# 4.0 Record Retention and Deletion Policy

## Ashover Primary School

[Version 2]

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|---|---|
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| Governor Minute No | 07/07/21.19 |
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| V2.1 February 2021 | Formatting review<br>Examples now given of what constitutes a 'major incident' with regards school trips and outings.<br>Amendments to the retention of DBS copy certificates. |

This document will be reviewed annually and sooner when significant changes are made to the law



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Contents

4.1 Introduction....4
4.2 Purpose....4
4.3 Why hold a Retention Policy?....5
4.4 Examples of How Pupil Records May Stored and the Information Shared.....5
4.4.1 Diaries and Notebooks....6
4.4.2 Emails, Texts and Instant Messaging....7
4.4.3 Social Media....7
4.5 Access to Records....7
4.6 Data Protection Policy....8
4.6.1 Retention Periods....8
4.6.2 Disposal of Data....8
4.7 Transfer of Records to Archives....9
4.8 Transfer of Records to other Media....9
4.9 Transfer of Records to other Settings....9
4.10 Responsibility and Monitoring....9
4.11 Outline Retention Schedule....10
4.11.1 Employment Records....10
4.11.2 Financial and Payroll Records....11
4.11.3 Agreements and Administration Paperwork....12
4.11.4 Health and Safety Records....12
4.11.5 Pupil Records....13
4.12 Full Retention Schedule....14
1. Management of the School....14
1.1 Governing Body....14
1.2 Head Teacher....19
1.3 Admissions Process....21
1.4 Operational Administration....23
2. Human Resources....25
2.1 Recruitment....25
2.2 Operational Staff Management....28
2.3 Management of Disciplinary and Grievance Processes....29
2.4 Health and Safety....33
2.5 Payroll and Pensions....34
3. Financial Management of the School....35
3.1 Risk Management and Insurance....35

3.2 Asset Management ..... 36
3.3 Accounts and Statements including Budget Management ..... 36
3.5 School Fund ..... 38
3.6 School Meals ..... 39
4. Property Management. ..... 39
4.1 Management ..... 39
4.2 Maintenance ..... 41
5. 1 Pupil's Educational Record ..... 41
5.2 Attendance ..... 46
5.3 Special Educational Needs ..... 47
6. Curriculum Management ..... 48
6.1 Statistics and Management Information ..... 48
6.2 Implementation of Curriculum ..... 49
7. Extra Curriculum Management ..... 51
7.1 Extra Curriculum Management ..... 51
7.2 Walking Bus ..... 52
7.3 Family Liaison Officers and Home School Liaison Assistants ..... 53
8. Central Government and Local Authority ..... 54
8.1 Local Authority ..... 54
8.2 Central Government ..... 55
9. School Support Organisations ..... 55
9.1 School Support Organisations ..... 55
Appendix A – List of School Records and Data safely destroyed ..... 56
Specimen Checklist for Annual Review of School Records and Safe Data Destruction ..... 56
Appendix B - Safe Retention of Records Information Security and Business Continuity ..... 57
B1 Digital Information ..... 58
B2 Hard Copy Information and Records ..... 59
B3 Risk Analysis ..... 59
B4 Responding to Incidents ..... 60
B5 Maintaining a School Archive ..... 60

## 4.1 Introduction

This record retention and deletion policy contains recommended retention periods for the different record series created and maintained by (school name). The schedule refers to all information regardless of the media in which it is stored.

Some of the retention periods are governed by statute. Others are guidelines, following best practice, employed by schools throughout the United Kingdom. Every effort has been made to ensure that these retention periods are compliant with the requirements of the General Data Protection Regulation 2018 (GDPR), the Data Protection Act 2018 (DPA), Article 8, the Human Rights Act 1998, the Freedom of Information Act 2000 (FOI) and the Code of Practice on Records Management (under Section 46 of the FOI).

Managing records series using these retention guidelines will be deemed to be 'normal processing' under the terms of the legislation noted above. If those record series are to be kept for longer or shorter periods than the time scales held in this document, the reasons for any deviation must be recorded.

This policy will be reviewed at intervals of no less than three years, or exceptionally, if required by changes in Data Protection, Freedom of Interest or other legislation, where relevant.

**Due to the ongoing Independent Inquiry into Child Sexual Abuse (IICSA) no pupil and staff record should be destroyed until further notice. The guidance below gives a retention period (in the 'Retention Action' column), but where records should not be destroyed, this has been noted in the 'Disposal Action' column. For further information/clarification please contact Derbyshire County Council's Corporate Records Manager by emailing records.management@derbyshire.gov.uk or telephoning 01629 539203.**

*If printed, copied or otherwise transferred from this website, this document will be considered to be an uncontrolled format.*

## 4.2 Purpose

All schools need to create and maintain accurate records for them to function and carry out the tasks of educating and safeguarding pupils. This policy, for managing records at (school name) has been drawn up in conformity with legislation, regulations affecting schools and best practice as promoted by the Information and Records Management Society of Great Britain.

This policy sets out guidelines for recording, managing, storing and the disposal of data, whether they are held on paper or electronically (including on line), in order to assist staff, and the school, to comply with the General Data Protection Regulation (2018) and the Freedom of Information Act (2000). It should be read and used in conjunction with the following school policies;

- Management Information Systems
- Data Protection Policy
- Privacy Notices
- Information Asset Register

The implementation of the General Data Protection (2018) did not fundamentally change the principles around the duration of records retention. However, it has introduced stricter rules about the use and storage of personal data, requiring more dynamic, efficient and secure storage systems. It is expected that;

- All information held by schools needs to be justifiable, by reference, to its purpose.
- Schools must be transparent and accountable as to what data they hold.
- Schools must understand and explain the reasons why they hold data.
- Schools must be able to respond to Subject Access Requests.

- Schools must be able to amend, delete or transfer data promptly upon any justified request.
- Schools must be able to audit how personal data was collected and when and why.
- *Schools must hold sensitive data securely, accessed only by those with reason to view it and possess a policy as to why it is needed.*

All members of staff, with access to records, are expected to;

- Manage their current record keeping systems using the Retention Policy.
- Only dispose of records in accordance with the requirements outlined in this policy, if authorised to do so.
- Ensure that any proposed divergence from the records retention schedule and disposal policies is authorised by the Head Teacher.

This policy does not form part of any employee's contract of employment and is not intended to have a contractual effect. However, it does reflect the school's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the school but 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 the procedure, including time limits, as appropriate.

## 4.3 Why hold a Retention Policy?

There are a number of benefits which arise from the use of a Retention Policy:

- Managing records against the Retention Policy is deemed to be 'normal processing' under the GDPR (2018) and the Freedom of Information Act (2000). Where members of staff are managing records using the Retention Policy, they will not be culpable of tampering or the unauthorised alteration of data, once a Freedom of Information request or Subject Access Request (SAR) has been made.
- Members of staff can be confident about destroying information at the appropriate time and in a secure fashion.
- Information which is subject to Freedom of Information and GDPR legislation will be available, when required.
- The school is not maintaining and holding information unnecessarily.

## 4.4 Examples of How Pupil Records May Stored and the Information Shared.

The following examples illustrate a number of options by which schools may hold data – in some cases, where information is held on different platforms, a combination of these options may be employed ('hybrid files'). It is advised that the school, working with their Data Protection Officer, creates a summary of what information they hold and how;

Pupil record (hard copy) - 'a manila file ('buff folder') is kept on each pupil, in a locked filing cupboard within the classroom/business office/Head Teacher's office. This file holds hard copies of information about that pupil e.g. consent forms, annual data audits.'

Pupil record (electronic) - 'a record is held on the school's electronic Management Information System RM Integris, from information provided by the child's parents upon admission. Information includes; pupil name, address, emergency contact details, free school meal status, statutory test results, daily attendance'

Pupils with Special Educational Needs – 'pupils with Special Educational Needs are recorded in the Management Information System RM Integris and information regarding these individuals is made available to involved staff, with permissions delegated and recorded by the HT. Electronic records are held, securely, on the appropriate staff drive within the server/cloud, managed by the school's SENCO. Hard copy information is stored, securely, in the SENCO office and also within the pupil's buff folder.'

Pupils receiving Pupil Premium (PP) funding/Looked After Children (LAC) – 'pupils in receipt of additional funding, due to their PP, LAC or post-LAC family status, are recorded in the Management Information System RM Integris. Information regarding individual pupils is made available to involved staff, with permissions delegated and recorded by the HT. Electronic copies of PP review/LAC review documents are held, securely, on the appropriate staff drive within the server/cloud, managed by the Mercury AVS. Hard copy information is stored within the pupil's buff folder.'

