



ALDERLEY EDGE
SCHOOL FOR GIRLS

Data Retention Policy and Schedule

May 2026

This policy and schedule is written in light of the closure of AESG on July 7th 2026. In constructing the document, the School has followed guidance set out in numerous publications, but especially:

Data Protection in schools government document [Data protection in schools - Record keeping and management - Guidance - GOV.UK](#) March 2026 Update

The Independent Schools Bursars Association (ISBA) **Guidelines for Independent Schools on the Storage and Retention of Records and Documents**

It has also sought advice and guidance from legal, educational and Data Retention agencies.

Significantly, in light of the above, it has sought the advice and guidance from the Information Commissioner's Office (ICO) and this has been used extensively in devising the final schedule contained in this document.

Context

In devising a comprehensive document to detail the data to be retained, the retention period, arrangements for storage and deletion after the end of a retention period, a number of complex factors are integral to final decisions being made. In particular:

1 There is scant procedural advice on data retention when a school closes. ISBA summarise the issues as:

School closure situations are inherently more complex and will require case by case consideration and advice, particularly if there is no successor entity to retain the records following a closure.

2 All data retention schedules (such as the example found in both government and ISBA documents) are written for schools in operation and ongoing entities.

3 Data retention guidance is clear that *data protection law is based on the principle that personal data (that is, data by which a living individual or 'data subject' may be identified) must not be held for longer than is necessary for the particular lawful purpose for which it was collected¹. Nor should schools keep more personal data than is necessary for that purpose.*

4 While it is clear that schools must have data retention policies, **most actual retention periods are matters of judgment.**

Also note that the ISBA document also states that *data protection law – being principles-based – does allow data controller organisations to make its own decisions as to how to process and retain data, based on all available lawful considerations and its reasonable aims*

5 Many retention periods are dependent upon there being the capacity to regularly review files. Where this is not possible, alternative arrangements, suitably assessed, may be considered.

6 The ICO have provided clear guidance that if data is no longer relevant or needed it need no longer be held. The ICO have confirmed that with the School Closure, the data held (apart from any legal requirement for retention) ceases to be relevant as there is no one as Data Controller to act upon requests for data/available to review the data.

7 Where data needs to be retained – for example current pupil safeguarding records/pupil records- the ICO recommend that these should follow the pupil to the next school and once confirmation received that they are received, the new school becomes the Data Controller of that pupil's data.

8 Where data is for pupils no longer at the school or is data that needs to be retained legally, the ICO recommend that this be lodged with a provider who can access the data if necessary. While the ICO are clear that it is not within their remit to advise who this should be, they do recommend approaching the Local Authority for safeguarding information and making appropriate arrangements for other data such as accounts – for example, a solicitor with a clear deletion schedule.

The conclusion that can be reasonably drawn from the above considerations is that the exceptional circumstances of the school closure allow for the writing and expediting of a data retention policy that reflects the realities of data management and retention after closure. While clearly needing to adhere to best practice around certain data (for example child sexual abuse safeguarding information), the ICO has confirmed that the exceptional nature of the closure allows, within the remit of no longer being needed or relevant, for much data (having been passed on where appropriate to new schools or the local authority or solicitor or similar) to be deleted a relatively short period after closure.

Data Controllers, Storage and Deletion

Data that needs to be retained will be stored as far as possibly digitally. Such data required to be retained will be clearly archived with retention and destruction dates and held by an appropriate body to carry out this task – eg lawyers. A representative from the School be appointed as a to agree/oversee annual deletion of the data in conjunction with lawyers.

Information passed on to Schools and Local Authority will mean all enquiries go to those entities as the new Data Controller. Other data can be accessed if required from the digital archive via solicitors. A note tied to a legacy web page will direct potential data requests to the relevant authority.

Data Retention Schedule

The Data Retention Schedule is devised on the basis of the above parameters.

The date of closure (referred to in schedule) of AESG is 7th July 2026.

