



Data Retention Policy

December 2025

Reviewed by Executive Team:	November 2025
Endorsed by [committee]:	N/A
Approved by Board:	9 December 2025
Next review	Autumn 2027

1. Introduction

- 1.1. Horsham Learning Alliance (Trust) must, in respect of its processing of personal data, comply with Data Protection Laws i.e., the Data Protection Act 2018, the General Data Protection Regulation 2016/679, and related legislation.
- 1.2. This Retention Policy should be read in conjunction with the Trust's Data Protection Policy and Privacy Notices which set out the Trust's overall approach to data protection matters and the rationale for why a Retention Policy is required for personal data.
- 1.3. The Trust is under a legal obligation to keep personal data only for as long as the Trust needs it. Once the Trust no longer needs personal data, the Trust must securely delete it. The Trust recognises that the correct and lawful treatment of data will maintain confidence in the Trust and will provide for a successful working environment.
- 1.4. This Policy applies to all Trust employees, including volunteers, consultants, contractors hired to work on behalf of the Trust, Members, Trustees and Governors referred to collectively as Trust staff.
- 1.5. All Trust staff with access to personal data must comply with this Retention Policy.
- 1.6. Please read this Retention Policy carefully. All Trust staff must comply with it at all times. If you have any queries regarding this Retention Policy, please consult your manager and/or a member of the Data Protection Team. You are advised that any breach of this Retention Policy will be treated seriously and may result in disciplinary action being taken against you.
- 1.7. Trust staff will receive a copy of this Policy when they begin their role and may receive periodic revisions of this Policy. This Policy does not form part of any Trust staff members contract of employment and the Trust reserves the right to change this Policy at any time. All Trust staff are obliged to comply with this Policy at all times.

2. Scope

- 2.1. This Retention Policy explains how the Trust complies with our legal obligation not to keep personal data for longer than we need it and sets out when different types of personal data will be deleted. In particular, it sets out details of the Trust's policies for the retention of Special Category personal data.

3. Data Retention Periods

- 3.1. The Trust has assessed the types of personal data that the Trust holds and the purposes the Trust use it for. The table below sets out the retention periods that the

Trust has set for the different departments within the Trust, and the different types of data that they each hold.

- 3.2. If any member of Trust staff considers that a particular piece of personal data needs to be kept for more or less time than the period set out in this policy, please contact the Data Protection Team for guidance.

4. Retention periods of different categories of data

Note: It is important to remember that data retention looks at all data streams and one size does not fit all. Defined retention periods should be set in relation to each category of personal data. When setting data retention periods, consideration should be given to the following:

- the purpose for which the data was obtained;
- whether the purpose has been fulfilled; and
- whether the data needs to be retained for any potential legal claims.

5. Changes to this policy

The Trust reserves the right to change this policy at any time.

If you have any queries concerning this policy, please contact the Trust's Data Protection Officer: DPO@hla.education or member of the local Data Protection Team based at the College or schools.

6. Related Documentation

This policy links to the following policies and procedures:

- Data Protection Policies
- Privacy Notices
- Freedom of Information Policy and Publication Scheme
- Safeguarding and Child Protection Policies
- Health and Safety Policy

Retention Schedule

	Record	Period of Retention
Governance		
1.	Establishment and development of the institution's legal framework and governance structure	Life of the institution
2.	Trust Board and Committee Meeting Agendas and Papers	Current year + 50 (subject to review of archival value)
3.	Formal minutes approved by the Trust Board and its Committees	Current year + 50 (subject to review of archival value)
4.	Appointment of Trustees	Termination of appointment + 6 years (Limitation Act 1980)
5.	Register of Interests	Termination of appointment + 6 years
6.	Terms of Reference of the Committees of the Trust Board	Life of the Institution
7.	Trustee and Governor Training	Current year + 3 years
8.	Legal advice relating to governance	Life of the Institution
9.	Appointment of Executives	Until termination of employment + 7 years
10.	Unsuccessful Executive candidates	12 months from the date of the decision to appoint the successful candidate
General		
11.	Trust Policies and Procedures/Guidance	The life of the policy/guidelines + 3 years for updates
12.	Strategic Plan	Superseded + 10 years
13.	Contracts (originals) including tenders, time-expired contracts and transport tenders, for instance, DfE Funding Agreements. Legal support for negotiation, establishment and review of agreements and contracts under seal	7 years Termination of Contract + 12 years (c.58 Limitation Act 1980)
14.	Minutes of meetings such as SLT, Subcontracting and Risk Management Group	3 years
15.	Complaints files	3 years
16.	Risk Register Documentation	Superseded + 3 years
17.	Self-Assessment Reports	Current year + 5 years
18.	Freedom of Information Requests Register	Last action + 6 years
19.	Freedom of Information Publication Scheme	Annual Review subject to AoC Guidance

Quality		
20.	Internal Quality Files	5 years
21.	Student comments and College/schools surveys	7 years
Finance		
22.	Payroll Data (including pay claims, expense claims)	Duration of individual's employment, then archived for 7 years
23.	Pension Records	Under LGPS regs employers should be able to provide the last 13 years pensionable pay for a 3 in 10 calculation, as well as a full-service history for any employee with pre-April 2014 service
24.	Employers Liability Certificate	40 years
25.	Financial Records (all records including invoices, receipts, copies of ledgers and accounts – electronic and hard copy)	7 years
26.	Fixed Asset Register	50 years
27.	External and Internal Audit Records	7 years
28.	Insurance policies, insurance claims	7 years
Health and Safety		
29.	Accident Register/Reports HSE returns	7 years
30.	Accident Register/Reports Internal Records	3 years
31.	Health and Safety Assessments/Records (including audits, tests and inspection records)	7 years
32.	PAT testing records	5 years
Legal Contracts		
33.	Deeds to properties	Indefinitely
34.	Legal support for negotiation, establishment and review of other contracts and agreements	Termination of Contract + 6 years
35.	Legal advice concerning legal framework, industrial relations, health and safety issues	Life of Institution
36.	Validation documents with Universities	For the life of the programme + 1 year