Medical Records – 'information regarding the medical needs of a pupil is provided by parents/carers upon admission and updated, where necessary, following the annual data check. Information provided includes any significant known reactions to medication, major allergies and notable medical conditions. This information is available to staff likely to administer medication or treatment. The information is shared externally (trips) or to external agencies (catering) only with parental permission. This is information is held under the terms of the retention schedule, following the completion of the trip, or, with regards catering, for the duration of the child's time in school.

Any pupil who has a more serious level of medical need (e.g. diabetes, anaphylaxis) will have an individual Health Care Plan (HCP), which is presented by the parent/guardian, with the GP's/consultant's instructions for care within the school should the need arise. These records, with the consent of the parent/guardian, will be shared with school staff to ensure pupil safety. Photographs of the children (where appropriate and applicable), will be displayed in the staff room/business office/reception/first aid room. Hard copy information is stored with the pupil's buff folder. These records are shared with medical services, in the event of an emergency and any visible instructions/guidance relating the child will be displayed only for the duration of their time in school.'

Financial Records – 'financial records are held in the business office. School dinner payments and school trip payments will be held electronically on ParentPay.

### 4.4.1 Diaries and Notebooks

Confidential or work related notes, written in an employee diary or notebook, are not considered to be school records and should always be transferred to an appropriate record keeping system as soon as possible. All school staff members are responsible for ensuring that any confidential or work related notes that they have recorded in a diary/notebook are;

- kept secure at all times e.g. not left unattended, on desks or in vehicles, and are locked away in a secure location when not in use.
- Transferred to an appropriate record keeping system as soon as possible RM Integris.
- Within three months of being completed, treated as confidential waste i.e. destroyed securely and safely, after confirming that all relevant information has been transferred to an appropriate record keeping system.

As a guide;

- Notebooks should be destroyed within three months of being completed i.e. when they are full
- Diaries should be retained for the first three months of the following year and then destroyed.

The school's Data Protection Officer will remind all members of staff, within the school and where relevant, of their responsibility to destroy completed diaries and notebooks on a regular basis. All currently completed diaries/notebooks, held on site or elsewhere, should be destroyed as soon as possible, unless there is a specific reason to keep them, agreed by the Head Teacher, and then retained on an appropriate record keeping system e.g. staff personnel file.

### 4.4.2 Emails, Texts and Instant Messaging

Emailing is a form of communication – it is not a means of storing information that may be kept securely elsewhere. Emails should not be kept, but rather transferred, if the information they hold falls into the categories listed within the Retention Schedule e.g. does it form part of the pupil record? Does it relate to an employee or a decision about an employee? If so, this information could be transferred e.g. printed off and kept in the pupil's buff folder, and the email deleted. Emails and attachments which hold data must not be kept as emails; they must be either be saved in an appropriate electronic management information system or printed off and filed as a hard copy document.

Schools should consider implement a rule whereby emails are automatically deleted after a period of time, once they have been filed, and make this known via this schedule. Such a rule would limit the amount of information that might be available to a data subject under a Subject Access Request and helps reduce the amount of electronic storage required by the school.

Similarly, texts, Instant Messages (e.g. WhatsApp, Facebook Messenger) or message boards and forums are not considered a permanent record of being ephemeral and temporary. If the content of the message or text is significant e.g. a staff member highlights concerns around a pupil's behaviour, then it should be copied and transferred into the appropriate filing system e.g. a safeguarding case file, either by saving it in a readable electronic format, or printing it off, or taking a screen shot.

Any information recorded within texts, Instant Messages, message boards or forums is subject to the same Data Protection and Freedom of Information legislation, regardless of format. Therefore, it is advisable to only use these methods of communication to transmit information which is not sensitive or directly related to a third party. Similarly, with regards emails, all electronic communications, whilst they are held by the school, are disclosable under the same legislation and anything written or held, within an email, could potentially be made public under the terms of a Subject Access Request.

### 4.4.3 Social Media

Many schools will maintain some form of social media channel, such as Twitter or Facebook, with which to communicate with staff and parents. It should be noted though that social media is not just a means of communication, but can also act a repository for storing information and third party data. Information held in this format is subject to the Freedom of Information Act 2000 and the Data Protection Act 2018.

Social media outlets have different retention periods. Schools must be aware of how long these periods are, outline this within this schedule and secure the appropriate consent to share personal data to enable the rights of the data subject. The school needs to ensure that the primary users (i.e. those staff members who hold administrative permissions, to upload and remove information) are aware of these retention periods. Where these retention periods are longer than that set out as part of a standard school policy or best practice e.g. removing pupil images from the school's website when that pupil has left, processes must be in place to remove any posts or photographs on a regular and routine basis.

Social media posts can remain online for a period long after the school has deleted them. They can be shared and redistributed many times, beyond the control of the individual who first posted them. There it is vital that the school is clear when obtaining the consent to share data, from pupils, parents, staff and volunteers, as to where information will be shared, for how long and outlining the risk of information being shared, or cached, beyond their control.

## 4.5 Access to Records

For the efficient running of the school, all teaching staff and relevant office staff will have access to the school's Management Information System (insert name). Teaching staff may complete some the following functions e.g. enter names on the register or add other agency involvement, and may consult the pupil record. N.B. where records

are maintained as hard copy within the school office, access is available to teaching staff with regards some information e.g. emergency contact numbers, consents. Other information e.g. discretionary absence request letters, attendance letters, are held in the school office and are only available to the relevant member of staff upon request.

All permissions to access data are granted by the Head Teacher and recorded in the member of staff's personnel file.

All teaching and office staff will be given training and guidance on accessing and managing school records, to ensure compliance with the time scales laid out under the retention schedule. As a guiding principle the General Data Protection Regulation requires that personal data is only retained for as long as is necessary and for the specific lawful purpose(s) it was acquired; all information, held by the school, must be kept in accordance with the school's Data Protection Policy.

## 4.6 Data Protection Policy

Pupils, parents and member of staff are informed, via the school's Data Protection Policy https://www.ashover.derbyshire.sch.uk/our-school-1/policies-and-forms, that any information held on them, upon either admission or commencement of employment, is for the school to carry out statutory functions, necessary for the efficient operation of the setting – data held will be reviewed regularly and will be stored, processed and shared (where appropriate and applicable) under the terms of the General Data Protection Regulation (2018).

### 4.6.1 Retention Periods

The following tables provide guidance on retention period for the different records held by (school name). Unless there is a specific statutory obligation to hold or destroy records (please refer to the instruction on the cover sheet regards the safekeeping of records during Independent Inquiry into Child Sexual Abuse (IICSA)), the retention periods are established by the school for guidance purposes.

N.B. it must be emphasised that, under the terms of the current IICSA moratorium, the present focus on safeguarding does not mean that existing laws, in respect to data protection, are now suspended, nor that schools may not still be liable for breaches of data protection legislation (such as retaining personal data longer, or in greater volume, than is necessary for its purpose, or a failure to keep data accurately and safely).

### 4.6.2 Disposal of Data

As mentioned above, the fifth Data Protection principle, states that 'Personal data processed for any purpose, or purposes, shall not be kept longer than is necessary for that purpose, or purposes'. It is the responsibility of the Head Teacher that records, which are no longer required for business use, are to be reviewed as soon as possible, so that the appropriate records can be destroyed or transferred, where necessary.

Not all data needs to be destroyed. The school should determine whether records are to be selected, either for permanent preservation, or for destruction or to be transferred into a different format e.g. digitised, or to be retained further, by the setting, for research or litigation purposes. Any decision, regards a change to the way data is held in the setting, must be documented as part of the records management policy. For example; financial records can be destroyed after six years, plus the year they were created in, and are often shredded or passed to a confidential waste provider for safe destruction. School newsletters, however, might be transferred to Derbyshire County Council's Records Office for archiving and safe keeping, as a means of preserving the school's heritage.

When information is no longer required, it should be disposed of. For confidential, sensitive or personal information, to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed. It is recommended that paper documents are destroyed with a cross shredder – where this is not possible, and, e.g. a ribbon shredder is employed, the waste should not be recycled but destroyed beyond recognition e.g. via an incinerator bin.

Skips and 'regular' waste disposal are not considered to be secure.

CD's/DVD's/discs should be cut into pieces. Hard copy images, AV recordings and hard disks should be dismantled and destroyed. Where third party disposal companies are employed, they should, wherever possible be supervised and any destruction of data or removal of data, from the site, is logged and the destruction certified. Staff working for external provider should have been trained in the handling and destruction of confidential data.

Destruction of data will be planned with specific dates and all records will be identified as to the date of destruction. N.B. if a record is noted pending destruction or transfer, either to archives off site or to another setting, but has not yet been destroyed/transferred, and a request for records has been received, that record must still be made available to the requestor.

