



Christ Centred, Child Centred, Catholic Educational Excellence

THE DIOCESE OF WESTMINSTER ACADEMY TRUST

DATA RETENTION POLICY

This Retention Policy has been approved and adopted by The Diocese of Westminster Academy Trust in July 2025 and will be reviewed in July 2027.

Signed by the Chair of The Diocese of Westminster Academy Trust:



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Schools should retain data for at least the minimum period stated below which has been developed by the Department for Education. However, if there is a clear and lawful justification for keeping it longer—such as ongoing legal, financial, or regulatory requirements—this may be permissible, provided appropriate safeguards are in place to ensure compliance with data protection laws. One example is staff data, kept in line with financial retention periods and specified in the Staff, Governor and Volunteer Privacy Notice.

1. Pupil records

Document type	Retention period	Action at end of retention period	Further information
Primary school pupil records	Until the pupil leaves the school.	Transfer to secondary school or other primary school when the pupil leaves.	See The Education (Pupil Information) (England) Regulations 2005 for details of what to keep in the pupil record. There is guidance on how to transfer information to another school.
Secondary school pupil records	Until the pupil's 25th birthday.	Dispose of records securely. If the pupil leaves to go to another school, transfer the records to that school.	See The Education (Pupil Information) (England) Regulations 2005 for details of what to keep in the education record. Retain as detailed in section 2 of the Limitation Act 1980 . There is guidance on what to do if the academy closes before the end of the retention period.
Special educational needs and disabilities (SEND), including reviews and education, health, and care (EHC) plans	6 years from the cessation of the EHC plan.	Dispose of records securely, unless the document is subject to a legal hold. If the pupil leaves to go to another school, transfer the records to that school.	SEND code of practice: 0 to 25 years . Retain as detailed in section 2 of the Limitation Act 1980 . Regulation 17 of The Special Educational Needs and Disability Regulations 2014 .



2. Child protection records

Document type	Retention period	Action at end of retention period	Further information
Child protection files	Until the child's 25th birthday. If the file relates to child sexual abuse, retain until the child's 75th birthday.	Dispose of records securely. Child protection files should be passed on to any new school a child attends. This should be transferred as separately from the main pupil file.	Should be stored either as a separate file or in a sealed envelope in the pupil file. Keeping children safe in education , sections 122 and 123. The Report of the Independent Inquiry into Child Sexual Abuse (IICSA) recommendation on access to records .
Allegations of child protection against a member of staff, including unfounded allegations	Until the staff member's normal retirement age, or 10 years from the date of the allegation, whichever is later.	Dispose of records securely.	Keeping children safe in education . Working together to safeguard children .

3. Finance records

Document type	Retention period	Action at end of retention period	Further information
Contracts	6 years from the last payment on the contract.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
Debtor's records	6 years from end of the financial year.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
VAT records	6 years from finance year end.	Dispose of records securely.	May include invoices, budgets, bank statements and annual accounts. Record keeping (VAT Notice 700/21) .



4. Governance records

Document type	Retention period	Action at end of retention period	Further information
Admissions	6 years from the admission date.	Dispose of records securely.	Regulation 7 of the School Attendance (Pupil Registration) (England) Regulations 2024.
Attendance registers	6 years from the date of entry.	Dispose of records securely.	Regulation 7 of the School Attendance (Pupil Registration) (England) Regulations 2024.
Annual governors' report	10 years.	Dispose of records securely.	The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002. Retain as detailed in section 2 of the Limitation Act 1980 .
Curricular record	At least 1 year.	Dispose of records securely.	The Education (School Records) Regulations 1989. Regulation 3 of the Education (Pupil Information) (England) Regulations 2005.
Directors – disqualification	15 years from the date of disqualification.	Dispose of records securely.	The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England) Regulations 2004.
Records of educational visits	10 years from the date of the visit. If there was an incident on the visit, retain the permission slips for all pupils and the incident report in the pupil record .	Dispose of records securely.	Health and safety on educational visits. Retain as detailed in section 2 of the Limitation Act 1980 .



Document type	Retention period	Action at end of retention period	Further information
School vehicles	6 years from the disposal of the vehicle.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
Statutory registers and compliance	Retention periods vary, for example: Memorandums of understanding should be retained for the life of the academy plus 6 years. Annual reports should be retained for 10 years from the date of the report. Board meeting records should be retained for 10 years from the date of the meeting.	Dispose of records securely.	May include annual reports and governance records. Companies Act 2006 contains information on which statutory registers to keep. Compliance guidance in the maintained schools governance guide . Compliance guidance in the academy trust governance guide . Academy trust handbook .



5. Health and safety records

Document type	Retention period	Action at end of retention period	Further information
Accessibility plans	Life of plan plus 6 years.	Dispose of records securely.	Retain as detailed in section 2 of the Limitation Act 1980 .
Accident records	3 years from the date of the accident.	Dispose of records securely.	Accidents involving pupils should be retained in the pupil record . Regulation 25 of the Social Security (Claims and Payments) Regulations 1979 .
Monitoring exposure to substances hazardous to health, including asbestos	5 years.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002 .
Health surveillance records	40 years.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002 . Health surveillance- Record keeping .
Other health records of staff	While the worker is employed in your school.	Dispose of records securely.	The Control of Substances Hazardous to Health Regulations 2002 . HSE guidance on Health surveillance- Record keeping .
Fire assessments	Life of the risk assessment plus 6 years.	Dispose of records securely.	Fire Service Order 2005 . Retain as detailed in section 2 of the Limitation Act 1980 .



6. Property records

Document type	Retention period	Action at end of retention period	Further information
Maintenance records	6 years from finance year end.	Dispose of records securely.	Record keeping (VAT Notice 700/21) .
Title deeds	12 years from end of deed.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .

7. Staff records

Document type	Retention period	Action at end of retention period	Further information
Copies of DBS certificates	6 months from date of recruitment.	Dispose of records securely.	Keeping children safe in education .
Maternity pay records	3 years after the end of the tax year in which the maternity pay period ends.	Dispose of records securely.	The Statutory Maternity Pay (General) Regulations 1986 .
Pay records	3 years from the end of the tax year they relate to.	Dispose of records securely.	PAYE and payroll for employers: Keeping records .
Personnel files	6 years from termination of employment.	Dispose of records securely.	Section 2 of the Limitation Act 1980 .
Retirement benefits	A minimum of 6 years from the end of the year in which the accounts were signed.	Dispose of records securely.	Regulation 15 of the Retirement Benefits Schemes (Information Powers) Regulations 1995 .

