

PLASHET SCHOOL



Working together to promote & celebrate achievement

Record Retention, Destruction & Archive Policy

Applicable from 5th October 2018

Signed:

Chair of Governors

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Introduction

The General Data Protection Regulation (GDPR), that came into force on 25 May 2018, requires all organisations, to retain personal data for **no longer than necessary for the purposes we process it for**. Not only is this a requirement of the GDPR, it is also good practice. GDPR also requires that there is a valid basis for the collection of personal data and that the basis is stipulated when the data is collected.

The Retention, Destruction and Archive Policy aims to ensure that personal data is held securely, for the minimum time necessary and is then disposed of securely. It will require an ongoing review of the school's record management processes to ensure that all personal data is collected on an appropriate basis, retained in a secure manner, and disposed of when no longer necessary for the purpose it was collected. Disposal of data must be carried out in a regulated manner with appropriate certification if disposed of via a third party. GDPR regulations are not prescriptive for specific data components, the school must therefore review the personal data we hold to determine appropriate retention and disposal procedures. In some instances, the school may be legally obliged to retain data for a specified period under other pieces of legislation.

This policy is based on The Information and Records Management Society's (IRMS) 'Records Management Toolkit for Schools – Module 1'; this is being reviewed by the society to comply with any changes necessary under GDPR regulations. Plashet School's Records Retention, Destruction & Archive Policy will be revised in conjunction with the updated IRMS Toolkit when it is published. In the meantime, the policy will be monitored and reviewed regularly to ensure compliance under current practice.

The flowchart, **Appendix A** can serve as an aide memoire to determine whether data should be retained, disposed of or archived.

The draft Plashet School Data Retention Schedule, **Appendix B** is a comprehensive document detailing specific processes for our records and personal data. It is currently being developed and allows flexibility to cover new processes and amend existing ones over time.

Background

Section 46 of the Freedom of Information Act 2000 requires schools to follow a Code of Practice on managing their records. Under section 7 of the Code of Practice on the Management of Records, it states that:

- 'Authorities should have in place a records management policy, either as a separate policy or as part of a wider information or knowledge management policy.'

This policy statement has been adopted by Plashet School to reflect the needs of the school. It has been extracted from a model action plan for developing records management compliant with the Lord Chancellor's Code of Practice under Section 46 of the Freedom of Information Act 2000 Model Action Plan for Schools.

Records Retention, Destruction & Archive Policy

This policy sets out the minimum and maximum periods of retention for the personal data that we process.

Historically school records have been retained based on the archive capacity available, under GDPR however, schools have a duty to retain personal data for the minimum period necessary. A more systematic and rigorous approach must therefore be taken in respect of actively seeking to dispose of personal data at the earliest opportunity. Retention of unnecessary personal data increases the risk of a data breach and could exacerbate the severity of a breach if the data should not have been retained. There are legal considerations in respect of the retention of certain records which must be incorporated in the policy.

These include:

- statutory duties and government guidance relating to schools, including for safeguarding;
- disclosure requirements for potential future litigation;
- contractual obligations;
- the law of confidentiality and privacy; and
- the General Data Protection Regulations (GDPR) and associated legislation.

These will inform not only minimum and maximum retention periods for specific data, but also who should have access to it.

This document provides the policy framework through which this effective management can be achieved and audited. It covers:

1. Scope
2. Responsibilities
3. Relationships with existing policies

1. Scope

- 1.1. This policy applies to all records received, created and maintained by the staff in the course of their day to day work and functions
- 1.2. Meaning of "Record" - In these guidelines, "record" means any document or item of data which contains evidence or information relating to the school, its staff or students. Some of this material, but not all, will contain personal data of individuals as defined in the GDPR.
- 1.3. Many new and recent records will be created, received and stored electronically. Others (such as Certificates, Registers, or older records) will be original paper documents. The format of the record is less important than its contents and the purpose for keeping it.
- 1.4. Both paper and digital records will be stored securely and all appropriate measures taken to ensure the security of the data at all times.