The Freedom of Information Act 2000 requires the school to maintain a list of all records that have been destroyed and who authorised their destruction. The appropriate members of staff (Data Lead) should record;

- File reference and/or unique identifier
- File title or brief description of contents
- Number of files
- Name of the authorising officer

## 4.7 Transfer of Records to Archives

Where records have been identified as being worthy of permanent preservation, due to their historical or social value, they may be retained on site or transferred to Derbyshire County Council Records Office. If held by the school, it is advised that the school will contact Derbyshire County Council's Corporate Records Manager for guidance and best practice, with regards the preservation of data.

## 4.8 Transfer of Records to other Media

Here lengthy retention periods have been allocated to records, member of staffs may wish to consider converting paper records to other media (e.g. digital or virtual, 'cloud' based). The lifespan of the media, and the ability to migrate data, should always be considered.

## 4.9 Transfer of Records to other Settings

When a child leaves the school, all pupil records should be transferred in a secure manner, to the child's new school. If the records contain sensitive information (e.g. Child Protection records), proof of receipt must be obtained and logged by the school's Data Lead. All data held by the school should then be deleted, including all paper records and data stored electronically. A record should be kept for tracking and auditing purposes only.

## 4.10 Responsibility and Monitoring

The Head Teacher and/or officer tasked with the role of Data Lead, hold primary and day to day responsibility, for implementing this policy. The Data Protection Office, in conjunction with the school, is responsible for monitoring its use and effectiveness and resolving any queries with regards the interpretation of the policy. The Data Protection Officer will consider the suitability and adequacy of this policy and will pass any amendments or alterations directly to the Head Teacher.
Internal control systems and procedures will be subject to regular audits, to provide assurance that they are effective in creating, maintaining and removing records.

## 4.11 Outline Retention Schedule

Derbyshire County Council's GDPR for Schools service uses an adapted version of the IRMS pro forma retention schedule (Please see following). This offers a comprehensive and thorough review of all possible data that may be held by a school – the outline schedule, however, provides an initial overview of how the data retention policy can be applied to the records held by a school;

**Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their Data Protection Officer.**

| FILE DESCRIPTION | RETENTION PERIOD |
|---|---|
| 4.11.1 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 | DO NOT DESTROY (Refer to note on front page) then 6 years after employment ceases |
| Written particulars of employment, contracts of employment and changes to terms and conditions | DO NOT DESTROY (Refer to note on front page) then 6 years after employment ceases |
| Right to work documentation including identification documents | DO NOT DESTROY (Refer to note on front page) then 2 years after employment ceases |
| Immigration checks | DO NOT DESTROY (Refer to note on front page) then 2 years after the termination of employment |
| DBS checks and disclosures of criminal records forms | The school does not have to keep copies of the DBS certificates. |
| Change of personal details notifications | No longer than 6 months after receiving this notification |
| Emergency contact details | Destroyed on termination |



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| Personnel and training records | DO NOT DESTROY (Refer to note on front page) then, while employment continues and up to six years after employment ceases |
| 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 |
| 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:<br>· Opt out forms<br>· Records of compliance with WTR | Two years from the date on which they were entered into<br>Two years after the relevant period |
| Disciplinary and training records | DO NOT DESTROY (Refer to note on front page) then 6 years after employment ceases |
| Allegations of a child protection nature against a member of staff including where the allegation is founded | DO NOT DESTROY (Refer to note on front page) then until the person's normal retirement age or 10 years from the date of allegation, whichever is longer, then review. NB – allegations that are found to be malicious should be removed from personnel files, from the date they are proven to be unfounded. |
| 4.11.2 Financial and Payroll Records | |
| Pension records | Current year + 6 years |
| Retirement benefits schemes – notifiable events (for example, relating to incapacity) | Current year + 6 years |
| Payroll and wage records | Current year + 6 years |
| Maternity/Adoption/Paternity Leave records | Current year + 3 years |
| Statutory Sick Pay | Current year + 3 years |



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| 4.11.3 Agreements and Administration Paperwork | |
| School Development Plans | Life of plan + 6 years |
| Professional Development Plans | Life of the plan + 6 years |
| Visitor management systems (including electronic systems, visitors books and signing in sheets) | Current year + 6 years |
| Newsletters and circulars to staff, parents and pupils | Current year + 1 year |
| 4.11.4 Health and Safety Records | |
| Health and Safety Policy Statements | Life of the policy + 3 years |
| Health and Safety Risk Assessments | Life of the assessment + 3 years |
| Any reportable accident, death or injury in connection with work | Date of the incident + 3 years |
| Accident reporting | Adults – Retain for 7 years from the date of the accident<br>Children – Retain for 25 years from the child's date of birth |
| Fire precaution log books | Current year + 3 years |
| Process of monitoring: -<br>· radiation<br>· asbestos<br>· records specified by the Control of Substances Hazardous to Health Regulations (COSHH) | 40 years from the date of the last entry made in the record |
| Records of tests and examinations of control systems and protection equipment under COSHH | 5 years from the date on which the record was made |



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| 4.11.5 Pupil Records | |
|---|---|
| Admissions records | 1 year from the date of admission |
| Register of Admissions | Entries to be preserved for three years from date of entry |
| School Meals Registers | Current year + 3 years |
| Free School Meals Registers | Current year + 6 years |
| Pupil Record | DO NOT DESTROY (Refer to note on front page) then retain whilst the child remains at school/Date of birth of the pupil + 25 years |
| Attendance Registers | 3 years from the date of entry |
| Special Educational Needs files, reviews and individual education plans (this includes any statement and all advice and information shared regarding educational needs) | DO NOT DESTROY then retain from date of birth of the pupil + 31 years |



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# 4.12 Full Retention Schedule

## 1. Management of the School.

This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Head Teacher and the Senior Management Team, the admissions process and operational administration.

| 1.1 Governing Body | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 1.1.1 | Agendas for Governing Body meetings | There may be data protection issues, if the meeting relates to confidential concerns around staff or pupils | Conclusion of meeting | One copy to be retained with the master set of minutes - all other copies can be disposed of | Secure disposal | Common practice | | | |
| 1.1.2 | Minutes of Governing Body meetings | There may be data protection issues, if the meeting relates to confidential concerns around staff or pupils | Date of meeting | | If the school is unable to store these, they should be offered to Derbyshire County Council Records Office | Common practice | | | |
| | Principal Set (signed) | | | Permanent to be held at school | | Common practice | | | |



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| | Inspection Copies | | | Date of meeting + 3 years | Secure disposal | Common practice | | | |
| 1.1.3 | Reports present to the Governing Body | There may be data protection issues, if the meeting relates to confidential concerns around staff or pupils | Date of report | Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently | Secure disposal or retain with the signed set of minutes | Common practice | | | |
| 1.1.4 | Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002 | None | Date of meeting | Date of the meeting + a minimum of 6 years | Secure disposal | Common practice | | | |
| 1.1.5 | Instruments of Government including Articles of Association | None | Closure of school | Permanent | These should be retained in the schools whilst the school is open and then to Derbyshire County Council Records Office, when the school closes | Common practice | | | |
| 1.1.6 | Trusts and Endowments managed by the Governing Body | None | End of operational use | Permanent | These should be retained by the school, whilst the | Common practice | | | |



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| | | | | | school is open and then to Derbyshire County Council Records Office, should the school close | | | | |
| 1.1.7 | Action plans created and administered by the Governing Body | None | Expiration of action plan | Until superseded or whilst relevant | Secure disposal | Common practice | | | |
| 1.1.8 | Policy documents created and/or administered by the Governing Body | None | Expiration of the policy | Until superseded. The school should consider keeping all policies relating to safeguarding and child protection or other pupil related issues, such as exclusion, until the IICSA has issued its recommendations | Secure disposal | Common practice | | | |
| 1.1.9 | Records relation to complaints made to, and investigate by the Governing Body and/or Head Teacher | Yes | Resolution of complaint | Date of the resolution of the complaint + a minimum of 6 years; if negligence is | Secure disposal | Common practice | | | |



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| | | | | involved then current year + 5 years.<br>If child protection or safeguarding issues are involved then current year + 40 years | | | | | |
| 1.1.10 | Annual Reports created under the requirements of the Education (Governor's Annual Reports)(England)(Amendment) Regulations 2002 | No | End of the calendar year that the record was created in | Date of the report + 10 years | Secure disposal | Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 | | | |
| 1.1.11 | Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies | No | Date proposal accepted or declined | For the life of the organisation | If the school is unable to store these, they should be offered to Derbyshire County Council Records Office | Common practice | | | |
| 1.1.12 | Records relating to the appointment of parent and staff governors, not appointed by the governors | Yes | Date of election | Date of election + 6 months | Secure disposal | Common practice | | | |
| 1.1.13 | Records relating to the appointment of co-opted governors | Yes | Date of appointment | Provided that the decision has been recorded in | Secure disposal | Common practice | | | |



