



## Retention of Records Policy

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## How to use this document

These guidelines have been produced by **Learn Sheffield & EduDataPro**.

They combine guidance produced by Department of Education, Sheffield City Council, the IRMS and other local authorities. Under the **General Data Protection Regulations** (GDPR), the '**storage limitation principle**' states that as data controllers, schools and trusts should not retain data for longer than they need it and be able to justify why you need to keep any personal data.

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## Independent Inquiry into Child Sexual Abuse (IICSA)– Retention of related documents

**On 2 July 2015 the chair of the 'Independent Inquiry into Child Sexual Abuse' (IICSA) [wrote to all local authorities](#) requesting that any material that may be required for the enquiry is retained until further notice. This includes data held at all "schools including private and state-funded boarding and day schools"**

*"Your organisation is asked to retain any and all documents; correspondence; notes; emails and all other information – however held – which contain or may contain **content pertaining directly or indirectly to the sexual abuse of children** or to child protection and care. **For the purposes of this appendix, the word "children" relates to any person under the age of 18.**"* <https://www.iicsa.org.uk/key-documents/82/view/letter-to-local-authority-ceos.pdf>

**In schools this relates to all child protection records or allegations of abuse (including unfounded).**

Version History	Details	Date	Author
<b>0.1 (Draft)</b>	Draft by TW. Based on DfE document, merged with SCC records policy (1.2).	October 2018	TW (EDP)

<b>0.2</b>	Input from Minerva Learning Trust	Dec 2018	TW (EDP)
<b>0.3</b>	Input from Minerva Learning Trust	Jan 2019	TW (EDP)
<b>0.4</b>	Review by SCC and Learn Sheffield. Comments incorporated by TW	July 2019	TW (EDP)
	Cross reference with latest IRMS document		

## Definitions & Glossary

**Business decision:** if there is no law or regulation to say how long a record should be kept, the school/trust may base this decision on the administrative needs of the organisation

**Common practice:** if there is no law or regulation to say how long a record should be kept, we may base this decision on what similar organisations do

**Secure Disposal:** the processes associated with the end of a records lifecycle, they will typically include destruction by shredding of the records or transfer of the records to SCC for permanent preservation. For electronic records deletion of data from the live storage versions is sufficient. If data is not easily accessible from an offline backup or archived storage, then deletion of all copies is not necessary, however care should be taken to delete data again if a full restoration of data from a backup is required.

**Permanent:** Retain the record permanently while the school is open and if the school is closed, then transfer to **Sheffield Archives** or if the school is part of a multi-academy trust then the central trust records

### 1. Freedom of Information Act 2000 (FoIA 2000)

The Freedom of Information Act 2000 requires the school or trust **to maintain a list of records which have been destroyed** and who authorised their destruction. Members of staff should record at least:

- File reference (or other unique identifier);
- File title (or brief description);
- Number of files and date range
- The name of the authorising officer
- Date action taken

Following this guidance will ensure that the school is compliant with the Data Protection rules and the Freedom of Information Act 2000. Appendix 1 details best practice around archiving of data within schools and trusts.

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Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
<b>2. Management of the School</b>						
<b>2.1. Governing Body</b>						
1.1.1	Agendas for meetings	Potentially	One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL/DELETION	Common practice	
1.1.2	Minutes of meetings					
	Principal Set (signed)	Potentially	PERMANENT	If the school is unable to store these then they should be offered to the County Archives Service	Common practice	There may be data protection issues if the meeting is dealing with confidential issues relating to staff
	Inspection Copies	Potentially	Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be DESTROYED SECURELY.	Common practice	There may be data protection issues if the meeting is dealing with confidential issues relating to staff
1.1.3	Reports presented to the meeting	Potentially	PERMANENT	Retain with the signed set of the minutes	Common practice	There may be data protection issues if the report deals with confidential issues relating to staff
1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002 (Maintained schools only)	No	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL/DELETION	Governors' Annual Reports) (Amendment) Regulations 2002	Maintained schools only
1.1.5	Instruments of Government including Articles of Association	No	PERMANENT	These should be retained in the school whilst the school is open and then offered to local authority archives service or central trust records when the school closes.	Common practice	

Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
1.1.6	Trusts and Endowments managed by the Governing Body	No	PERMANENT	These should be retained in the school whilst the school is open and then offered to SCC Archives (or central trust records) if the school closes.	Common practice	
1.1.7	Action plans created and administered by the Governing Body	No	Life of the action plan + 3 years	SECURE DISPOSAL/DELETION	Common practice	
1.1.8	Policy documents created and administered by the Governing Body	No	PERMANENT	N/A	Common practice	Important to keep in case of historical queries e.g. pension or pay disputes
1.1.9	Records relating to complaints dealt with by the Governing Body	Yes	Date of the resolution of the complaint + a minimum of 6 years	SECURE DISPOSAL/DELETION	Common practice	
1.1.10	[Maintained schools only] Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Date of report + 10 years	SECURE DISPOSAL/DELETION	Governors' Annual Reports) (Amendment) Regulations 2002	
1.1.11	Proposals concerning the change of status of a maintained school	No	Date proposal accepted or declined + 3 years	SECURE DISPOSAL/DELETION	Common practice	

## 2.2. Head Teacher and Senior Management Team

1.2.1	Historical Log books of activity in the school maintained by the Head Teacher	Potentially	PERMANENT	These could be of permanent historical value and should be offered to the Archives Service if appropriate	Common practice	There may be data protection issues if the log book refers to individual pupils or members of staff
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Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
1.2.2	Records of Senior Management Team meetings and the meetings of other internal administrative bodies	Potentially	Date of the meeting + 3 years	SECURE DISPOSAL/DELETION	Common practice	There may be data protection issues if the minutes refers to individual pupils or members of staff
1.2.3	Supporting reports created by the Head Teacher or the Management Team	Potentially	Date of the report + a minimum of 3 years	SECURE DISPOSAL/DELETION	Common practice	There may be data protection issues if the report refers to individual pupils or members of staff
1.2.4	School Development Plans	No	Life of the plan + 3 years	SECURE DISPOSAL/DELETION	Common practice	
<b>2.3. Admissions Process</b>						
1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No	Life of the policy + 3 years	SECURE DISPOSAL/DELETION	Common practice	
1.3.2	Admissions – if the admission is successful	Yes	Date of last action + 2 years	SECURE DISPOSAL/DELETION	SCC Policy	
1.3.3	Admissions – if the appeal is unsuccessful	Yes	Date of last action + 2 years	SECURE DISPOSAL/DELETION	SCC Policy	
1.3.4	Register of Admissions [Historical]	Yes	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL/DELETION	Common practice	Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school.
1.3.5	Admissions – Secondary Schools – Casual	Yes	Current year + 1 year	SECURE DISPOSAL/DELETION	Common practice	e.g. Managed moves or guest students
1.3.6	Proofs of address supplied by parents as part of the admissions process	Yes	Current year + 1 year	SECURE DISPOSAL/DELETION	Common practice	



Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
1.3.7	Supplementary Information form including additional information such as religion, medical conditions etc	Yes				
	For successful admissions	Yes	This information should be added to the pupil file	SECURE DISPOSAL/DELETION	Common practice	
	For unsuccessful admissions	Yes	Until appeals process completed	SECURE DISPOSAL/DELETION	School Admissions Appeals Code 2012	
<b>2.4. Operational Administration</b>						
1.4.1	General file series	No	Current year + 5 years	STANDARD DISPOSAL	Common practice	
1.4.2	Records relating to the creation and publication of the school brochure or prospectus	No	Current year + 3 years	STANDARD DISPOSAL	Common practice	
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No	Current year + 1 year	STANDARD DISPOSAL	Common practice	
1.4.4	Newsletters and other items with a short operational use	No	Current year + 1 year	STANDARD DISPOSAL	Common practice	
1.4.5	Visitors and Staff Signing-in records [Paper or digital systems]	Yes	Current year + 3 years	SECURE DISPOSAL/DELETION	Business decision	
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No	Current year + 6 years	SECURE DISPOSAL	Common practice	
<b>3. Human Resources</b>						
<b>3.1. Recruitment</b>						
2.1.1	All records leading up to the appointment of a new member of staff - unsuccessful candidates	Yes	Date of appointment of successful candidate + 6 months	SECURE DISPOSAL/DELETION	SCC policy	
2.1.2	All records leading up to the appointment of a new member of staff – successful candidate	Yes	All the relevant information should be added to the staff	SECURE DISPOSAL/DELETION	Common practice	

Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
			personal file (see below) and all other information retained for 6 months			
2.1.3	Pre-employment vetting information – DBS Checks	Yes	These should <b>not</b> be retained	SECURE DISPOSAL/DELETION	DBS guidelines	
2.1.4	Proofs of identity collected as part of the process of checking	Yes	These must be checked and a note kept of what was seen and what has been checked. If it is necessary to keep copy documentation then this should be <b>securely</b> retained in the member of staff's personal file	SECURE DISPOSAL/DELETION	Common practice	
2.1.5	Pre-employment vetting information – Evidence proving the <b>right to work</b> in the United Kingdom	Yes	These documents should be added to the Staff Personal File [see below], kept until termination of employment + 6 years	SECURE DISPOSAL/DELETION	<a href="#">Home Office guidance</a>	
<b>3.2. Operational Staff Management</b>						
2.2.1	Staff Personnel File	Yes	Termination of Employment + 6 years (unless child protection or safeguarding matter see 2.3.1)	SECURE DISPOSAL/DELETION	SCC policy & Limitation Act 1980	
2.2.2	Timesheets	Yes	Current year + 6 years	SECURE DISPOSAL/DELETION	Common practice	
2.2.3	Staff attendance records	Yes	Current year + 6 years	SECURE DISPOSAL/DELETION	Common practice	
2.2.4	Annual appraisal/ assessment records	Yes	Termination of Employment + 6 years	SECURE DISPOSAL/DELETION	Common practice	
2.2.5	Single Central Record	Yes	Keep current version up to date. Keep 6 years of previous versions	SECURE DISPOSAL/DELETION	Common practice	
2.2.6	CPD /Training Records	Yes	Termination of Employment + 6	SECURE		

Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
			years	DISPOSAL/DELETION		
<b>3.3. Management of Disciplinary and Grievance Processes</b>						
2.3.1	Allegation of a child protection nature against a member of staff (including where the allegation is unfounded)	Yes	<del>Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer.</del> Do <b>NOT</b> destroy (see p1)	<del>SECURE DISPOSAL/DELETION</del> These records must be shredded Do <b>NOT</b> destroy (see p1)	IICSA guidance (2015)	Allegations that are found to be malicious should be removed from personnel files.
2.3.2	Disciplinary Proceedings	Yes				
	Verbal warning	Yes	Date of warning + 6 months or if safeguarding related see 2.3.1	SECURE DISPOSAL/DELETION	Common practice	If a record of the warning is placed on personal files then they must be removed from the file after the retention period
	written warning – level 1	Yes	Date of warning + 6 months or if safeguarding related see 2.3.1	SECURE DISPOSAL/DELETION	Common practice	
	written warning – level 2	Yes	Date of warning + 12 months or if safeguarding related see 2.3.1	SECURE DISPOSAL/DELETION	Common practice	
	final warning	Yes	Date of warning + 18 months or if safeguarding related see 2.3.1	SECURE DISPOSAL/DELETION	Common practice	
	case not found	Yes	If the incident is child protection related then see above, otherwise dispose of at the conclusion of the case	SECURE DISPOSAL/DELETION	Common practice	
<b>3.4. Health and Safety</b>						
2.4.1	Health and Safety Policy Statements	No	Life of policy + 3 years	SECURE DISPOSAL/DELETION		

Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
2.4.2	Health and Safety Risk Assessments	No	Life of risk assessment + 3 years	SECURE DISPOSAL/DELETION		
2.4.3	Records relating to accident/ injury at work	Yes	Date of incident + 12 years	SECURE DISPOSAL/DELETION		
2.4.4	Accident Reporting					
	Adults	Yes	Date of the incident + 6 years	SECURE DISPOSAL/DELETION	SCC Policy	
	Children	Yes	Date of the incident + 21 years	SECURE DISPOSAL/DELETION	SCC Policy	
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Current year + 40 years	SECURE DISPOSAL/DELETION	SCC Policy	
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Date of last action + 40 years	SECURE DISPOSAL/DELETION	SCC Policy	
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No	Last action + 50 years	SECURE DISPOSAL/DELETION	The Ionising Radiations Regulations 1985	
2.4.8	Fire Precautions log books	No	Current year + 6 years	SECURE DISPOSAL/DELETION	Common practice	
<b>3.5. Payroll and Pensions</b>						
2.5.1	Payroll records (including maternity pay and statutory sick pay records)	Yes	Current year + 6 years	SECURE DISPOSAL/DELETION	Standard financial regulations	
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Current year + 6 years	SECURE DISPOSAL/DELETION	Standard financial regulations	

Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
<b>4. Financial and Risk Management of the School</b>						
<b>4.1. Risk Management and Insurance</b>						
3.1.1	Employer's Liability Insurance Certificate	No	Closure of the school + 40 years	STANDARD DISPOSAL	Common practice	
<b>4.2. Asset Management</b>						
3.2.1	Inventories of furniture and equipment	No	Current year + 6 years	STANDARD DISPOSAL	Common practice	
3.2.2	Burglary, theft and vandalism report forms	Potentially	Current year + 6 years	SECURE DISPOSAL/DELETION	Common practice	May include names
<b>4.3. Accounts and Statements including Budget Management</b>						
3.3.1	Annual Accounts	No	Current year + 6 years	STANDARD DISPOSAL	Standard financial regulations	
3.3.2	Loans and grants managed by the school	No	Date of last payment on the loan + 6 years	SECURE DISPOSAL/DELETION	Common practice	
3.3.3	Student Grant applications	Yes	Current year + 3 years	SECURE DISPOSAL/DELETION	Common practice	
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No	Life of the budget + 3 years	SECURE DISPOSAL/DELETION	Common practice	
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No	Current financial year + 6 years	SECURE DISPOSAL/DELETION	Standard financial regulations	
3.3.6	Records relating to the collection and banking of monies	No	Current financial year + 6 years	SECURE DISPOSAL/DELETION	Standard financial regulations	
3.3.7	Records relating to the identification and collection of debt	No	Current financial year + 6 years	SECURE DISPOSAL/DELETION	Standard financial regulations	
<b>4.4. Contract Management</b>						
3.4.1	All records relating to the management of contracts	No	Last payment on the contract +	SECURE	The Limitations Act	

Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
	under seal		12 years	DISPOSAL/DELETION	1980	
3.4.2	All records relating to the management of contracts under signature	No	Last payment on the contract + 6 years	SECURE DISPOSAL/DELETION	The Limitations Act 1980	
3.4.3	Records relating to the monitoring of contracts	No	Current year + 2 years	SECURE DISPOSAL/DELETION	The Limitations Act 1980	
<b>4.5.School Fund [Maintained schools only]</b>						
3.5.1	School Fund - Cheque books	No	Current year + 6 years	SECURE DISPOSAL/DELETION	Standard financial regulations	
3.5.2	School Fund - Paying in books	No	Current year + 6 years	SECURE DISPOSAL/DELETION	Standard financial regulations	
3.5.3	School Fund – Accounting records [Historically: Ledger]	No	Current year + 6 years	SECURE DISPOSAL/DELETION	Standard financial regulations	
3.5.4	School Fund – Payment Invoices	No	Current year + 6 years	SECURE DISPOSAL/DELETION	Standard financial regulations	
3.5.5	School Fund – Receipts	No	Current year + 6 years	SECURE DISPOSAL/DELETION	Standard financial regulations	
3.5.6	School Fund - Bank statements	No	Current year + 6 years	SECURE DISPOSAL/DELETION	Standard financial regulations	
3.5.7	School Fund – Educational Visit Records relating to 3.5.4 and 3.5.5	No	Current year + 6 years	SECURE DISPOSAL/DELETION	Standard financial regulations	
<b>4.6.School Meals</b>						
3.6.1	Free School Meals Registers	Yes	Current year + 6 years	SECURE DISPOSAL/DELETION	Common practice	
3.6.2	School Meals Registers	Yes	Current year + 3 years	SECURE DISPOSAL/DELETION	Common practice	
3.6.3	School Meals Summary Sheets	No	Current year + 3 years	SECURE	Common practice	

Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
				DISPOSAL/DELETION		
<b>5. Property &amp; Assets</b>						
<b>5.1. Management</b>						
4.1.1	Title deeds of properties belonging to the school	No	PERMANENT These should follow the property unless the property has been registered with the Land Registry	DO NOT DESTROY	Common practice	
4.1.2	Plans of property belong to the school	No	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.	DO NOT DESTROY	Common practice	
4.1.3	Leases of property leased by or to the school	No	Expiry of lease + 6 years	SECURE DISPOSAL/DELETION	Common practice	
4.1.4	Records relating to the letting of school premises	No	Current financial year + 6 years	SECURE DISPOSAL/DELETION	Common practice	
<b>5.2. Maintenance</b>						
4.2.1	All records relating to the maintenance of the school carried out by contractors	No	Current year + 6 years	SECURE DISPOSAL/DELETION	Common practice	
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No	Current year + 6 years	SECURE DISPOSAL/DELETION	Common practice	
<b>5.3. Security</b>						
4.3.1	CCTV – Footage/recordings	Yes	Date created + 14 days (min)	AUTOMATIC DELETION	SCC policy	Depending on system, footage will be overwritten after a period of time

Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
4.3.2	CCTV footage (recorded copies)	Yes	Closure of investigation + 2 years	SECURE DISPOSAL/DELETION	SCC policy	
4.3.3	Requests for footage	Yes	Date of last actions + 2 years	SECURE DISPOSAL/DELETION	SCC policy	

## 6. Pupil Management

### 6.1. Pupil's Educational Record

5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes				Refer to 5.3 for SEN records
	Primary (physical file)	Yes	Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school	SCC policy	
	Primary (electronic)	Yes	Date of Birth of the pupil + 25 years	USE BULK DELETION TOOLS IN SCHOOL MIS	SCC policy	A CTF extract is not the entire student record
	Secondary (electronic & physical)	Yes	Date of Birth of the pupil + 25 years	SECURE DISPOSAL (PHYSICAL) + USE BULK DELETION TOOLS IN MIS (ELECTRONIC)	SCC policy	The electronic records should be deleted when the physical record is destroyed
5.1.2	Examination Results – Pupil Copies	Yes				
	Public	Yes	This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.	Common practice	
	Internal	Yes	This information should be added to the pupil file		Common practice	
5.1.3	Child Protection information held on pupil file	Yes	If any records relating to child protection issues are placed securely on the pupil file and then retained for the same period of time as the pupil file.	<del>SECURE DISPOSAL/DELETION— these records MUST be shredded</del>	"Safeguarding Children in Education" 2004 Keeping Children Safe in Education (Department for	See note on p1



Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
				Do <b>NOT</b> destroy (see p1)	Education)	
5.1.4	Child protection information held in separate files	Yes	DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	<del>SECURE DISPOSAL/DELETION—these records MUST be shredded</del> Do <b>NOT</b> destroy (see p1)	"Safeguarding Children in Education" 2004 Keeping Children Safe in Education (Department for Education)	See note on p1
<b>6.2. Attendance</b>						
5.2.1	Attendance Registers (physical)	Yes	Retain for 3 years from last entry	SECURE DISPOSAL/DELETION	Common practice	In practice most attendance is now recorded electronically and associated with student record
5.2.2	Correspondence relating to absence	Yes	Current academic year + 2 years	SECURE DISPOSAL/DELETION	Common practice	
<b>6.3. Special Educational Needs</b>						
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Date of Birth of the pupil + 32 years	SECURE DISPOSAL/DELETION	SCC policy	
5.3.2	[Historical] Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Date of birth of the pupil + 32 years [This would normally be retained on the pupil file]	SECURE DISPOSAL/DELETION unless the document is subject to a legal hold	SCC policy	
5.3.3	Education Health & Care Plan (EHCP) [Used since 2014, replaced 'statements of special education needs']	Yes	Date of birth of the pupil + 32 years [This would normally be retained on the pupil file]	SECURE DISPOSAL/DELETION unless the document is subject to a legal hold	SCC policy	

Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
<b>7. Curriculum Management</b>						
<b>7.1. Statistics and Management Information</b>						
6.1.1	Examination Results (Schools Copy)	Yes	Current year + 6 years	SECURE DISPOSAL/DELETION		
	SATs Results	Yes	The SATS results should be recorded on the pupil's educational file	SECURE DISPOSAL/DELETION	Common practice	The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison
	Examination Papers	Yes	The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL/DELETION	Common practice	
6.1.2	Progress & Contextual Data	Yes	Current year + 6 years	SECURE DISPOSAL/DELETION	Common practice	
<b>7.2. Implementation of Curriculum</b>						
6.2.1	Schemes of Work	No	Current year + 1 year	Review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL/DELETION	Common practice	
6.2.2	Timetable	No	Current year + 1 year	STANDARD DISPOSAL	Common practice	
6.2.3	Marking & Assessment Records	Yes	Current year + 1 year	SECURE DISPOSAL/DELETION	Common practice	
6.2.4	Record homework set	No	Current year + 1 year	STANDARD DISPOSAL	Common practice	
6.2.5	Pupils' Work	Yes	Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not	SECURE DISPOSAL/DELETION	Common practice	

Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
			the school's policy then current year + 1 year			
6.2.6	Photographs of pupils (digital and printed)	Yes	Dispose when pupil leaves	SECURE DISPOSAL/DELETION	Business decision	Where there is no consent to use, images should not be kept indefinitely. Limited quantities of images may be kept for historical or archive purposes but there should be clear reasons for doing so.