37.	Contracts* with partners	Indefinitely
Human Resources		
38.	Staff Professional Development Records	2 years after termination of employment
39.	Recruitment Files (digital copies of applications from successful and unsuccessful candidates)	Paper – 1 year Digital portal – when candidate deletes account *
40.	References given	Duration of employment + 7 years after leaving
41.	References received	Duration of employment + 7 years after leaving. References received for applicants who are not appointed are retained for 12 months
42.	Employment Tribunal	30 years
43.	Induction administration records	Duration of employment + 7 years after leaving
44.	Staff Personal Files – see also 55 under Safeguarding	Duration of employment + 7 years after leaving
45.	Summary of record of service	10 years from end of employment
46.	Pre-employment Health Screening records	Duration of employment + 7 years after leaving
47.	Sickness Records	Duration of employment + 7 years after leaving
48.	Medical Records	Duration of employment + 7 years after leaving
49.	Health records where reason for termination of employment is connected with health, including stress related illness	Duration of employment + 7 years after leaving
50.	Single Central Record	Duration of employment + 7 years after leaving
51.	Disclosure and Barring Scheme (DBS) certificates	Duration of employment + 7 years after leaving
52.	Parental Leave	5 years from birth/adoption of the child or 18 years if the child receives a disability allowance
53.	Pension scheme investment policies	12 years from the ending of any benefit payable under the policy
54.	Facts relating to less than 20 redundancies, facts relating to 20 or more redundancies and Trade Union agreements	7 years from the date of agreement

55.	Personal ID for unsuccessful shortlisted job applicants (photocopies of passports, DBS, driving license, marriage certificate)	1 week
56.	Safeguarding (staff/volunteers) Records relating to concerns about an adult's behaviour around children should be kept on individual person's file, unless found to be malicious in which case they should be destroyed immediately	Until normal retirement age or for 10 years whichever period is the greater
Funding/MIS/Exams/Students Records		
57.	Student Records	7 years
58.	Exam Records including timetables, results, appeals, visits	7 years
59.	Exam Concessions	7 years
60.	Student Details (personal files)	7 years (electronic records can be kept for longer in which case the details kept will be simple i.e., start and finish dates and examinations taken)
61.	Student Course/Subject Files	5 years
62.	Student Applications (that do not lead to enrolment)	2 years
63.	Student Services:- • Student Counselling • Advice and Guidance • Access Fund	Duration of student's enrolment, then archived for 3 years
64.	Staff Timetables	2 years for paper 5 years for electronic
65.	Enrolment forms, registers, funding claims	at least 30 years
66.	Exam results	7 years
67.	Exam certificates (returned)	1 year
68.	Attendance Registers	6 years from date of entry
69.	Absence correspondence	Current academic year + 2 years
70.	Special Education Needs files, reviews and EHCP	DOB of student + 25 years
71.	Consents relating to College/schools activities/trips where no major incident	Duration of enrolment, or until withdrawn

72.	Consents relating to College/schools activities/trips where there has been a major incident	DOB of student involved + 25 years Permission slips for all students on trip should be retained for this period
73.	Photographs of students	General – while enrolled + 3 years Publicity – until consent is withdrawn
74.	Safeguarding (students) information is retained in individual student files	Until the student is 25
75.	Records concerning Looked After Children	75 years from date of leaving College/schools
76.	Special Education Needs files, reviews and EHCP	Until the student is 25
77.	Student's Own Work – (linked to Retention of Student Work Policy), mark books, schemes of work, class record books and records of homework set	1 year
78.	Learner Support Fund claims	7 years
79.	Records including EHCPs and Exam Access Arrangements	6 years
IT Department		
80.	Support Contracts	Current Year + 7 Years
81.	Staff use of Computers Agreements	Current Staff + 1 year
82.	Software Licence agreements	Current Year + 7 years
83.	IT Support Helpdesk Requests and Emails	Current Year + 1 year
84.	Firewall and web filter logs	1 year
85.	Virus, Malware, DLP and Backup logs	1 year
86.	Capital and revenue budget allocation	Current year + 7 years
Library		
87.	Reader records for staff and students with no outstanding overdue loans	Current academic year
88.	Record of communication with staff and students who have overdue loans	Destroy once resolved or 3 years after item due date

89.	Reader records for staff and students who have left with loans	3 years after item due date
90.	Library survey feedback and comments	3 years
91.	Evening sign in and out registers	Current academic year
All Curriculum Areas/Departments		
92.	Minutes of staff and curriculum meetings	Current and previous year
Estates		
93.	Helpdesk Requests	From date of issue + 1 year
94.	Inspection, maintenance and repair of property	Completion of work + 2 years
95.	CCTV recordings	Creation + 42 days
96.	Repairs to fixtures and fittings	Current year + 1 year
97.	Records of Disposal of Hazardous Material	Current year + 4 years
98.	Key Register	Creation + 2 years
99.	Visitor management software for Visitors and Contractors – records deleted	1 year
100.	Record of Incidents	Current + 1 year
101.	Activation of Fire Alarm	Current + 1 year
102.	Intruder Activation Log Sheets	Current + 1 year
103.	Health and Safety/Operations Maintenance Manuals (i.e. lifts)	Life of the Building
104.	Medical records kept for the reason of the Control of Substances Hazardous to Health Regulations 1999	40 years