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| | | | | the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children – in this case, retain for 25 years) | | | | | |
| 1.1.14 | Records relating to the election of chair and vice chair | Yes | Date of appointment | Once the design has been recorded in the minutes, the records relating to the election can be destroyed | Secure disposal | Common practice | | | |
| 1.1.15 | Scheme of delegation and terms of reference for committees | Yes | Expiration of terms | Until superseded or whilst relevant (schools may wish to retain these records for reference | If the school is unable to store these, they should be offered to Derbyshire | Common practice | | | |



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| | | | | purposes in case decisions need to be justified) | County Council Records Office | | | | |
| 1.1.16 | Meetings schedule | No | Date of meeting | Current year | Secure disposal | Common practice | | | |
| 1.1.17 | Register of attendance at Full Governing Board meetings | Yes | Date of meeting | Date of meeting + 6 years | Secure disposal | Common practice | | | |
| 1.1.18 | Papers relating to the management of the annual Parent's Evening | Yes | Date of meeting | Date of meeting + 6 years | Secure disposal | Common practice | | | |
| 1.1.19 | Records relating to Governor Monitoring Visits | Yes | Date of visit | Date of visit + 3 years | Secure disposal | Common practice | | | |
| 1.1.20 | Annual reports required by the Department of Education | Yes | Date of report | Date of report + 10 years | Secure disposal | Common practice | | | |
| | The revised IRMS Retention Guidelines for Schools (2019) has included a new section relating to the Governor Management. In all the following cases, the file should be retained from the date of appointment + 6 years, and disposed of securely;<br>• Appointment of a clerk to the governing body<br>• Terms of office of serving governors, including evidence of appointment<br>• Governor declaration against disqualification criteria<br>• Register of business interests<br>• Training required, and received, by governors<br>• Induction programme for new governors<br>• DBS checks carried out on the clerk and members of the governing body<br>• Governor personnel files.<br><br>The Governor's Code of Conduct is 'expected to be a dynamic document; one copy of each version should be kept for the life of the school. | | | | | | | | |

| 1.2 Head Teacher | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |



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| 1.2.1 | Log books of activity in the school maintained by the Head Teacher | There may be data protection concerns if the log book refers to individual pupils or members of staff | Date of last entry in the log book | Date of the last entry in the log book + a minimum of 6 years and then review (NB Legislation no longer requires the completion of a school log book) | These could be of permanent historical value and should be offered to Derbyshire County Council Records Office | Common practice | | | |
| 1.2.2 | Minutes of Senior Management Team meeting and the meetings of other internal administrative bodies | There may be data protection concerns if the minutes refers to individual pupils or members of staff | Date of the meeting | Date of the meeting + 3 years | Secure disposal | Common practice | | | |
| 1.2.3 | Reports created by the Head Teacher or the Senior Management Team | There may be data protection concerns if the report refers to individual pupils or members of staff | Date of report | Date of report + 3 years | Secure disposal | Common practice | | | |
| 1.2.4 | Records created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with | There may be data protection concerns if the records refers to individual | Date of record | Current academic year + 6 years then review | Secure disposal | Common practice | | | |



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| | administrative responsibilities | pupils or members of staff | | | | | | | |
| 1.2.5 | Correspondence created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities | There may be data protection concerns if the correspondence refers to individual pupils or members of staff | Date of correspondence | Date of correspondence + 3 years and then review | Secure disposal | Common practice | | | |
| 1.2.6 | Professional Development Plans | Yes | Date plan commences | Life of plan + 6 years | Secure disposal | Common practice | | | |
| 1.2.7 | School Development Plans | No | Date plan commences | Life of plan + 3 years | Secure disposal | Common practice | | | |

| 1.3 Admissions Process | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 1.3.1 | All records relating to the creation and implementation of the School's Admission's Policy | No | Expiration of the policy | Life of the policy + 3 years then review | Secure disposal | School Admissions Code Statutory Guidance 2014 | | | |
| 1.3.2 | Admissions – if the admission is successful | Yes | Date of admission | Date of admission + 1 year | Secure disposal | School Admissions Code Statutory Guidance 2014 | | | |



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| 1.3.3 A | Admissions – if the admission is unsuccessful (where no appeal is made) | Yes | Resolution of case | Resolution of case + 1 year | Secure disposal | School Admissions Code Statutory Guidance 2014 | | | |
| 1.3.3 B | Admissions – if the admission is unsuccessful (where an appeal is made) | Yes | Resolution of case | Resolution of case + 1 year | Secure disposal | School Admissions Code Statutory Guidance 2014 | | | |
| 1.3.4 | Register of Admissions | Yes | Last entry in register | Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made * | Transfer to Derbyshire County Council Records Office | School Admissions Code Statutory Guidance 2014 | | | |
| 1.3.5 | Admissions (Secondary School – Casual) | Yes | Date of admission | Current year + 1 year | Secure disposal | The Limitations Act 1980 | | | |
| 1.3.6 | Proofs of address, supplied by parents, as part of the admissions process | Yes | Date of admission | Current year + 1 year | Secure disposal | School Admissions Code Statutory Guidance 2014 | | | |
| 1.3.7 | Supplementary information forms to include; religion, medical conditions etc. | | | | | | | | |



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| | For successful admissions | Yes | Date of admission/annual data check | This information should be added to the pupil file | Secure disposal | The Limitations Act 1980 | | | |
| | For unsuccessful admissions | | Date of admission | Until the appeal process is completed | Secure disposal | The Limitations Act 1980 | | | |

| 1.4 Operational Administration | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 1.4.1. | General file series | No | End of calendar year | Current year + 5 years then review | Secure disposal | Common practice | | | |
| 1.4.2 | Records relating to the creation and publication of the school brochures or prospectus | No | Expiration of current publication | Current year + 3 years | Transfer to Derbyshire County Council Records Office | Common practice | | | |
| 1.4.3 | Records relating to the creation and distribution of circulars to staff, parents or pupils | No | Date of record | Current year + 1 year | Transfer to Derbyshire County Council Records Office | Common practice | | | |
| 1.4.4 | Newsletters and other items with short operational use | No | Date of record | Current year + 1 year | Transfer to Derbyshire County Council Records Office | Common practice | | | |



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|---|---|---|---|---|---|---|---|---|---|
| 1.4.5 | Visitor management systems (including electronic systems, visitors books and signing in sheets) | Yes | End of calendar year | Current year + 6 years then review | Secure disposal | Common practice | | | |
| 1.4.6 | Records relating to the creation and management of Parent Teacher Associations and/or Old Pupil Associations | No | Date of record | Current year + 6 years then review | Secure disposal | Common practice | | | |
| 1.4.7 | School Privacy Notice which is sent to parents as part of GDPR compliance | No | When policy is superseded | Date of issue + 6 years | Secure disposal | Common practice | | | |
| 1.4.8 | Consents relating to school activities as part of GDPR compliance (e.g. consent to be sent circulars or mailings | No | Date of admission | This information should be added to the pupil file | Secure disposal | Common practice | | | |
| 1.4.9 | Security breach logs | Yes | Date of implementation | Date of issue + 25 years (pupils) and 6 years (staff) | Secure disposal | Common practice | | | |
| 1.4.10 | Digital Continuity Plans | Yes | Expiration of current plan | Date of issue + 6 years | Secure disposal | Common practice | | | |

| 1.5 School communications | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 1.5.1. | School emails – inbox, sent items, deleted items | Yes | End of academic year | School to complete | Full deletion | Common practice | | IT technician, SLT | |
| 1.5.2 | Social media platforms – please list | Yes | End of academic year | School to complete | Posts deleted | Common practice | | IT technician, SLT | |



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| 1.5.3 | Website – pictures / news stories | Yes | End of academic year | School to complete | Posts deleted | Common practice | | IT technician, SLT | |

## 2. Human Resources.

This section deals with all matters relating to Human Resources management within the school.

| 2.1 Recruitment | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 2.1.1 | All records leading up to the appointment of a new Head Teacher | Yes | Date of appointment | Unsuccessful attempts - Date of appointment + 6 months. This information should be added to the staff personnel file and retained until the end of the appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years (see below) | DO NOT DESTROY (Refer to note on front page) | Common practice, Immigration, Asylum and Nationality Act 2006 | | | |
| 2.1.2 | All records leading up to the appointment of a new member of staff (successful candidate) | Yes | Date of appointment | Date of appointment + 6 years. This information should be added to the staff personnel file (see below) | DO NOT DESTROY (Refer to note on front page) | Common practice, Immigration, Asylum and Nationality Act 2006 | | | |
| 2.1.3 | All records leading up to the appointment of a new member of | Yes | Date of interview | Date of interview + 12 months | Secure disposal | Common practice | | | |



