



Document Retention Policy

Introduction

St Hilary's actively promotes democracy, the rule of law, individual liberty and mutual respect of those with different faiths and beliefs. These fundamental British Values underpin all that we offer, as does our School Motto 'Not for oneself but for all.'

This policy sets out the School's arrangements for the creation, management, retention, review, archiving and secure disposal of records. It should be read with the School's Data Protection Policy, Privacy Notices, Safeguarding and Child Protection Policy, Recruitment Policy and other relevant policies.

The School is the data controller for most personal data it processes. Personal data will be retained only for as long as necessary for the purpose for which it is processed, taking account of statutory requirements, safeguarding obligations, limitation periods, contractual and insurance requirements and the School's legitimate operational needs.

1. Legal and regulatory framework

This policy has been reviewed for September 2026 with regard to the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025, the Freedom of Information Act 2000 where applicable, the Limitation Act 1980, the School Attendance (Pupil Registration) (England) Regulations 2024, Keeping Children Safe in Education 2026, relevant employment, tax, health and safety and safeguarding legislation, and current Department for Education and Information Commissioner's Office guidance.

The Data (Use and Access) Act 2025 does not replace the UK GDPR or Data Protection Act 2018. The School will keep its data protection procedures, lawful bases, privacy information and complaints arrangements under review as the amended framework is implemented.

2. Retention principles

- Records will be accurate, relevant, appropriately secured and accessible only to those who need them.
- Personal data will not be kept for longer than is necessary. Each retention period should have a documented statutory, safeguarding, contractual, limitation, insurance, historical or operational justification.
- At the end of the retention period, records will be securely destroyed, deleted or irreversibly anonymised unless a lawful reason requires continued retention.
- Where records are selected for permanent historical archiving, the School will document the purpose and ensure that any continuing processing of personal data is lawful and proportionate.
- Electronic and paper records are subject to the same retention principles.

3. Legal holds and suspension of destruction

Normal destruction must be suspended where the School knows or reasonably anticipates that a record may be relevant to litigation, an insurance claim, safeguarding or regulatory investigation, police enquiry, complaint, subject access or other information-rights request, employment dispute or other formal

proceedings. The relevant records must be preserved until the Headmaster, Business Manager/DPO or appropriate adviser confirms that the hold may be lifted.

4. Current pupil records

A file is maintained for each pupil. It may include admissions and contractual records, academic and pastoral records, reports, correspondence with parents, disciplinary information and other information required for the effective operation of the School. The School's electronic systems also hold information such as contact details, attendance and academic information.

Access is role-based and limited to staff who require the information for their duties. Medical, safeguarding, financial and other particularly sensitive information will be subject to additional access controls.

5. Special educational, welfare and medical information

Information about special educational needs and disabilities (SEND), welfare and medical needs will be made available only to staff who need it. There is no single statutory retention period applying to all SEND records. Such records will be retained according to their nature and purpose and any applicable educational, safeguarding, medical, contractual or limitation requirement.

Routine medical information, individual healthcare plans, medication records, accident records and safeguarding-related medical information will be managed according to the relevant category in the retention schedule. Medical information forming part of a safeguarding record will follow the safeguarding retention period.

6. Access, privacy and data subject rights

The School's Privacy Notices and Data Protection Policy explain how personal data is used and the rights available to individuals. Requests for access to personal data and other information-rights requests will be handled under the applicable data protection legislation and School procedures.

Records must not be retained merely because they may be useful at some unspecified future date. Staff should avoid unnecessary duplication and should store records in approved School systems.

7. Records of former pupils

Records relating to former pupils will be retained in accordance with the retention schedule below rather than under a single blanket retention period. Where a pupil transfers to another school, records that must or should accompany the pupil will be transferred securely in accordance with applicable requirements. Safeguarding records are transferred separately from the main pupil file.

Summary historical information, such as examination results, prize lists and other significant achievements, may be selected for longer-term archival retention where the School has documented a lawful and proportionate historical purpose.

8. Secure disposal and destruction log

Confidential paper records will be cross-cut shredded or destroyed through an approved confidential-waste service. Electronic records will be securely deleted from active systems and, where practicable, from backups in accordance with the School's backup lifecycle. Where an external destruction provider is used, appropriate contractual and security safeguards must be in place.

The School will keep an appropriate destruction record showing what category of records was destroyed, the date, the method and the person who authorised destruction. The destruction log should not reproduce the personal data that has been destroyed.

9. Review and responsibility

The Business Manager/DPO is responsible for coordinating this policy and the retention schedule. Record owners are responsible for applying the schedule to records within their areas. The schedule will be reviewed at least annually and whenever relevant legislation, statutory guidance or School systems materially change.

