The BRIT SCHOOL for Performing Arts and Technology

Name of Policy:	Data Retention Policy
Author:	Katie Findlater
Applicable to:	Staff (including Employees, Governors, Trustees, and Volunteers), Students, and Parents
Effective date:	28/10/2026
Date of next review:	27/10/2027

Version History Log

Version	Description of Change	Date of Policy Release
1.0	Original BRIT School Data Retention Policy.	19/01/2026
2.0	Updated to align with Judicium Master Template v8 (Added Document Control Block, Version History Log, updated statutory retention references for Admissions & Attendance Registers under 2024 guidance, updated primary vs secondary pupil record distinction, added note on filing archived records with destruction dates, and added Appendix 1 - Data Destruction Log).	28/10/2026

AIM

The School has a responsibility to maintain its records and record keeping systems. When doing this, the School will take account of the following factors:

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Accessibility of records and record keeping systems.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the School's current practice, the requirements of current legislation and best practice and guidance. All staff must be familiar with this policy and comply with it. It may be amended by the School from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect. The School may also vary any parts of this procedure, including any time limits, as appropriate in any case.

DATA PROTECTION

This policy sets out how long employment-related and pupil data will normally be held by the School and when that information will be confidentially destroyed in compliance with the terms of the UK General Data Protection Regulation (UK GDPR) and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of the School. The School's Data Protection Policy outlines its duties and obligations under the UK GDPR.

RETENTION SCHEDULE

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the School will adhere to the standard retention times listed within that schedule.

The retention schedule refers to all records regardless of the media (e.g., paper, electronic, microfilm, photographic etc) in/on which they are stored. All records will be regularly monitored by the Director of Data, Exams & Scheduling.

The schedule is a relatively lengthy document listing the many types of records used by the School and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

DESTRUCTION OF RECORDS

Where records have been identified for destruction, they should be disposed of in an

appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information or sensitive policy information should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate waste paper merchant. All electronic information will be deleted.

The BRIT School maintains a database of records which have been destroyed and who authorised their destruction (detailed in Appendix 1). When destroying documents (paper and electronic records), the appropriate staff member should record in this list the following:

- File reference (or other unique identifier);
- File title/description;
- Number of files;
- Name of the authorising officer;
- Date destroyed or deleted from system; and
- Person(s) who undertook destruction.

RECORD KEEPING OF SAFEGUARDING

Any allegations made that are found to be malicious must not be part of the personnel records.

For any other allegations made, the School must keep a comprehensive summary of the allegation made, details of how the investigation was looked into and resolved and any decisions reached. This should be kept on the personnel files of the accused.

Any allegations made of sexual abuse should be preserved by the School for the term of an inquiry by the Independent Inquiry into Child Sexual Abuse. All other records (for example, the personnel file of the accused) should be retained until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. In 2022 the Independent Inquiry into Child Sexual Abuse (IICSA) concluded and published their final report, leaving a recommendation that all records relating to child sexual abuse should be retained for a period of 75 years.

The ICO has not currently produced guidance or frameworks regarding retention as recommended by the inquiry. Until this has been produced, records will still be retained for a prolonged period as recommended initially by IISCA in order to fulfil potential legal duties that a school may have in relation to the inquiry or any further guidance.

ARCHIVING

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. A

database of the records sent to the archives is maintained by the Director of Student Services. The appropriate staff member, when archiving documents, should record in this list the following information:

- File reference (or other unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising officer.

Files in our archive will be filed away with the destruction date as appropriate.

TRANSFERRING INFORMATION TO OTHER MEDIA

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

TRANSFERRING INFORMATION TO ANOTHER SCHOOL

We retain the pupil's educational record whilst the child remains at the School. Once a pupil leaves the School, the file should be sent to their next school. The responsibility for retention then shifts onto the next school. We retain the file for a year following transfer in case any issues arise as a result of the transfer.

RESPONSIBILITY AND MONITORING

The Director of Data, Exams & Scheduling has primary and day-to-day responsibility for implementing this Policy. The Data Protection Officer, in conjunction with the School, is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The Data Protection Officer will consider the suitability and adequacy of this Policy and report improvements directly to management.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining, and removing records. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

EMAILS

Emails accounts are not a case management tool in itself. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost. General emails will be retained for 3 years.

PUPIL RECORDS

All schools with the exception of independent schools, are under a duty to maintain a pupil record for each pupil. Early Years will have their own separate record keeping requirements. If a child changes schools, the responsibility for maintaining the pupil record moves to the next school. We retain the file for a year following transfer in case any issues arise as a result of the transfer.