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| | staff/governor (unsuccessful candidate) | | | | | | | | |
| 2.1.4 | Pre-employment vetting information of successful candidates – DBS | Yes | Date of receipt | Application forms, references and other documents – for the duration of their employment + 6 years | Secure disposal | DBS guidelines (Service Employer Guide 2014), Keeping Children Safe in Education 2018 | | | |
| 2.1.5 | Proofs of identity collected as part of the process of checking 'portable' enhanced DBS disclosure | Yes | Date of receipt | To be added to the member of staff's personal folder | DO NOT DESTROY (Refer to note on front page) | DBS guidelines | | | |
| 2.1.6 | Pre-employment vetting information of successful candidates – evidence proving the right to work in the United Kingdom | Yes | Date of receipt | Where possible, these documents should be added to the member of staff's personal folder. If they are kept separately, the Home Office requires that the documents are kept until termination of employment plus not less than 2 years. | DO NOT DESTROY (Refer to note on front page) | An Employer's Guide to Right to Work Checks (Home Office 2015) | | | |
| 2.1.7 | Pre-employment vetting information of successful candidates – for the purposes of ensuring school staff | Yes | Date of receipt | To be added to the member of staff's personal folder | DO NOT DESTROY (Refer to the note on front page) | Common practice | | | |



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| | are adequately qualified | | | | | | | | |



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| 2.2 Operational Staff Management | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 2.2.1 | Staff Personnel File | Yes | Date of appointment | Termination of employment + 6 years | DO NOT DESTROY (Refer to the note on front page) | Limitations Act 1980 | | | |
| 2.2.2 | Timesheets | Yes | Date of appointment | Current year + 6 years | DO NOT DESTROY (Refer to the note on front page) | Common practice | | | |
| 2.2.3 | Annual appraisal/assessment records | Yes | End of calendar year that the record was created in | Current year + 6 years | DO NOT DESTROY (Refer to the note on front page) | Common practice | | | |
| 2.2.4 | Sickness absence monitoring | Yes | Date of absence | Sickness records are categorised as 'sensitive data'. There is a legal obligation under Statutory Sickness Pay to keep records for sickness monitoring. Sickness records should be kept | Secure disposal | Common practice | | | |



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| | | | | separate from accident records. Current practice recommends that sickness records should be held for the current year + 3 years. | | | | | |
| 2.2.5 | The revised IRMS Retention Guidelines for Schools (2019) has included a new section relating to staff training. In all the following cases, the file should be retained from the date of appointment and disposed of securely as follows;<br><br>• Where training leads to continuing professional development – for the length of time required by the professional body<br>• All training except where dealing with children e.g. First Aid or Health and Safety – to be retained on the personnel file (as per 2.1.1)<br>• All training where the training relates to children e.g. safeguarding – DO NOT DESTROY (Refer to the note on the front page). The IRMS now advises a retention period of 40 years, reflecting that IICSA may wish to see training records as part of an investigation. | | | | | | | | |

| 2.3 Management of Disciplinary and Grievance Processes | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 2.3.1 | Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded | Yes | Date of referral | Until the person's normal retirement age or 10 years from the date of allegation, whichever is longer, then review. NB – allegations that are found to be malicious should | DO NOT DESTROY (Refer to the note on front page) | Keeping Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A | | | |



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| | | | | be removed from personnel files, from the date they are proven to be unfounded. | | guide to inter-agency working to safeguard and promote the welfare of children' 2018 | | | |
| 2.3.2 | Disciplinary proceedings | Yes | | | | | | | |
| | Verbal warning | Yes | Date of warning | Date of warning + 6 months | DO NOT DESTROY (Refer to the note on front page) | Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018 | | | |
| | Written warning (level 1) | Yes | Date of warning | Date of warning + 6 months | DO NOT DESTROY (Refer to the note on front page) | Children Safe in Education; Statutory Guidance for Schools and Colleges | | | |



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| | | | | | | 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018 | | | |
| | Written warning (level 2) | Yes | Date of warning | Date of warning + 12 months | DO NOT DESTROY (Refer to the note on front page) | Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018 | | | |
| | Final warning | Yes | Date of warning | Date of warning + 18 months | DO NOT DESTROY (Refer to | Children Safe in Education; Statutory | | | |



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| | | | | | the note on the front page) | Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018 | | | |
| 2.3.3 | Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings) | Yes | Date of resolution | If the incident is child protection related then see above; otherwise dispose following the conclusion of the case | DO NOT DESTROY (Refer to the note on front page) | Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018 | | | |



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N.B. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.
Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct at a later date, and then defend themselves by denying they would undertake such an action, reference to the earlier proceedings may show that they should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that they had e.g. "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim.
Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.

| 2.4 Health and Safety | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 2.4.1 | Accessibility Plans | No | End of the calendar year that the records was created in | Current year + 6 years | Secure disposal | Disability and Equality Act 2010 | | | |
| 2.4.2 | Health and Safety Policy Statements | No | Implementation of the policy | Life of the policy + 3 years | Secure disposal | Common practice | | | |
| 2.4.3 | Health and Safety Risk Assessments | No | Implementation of the assessment | Life of the assessment + 3 years | Secure disposal | Common practice | | | |
| 2.4.4 | Records relating to accidents/injuries at work | Yes | Date of incident | Date of incident + 12 years | Secure disposal | Common practice | | | |
| 2.4.5 | Accident reporting | | | | | | | | |
| | Adults | Yes | Date of incident | Retain for 7 years | Secure disposal | The Limitations Act 1980 | | | |
| | Children | Yes | Date of birth | Retain for 25 years | Secure disposal | The Limitations Act 1980 | | | |


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| 2.4.6 | Control of Substances Hazardous to Health (COSHH) | No | Last action on file | Current year + 40 years | Secure disposal | The Control of Substances Hazardous to Health Regulations 2002 | | | |
| 2.4.7 | Process of monitoring areas where employees/pupils are likely to come into contact with asbestos | No | Last action on file | Last action + 40 years | Secure disposal | The Control of Asbestos at Work Health Regulations 2012 | | | |
| 2.4.8 | Process of monitoring areas where employees/pupils are likely to come into contact with radiation | No | Last action on file | Last action + 50 years | Secure disposal | The Ionising Radiations Regulation 2017 | | | |
| 2.4.9 | Fire Precautions log books | No | End of calendar year | Current year + 3 years | Secure disposal | Common practice | | | |

| 2.5 Payroll and Pensions | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 2.5.1 | Maternity Pay Records | Yes | End of the financial year in which the maternity pay period ends | Current year + 3 years | Secure disposal | Statutory Maternity Pay (General) Regulations 1986 | | | |
| 2.5.2 | Records held under Retirement Benefits Schemes - records of notifiable events, for | Yes | End of the financial year | Current year + 6 years | Secure disposal | Retirement Benefits Schemes (Information | | | |



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| | example, relating to incapacity | | | | | Powers) Regulations 1995 | | | |

The revised IRMS Retention Guidelines for Schools (2019) has greatly expanded the section relating to payroll and pensions, with the inclusion of 37 new elements, some of which, depending on the size of the school, may not be relevant. They can be summarised as follows;

- Records to be maintained for the current year + 6 years (Under the Taxes and Management Act 1970, Income and Corporation Taxes 1988), for secure disposal – Batches, Bonus Sheets, Car Loans, Car Mileage Output, Insurance, Members Allowance Register, National Insurance (Schedule of payments), Part Time Fee claims, Payroll (gross/net, weekly or monthly), Payroll Reports, Payslips (copies), Pension Payroll, Superannuation adjustments and reports.
- As above but for the current year + 3 years – Bonus sheets, Car Allowance claims, Overtime
- Records to be maintained for the current year + 6 years (as Common practice) – Income Tax P60, Personal bank details (if employment ceases then end of employment + 6 years, otherwise until superseded + 3 years), Tax Forms P6/P11/P11D/P35/P45/P46/P48 (The minimum requirement, as stated in Inland Revenue Booklet 490, is for at least 3 years after the end of the tax year to which they apply. Originals must be retained in paper/electronic format. It is a corporate decision to retain for current year + 6 years. Employees should retain records for 22 months after current tax year)
- Records to be maintained for the current year + 3 years (as Common practice) – Absence records, Sickness records, Staff returns, Time Sheets/Clock Cards/Flexitime