2. Responsibilities

- 2.1. The school has a corporate responsibility to maintain its records keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher.
- 2.2. The person(s) responsible for records management in the school will give guidance for good records management practice and will promote compliance with this policy

so that information can be retrieved easily, appropriately and in a timely manner. They will also monitor compliance with this policy by carrying out an audit at least annually to check if records are stored securely and can be accessed appropriately.

- 2.3. Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management procedures.

3. Relationship with existing policies

This policy has been drawn up within the context of:

- General Data Protection Regulation (GDPR)
- Freedom of Information Policy
- Data Protection Policy
- Other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

Child Protection and Document Retention

In the light of the 'Independent Inquiry into Child Sexual Abuse' and various high-profile safeguarding cases, all schools should be aware of the emphasis currently being placed on long-term, lifetime or even indefinite keeping of full records related to incident reporting. Regardless of suggested retention timescales set out below, Plashet School may at its discretion, extend this rule to any and/or all personnel and student files on a 'safety first' basis.

In drawing up these guidelines, the foregoing principles have been fully taken into consideration. Child safety should not be compromised by putting data protection rules first, nor should these take precedence over the prevention and processing of safeguarding. These guidelines have been drafted in full awareness of these considerations. Data protection issues should never put child safety at risk, nor take precedence over the general prevention and processing of safeguarding

Secure Disposal of Documents

Data will in future need to be archived on the basis of deletion date in addition to the nature of the data. Data to be destroyed will be logged by the persons carrying out the process as evidence of compliance. This will also save time in assessing whether records still exist in cases where information is required by external organisations, i.e. the LA, other schools and colleges, the Police and for litigation purposes.

When data is to be destroyed, this may be carried out by an appropriately licenced third party.

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. Paper records that are disposed of in school must be shredded using a cross-cut shredder; CDs/ DVDs/diskettes must be cut into pieces.

Hard-copy images, AV recordings and hard disks will be dismantled and destroyed. Where third party disposal experts are used, they will be subject to adequate contractual obligations to the school to process and dispose of the information confidentially and securely. It is required that confirmation of disposal will be received on completion.