## 8. Extra Curriculum Management

### 8.1. Educational Visits outside the Classroom

7.1.1	Records created by schools to obtain approval to run an educational visit outside the Classroom	No	Date of visit + 6 years	SECURE DISPOSAL/DELETION	Common practice	
7.1.2	Parental consent forms for school visit where there has been <b>no</b> major incident	Yes	Conclusion of the visit	SECURE DISPOSAL/DELETION	Common practice	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.
7.1.3	Parental consent forms for school visits – where there <b>has</b> been a major incident	Yes	DOB of the pupil involved in the incident + 25 years  The consent for all the pupils on the visit need to be retained to show that the rules had been followed for all pupils. Refer to 2.4.4 'Accident Reporting'	SECURE DISPOSAL/DELETION	<a href="#">RIDDOR</a> & <a href="#">OEAP</a>	
7.1.4	Walking Bus Registers (no incidents)	Yes	Date of register + 3 years	SECURE DISPOSAL/DELETION	Common practice	If there is an incident requiring an accident report the register will be

Ref	File description	Contains personal data?	Trigger date & Retention Period	Disposal Action	Basis for retention	Comments
						submitted with the accident report and kept for the period of time required for accident reporting
<b>9. Central Government and Local Authority Returns</b>						
8.1	Attendance Returns	No	Current year + 3 year	SECURE DISPOSAL/DELETION	Common practice	
8.2	School Census Returns	No	Current year + 3 years	SECURE DISPOSAL/DELETION	Common practice	
8.3	Workforce Census Returns	No	Current year + 3 years	SECURE DISPOSAL/DELETION	Common practice	
8.4	Other returns made to central government or local authority	No	Current year + 3 years	SECURE DISPOSAL/DELETION	Common practice	

## Appendix 1 – Best practice for data archiving and destruction

- Archive boxes should be of the disposable cardboard type
- Boxes should only contain a single type of records with a single clearly marked destroy date (e.g. "Destroy in 2025", do not mix finance and pupil or personnel files in the same box)
- Boxes should be clearly numbered with unique codes that match an index of archived files held by the business manager or lead archivist
- Using large plastic boxes or mixing types of data requires that the files are reviewed before destruction, this should be avoided where possible as it can lead to a data breach.
- The outside of the boxes should be clearly marked with the following information
  - a. Box number
  - b. Contents (e.g. Students file, surnames A-F)
  - c. Number of files (e.g. 30)
  - d. File types (e.g. pupil records)
  - e. Date range (leavers in July 2018)
  - f. Retention period (e.g. 25 years from DoB)
  - g. Destroy date (e.g. Destroy in 2027)
- A template for this purpose is on the following page
- Whilst held in the archive, under the GDPR, files including personal data need to be searchable within a calendar month of receiving a subject access request.
- At the point of destruction, a record of what files have been destroyed needs to be kept under the Freedom of Information Act 2000. If it is in a readable state, the sheet attached to the outside of the box can be removed and kept as a record of what has been destroyed.
- Archive boxes should be stacked in chronological order with the labels clearly showing, it should be easy to identify which boxes need to be destroyed.
- Annually (commonly during the summer break) the archive should be reviewed, and boxes for destruction be removed and if necessary, the archive reorganised so space for most recent files is available.
- Destruction of files should be done by shredding. Ideally by a professional document destruction service provider that provides a certificate of destruction.

Complete the first section and attach to side of archive box so it is clearly visible in archive

<b>Box number</b>		<b>Destroy date</b> (Year at end of retention period)	
Contents (including any file titles and reference numbers)			
Number of files			
Type	Student files / Personnel Files / Finance / Other		
Date range			
Date Archived			
Retention Period			
Archiver (staff name)			

Confirmation of Destruction (only complete at point of destruction)

Confirmed date of destruction	
Authorising officer (Name and role)	
Signed	

At point of destruction remove & keep this sheet for evidence of destruction, required under '**Freedom of Information Act 2000**'