## 3. Financial Management of the School.

This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Head Teacher and the Senior Management Team, the admissions process and operational administration.

| 3.1 Risk Management and Insurance | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 3.1.1 | Employer's Liability Insurance Certificate | No | Closure of school | Date of closure + 40 years | Transfer to Derbyshire County Council Records Office | Common practice | | | |



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| 3.2 Asset Management | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 3.2.1 | Inventories of furniture and equipment | No | End of calendar year | Current year + 6 years | Secure disposal | Common practice | | | |
| 3.2.2 | Burglary, theft and vandalism report forms | No | End of calendar year | Current year + 6 years | Secure disposal | Common practice | | | |

| 3.3 Accounts and Statements including Budget Management | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 3.3.1 | Annual accounts | No | End of financial year | Current year + 6 years | Transfer to Derbyshire County Council Records Office | Common practice | | | |
| 3.3.2 | Loans and grants managed by the school | No | End of financial year | Date of last payment on the loan + 12 years then review | Secure disposal | Standard financial regulations | | | |
| 3.3.3 | Student Grant applications | Yes | End of financial year | Current year + 3 years | Secure disposal | Standard financial regulations | | | |
| 3.3.4 | All records relating to the creation and managements of budgets, including the Annual Budget | No | End of financial year | Current financial year + 3 years | Secure disposal | Common practice | | | |



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| | statement, and background papers | | | | | | | | |
| 3.3.5 | Invoices, receipts, order books and requisitions, delivery notices | No | End of financial year | Current financial year + 6 years | Secure disposal | Standard financial regulations | | | |
| 3.3.6 | Records relating to the collection and banking of monies | No | End of financial year | Current financial year + 6 years | Secure disposal | Standard financial regulations | | | |
| 3.3.7 | Records relating to the identification and collection of debt | Yes | End of financial year | Current financial year + 6 years | Secure disposal | Standard financial regulations | | | |
| 3.3.8 | Pupil Premium Fund records | Yes | End of financial year | Date pupil leaves the provision + 6 years | | | | | |

| 3.4 Contract Management | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 3.4.1 | All records relating to the management of contracts under seal | No | End of contract | Current year + 12 years | Secure disposal | The Limitations Act 1980 | | | |
| 3.4.2 | All records relating to the management of contracts under signature | No | End of contract | Current year + 6 years | Secure disposal | The Limitations Act 1980 | | | |
| 3.4.3 | Records relating to the monitoring of contracts | No | End of calendar year | Current year + 6 or 12 years | Secure disposal | Common practice | | | |



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| 3.5 School Fund | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 3.5.1 | School Fund – cheque books | No | End of use | Current year + 6 years | Secure disposal | Financial Services Act, HMRC regulations Companies Act | | | |
| 3.5.2 | School Fund – paying in books | No | End of use | Current year + 6 years | Secure disposal | Financial Services Act, HMRC regulations Companies Act | | | |
| 3.5.3 | School Fund - ledger | No | End of use | Current year + 6 years | Secure disposal | Financial Services Act, HMRC regulations Companies Act | | | |
| 3.5.4 | School Fund – invoices | No | End of financial year | Current year + 6 years | Secure disposal | Financial Services Act, HMRC regulations Companies Act | | | |
| 3.5.5 | School Fund - receipts | No | End of financial year | Current year + 6 years | Secure disposal | Financial Services Act, HMRC regulations Companies Act | | | |
| 3.5.6 | School Fund – bank statements | No | End of financial year | Current year + 6 years | Secure disposal | Financial Services Act, HMRC regulations Companies Act | | | |



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| 3.5.7 | School Fund – journey books | No | End of financial year | Current year + 6 years | Secure disposal | Financial Services Act, HMRC regulations Companies Act | | | |

| 3.6 School Meals | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 3.6.1 | Free School Meals Register | Yes | End of calendar year | Current year + 6 years | Secure disposal | Common practice | | | |
| 3.6.2 | School Meals Register | Yes | End of calendar year | Current year + 3 years | Secure disposal | Common practice | | | |
| 3.6.3 | School Meals Summary Sheets | No | End of calendar year | Current year + 3 years | Secure disposal | Common practice | | | |

## 4. Property Management.

This section covers the management of buildings and property.

| 4.1 Management | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period (Operational) | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 4.1.1 | Title deeds of properties belonging to the school | No | Archive upon closure | Permanent. These should follow the property unless | Transfer to Derbyshire County Council | Common practice | | | |



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| | | | | the property has been registered with the Land Registry | Records Office | | | | |
| 4.1.2 | Plans of property belonging to the school | No | Transfer of asset | These should be retained whilst the building belongs to the school and should be passed onto any new owners, if the building is leased or sold. | Transfer to Derbyshire County Council Records Office | Common practice | | | |
| 4.1.3 | Leases of property leased by, or to, the school | No | Commencement of lease | Expiry of lease + 6 years | Secure disposal | Common practice | | | |
| 4.1.4 | Records relating to the letting of school premises | No | End of financial year that the record was created in | Current financial year + 6 years | Secure disposal | Common practice | | | |



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| 4.2 Maintenance | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 4.2.1 | All records relating to the maintenance of the school, carried out by contractors | No | End of financial year that the record was created in | Current financial year + 6 years | Secure disposal | Common practice | | | |
| 4.2.2 | All records relating to the maintenance of the school, carried out by school employees, including maintenance log book | No | End of calendar year that the record was created in | Current calendar year + 6 years | Secure disposal | Common practice | | | |

# 5. Pupil's Educational Record

This section includes all records which are created during the time a pupil spends at school.

| For information relating to accident reporting, please refer to the Health and Safety section above.. | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 5.1.1 | Pupil's Educational Record required by the Education (Pupil Information) (England) Regulations 2005 | | | | | | | | |
| | Primary | Yes | Date pupil changes school | Retain whilst the child remains at the primary school | The file should follow the pupil when they leave | Pupil's Educational Record required by | | | |



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| | | | | | the primary school * | the Education (Pupil Information) (England) Regulations 2005 | | | |
| | Secondary | Yes | Pupil's date of birth | Date of birth of the pupil + 25 years | DO NOT DESTROY (refer to note on front page) | The Limitations Act 1980 | | | |
| 5.1.2 | Examination Results - Pupil Copies | | | | | | | | |
| | Public | Yes | Date of examination | This information should be added to the pupil file | Secure disposal All uncollected certificates to be returned to the examination board, after reasonable attempts to contact the pupil have failed | Common practice | | | |
| | Internal | Yes | Date of examination | This information should be added to the pupil file | Secure disposal | Common practice | | | |
| 5.1.3 | Child Protection Information held on pupil file | | | | | | | | |
| | Primary | Yes | Date pupil changes school (Where a child is removed from the roll to be | If any records relating to child protection issues are | Transfer to Secondary School | Keeping Children Safe in Education; Statutory Guidance for | | | |



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|---|---|---|---|---|---|---|---|---|---|
| | | | educated at home/missing from education, see below) | placed on the pupil file, it should be in a sealed envelope and retained for the same period of time as the pupil record. Where child protection information is held separately, retain for 25 years from the child's date of birth, then review. Common practice, following guidance from LA Safeguarding services, advises that the principal copy of this information will be held by the LA Children's Services. | | Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018 | | | |



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|---|---|---|---|---|---|---|---|---|---|
| | Secondary | Yes | Pupil's date of birth<br>(Where a child is removed from the roll to be educated at home/missing from education, see below) | If any records relating to child protection issues are place on the pupil file, it should be in a sealed envelope and retained for the same period of time as the pupil record. Where child protection information is held separately, retain for 25 years from the child's date of birth, then review. Common practice, following guidance from LA Safeguarding services, advises that the principal copy of this | DO NOT DESTROY (refer to note on front page). Consider transfer to off-site storage on the child reaching school leaving age | Keeping Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018 | | | |



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| | | | | information will be held by the LA Children's Services. | | | | | |
| | Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths. | Yes | Date removed from roll | As above.<br>NB – Scan all documents into one folder, use the naming convention as per guidance sent out (CME) and send via Perspective Lite Secure Portal, which can also be accessed via Derbyshire SchoolsNet | Transfer to Derbyshire County Council Coordinator for Missing Children | Keeping Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children' 2018 | | | |
| | Child is removed from the roll and is Elective Home Educated | Yes | Date removed from roll | As above.<br>NB – Scan all documents into one folder, use the naming convention as per guidance sent out (EHE) and send via Perspective Lite Secure | Transfer to Derbyshire County Council Coordinator Education Improvement Service | Keeping Children Safe in Education; Statutory Guidance for Schools and Colleges 2015 ('Working together to safeguard children. A guide to inter- | | | |



