. Data Breaches**

If records are lost, accessed unlawfully or destroyed incorrectly:

- staff must report immediately
- DPO assesses the breach
- ICO notified if required
- individuals informed where necessary

## **14. Staff Changes**

When staff leave:

- all records must be transferred to central systems
- no records may remain on personal devices
- system access removed promptly

## **15. Review Cycle**

This policy will be reviewed annually or sooner if legislation or guidance changes.