RETENTION SCHEDULE

FILE DESCRIPTION	RETENTION PERIOD
Employment Records	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference. In this case, application forms will give applicants the opportunity to object to their details being retained.
Job applications and interview records of successful candidates	Added to staff personnel file and retained in line with that record (6 years after employment ceases).
Written particulars of employment, contracts of employment and changes to terms and conditions	Added to staff personnel file and retained in line with that record (6 years after employment ceases).
Right to work documentation including identification documents and immigration checks	Kept separately from personnel file and retained for 2 years after employment ceases. (Employer's guide to right to work checks: 21 June 2024).
DBS checks and disclosures of criminal records forms	DBS certificates should be destroyed as soon as practicable after the check has been completed and the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months.
Change of personal details notifications	No longer than 6 months after receiving this notification.
Emergency contact details	Destroyed on termination.
Personnel records	While employment continues and up to six years after employment ceases (Limitation Act 1980).
Annual leave records	Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year.

FILE DESCRIPTION	RETENTION PERIOD
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards.
Working Time Regulations: Opt out forms & Records of compliance with WTR	Two years from the date on which they were entered into / Two years after the relevant period.
Disciplinary records	6 years after employment ceases (Limitation Act 1980).
Grievance records	6 years after employment ceases (Limitation Act 1980).
Training	6 years after employment ceases (Limitation Act 1980) or length of time required by the professional body.
Staff training where it relates to safeguarding or other child related training	Date of the training plus 40 years (This retention period reflects that the IICSA may wish to see training records as part of an investigation).
Annual appraisal/assessment records	Current year plus 3 years.
Professional Development Plans	Life of the plan or plan superseded + 6 years.
Allegations of a child protection nature against a member of staff including where the allegation is unfounded	10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed.
Financial and Payroll Records	
Pension records	12 years.
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	6 years from the end of the scheme year in which the event took place.
Payroll and wage records	6 years after end of tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988).
Maternity/Adoption/Paternity Leave records	3 years after end of tax year they relate to (Statutory Maternity Pay (General) Regulations 1986).

FILE DESCRIPTION	RETENTION PERIOD
Statutory Sick Pay	3 years after the end of the tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988).
Current bank details	Until updated plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988).
Bonus Sheets	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988).
Time sheets/clock cards/flexitime	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988).
Pupil Premium Fund records	Date pupil leaves the school plus 6 years.
National Insurance (schedule of payments)	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988).
Insurance	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988).
Overtime	Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988).
Annual accounts	Current year plus 6 years.
Loans and grants managed by the School	Date of last payment on loan + 6 years if loan < £10,000 or date of last payment + 12 years if loan > £10,000.
All records relating to the creation and management of budgets	Life of the budget plus 3 years.
Invoices, receipts, order books and requisitions, delivery notices	Current financial year plus 6 years.
Student Grant applications	Current year plus 3 years.
School fund documentation (invoices, cheque books, receipts, bank statements)	Current year plus 6 years.
Free school meals registers (where used as	Current year plus 6 years.

FILE DESCRIPTION	RETENTION PERIOD
a basis for funding)	
School meal registers and summary sheets	Current year plus 3 years.
Agreements and Administration Paperwork	
Collective workforce agreements and past agreements that could affect present employees	Permanently.
Trade union agreements	10 years after ceasing to be effective.
Strategic Plan or School Development Plans	Life of plan or until plan superseded + 3 years. If major changes are made, an archive copy should be retained.
Visitor Signing-in Records	6 years (Sign In App and On-Guard system).
Newsletters and circulars to staff, parents and pupils	1 year (and the School may decide to archive one copy).
Minutes of Senior Management Team meetings	Date of the meeting plus 3 years or as required.
Reports created by the Head Teacher or the Senior Management Team	Date of the report plus a minimum of 3 years or as required.
Records relating to the creation and publication of the school prospectus	Current academic year plus 3 years.
Health and Safety Records	
Health and Safety consultations	Permanently.
Health and Safety Risk Assessments	Life of the risk assessment plus 3 years.
Health and Safety Policy Statements	Life of policy plus 3 years.
Any records relating to any reportable death, injury, disease or dangerous occurrence	Date of incident plus 3 years provided that all records relating to the incident are held on personnel file.
Accident reporting records relating to individuals under 18 years of age at the time of incident	Until the child reaches the age of 21 (Limitation Act 1980).
Accident reporting records relating to individuals over 18 years of age at the	Date of last entry in accident book + 3 years (or if negligence allegation possible:

FILE DESCRIPTION	RETENTION PERIOD
time of incident	incident + 15 years / settlement + 6 years).
Fire precaution log books	Current year plus 6 years.
Medical records / details of lead, asbestos, COSHH exposures	40 years from the date of the last entry made in the record (COSHH Regulations; Control of Asbestos Regulations).
Records of tests and examinations of control systems and protection equipment under COSHH	5 years from the date on which the record was made.
Governing Body Documents	
Instruments of government	For the life of the School. Consult local archives before disposal.
Meetings schedule	Current year.
Minutes – principal set (signed)	Generally kept for the life of the organisation (Date of meeting + 10 years minimum).
Agendas – principal copy / additional copies	Stored with principal set of minutes / Additional copies destroyed after meeting date.
Policy documents created and administered by the governing body	Until replaced.
Register of attendance at full governing board meetings	Date of last meeting in the book plus 6 years.
Annual Reports created under requirements of Education Regulations 2002	Date of report plus 10 years.
Records relating to complaints investigated by governing body/Head Teacher	Major complaints: current year + 6 years; Negligence: + 15 years; Safeguarding: + 40 years; Child sexual abuse: indefinitely.
Correspondence sent and received by governing body or Head Teacher	General correspondence retained for current year plus 3 years.
Governor terms of office, appointment records, training, and personnel files	Date appointment ceases plus 6 years (except child allegations: 25 years).
Register of business interests	Date appointment ceases plus 10 years

FILE DESCRIPTION	RETENTION PERIOD
	(Companies Act 2006).
Pupil Records	
Details of whether admission is successful/unsuccessful	1 year from date of admission/non-admission (School Admissions Code Guidance).
Proof of address supplied by parents as part of admissions process	Current year plus 1 year (School Admissions Code Guidance).
Admissions Register	Entries to be preserved for six years from date of entry (Working together to improve school attendance, Section 36, 2024 Statutory guidance).
Pupil Record, including non-child protection safeguarding records	Primary – Whilst the child attends the School. Secondary – Until the child reaches the age of 25 (Limitation Act 1980, Section 2).
Attendance Registers	Six years from the date of entry (Working together to improve school attendance, Section 36, 2024 Statutory guidance).
Correspondence relating to any absence (authorised or unauthorised)	Current academic year plus 2 years (Education Act 1996, Section 7).
Counselling Records	5 years from date of counselling.
Special Educational Needs files, reviews, and EHCP plans	Primary – whilst child attends. Secondary – Date of birth + 31 years (EHCP valid to 25 + 6 years).
Child protection information (held in separate file)	DOB of child plus 25 years then review (Sexual abuse allegations: retained indefinitely under IICSA guidance).
Examination results (pupil copy / school copy)	Pupil copy added to pupil file / School copy kept current year plus 6 years.
Consents relating to school activities (UK GDPR compliance)	Evidence retained whilst pupil attends school, or until withdrawn (whichever shorter).
Pupil work, mark books, schemes of work, timetables, homework records	Returned at end of academic year or kept current year plus 1 year.

FILE DESCRIPTION	RETENTION PERIOD
Photographs of pupils	For the time child is at the School and a short while after (historic images may be retained longer).
Parental consent forms for school trips	No major incident: end of trip/academic year. Major incident involved: DOB of pupil involved + 25 years (all permission slips on trip retained).
Other Records	
Emails	3 years.
CCTV	31 days.
Privacy notices	Until replaced plus 6 years.
Inventories of furniture and equipment	Current year plus 6 years.
Building maintenance records by contractors/employees	Whilst the building belongs to the school.
Lettings records / PTA & Old Pupils Association records	Current financial year plus 6 years.
Referral forms / Contact data sheets	While referral current / Current year then review (destroy if inactive).

APPENDIX 1 – DATA DESTRUCTION LOG

Guidance note: It is important to record any large destruction of data (both electronic and hard copy based). Utilising a data destruction log is an effective way to evidence compliance. Be mindful not to add personal data of data subjects whose data you are destroying.

File Reference Number	Description of Record / Document	Number / Detail of Documents Included	Details of Action Carried Out & Date Destroyed	Name of Staff Member & Date
Example: Staff2016	*Job description, CV, contract, qualifications and certifications*	*5 ex-staff members*	*Shred-It – Data Destruction certificate: ShredIt2701*	*John Smith – 01/01/2026*