Data Retention Periods for School Data After Closure

Type of Record/Document	Suggested Data to Retain and Retention Period
<p><u>EMAILS ON SERVER</u></p> <ul style="list-style-type: none">• Pupil email account• Staff emails	<p>All pupils to be given deadline for removing e-mail account being switched off – given results/possible remarks/appeals etc. for Y11 and Y13 this should not be before end of September. All other pupil year groups a deadline of two weeks after closure).</p> <p>Y13 already been told to change their UCAS account to personal e-mails.</p> <p>For staff suggest a 31 August deadline for e-mail accounts to be removed. Most will be in new schools after this date.</p> <p>It would be pertinent to have personal contact e-mails for staff to be held for a year in case of need to contact.</p>
<p><u>SCHOOL-SPECIFIC RECORDS</u></p> <ul style="list-style-type: none">• Registration documents of School• Admission Register ('the school roll')• Attendance Register• Minutes of Governors' meetings• Complaints Register / Log	<p>Deleted on closure.</p> <p>Copies of roll can be retained as record of being a pupil at the school for archive purposes but personal details removed. All full copies to be deleted by 1st November 2026.</p> <p>All copies to be deleted by 1st November 2026.</p> <p>Governors minutes and other related documents since September 2024 to be held electronically and deleted after 6 years.</p> <p>Complaints Log since September 2024 to be held for one year after closure and then deleted. Any relevant safeguarding information contained as part of complaint meeting the DSL threshold for retention, added to relevant safeguarding files.</p>

<p><u>INDIVIDUAL PUPIL RECORDS</u></p> <ul style="list-style-type: none"> • Admissions: application forms, assessments, records of decisions for pupils currently in the school. • Student immigration records • Examination results (external) • Pupil Academic File: <ul style="list-style-type: none"> - Pupil reports and performance records - SEND information <p>Pupil medical records (<i>not accidents</i>)</p> <ul style="list-style-type: none"> • Other pupils records not safeguarding or pastoral related 	<p><i>NB these records will contain personal data</i></p> <p>Deletion October 31 2026</p> <p>For any unsuccessful applications, details should be destroyed immediately.</p> <p>Deletion October 31 2026</p> <p>Summary external examination results (name and grades obtained at GCSE/A Level/BTEC by subject) to be retained by solicitors for 7 years. The data held will be deleted after seven years (although may include results for cohorts back to 2009).</p> <p>.</p> <p>Passed to new school and then deleted.</p> <p>Former pupils core school records will be deleted on annual basis for next seven years.</p> <p>Unless part of safeguarding, deletion 31 October 2026.</p> <p>Note medical information will not be passed to new school unless part of safeguarding. New schools should ask for medical information as part of admissions procedures.</p> <p>All other documentation not related to pastoral/safeguarding can be deleted on School closure.</p>
<p><u>SAFEGUARDING</u></p> <ul style="list-style-type: none"> • • • • • Policies, procedures and insurance • Accident / Incident reporting • Child Protection files and specific records of child sexual abuse 	<p>Current pupils records transfer to the new school and deleted October 31 2026.</p> <p>For former pupils, the DSL determines threshold for retention of safeguarding information.</p> <p>That information passed to local authority and then deleted 31st October 2026.</p> <p>CPOMS (pastoral management system) shut down on October 31st 2026.</p>

<ul style="list-style-type: none"> • Video/audio recordings of meetings 	<p>Delete by October 31st. 2026 unless forming a significant part of one of the serious safeguarding cases above</p>
<p>Whole School Data – eg cohort spreadsheets of progress etc (Not department data – see below)</p> <p>Internal Exams</p>	<p>This refers to such data that may, for example, have been retained on a centralised spreadsheet – eg records of entrance exams, cohort progress spreadsheets, MIdYIS/YELLIS/ALIS data – deleted 31st October 2026.</p> <p>For Y11 and Y13 a later date of December 31st 2026 or until final exam appeals etc. have been completed and certificates issued.</p> <p>If the spreadsheet shows the same data as held elsewhere – eg pupil reports/grades deleted from August 31st. 2026</p> <p>Internal exam data for current pupils to be deleted by October 31st 2026</p>
<p>Department Data/Pupil Work</p> <p>NEA Assessments</p>	<p>All departments should separate out tracking sheets for Y11 and U6th as these may be needed post publication of examination results and clearly labelled. Held centrally and deleted after issue of examinations certificates of 31st December 2026 whichever is earlier.</p> <p>All tracking spreadsheets/records of marks for Reception to Y10 and Y12 (and any historical records) to be deleted by August 31st.</p> <p>All teacher mark books to be deleted by August 31st.</p> <p>Any pupil work to be given back to pupils before July 7th and any copies deleted by August 31st.</p> <p>Previous pupils work/exemplar exam scripts etc. to be destroyed by August 31st</p> <p>All NEA assessments for Y11 and Y13 to be retained and passed to Exam Office.</p> <p>Any Y10/Y12 assessments to be sent to new school or given to pupils as appropriate/deemed allowable by specification.</p>

