

HORIZONS EDUCATION TRUST

Data and Records Retention Policy

September 2025

POLICY ISSUE CONTROL

POLICY TYPE:	Statutory, Mandatory
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APPROVED BY:	Director of Operations
TRUST BOARD APPROVAL:	FPP
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Document Control	
September 2025	<p>Consolidation of 2 pre-existing documents to ensure consistency and clarity.</p> <ul style="list-style-type: none">• Updated staff file retention from 6 to 7 years for consistency with 2023 policy.• Updated timesheet retention from 6 to 7 years to align with payroll records.• Corrected guidance on board minutes: retain for 6 years then review (not permanently).• Included outstanding sections from the original 2021 schedule, avoiding duplication and ensuring complete coverage.

TABLE OF CONTENTS

1.	Introduction	4
2.	Policy Purpose and Scope.....	4
3.	Legal Compliance and Responsibilities	4
4.	Retention Schedules.....	5
	Governance Records	5
	Staff Records	5
	Health and Safety.....	5
	Pupil Records	5
	Finance & Payroll.....	6
	Admissions	6
	Special Educational Needs	6
	Educational Visits	6
	Operational Administration	6
	Management Info and Statistics	6
	Family Liaison Records	7

1. Introduction

This combined policy document sets out the Horizons Education Trust's approach to the retention of data and records. It reflects both statutory and recommended retention periods for records relating to staff, pupils, governance, administration, health and safety, and finance, while ensuring compliance with UK data protection law, including the General Data Protection Regulation (GDPR).

2. Policy Purpose and Scope

This policy applies to all employees, workers, contractors, and volunteers. It governs how the Trust retains, stores, and disposes of personal data and organisational records in both paper and electronic formats. It integrates information from the Trust's Records Retention Schedule (2021) and Data Retention Policy (2023).

3. Legal Compliance and Responsibilities

The Trust recognises its legal responsibilities in retaining data for only as long as necessary. Personal data will be held for statutory or recommended periods as defined by legislation and guidance including the Limitation Act 1980, the Education Act 1996, and the GDPR. The Data Protection Officer holds overall responsibility for ensuring compliance with this policy.

4. Retention Schedules

The detailed retention schedules are organised by operational area and outlined in the following sections.

Governance Records

Document	Period of Retention	Notes
Board Minutes	6 years	Secure Disposal or Retain
Board Reports	6 years	Secure Disposal or Retain
Complaints to Board	Resolution + 6 years	Secure Disposal

Staff Records

Document	Period of Retention	Notes
Staff Personal File including DBS	Termination + 7 years	
Recruitment - Successful Candidate	Termination + 7 years	
Recruitment - Unsuccessful Candidate	6 months	
Timesheets	Termination + 7 years	
Disciplinary Records – CP raised	Termination + 25 years	
Disciplinary Records – CP not raised		Refer to relevant policy
Microsoft Account (email and OneDrive)	Termination + 7 years	

Health and Safety

Document	Period of Retention	Notes
Accident Records (Adults)	Date of incident + 6 years	Secure Disposal
Accident Records (Children)	DOB + 30 years	Secure Disposal
RIDDOR / Injury Reports	Date of incident + 12 years	Secure Disposal

Pupil Records

Document	Period of Retention	Notes
Pupil Educational File (Primary)	While pupil attends + transfer, or DOB + 30 years	Transfer/LA
Pupil File (Secondary)	While pupil attends + transfer, or DOB + 30 years	Secure Disposal
Child Protection (on file)	Same as pupil file	Secure Disposal (sealed envelope)
Child Protection (separate)	DOB + 30 years	Secure Disposal

Finance & Payroll

Document	Period of Retention	Notes
Payroll Records	7 years	Secure Disposal
Wage/Salary Records	7 years	Secure Disposal
HMRC Correspondence	7 years	Secure Disposal

Admissions

Document	Period of Retention	Notes
Admissions – successful	Date of admission + 1 year	Secure Disposal
Admissions – unsuccessful	Resolution + 1 year	Secure Disposal
Admissions Register	3 years after entry	Review/Possibly Permanent
Proof of Address	Current year + 1 year	Secure Disposal
Supplementary Info – successful	Add to pupil file	As per pupil file
Supplementary Info – unsuccessful	Until appeals complete	Secure Disposal

Special Educational Needs

Document	Period of Retention	Notes
SEN files, reviews, IEPs	DOB + 30 years	Secure Disposal
Statements (Ed. Act 1990):	DOB + 30 years	Secure Disposal
Advice to Parents	DOB + 30 years	Secure Disposal
Accessibility Strategy	DOB + 30 years	Secure Disposal

Educational Visits

Document	Period of Retention	Notes
Consent forms (no major incident):	Conclusion of trip	Secure Disposal
Consent forms (major incident):	DOB + 30 years	Secure Disposal
Walking / Bus Registers	3 years	Secure Disposal

Operational Administration

Document	Period of Retention	Notes
Visitors Books / Signing-in Sheets	Current year + 6 years	Secure Disposal

Management Info and Statistics

Document	Period of Retention	Notes
Exam Results (school copy)	Current year + 6 years	Secure Disposal
SATS Results (composite)	Current year + 6 years	Secure Disposal
Exam Papers:	Until appeals complete	Secure Disposal
Published Admission Number	Current year + 6 years	Secure Disposal
Value Added / Contextual Data	Current year + 6 years	Secure Disposal
Self-Evaluation Forms	Current year + 6 years	Secure Disposal

Family Liaison Records

Document	Period of Retention	Notes
Day Books	Current year + 2 years then review	Secure Disposal
Reports to outside agencies	While child is in school	Secure Disposal
Referral Forms	While current	Secure Disposal
Contact Data Sheets	Current year then review	Secure Disposal
Group Registers	Current year + 2 years	Secure Disposal