Data Retention Policy 2026/27

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Version	Date	Changes
1.0	May 2026	Initial policy — incorporating full retention schedule aligned to DfE retention schedule updated February 2026

1. Policy Statement

Empower Trust is committed to ensuring that personal data is processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Data will only be retained for as long as is necessary for legal, operational and safeguarding purposes. This policy sets out the periods of retention for the information and records that we process and applies to all information, regardless of format.

2. Scope

This policy applies to all staff, trustees, contractors and records held in both digital and paper formats across all schools and the central Trust team.

3. Roles and Responsibilities

The Trust has a corporate responsibility to maintain its records and record-keeping systems in accordance with the regulatory environment. The Data Protection Officer (DPO) has overall responsibility for this policy.

The Data Protection Ambassador in each academy will give guidance to staff regarding good records management practice and will promote compliance with this policy.

All employees must ensure that records for which they are responsible are accurate and maintained. At the end of their retention period, it is their responsibility to ensure that such records are disposed of in accordance with this policy.

4. Retention Principles

Records should be kept for as long as they are needed to meet the operational needs of the Trust, together with legal and regulatory requirements. We have assessed our records to:

- Determine their value as a source of information about the Trust, its operations, relationships and environment
- Assess their importance as evidence of business activities and decisions
- Establish whether there are any legal or regulatory retention requirements (including the Public Records Act 1958, the Freedom of Information Act 2000, the Limitation Act 1980, and the Data Protection Act 2018)

Where records are likely to have a historical value, or are worthy of permanent preservation, the Trust may choose to archive them at the end of any retention period.

Where information is to be archived or destroyed, schools must carry out such processing by no later than the August after the expiration of the retention period.

5. Retention Schedule Guidance

The retention schedule (Section 11) has been produced in line with legislation, regulations affecting schools, and best practice as promoted by the Information and Records Management Society (IRMS). It has been cross-referenced against the DfE Retention Schedule (updated 26 February 2026). This may not be an exhaustive list. Where academies are unsure of particular retention periods, they should seek further guidance from the Trust's DPO.

The schedule provides the following actions at the end of a retention period:

- Regular disposal — Records can be placed in a normal rubbish bin or skip.
- Secure disposal — Paper records must be shredded using a cross-cutting shredder, pulped or burned. CDs/DVDs and other storage media must be destroyed to particles no larger than 6mm. Any electronic data must be deleted alongside any back-ups.
- Secure disposal 'must be shredded' — Information is so sensitive it must be shredded on site by a member of staff and not left for collection by an external company.
- Review — At the end of the retention period, a review may be necessary to determine whether a further retention period is required. If not, the information must be securely disposed of.
- Transfer — At the end of the retention period, information may be transferred to another organisation. Information must be sent by encrypted email, other secure electronic means, recorded delivery, or delivered by hand.

If the Trust receives a request for records that have not yet been destroyed, even if they should have been destroyed, that record will still be made available to the requestor unless a legal exemption to disclosure applies.

6. Child Protection Records

Regardless of the suggested retention timescales set out in this policy, the Trust may at its discretion extend the retention period for any information if, upon review, it is felt that a child's safety may be at risk should the information be destroyed. Where such a decision is made, this will be documented and reviewed on a regular basis.

7. Email

Where an email has content that forms part of a record, information must be transferred to the appropriate record (e.g. the HR file, MIS system, safeguarding system etc.) as soon as possible and retained in line with the schedule below.

8. Using a Third Party

Academies may choose to use an external company to support them with secure disposal. If doing so, academies must carry out checks to ensure that the company is reputable and will destroy documents securely.

There must be a contract and a data processing agreement in place with the company to provide assurance that they will comply with the Data Protection Act and UK GDPR.

A record of disposal must also be maintained.

9. Record-Keeping

It is not necessary to document the disposal of records when it has been done in line with the records retention schedule below, unless a third-party provider has been used.

Where equipment and confidential waste has been sent for disposal or destruction by a third party, a log should be kept of the date the waste was collected, the company used, and a brief description of the files destroyed. The third party may provide a certificate of destruction which should also be retained.

Documents disposed of outside the retention schedule — either disposed of earlier or kept longer than listed — will also need to be recorded. A log should be kept of the date the decision was made, the authorising officer, a brief description of the files involved and the reason for the decision.