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| | | | | Portal, which can also be accessed via Derbyshire SchoolsNet | | agency working to safeguard and promote the welfare of children' 2018 | | | |

| 5.2 Attendance | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 5.2.1 | Attendance Registers | Yes | Last entry in register | Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made | Secure disposal | School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities 2014 | | | |
| 5.2.2 | Correspondence relating to authorized absence | Yes | Date of absence | Date of absence + 2 years | Secure disposal | School attendance: Departmental advice for maintained schools, Academies, independent schools | | | |



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| | | | | | | and local authorities 2014 | | | |

| 5.3 Special Educational Needs | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 5.3.1 | Special Educational Needs files, reviews and Individual Education Plans | | | | | | | | |
| | Primary | Yes | Date pupil changes school | Retain for duration of attendance at school | Transfer to Secondary School | The Limitations Act 1980 | | | |
| | Secondary | Yes | Pupil's date of birth | Date of birth of pupil + 35 years (This period is recommended by Derbyshire County Council) | DO NOT DESTROY (refer to note on front page) | Special Educational Needs and Disability Act 2001 Children and Family's Act 2014 | | | |
| 5.3.2 | Statement maintained under Section 234 of the Education Act 1990 and any amendments made to the statement | Yes | Pupil's date of birth | Date of birth of pupil + 25 years | DO NOT DESTROY (refer to note on front page) | Special Educational Needs and Disability Act 2001 Children and Family's Act 2014 | | | |



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| | | | | | | The Limitations Act 1980 | | | |

## 6. Curriculum Management

| 6.1 Statistics and Management Information | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 6.1.1 | Curriculum returns | No | End of the calendar year that the record was created in | Current year + 3 years | Secure disposal | Common practice | | | |
| 6.1.2 | Curriculum development | No | End of the calendar year that the record was created in | Current year + 6 years | Secure disposal | Common practice | | | |
| 6.1.3 | Examination Results (School's copy) | Yes | Date of examination | Current year + 6 years | Secure disposal | Common practice | | | |
| | SATS | | | | | | | | |
| | Results | Yes | Date that results are released | The SATS result should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the ages of 25 years. The school may wish to keep a composite record of all the whole | Secure disposal | Common practice | | | |



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| | | | | year SATS results. These could be kept for the current year + 6 years to allow suitable comparison | | | | | |
| | Examination papers | Yes | Date of examination | The examination papers should be kept until any appeals/validation process is complete | Secure disposal | Common practice | | | |
| 6.1.4 | Published Admission Number (PAN) Reports | Yes | End of the calendar year that the record was created in | Current year + 6 years | Secure disposal | Common practice | | | |
| 6.1.5 | Value Added and Contextual Data | Yes | End of the calendar year that the record was created in | Current year + 6 years | Secure disposal | Common practice | | | |
| 6.1.6 | Self-Evaluation Forms | Yes | Date of completion | Current year + 6 years | Secure disposal | Common practice | | | |
| 6.1.7 | Internal Moderation | Yes | Date of commencement | Academic year + 1 academic year | Secure disposal | Common practice | | | |
| 6.1.8 | External Moderation | Yes | Date of commencement | Until superseded | Secure disposal | Common practice | | | |

| 6.2 Implementation of Curriculum | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 6.2.1 | Schemes of Work | No | End of the calendar year | Current year + 1 year | Review these records at the end of | Common practice | | | |



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| | | | that the record was created in | | each year and allocate a further retention period or secure disposal | | | | |
| 6.2.2 | Timetable | No | End of the calendar year that the record was created in | Current year + 1 year | Secure disposal | Common practice | | | |
| 6.2.3 | Class Record books | No | End of the calendar year that the record was created in | Current year + 1 year | Secure disposal | Common practice | | | |
| 6.2.4 | Mark books | No | End of the calendar year that the record was created in | Current year + 1 year | Secure disposal | Common practice | | | |
| 6.2.5 | Record Homework set | No | End of the calendar year that the record was created in | Current year + 1 year | Secure disposal | Common practice | | | |
| 6.2.6 | Pupil's work | No | Where possible, pupils' work should be returned to the pupil at the end of the academic year. If this is not, currently, the school's policy then it should be | | Secure disposal (where applicable) | Common practice | | | |



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| | | | retained for the current year +1 | | | | | | |

# 7. Extra Curriculum Management

| 7.1 Extra Curriculum Management | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 7.1.1 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Primary schools) where there has not been a Major Incident | No | Date of visit | Date of visit + 14 years | Secure disposal | The Health and Safety at Work Act 1974 (NB – Records created might include risk assessments) | | | |
| 7.1.2 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom (Secondary schools) where there has not been a Major Incident | No | Date of visit | Date of visit + 10 years | Secure disposal | The Health and Safety at Work Act 1974 (NB – Records created might include risk assessments) | | | |
| 7.1.3 | Parental consent forms for school trips where there has been no Major Incident | Yes | Conclusion of trip | Although the consent forms could be retained for DOB of the pupil + 25 years, the requirement for them being needed is low and most schools do not have the | Secure disposal | Common practice | | | |



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| | | | | storage capacity to retain each form for this period of time. Therefore no retention is required | | | | | |
| 7.1.4 | Records created by schools to obtain approval for to run an Educational Visit outside the Classroom, **where there has been a Major Incident** | Yes | Pupil's DOB | Retain for 21 years from the date of birth of the pupil/s involved in the incident | Secure disposal | The Limitations Act 1980 (NB – Records created might include risk assessments) | | | |
| 7.1.5 | Parental consent forms for school trips, **where there has been a Major Incident** | Yes | Pupil's DOB | Retain for 21 years from the date of birth of the pupil/s involved in the incident.<br>The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils | Secure disposal | The Limitations Act 1980 | | | |

| 7.2 Walking Bus | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 7.2.1 | Walking Bus registers | Yes | Last entry in register | Date of register + 6 years<br><br>This takes into account the fact that if there is | Secure disposal | Common practice | | | |



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| | | | | an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for reporting (please refer to Section 2.4.4 Accident Reporting). | | | | | |

| 7.3 Family Liaison Officers and Home School Liaison Assistants | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 7.3.1 | Day books | Yes | End of the calendar year that the record was created in | Current year + 2 years then review | Secure disposal | Common practice | | | |
| 7.3.2 | Reports for outside agencies – where the report has been included on the agency case file | Yes | Date of completion of report | Whilst the child is attending school and then destroy | DO NOT DESTROY (refer to note on front page) | Common practice | | | |
| 7.3.3 | Referral forms | Yes | Date of completion of form | While the referral is current | DO NOT DESTROY (refer to note on front page) | Common practice | | | |
| 7.3.4 | Contact data sheets | Yes | End of the calendar year | Current year then review – if contact | Secure disposal | Common practice | | | |



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| | | | that the record was created in | is no longer active then destroy | | | | | |
| 7.3.5 | Contact data base entries | Yes | End of the calendar year that the record was created in | Current year then review – if contact is no longer active then destroy | Secure disposal | Common practice | | | |
| 7.3.6 | Group registers | Yes | Last entry in register | Current year + 2 years | Secure disposal | Common practice | | | |

## 8. Central Government and Local Authority

| 8.1 Local Authority | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 8.1.1 | Secondary Transfer sheets | Yes | Year of transfer | Current year + 2 years | Secure disposal | Common practice | | | |
| 8.1.2 | Attendance Returns | Yes | End of the calendar year that the record was created in | Current year + 1 year | Secure disposal | Common practice | | | |
| 8.1.3 | School Census Returns | No | Completion of return | Current year + 5 years | Secure disposal | Common practice | | | |
| 8.1.4 | Circulars and other information sent from the Local Authority | No | Date of issue | Operational use | Secure disposal | Common practice | | | |



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| 8.2 Central Government | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 8.2.1 | OFSTED reports and papers | No | Date new report is issued | Retain whilst current | Transfer to Derbyshire County Council Records Office | Common practice | | | |
| 8.2.2 | Returns made to central government | No | End of the calendar year that the record was created in | Current year + 6 years | Secure disposal | Common practice | | | |
| 8.2.3 | Circulars and other information sent from central government | No | Date of issue | Operational use | Secure disposal | Common practice | | | |

# 9. School Support Organisations

| 9.1 School Support Organisations | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Reference | Basic File Description | Data Protection Concerns | Trigger | Retention Period | Action upon end of use | Basis for Retention | Location | Access limited to (Role) | Annual Review Completed (Y/N) |
| 9.1.1 | Family Liaison Officers and Home School Liaison Assistant day books | Yes | Completion of book | Current year + 2 years | Secure disposal | Common practice | | | |
| 9.1.2 | As above – Reports for external agencies where the report has been included on the case file created by the external agency | Yes | Completion of report | Whilst pupil is attending school and then destroy | Secure disposal | Common practice | | | |
| 9.1.3 | As above – Referral forms | Yes | Completion of referral | Whilst the referral is current | Secure disposal | Common practice | | | |



