



Document Owner and Approval

Queen Mary's College (QMC) is an Academy within the North Hampshire Education Alliance (NHEA) Multi-Academy trust. The College, on behalf of the NHEA, is the Data Controller and the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the College's review schedule.

A current version of this document is available to all members of staff on the Staff Hub.

Version History Log

Version	Description of Change	Date of Policy Release by Judicium
1	Initial issue	9.10.23
2	Reviewed	July 2025
3	Headers & Logos updated- Formatted	October 2025
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1 Data Retention Policy

1.1 The College has a responsibility to maintain its records and record keeping systems.

When doing this, the College 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.

1.2 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 College's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the College 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 College may also vary any parts of this procedure, including any time limits, as appropriate in any case.

2 Data Protection

- 2.1 This policy sets out how long employment-related and student data will normally be held
- 2.2 by the College 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.
- 2.3 Data will be stored and processed to allow for the efficient operation of the College. The College's Data Protection Policy outlines its duties and obligations under the UK GDPR.

3 Retention Schedule

- 3.1 Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the College will adhere to the standard retention times listed within that schedule.
- 3.2 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 conducting regular reviews and review of the retention schedule.

4 Destruction of Records

- 4.1 The schedule is a relatively lengthy document listing the many types of records used by the College and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.
- 4.2 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.
- 4.3 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 wastepaper merchant. All electronic information will be deleted.
- 4.4 The College maintains a database of records which have been destroyed and who authorised their destruction. When destroying documents, 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.

5 Retention of Safeguarding Records

- 5.1** Any allegations made that are found to be malicious must not be part of the personnel records.
- 5.2** For any other allegations made, the College 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.
- 5.3** Any allegations made of sexual abuse should be preserved by the College for the term of an inquiry by the Independent Inquiry into Student 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. Guidance from the Independent Inquiry Student Sexual Abuse states that prolonged retention of personal data at the request of an Inquiry would not contravene data protection regulation provided the information is restricted to that necessary to fulfil potential legal duties that a College may have in relation to an Inquiry.
- 5.4** Whilst the Independent Inquiry into Student Sexual Abuse is ongoing, it is an offence to destroy any records relating to it. At the conclusion of the Inquiry, it is likely that an indication regarding the appropriate retention periods of the records will be made.

6 Archiving

- 6.1** 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 SLT and the Safeguarding Team. 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.

7 Transferring Information to Other Media

- 7.1** 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.

8 Responsibility and Monitoring

- 8.1** SLT has primary responsibility and relevant staff have day-to-day responsibility for implementing this policy. The Data Protection Officer, in conjunction with the College 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.
- 8.2** Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.
- 8.3** 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.

9 Emails

- 9.1** Emails will be deleted centrally on a rolling 3 year basis. If emails 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 student 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.

10 Student Records

- 10.1** All Colleges are under a duty to maintain a student record for each student. If a student changes Colleges, the responsibility for maintaining the student record moves to the next College. We retain the file for a year following transfer in case any issues arise as a result of the transfer.

11 Retention Schedule

FILE DESCRIPTION	RETENTION PERIOD
Employment Records	
Job applications and interview records of unsuccessful candidates	Six months after notifying unsuccessful candidates, unless the College 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	10 years after employment ceases
Written particulars of employment, contracts of employment and changes to terms and conditions	10 years after employment ceases
Right to work documentation including identification documents	10 years after employment ceases
Immigration checks	10 years after the termination of employment
DBS checks and disclosures of criminal records forms	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
Personnel records	While employment continues and up to 10 years after employment ceases
Annual leave records	10 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 10 years afterwards
Working Time Regulations: <ul style="list-style-type: none"> • Opt out forms • Records of compliance with WTR 	<ul style="list-style-type: none"> • 10 years from the date on which they were entered into • 10 years after the relevant period
Disciplinary records, including allegations of a student protection nature against a member of staff including where the allegation is founded	When spent
Training	10 years after employment ceases or length of time required by the professional body
Annual appraisal/assessment records	Current year plus 10 years
Professional Development Plans	10 years from the life of the plan
Financial and Payroll Records	
Pay and pension records	10 years
Retirement benefits schemes – notifiable events (for example, relating to incapacity)	10 years from the end of the scheme year in which the event took place
Payroll and wage records	10 years after end of tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Maternity/Adoption/Paternity Leave records	10 years after end of tax year they relate to
Statutory Sick Pay	10 years after the end of the tax year they relate to