These records will provide an audit trail for any inspections conducted by the Information Commissioner's Office (ICO) and will aid in addressing Freedom of Information requests where the Trust no longer holds the information.

10. Monitoring

The DPO will review this policy on an annual basis, or more often if required by changes to legislation or organisational practice. The policy will be cross-referenced against the DfE Retention Schedule at each review cycle.

11. Retention Schedule

11.1 Pupils, Curriculum and Outcomes

Basic File Description	Retention Period	Action at End of Retention Period
All records relating to creation and implementation of the Admissions Policy	Life of the policy + 3 years	Review
Paperwork relating to successful admissions	Add to pupil file	Secure disposal
Paperwork relating to unsuccessful admissions	Resolution of case + 1 year	Secure disposal
Register of admissions	For each entry — date of entry + 6 years	Secure disposal
Proof of address supplied by parents as part of the admissions process	Current year + 1 year	Secure disposal
Supplementary information for admission process (e.g. religion, medical conditions) — successful	Add to pupil file; see retention period for pupil file	Secure disposal
Supplementary information for admission process — unsuccessful	Retain until appeal process complete	Secure disposal
Published Admission Number reports	Current year + 6 years	Secure disposal
Pupil File (Primary)	Retain whilst at primary school	Follow pupil to next school or send to Local Authority
Pupil Education Record (Secondary or last known school)	Date of birth + 25 years	Secure disposal
Secondary transfer sheets	Current year + 2 years	Secure disposal
Records regarding exclusions	Date of birth + 25 years	Secure disposal
Attendance registers (general)	Each entry preserved for 6 years after the date of the entry	Secure disposal
Attendance records — breakfast club registers	15 years from date created	Secure disposal
Attendance returns to the local authority	Current year + 1 year	Secure disposal
School census returns	Current year + 7 years	Secure disposal
Walking bus registers (no incident)	Date of register + 3 years	Secure disposal
SEND files — primary (reviews, IEPs, EHCPs and amendments)	Retain whilst at primary school	Follow pupil to next school or send to Local Authority
SEND files — secondary or last known school	Date of birth + 25 years	Secure disposal
Management of exam registrations	Per exam board requirements	Refer to exam board
Public examination results (pupil copy)	Certificates given to pupils; outcomes on pupil file. Uncollected certificates returned after date of exam + 1 year.	See pupil file retention
Internal examination results (pupil copy)	Added to pupil file	See pupil file retention
Examination results (school's copy)	Current year + 6 years	Secure disposal
Curriculum returns	Current year + 3 years	Secure disposal

Basic File Description	Retention Period	Action at End of Retention Period
SATs exam papers	Retain until any appeal/validation process is complete	Secure disposal
Value added and contextual data	Current year + 6 years	Secure disposal
Schemes of work	Current year + 1 year	Secure disposal
Timetable	Current year + 1 year	Secure disposal
Class lists	Current year + 1 year	Secure disposal
Mark books	Current year + 1 year	Secure disposal
Record of homework set	Current year + 1 year	Secure disposal
Pupils' work	Return to pupil at end of academic year where possible; if not possible — current year + 1 year	Secure disposal
Records for approval of educational trips — Primary	Date of visit + 14 years	Secure disposal
Parental consent forms — non-residential trips (no major incident)	Conclusion of the trip	Secure disposal
Parental consent forms — non-residential trips (major incident occurred)	Date of birth of pupil involved + 25 years	Review
Parental consent forms — residential trips	Date of birth of youngest pupil involved + 25 years	Secure disposal
Pupil online accounts (email, apps)	Date of leaving + 3 years	Deleted by IT provider

11.2 Safeguarding

Basic File Description	Retention Period	Action at End of Retention Period
Safeguarding records — child not looked after, leaves and does not transfer (low level / no inter-agency involvement)	Date of birth + 25 years	Secure disposal
Safeguarding records — child not looked after, leaves and does not transfer (referral made / social care / other agencies involved)	Date child left school + 35 years	Secure disposal
Safeguarding records — child not looked after, moves to another school or leaves to attend college (under 18)	Chronology retained per above periods; records handed/transferred to receiving DSL	Secure disposal / Transfer
Safeguarding records — looked-after child	Until the child is aged 75 years	Secure disposal
Allegation of child protection nature against a visitor/volunteer (including unfounded allegations)	Until person's normal retirement age OR 10 years from date of allegation (whichever is longer)	Review
Hard copy cause for concern forms (staff/visitors without CPOMS access)	Scanned to CPOMS; hard copies retained in line with periods above	Review then secure disposal