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| 9.1.4 | As above – Contact data sheets | Yes | Completion of sheet | Current year then review, if contact is no longer, then destroy | Secure disposal | Common practice | | | |
| 9.1.5 | As above – Contact database entries | Yes | Completion of entry | Current year then review, if contact is no longer, then destroy | Secure disposal | Common practice | | | |
| 9.1.6 | Group registers | Yes | Completion of register | Current year + 2 years | Secure disposal | Common practice | | | |
| 9.1.7 | Parent Teacher Associations and Old Pupil Associations – Records relating to the creation and management of PTA and Old Pupil Associations | Yes | Date of foundation | Current year + 6 years | Secure disposal | Common practice | | | |

## Appendix A – List of School Records and Data safely destroyed

### Specimen Checklist for Annual Review of School Records and Safe Data Destruction

The following sheet can be completed or, alternatively, document in a spreadsheet

| Reference Number | File/Record Title | Description | Reference or Cataloguing Information | Number of Files Destroyed | Method of Destruction | Confirm; (i) (ii) Safely Destroyed In accordance with Data Retention Guidelines Yes/No | Name of Authorising Officer |
|---|---|---|---|---|---|---|---|
| e.g. | School invoices | Copies of purchase invoices dated 2011/12 | Folders marked 'Purchase Invoices 2011/13' 1-3 | 3 Folders | Cross shredded | Yes | J Smith (Head) |
| 1. | | | | | | | |



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| 2. | | | | | | | |
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| 15. | | | | | | | |
| 16. | | | | | | | |

## Appendix B - Safe Retention of Records Information Security and Business Continuity

Information Security and Business Continuity are both important activities in ensuring good information management and are vital for compliance with Data Protection legislation. Taking measures to protect your records can ensure that:

• Your school can demonstrate compliance with the law and avoid data loss incidents;

• In the event of a major incident, your school should be able to stay open and will at least have access to its key administrative and teaching records.

An Information Security Policy should incorporate a Business Continuity Plan and should deal with records held in all media across all school systems:

• Electronic (including but not limited to databases, word processed documents and spreadsheets, scanned images)

• Hard copy (including but not limited to paper files, plans)



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# B1 Digital Information

In order to mitigate against the loss of electronic information a school needs to:

a. Operate an effective back-up system

You should undertake regular backups of all information held electronically to enable restoration of the data in the event of an environmental or data corruption incident. Where possible these backups should be stored in a different building to the servers and if possible off the main school site. This is to prevent loss of data, reduce risk in case of theft or the possibility of the backups becoming temporarily inaccessible. Options for the management of back-up facilities include:

• Use of an off-site, central back up service (usually operated by the local authority or other provider). This involves a back-up being taken remotely over a secure network (usually overnight) and stored in encrypted format in premises other than the school.

• Storage in a data safe in another part of the school premises

The back-up may be stored in a fireproof safe which is located in another part of the premises. These premises must also be physically secure and any hard copy supporting data regarding the location of records should also be stored in the safe.

Where schools make us of cloud storage instead of, or alongside, physical onsite servers, they should ensure that the location of the cloud storage and the security offered are appropriate for the information and records stored.

b. Control the way data is stored within the school

Personal information should not be stored on the hard drive of any laptop or PC unless the device is running encryption software. Staff should be advised not to hold personal information about students or other staff on mobile storage devices including but not limited to memory sticks, phones, iPads, portable hard drives or even on CD.

c. Manage the location of server equipment

Ensure that the server environment is managed to prevent access by unauthorised people.

d. Ensure that business continuity plans are tested

Test restore processes on a regular basis to ensure that the first time you identify a problem with the backup is not the first time you need to retrieve data from it.



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## B2 Hard Copy Information and Records

Records which are not stored on the school's servers are at greater risk of damage by fire and flood as well as risk of loss and of unauthorised access. Wherever possible, and where appropriate, if information can be stored electronically rather than hard copy, then store it electronically.

a. Fire and flood

The cost of restoring records damaged by water can be high but a large percentage may be saved; a fire is much more destructive of records. In order to limit the amount of damage which a fire or flood can do to paper records, all vital information should be stored in filing cabinets, drawers or cupboards. Metal filing cabinets are a good first level barrier against fire and water. Where possible vital records should not be left on open shelves or on desks as these records will almost certainly be completely destroyed in the event of fire and will be seriously damaged (possibly beyond repair) in the event of a flood. The bottom shelves of a storage cupboard should be raised at least 2 inches from the ground. Physical records should not be stored on the floor.

b. Unauthorised access, theft or loss

Staff should be encouraged not to take personal data on staff or students out of the school unless there is no other alternative. Records held within the school should be in lockable cabinets. Consider restricting access to offices in which personal information is being worked on or stored. All archive or records storage areas should be lockable and have restricted access.

Where paper files are checked out from a central system, log the location of the file and the borrower, creating an audit trail.

c. Clear Desk Policy

A clear desk policy is the best way to avoid unauthorised access to physical records which contain sensitive or personal information and will protect physical records from fire and/or flood damage.

A clear desk policy involves the removal of the physical records which contain sensitive personal information to a cupboard or drawer (lockable where appropriate). It does not mean that the desk has to be cleared of all its contents.

## B3 Risk Analysis

Individual schools should undertake a business risk analysis to identify which records are vital to school management and these records should be stored in the most secure manner. Reference materials or resources which could be easily replaced are more suitable for storage on open shelves or desks.

The development of an information asset/risk register can assist with this process.



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## B4 Responding to Incidents

In the event of an incident involving the loss of information or records the school should be ready to pull together an incident response team to manage the situation. Schools should have a process, which must be used by all members of staff, if there is a major data loss or information security breach. This will involve appointing a Data Protection Officer to liaise with the Information Commissioner's Office if an information security breach needs to be reported. Please be aware – a loss of data e.g. accidental destruction of records, is a data breach just as if those records had been lost, stolen or wrongfully shared.

## B5 Maintaining a School Archive

Schools generate a large amount of data that is not necessarily personal or sensitive, yet is worthy of retention as part of the setting's historical legacy; records, year photographs, fliers and ephemera for plays, dances or student elections, letters, issues of the school newspaper. These, and other items, document not only the school's past, but also reflect its place within the greater community. Sometimes a school may be asked what historical records are still maintained within the setting. Often these requests come from former school pupils, when they need to provide proof of their attendance or educational record. Other requests come from family historians carrying out research on their family tree and about their ancestors.

A school archive is different from an official school records system – all schools will have an established record-keeping system for official records and a Management Information System, which includes record-keeping guidelines. A school archive preserves data, beyond the retention period, where there is a legitimate interest in holding that information e.g. to commemorate a significant event in the life of the school. It can take on many characteristics and serve many purposes--but it neither compliments nor replaces the official record-keeping systems. However, records held in an archive must be accessed the same way, as current school records, and it would be necessary for the school to prove the identity of anyone requesting historical information, in the same way they would a Subject Access Request. To comply with the General Data Protection Regulation, the schools should consider the following, if a request has been made to consult someone else's personal information in school archive that is not in the public domain.

- Entries for an individual who is (or would be) more than one hundred years old can be viewed without restriction.
- If the individual is less than one hundred years old you would need to provide proof that that person is now deceased, and to supply a death certificate for them.
- If the requester wishes to access information still held under the terms of the retention schedule, they would need to make a Subject Access Request.

When creating an archive, a school should be aware that it must serve the purpose of repository for the collection and preservation of historically valuable documents, relating to the history of the school or the community, which otherwise would be lost.



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Where the decision has been made not to transfer data to Derbyshire County Council Records Office, the school should consult with their Data Protection Officer to implement the following steps;

- Establish what information needs to be archived
- Select someone to serve as the archivist. This may be an additional function within an established role, to work alongside both the Data Protection Officer and Data Lead officer (where applicable).
- Select a physical location to house the collection, and determine what equipment and supplies are needed to accomplish the project for the first year and on a continuing basis e.g. safe storage, shelving
- Remember that archives can include electronic data e.g. schools may have digital photographs which are no longer displayed on their website or social media pages. Consider not only holding and cataloguing this data in a secure driver, but making potential requestors aware of its presence, through a dedicated website.
- Come to an agreement with Derbyshire County Council Records Office, in order for the collected materials could be turned over if the school archives should be discontinued.


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