<p>School Management System (ISAMS)</p>	<p>ISAMS to be turned off on 31st December 2026</p>
<p><u>CORPORATE RECORDS</u> (if this applies then suggest 7 years unless this is a legal requirement in which case retention periods here)</p> <ul style="list-style-type: none"> • Certificates of Incorporation • Minutes, Notes and Resolutions of Boards or Management Meetings • Shareholder resolutions • Register of Members/Shareholders • Annual reports 	<p>eg where schools have trading arms</p> <p>Permanent (or until dissolution of the company)</p> <p>Minimum – 10 years</p> <p>Minimum – 10 years</p> <p>Permanent (minimum 10 years for ex members/shareholders)</p> <p>Minimum – 6 years</p>
<p><u>ACCOUNTING RECORDS</u></p> <ul style="list-style-type: none"> • Accounting records (<i>normally taken to mean records which enable a company's accurate financial position to be ascertained & which give a true and fair view of the company's financial state</i>) • Tax returns • VAT returns • Budget and internal financial reports 	<p>Delete 6 years from the end of the financial year in which the transaction took place</p> <p>Delete 6 years from end of financial year in which the transaction took place</p> <p>Delete 6 years from end of financial year in which the transaction took place</p> <p>Delete 3 years from end of academic year to which the reports refer.</p>

<p><u>CONTRACTS AND AGREEMENTS</u></p> <ul style="list-style-type: none"> Signed or final/concluded agreements (<i>plus any signed or final/concluded variations or amendments</i>) Deeds (or contracts under seal) 	<p>Minimum – 7 years from completion of contractual obligations or term of agreement, whichever is the later</p> <p>Minimum – 13 years from completion of contractual obligation or term of agreement</p>
<p><u>INTELLECTUAL PROPERTY RECORDS</u></p> <ul style="list-style-type: none"> Formal documents of title (trade mark or registered design certificates; patent or utility model certificates) Assignments of intellectual property to or from the school IP / IT agreements (including software licences and ancillary agreements e.g. maintenance; storage; development; coexistence agreements; consents) 	<p>Permanent (in the case of any right which can be permanently extended, eg trade marks); otherwise expiry of right plus minimum of 7 years.</p> <p>As above in relation to contracts (7 years) or, where applicable, deeds (13 years).</p> <p>Minimum – 7 years from completion of contractual obligation concerned or term of agreement</p>
<p><u>EMPLOYEE / PERSONNEL RECORDS</u></p> <p>Single Central Record (SCR) of employees</p> <ul style="list-style-type: none"> Contracts of employment Employee appraisals or reviews Staff personnel file Payroll, salary, maternity pay records Pension or other benefit schedule records Job application and interview/rejection records (unsuccessful applicants) Staff immigration records (Right to work, etc.) Tier 2 migrant worker sponsor records Health records relating to employees Records of low-level concerns about adults 	<p>SCR kept as record of employees on closure for two years then deleted.</p> <p>Employee files deleted August 31st 2027 with exception of any safeguarding information to be passed to local authority on closure.</p> <p>Delete 6 years from end of financial year in which the transaction took place</p> <p>Delete 6 years from end of financial year in which the transaction took place</p> <p>Deleted August 31st 2027.</p> <p>Deleted August 31st 2027.</p> <p>Deleted August 31st 2027.</p> <p>Deleted October 31st 2026</p>

<p><u>INSURANCE RECORDS</u></p> <ul style="list-style-type: none"> • Insurance policies (will vary – private, public, professional indemnity) • Correspondence related to claims/ renewals/ notification re: insurance 	<p>Copies of the policies to be lodged with lawyers and time of retention to be advised by lawyers</p> <p>Deleted 7 years after the academic year to which the claim refers</p>
<p><u>ENVIRONMENTAL, HEALTH & DATA</u></p> <ul style="list-style-type: none"> • Maintenance logs • Accidents to children • Accident at work records (staff) • Staff use of hazardous substances • Covid-19 risk assessments, policies and other key documents 	<p>Deletion 7 years from date of last entry</p> <p>Deletion 7 years from leaving the school note statute of limitation re when claims can be made</p> <p>Delete 4 years from date of accident,</p> <p>Delete 7 years from end of date of use</p> <p>Deletion December 31st 2026</p>
<ul style="list-style-type: none"> • Risk assessments 	<p>Deletion December 31st 2026 unless related to safeguarding or incidents then 7 years after date of incident.</p>
<ul style="list-style-type: none"> • Data breach log / register 	<p>Delete after 3 years of the academic year to which log refers.</p>