11.3 Human Resources

Basic File Description	Retention Period	Action at End of Retention Period
All records leading up to appointment of a new Headteacher	All relevant information added to personnel file; remaining records — date of appointment + 6 years	Secure disposal
Records relating to appointment — successful candidate (excluding Headteacher)	All relevant information added to personnel file; remaining records — 2 years from date of appointment	Secure disposal
Records relating to appointment — unsuccessful candidates	2 years from date of appointment of successful candidate	Secure disposal
Pre-employment vetting — DBS checks	Not routinely retained. If a formal risk assessment is in place, kept for duration of the risk assessment or until convictions would be filtered (whichever is sooner). If awaiting a new starter's DBS, a copy of a previous employer's DBS may be kept until the new DBS is received.	Secure disposal
Proof of ID collected for DBS check	Checked and note made; copies may be added to personnel file	Secure disposal
Evidence of right to work in the UK	Added to personnel file or kept separately for 2 years from termination of employment (Home Office requirement)	Secure disposal
Records relating to TUPE	Date last member of staff transfers or leaves + 6 years	Secure disposal
Staff personnel files (including contract and training records)	Termination of employment + 6 years	Secure disposal
Time sheets	Current year + 6 years	Secure disposal
Performance management records	Current year + 6 years	Secure disposal
Records relating to agreement of pay and conditions	Date pay and conditions superseded + 6 years	Secure disposal
Training needs analysis	Current year + 1 year	Secure disposal
Allegation of child protection nature against a member of staff (including unfounded allegations)	Until person's normal retirement age OR 10 years from date of allegation (whichever is longer)	Review
Other disciplinary records — case not found (not child protection related)	Dispose at conclusion of the case	Secure disposal
Disciplinary sanctions	Remain on personnel file	See retention period for personnel file
Records of referrals to the Teaching Regulation Agency (TRA) — referrals closed after triage	5 years from referral closure	Secure disposal
Records of referrals to the TRA — referrals closed at initial assessment	10 years from closure of case	Secure disposal
Records of referrals to the TRA — investigations that progressed through to a hearing	50 years from closure of case	Secure disposal
Staff online accounts (email, apps, third party accounts)	Date of leaving + 2 years	Deleted by IT provider

11.4 Finance

Basic File Description	Retention Period	Action at End of Retention Period
All records relating to the creation and management of budgets	Life of the budget + 3 years	Secure disposal
Trustees Annual Report and Financial Statements	Date of report + 10 years	Secure disposal
Independent auditors report on regularity and report on financial statements	Financial year report relates to + 6 years	Secure disposal
Funding agreements	Date of last payment of funding + 6 years	Secure disposal
Funding records (capital grants, EAG, GAG etc.)	Date of last payment of funding + 6 years	Secure disposal
Gift aid and tax relief	Date of last payment + 6 years	Secure disposal
Loans and Grants	Date of last payment on loans + 12 years	Secure disposal
School fund records	Current financial year + 6 years	Secure disposal
School meal registers, including evidence of successful FSM eligibility checks	FSM — current year + 6 years; Other — current year + 3 years	Secure disposal
All other financial records and documents	Current financial year + 6 years	Secure disposal

11.5 Payroll

Basic File Description	Retention Period	Action at End of Retention Period
Maternity pay records	Current year + 3 years	Secure disposal
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	From the end of the year in which the accounts were signed + 6 years	Secure disposal
Records relating to pensions (including Teachers' Pension Scheme)	Date of last payment on the pension + 40 years, or until the member would reach age 100 (whichever is longer)	Secure disposal
Payroll records	Date of payroll run + 6 years	Secure disposal

11.6 Contracts and Licences

Basic File Description	Retention Period	Action at End of Retention Period
Records relating to contracts under seal (executed as a deed, signed and witnessed)	Last payment on contract + 12 years	Secure disposal
Records relating to any other contract	Last payment on contract + 6 years	Secure disposal
Records relating to monitoring of contracts	Current year + 2 years	Secure disposal
Records relating to software licences	Date licence expires + 6 years	Secure disposal