Updated: September 2026

Next review date: June 2027

Person responsible: Mrs Hannah Wynn (Business Manager)

Appendix 1 – Table of Retention Periods

Type of record / document	Retention period	Action / notes
SCHOOL-SPECIFIC / GOVERNANCE RECORDS		
Registration / constitutional documents of the School	Permanent, or until closure/dissolution as applicable	Retain securely; review any personal data within the record.
Statutory admission register entries	6 years beginning with the day on which the entry was made	School Attendance (Pupil Registration) (England) Regulations 2024. Securely dispose after expiry unless a legal hold applies.
Attendance register entries	6 years beginning with the day on which the entry was made	Back-up copies must also be retained as required by the 2024 Regulations. Do not archive indefinitely without a separate lawful purpose.
Governors' / Board meeting minutes and formal resolutions	10 years as a minimum; permanent retention may be appropriate for core constitutional records	Apply Companies Act requirements where applicable and document any archival selection.
Curricular records / annual curriculum / class records	At least 1 year; School operational records may be kept longer where justified	Review annually and securely dispose when no longer required.
Educational visit records	10 years from date of visit	If an incident occurs, retain relevant permission and incident records with the appropriate pupil/incident record.
PUPIL RECORDS		
Admissions applications, assessments and decisions – admitted pupils	6 years from admission date as a baseline for admissions records; longer only where justified by the record's purpose	Do not confuse with the statutory admission register entry, which runs 6 years from the date of entry.
Unsuccessful admissions applications	Normally up to 6 years from the decision where required for contractual/limitation purposes; shorter where sufficient	Review proportionality and privacy information.
Primary pupil educational record	Until pupil leaves the School, subject to transfer requirements	Transfer required records securely to the receiving school where applicable; MIS data may need short operational retention after departure.

Type of record / document	Retention period	Action / notes
Examination results / significant achievements	7 years from leaving for routine records; selected summary results may be archived permanently for a documented historical purpose	Keep only the minimum personal data needed for any permanent archive.
SEND records	No single statutory SEND-specific period	Risk assess by record type. Apply the relevant educational, safeguarding, medical, contractual or limitation period. Do not automatically retain to age 35.
Routine pupil medical / healthcare records	For the period needed for care and School operational/legal requirements; review on leaving	Where information forms part of a safeguarding or accident record, apply the longer relevant period.
Pupil accident records	At least 3 years from accident; pupil-related records may need longer retention within the pupil record / for limitation purposes	Apply safeguarding or legal-hold extensions where relevant.
SAFEGUARDING AND SAFER RECRUITMENT		
Safeguarding / Child Protection file	Until the child's 25th birthday	Transfer separately and securely to any new school. Dispose securely at end of period unless longer retention applies.
Child Protection file relating to child sexual abuse	Until the child's 75th birthday	Extended retention reflects IICSA records recommendation and current DfE guidance.
Allegations against a member of staff, including unfounded allegations	Until normal retirement age or 10 years from date of allegation, whichever is later	Follow KCSIE 2026. Records found to be malicious or false must be handled in accordance with KCSIE.
Copies of DBS certificates (where retained)	No longer than 6 months from date of recruitment / decision, unless a specific lawful reason justifies longer	Record the required check information on the Single Central Record; securely destroy certificate copies when no longer required.
Single Central Record	Maintain while required for statutory safeguarding compliance	Do not treat DBS certificates as part of a permanent SCR archive. Retain underlying recruitment records according to their own category.
EMPLOYEE / PERSONNEL RECORDS		

Type of record / document	Retention period	Action / notes
Employment contracts and personnel files	6 years from termination of employment	Longer retention only where justified, including safeguarding records or a legal hold.
Appraisals / performance reviews	Duration of employment plus up to 6 years where justified	Review for relevance; safeguarding material follows safeguarding periods.
Unsuccessful job applications / interview records	Normally 6 months after recruitment process; up to 12 months where justified	Longer retention for future vacancies should be transparent and appropriately justified.
Payroll / salary records	At least 3 years from end of relevant tax year; retain 6 years where needed for wider accounting/tax purposes	Apply the period appropriate to the particular payroll/accounting record.
Statutory maternity pay records	3 years after end of the tax year in which the maternity pay period ends	Securely dispose after expiry unless another lawful need applies.
Right to work / immigration records	Duration required by current Home Office requirements and any applicable statutory excuse period	Review current right-to-work guidance at time of disposal.
Other staff health records	While employed, unless a longer statutory or legal period applies	Health surveillance records are separate and may require 40 years.
HEALTH, SAFETY AND PROPERTY		
Accident records	3 years from date of accident as statutory baseline	Pupil accidents should also be managed with the pupil record; retain longer where limitation, safeguarding or legal hold requires.
Monitoring exposure to hazardous substances, including asbestos	5 years, unless a longer specific statutory period applies	Keep separate from health surveillance records.
Health surveillance records under COSHH	At least 40 years from date of last entry	Statutory extended retention. Do not apply the general 6/7-year personnel period.
Risk assessments	Life of assessment plus 6 years where appropriate	For fire risk assessments, retain life of assessment plus 6 years; other risk assessments should be retained according to legal/operational need.
Maintenance records	6 years from finance year end	Securely dispose after expiry unless property/insurance/legal need requires longer.