Insurance	Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988)
Annual accounts	Current year plus 7 years
Invoices, receipts, order books and requisitions, delivery notices	Current financial year plus 6 years
Student Financials Support/Bursary applications	Current year plus 6 years
College fund documentation (including but not limited to invoices, cheque books, receipts, bank statements etc).	Current year plus 6 years
Free College meals registers (where the register is used as a basis for funding)	Current year plus 6 years
Agreements and Administration Paperwork	
College Development Plans	3 years from the life of the plan
Minutes of Senior Leadership Team meetings	Date of the meeting plus 3 years
Records relating to the creation and publication of the College prospectus	Current academic year plus 3 years
Health and Safety Records	
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
Accident reporting records relating to individuals who are under and over 18 years of age at the time of the incident	Until student reaches the age of 21.
Fire precaution log books	Current year plus 3 years
Temporary and Casual Workers	
Records relating to hours worked and payments made to workers	10 years
Governing Body Documents	
Instruments of government	For the life of the College
Meetings schedule	Current year
Agendas & Minutes – principal set (signed)	Generally kept for the life of the organisation
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 required by the Department of Education	Date of report plus 10 years
Records relating to complaints made to and investigated by the governing body or head teacher	Major complaints: current year plus 6 years.

Records relating to the terms of office of serving governors, including evidence of appointment	Date appointment ceases plus 6 years
Register of business interests	Date appointment ceases plus 6 years
Records relating to the training required and received by governors	Date appointment ceases plus 6 years
Records relating to the appointment of a clerk to the governing body	Date on which clerk appointment ceases plus 10 years
Governor personnel files	Date appointment ceases plus 10 years
Student Records	
Details of whether admission is successful/unsuccessful	1 year from the date of admission/non-admission
Student Record	7 years – see special categories below
Attendance Registers	7 years from the date of entry
Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Date of birth of the student plus 31 years (Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan). (Children and Family's Act 2014; Special Educational Needs and Disability Act 2001)
Student protection information (to be held in a separate file).	DOB of the student plus 25 years then review Note: These records will be subject to any instruction given by IICSA
Exam results (student copy)	7 years in conjunction with other student information
Allegations of sexual abuse	For the time period of an inquiry by the Independent Inquiry into Student Sexual Abuse
Records relating to any allegation of a student protection nature against a member of staff	Until the accused normal retirement age or 10 years from the date of the allegation (whichever is the longer)
Student's work	Where possible, returned to student at the end of the academic year (provided the work is not required by exam boards for possible assessment/moderation.
College electronic Markbook system	No longer visible after student leaves College. Retained for 3 years.
Timetable	Current year plus 5 years
Photographs of students	Student ID photos retained for 5 years with student record.
Parental consent forms for College trips where there has been no major incident	Consent is held on student record for 7 years. Separate consent for residential/hazardous trips is held with trip

	information to provide an auditable trail for 7 years.
Other Records	
Emails Microsoft 365/Google systems e.g. OneDrive, Google Drive, Teams, etc	3 years
CCTV	1 calendar month
Privacy notices	Until replaced plus 6 years
Inventories of furniture and equipment	Current year plus 6 years
All records relating to the maintenance of the College carried out by contractors or employees of the College	Whilst the building belongs to the College
Records relating to the letting of College premises	Current financial year plus 6 years
Records relating to the creation and management of Parent Teacher Associations and/or Old Students Associations	Current year plus 6 years then review
Referral forms	While the referral is current
Contact data sheets	Current year then review, if contact is no longer active then destroy

Last reviewed July 2025