11.7 Risk Management and Insurance

Basic File Description	Retention Period	Action at End of Retention Period
Visitors books and signing in records	Current year + 6 years	Secure disposal
Insurance policies	Date policy expires + 6 years	Secure disposal
Records relating to settlement of insurance claims	Date claim settled + 6 years	Secure disposal
Employers liability insurance certificate	Closure of the Trust + 40 years	Secure disposal
Risk and control framework / Risk Register	Life of framework + 6 years	Secure disposal
H&S risk assessments (non-fire)	Life of risk assessment + 6 years	Secure disposal
Records of minor injuries (bump notes — icepack, plaster etc.)	Date of incident + 6 months	Secure disposal
Accident books	3 years after last entry	Secure disposal
Records of accidents to a child where action is taken (collected, taken to hospital etc.)	Date of birth + 25 years	Secure disposal
Accident Reporting Forms for adults (injuries where action is needed — e.g. reported on Trust compliance system)	Date of incident + 7 years; review. If RIDDOR report filed, follow records relating to accident/injury at work.	Secure disposal
Records relating to accident/injury at work	Date of incident + 12 years	Review (further period may be needed for serious accidents; if not — secure disposal)
Other incident reports	Current year + 20 years	Secure disposal
Control of substances hazardous to health	Current year + 10 years	Review
Asbestos monitoring/management	Last action + 40 years	Secure disposal
Radiation monitoring/management	Last action + 50 years	Secure disposal
Fire precaution log books	Current year + 6 years	Secure disposal
Fire risk assessments	Life of the risk assessment + 6 years	Secure disposal
Business Continuity Plans	Date the plan was superseded + 3 years	Secure disposal

11.8 Property and Asset Management

Basic File Description	Retention Period	Action at End of Retention Period
Land and building valuations	Date valuation superseded + 6 years	Secure disposal
Leases for land and other property	Date lease expires + 6 years	Secure disposal
Transfer of land	Life of land ownership	Transfer to new owner
Property plans	Life of land ownership	Transfer to new owner
Records relating to the letting of school premises	Current year + 6 years	Secure disposal
Inventories of furniture and equipment	Current year + 6 years	Secure disposal
Disposal of assets	Date asset disposed of + 6 years	Secure disposal
Burglary, theft and vandalism report forms	Current year + 6 years	Secure disposal
Property maintenance records	Current year + 6 years	Secure disposal
Acquiring, disposing of and maintenance of vehicles	Disposal of the vehicle + 6 years	Secure disposal
Service logs for vehicles (leased)	Return to lease company with vehicle	Return to lease company
Service logs for vehicles (owned)	Life of vehicle + 6 years	Secure disposal
GPS tracking data	Date of journey + 6 years	Secure disposal

11.9 Policies

Basic File Description	Retention Period	Action at End of Retention Period
Accessibility Plan	Date policy superseded + 3 years	Secure disposal
Charging and Remissions; Data Protection Policies and associated appendices; Freedom of Information; Special Educational Needs; Complaints; Home School Agreement	Date policy superseded + 6 years	Secure disposal
Equality Information and Objectives (PSED) Statement for Publication	Date of statement + 6 years	Secure disposal
Health and Safety Policy and Admissions Policy	Life of policy + 6 years, or 10 years from date of creation (whichever is longer)	Secure disposal
All other policies	Date policy superseded + 6 years	Secure disposal

11.10 Management

Basic File Description	Retention Period	Action at End of Retention Period
Minutes of meetings (non-governance)	Date of meeting + 5 years	Review
Reports created by the academy or the Trust	Date of report + 3 years	Secure disposal
Records created by the academy trust	Current academic year + 6 years	Secure disposal
Correspondence created by the academy trust	Date of correspondence + 5 years	Secure disposal
Professional Development Plans	Life of the plan + 6 years	Secure disposal
Self-evaluation forms	Current year + 6 years	Secure disposal
Management of complaints — Stage 1 and 2	Date complaint resolved + 6 years	Secure disposal
Management of complaints — Stage 3 (formal / escalated)	Date complaint resolved + 10 years	Secure disposal
Records relating to creation and publication of academy and Trust brochure or prospectus	Current year + 3 years	Secure disposal
Records relating to creation and distribution of circulars and newsletters	Current year + 1 year	Secure disposal
Records relating to Parent Teacher Association and other parent forums	Current year + 6 years	Secure disposal
Ofsted reports and papers	Life of the report	Review
Returns made to central government	Current year + 6 years	Secure disposal
Project management records (project plans, risk logs, issue logs)	Date of project closure + 10 years	Secure disposal
Legal advice and related correspondence	Date of advice + 10 years	Secure disposal