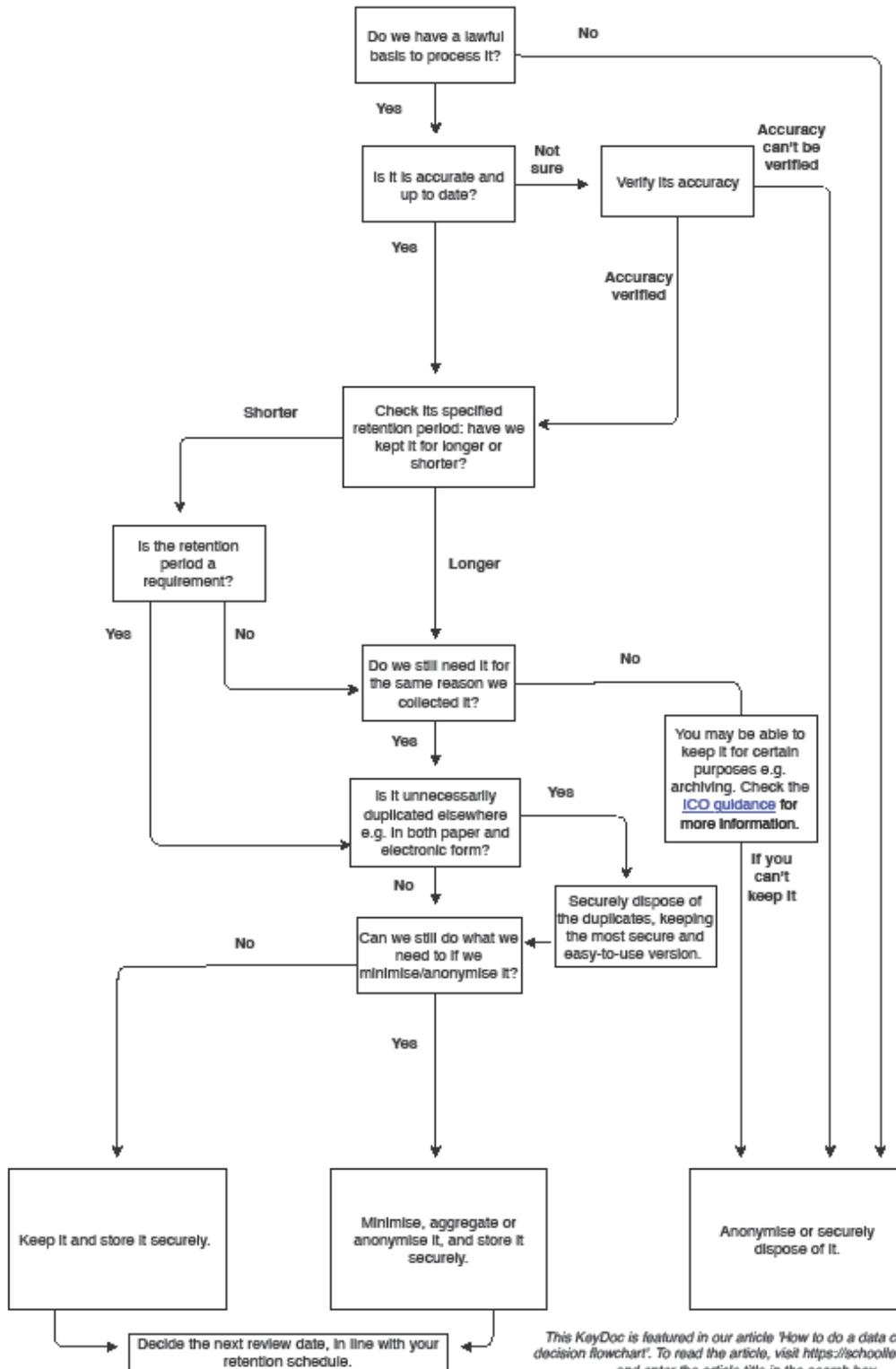
Timescales for Retention

The timescales stated in the schedule at Appendix B include minimum retention periods where there is a statutory/contractual requirement to retain for a specified period and maximum retention periods where there is a limited operational life for personal data. There will always be exceptions requiring judgment to be applied in particular circumstances, especially in relation to safeguarding/welfare/legal cases where data needs to be retained beyond the specified retention period in order to provide a full case history. Where personal data is deliberately retained beyond its stipulated operation life, a note should be retained to justify the reason for retention.

The essence of this guidance can be boiled down to the necessity of exercising thought and judgment – practical considerations mean that case-by-case 'pruning' of records may be impossible. It is therefore accepted that sometimes a more systemic or broad-brush approach may be necessary.

APPENDIX A

Should I keep this personal data?



This KeyDoc is featured in our article 'How to do a data clean out: decision flowchart'. To read the article, visit <https://schoolleaders.com> and enter the article title in the search box.

APPENDIX B

Draft Plashet School Data Retention Schedule

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Introduction

The Plashet School Data Retention Schedule attempts to identify processes which our records support, rather than identifying individual types of records. This is for two reasons:

- To make the retention period apply to all records independent of any format, i.e. the same rules apply to a paper file, an e-mail or another electronic document
- To allow flexibility in developing the schedule to cover new processes and amend existing ones over time.

The Schedule is intended to cover the lifecycle of records and information from creation through to destruction or permanent preservation.

Records intended for destruction under the Schedule may be destroyed in accordance with the provisions of the Schedule. Backup copies stored on alternative media (server/DVD/paper) should also be destroyed. This is vital to ensure compliance with the requirements of the General Data Protection Regulation (GDPR) within the Data Protection Act 2018 and Freedom of Information legislation.