Type of record / document	Retention period	Action / notes
School vehicle records	6 years from disposal of vehicle	Securely dispose after expiry.
FINANCE, CORPORATE AND CONTRACTS		
Accounting records / debtor records / VAT records	Generally 6 years from relevant financial year / transaction	Apply specific HMRC, Companies Act or charity requirements where applicable.
Tax returns	At least 6 years where applicable	Retain in line with the School's tax/accounting obligations.
Expense claims	6 years	Securely dispose after expiry.
Budgets and internal financial reports	3 years, unless required longer for audit or governance	Review before disposal.
Simple contracts / agreements	6 years after completion / last payment, unless a longer contractual period is justified	Limitation Act 1980 baseline.
Deeds / contracts executed as deeds	12 years after cause of action / completion as appropriate	Limitation Act 1980; obtain advice for significant property or long-tail liabilities.
Corporate statutory records / incorporation documents / register of members	In accordance with Companies Act requirements; core constitutional records may be permanent	Apply company/charity status requirements relevant to the School.
Intellectual property title records	Life of right plus appropriate post-expiry period; permanent where the right is renewable indefinitely	Contracts assigning/licensing IP follow the applicable contract/deed period.
INSURANCE		
Insurance policies	Life of policy plus any run-off / claims period required	Long-tail liabilities may justify extended retention. Keep employers' liability evidence as required by law and insurer advice.
Claims correspondence / notifications	At least 6 years after closure; longer for long-tail, safeguarding or personal injury matters	Apply legal hold where claim or potential claim remains live.
DATA PROTECTION AND INFORMATION GOVERNANCE		
Record of Processing Activities (ROPA) / data asset register	Maintain while current and relevant	Review at least annually and whenever processing materially changes.

Type of record / document	Retention period	Action / notes
Data Protection Impact Assessments (DPIAs)	Life of processing activity plus a reasonable period thereafter, normally 6 years where needed to evidence compliance	Review DPIAs when processing changes.
Personal data breach register and investigation records	Normally 6 years from closure, subject to risk and legal need	Keep enough information to demonstrate compliance; avoid unnecessary duplication of affected personal data.
Subject access / information-rights requests and responses	Normally 3 years from closure; longer where complaint, dispute or legal hold applies	Keep an auditable record of handling and outcome.
Data protection complaints	Normally 6 years from closure where needed to evidence handling and accountability	Apply DUAA-amended complaints procedures and legal holds where relevant.
Destruction log	Permanent or long-term administrative record, provided it contains only minimal metadata	Do not retain the destroyed personal data within the log.

Appendix 2 – Implementation notes

- Where two retention periods could apply, use the longer period only where there is a documented legal, safeguarding, insurance, limitation or operational reason.
- A retention period is not permission to keep every document in a category automatically. Staff should minimise duplication and periodically remove material that is no longer needed.
- Where a record is required for an active safeguarding matter, complaint, claim, investigation or litigation, the legal hold overrides the normal destruction date.
- Before destroying records in bulk, the responsible record owner should confirm that no legal hold, safeguarding requirement, subject access request or other live matter applies.
- The School should review this schedule annually against current DfE, ICO, KCSIE, HSE, HMRC and other applicable guidance.

Key sources used for the September 2026 review

Department for Education: Data protection in schools – Record keeping and management;

Data protection in schools – The Data Use and Access Act 2025;

Keeping Children Safe in Education 2026.

Legislation: School Attendance (Pupil Registration) (England) Regulations 2024;

UK GDPR;

Data Protection Act 2018;

Data (Use and Access) Act 2025;

Limitation Act 1980;

Control of Substances Hazardous to Health Regulations 2002.
Health and Safety Executive: COSHH health surveillance record-keeping guidance.