11.11 Governance

Basic File Description	Retention Period	Action at End of Retention Period
Articles of Association	Life of the Academy Trust	Regular disposal
Memorandum of Association	Life of the Academy Trust	Secure disposal
Constitution	Life of the Academy Trust	Regular disposal
Special Resolutions	Life of the Academy Trust	Secure disposal
Written Scheme of Delegation (SoD)	Life of the SoD + 10 years	Secure disposal
Rules and Bylaws	Date rules/bylaws superseded + 6 years	Secure disposal
Statutory registers (directors/trustees, members, secretaries, register of interests, gifts and hospitality)	Life of the Trust + 6 years	Secure disposal
Appointment and removal of members, trustees and Community Council Members or equivalent	Life of appointment + 6 years	Secure disposal
Director/trustee disqualification	Date of disqualification + 15 years	Secure disposal
Trustees Annual Report and Financial Statements	Date of report + 10 years	Secure disposal
Annual return/confirmation statement	Date of report + 10 years	Secure disposal
Strategic plans and reviews	Life of plan + 10 years	Secure disposal
Agendas, Minutes and meeting papers	One copy retained for the life of the Trust	Secure disposal
Annual schedule of business/agenda planner	Current year	Secure disposal
Procedures for the conduct of meetings (governance document)	Date document superseded + 6 years	Secure disposal

11.12 IT System Records

Basic File Description	Retention Period	Action at End of Retention Period
Google/Microsoft Analytics and equivalent website analytics data	26 months from date last modified	Secure disposal
Website cookies data	2 years from date created	Secure disposal
IT monitoring, network security and user access logs	5 years from date last modified	Secure disposal
Staff IT accounts / system access records	Date of leaving + 2 years	Deleted by Central IT
Pupil IT accounts (excluding Google — see Section 11.1)	Date of leaving + 3 years	Deleted by Central IT
Records relating to testing or checking IT systems	Duration of test only — copies deleted as soon as the test or check is complete	Secure deletion
External user accounts on Trust digital platforms	Deleted after 180 days of inactivity or on request	Automated deletion

11.13 Other Information

Basic File Description	Retention Period	Action at End of Retention Period
Data retrieved as part of a Subject Access Request (SAR) — HR-related SARs	Skeleton log kept of all requests. Copy of outcome letter placed on relevant staff file. Data retrieved kept in secure folder for 7 years following the date of the outcome letter.	Review then secure disposal
Data retrieved as part of a Subject Access Request (SAR) — all other SARs	Skeleton log kept of all requests. Copy of outcome letter placed on relevant student/staff file. Data retrieved kept in secure folder for 2 years following the date of the outcome letter.	Review then secure disposal
Data retrieved as part of a Freedom of Information (FOI) request	Skeleton log kept of all requests. Copy of outcome letter placed on the relevant file. Data retrieved kept in secure folder for 2 years following the date of the outcome letter.	Review then secure disposal
Record of breaches and data collected as part of the investigation	Skeleton log kept of all breaches. Notes, correspondence or data collated as a result of the investigation held for 2 years following the date the breach was realised.	Review then secure disposal
Data Processing Agreements, Data Sharing Agreements	Last payment on contract / date processing or sharing terminated (whichever is later) + 6 years	Secure disposal
Data Protection Impact Assessments (DPIAs)	Life of the DPIA + 6 years	Secure disposal
Biometric Data (e.g. fingerprints)	Destroyed once the data subject has left the academy or when consent has been withdrawn	Secure disposal
Photography	Date the data subject has left the academy + 3 years (unless deemed worthy of permanent preservation for	Secure disposal

Basic File Description	Retention Period	Action at End of Retention Period
	historical or social value — e.g. significant events, class/yearbook photographs)	