Limitation of Scope

Very few types of records have specified time periods for retention in law or in official government guidance. Where such advice exists it is included in this Schedule. Where advice does not exist, it is up to us to decide how long we wish to retain records. This Schedule gathers together retention criteria from a comprehensive best practice review of a wide range of organisations across the country.

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
Governing Body					
1.1.1	Agendas for Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL
1.1.2a	Minutes of Governing Body meetings: Principal Set (signed) by Chair of Governing Body	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		PERMANENT	If the school is unable to store these then they should be offered to the Borough Archives Service
1.1.2b	Minutes of Governing Body meetings: Inspection Copies	No		Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded
1.1.3	Reports presented to the Governing body	There may be data protection issues if the report deals with confidential issues relating to staff		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 the minutes
1.1.4	Meeting papers relating to the annual parents' meeting held under section 33	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
	of the Education Act 2002				
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 County Archives Service when the school closes.
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 County Archives Service when the school closes.
1.1.7	Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years	SECURE DISPOSAL
1.1.8	Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
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 then review for further retention in case of contentious disputes	SECURE DISPOSAL
1.1.10	Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
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 + 3 years	SECURE DISPOSAL
1.1.12	Governor File. Information which the school holds about a Governor including contact details, published details and consents for data use	Yes		Date of leaving the role + 1 year	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
Management					
1.2.1	Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual students or members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the Borough Archives Service if appropriate
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual students or members of staff		Date of the meeting + 3 years then review	SECURE DISPOSAL
1.2.3	Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual students or members of staff		Date of the report + a minimum of 3 years then review	SECURE DISPOSAL
1.2.4	Records created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual students or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL
1.2.5	Correspondence created by Head Teachers, Deputy	There may be data protection issues if the correspondence		Date of correspondence + 3 years then review	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
	Head Teachers, heads of year and other members of staff with administrative responsibilities	refers to individual students or members of staff			
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
1.2.7	School Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL
Admissions					
1.3.1	All records relating to the creation and implementation of the School Admissions Policy	No	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL
1.3.2	Admissions – if the admission is successful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities,	Date of admission + 1 year	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
			schools adjudicators and admission appeals panels December 2014		
1.3.3	Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
1.3.4	Register of Admissions	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made	REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past students to confirm the dates they attended the school.
1.3.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
1.3.6	Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory guidance for admission authorities,	Current year + 1 year	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
			governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014		
1.3.7a	Supplementary Information form including additional information such as religion, medical conditions etc.: For successful admissions	Yes		This information should be added to the student file	SECURE DISPOSAL
1.3.7b	Supplementary Information form including additional information such as religion, medical conditions etc.: For unsuccessful admissions	Yes		Until appeals process completed	SECURE DISPOSAL
Operational Administration					
1.4.1	General file series	No		Current year + 5 years then review	SECURE DISPOSAL
1.4.2	Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or students	No		Current year + 1 year	STANDARD DISPOSAL
1.4.4	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
1.4.5	Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Students Associations	No		Current year + 6 years then review	SECURE DISPOSAL
Recruitment					
2.1.1	All records leading up to the appointment of a new Head Teacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff –	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
	unsuccessful candidates				
2.1.3	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 personal file (see below) and all other information retained for 6 years	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks	No	DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74	The school does not have to keep copies of DBS certificates. If the school does so, the copy must NOT be retained for more than 6 months A note can be placed in the Staff Personal File that the DBS has been checked by Administration staff	SECURE DISPOSAL
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, this should be placed on the member of staff’s personal file South Reception use a facing sheet to carry out this process which is forwarded to the SBM	
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	An employer’s guide to right to work checks [Home Office May 2015]	Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years	

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
Staff Management					
2.2.1	Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal/ assessment records	Yes		Current year + 6 years	SECURE DISPOSAL
Disciplinary & Grievance Process					
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note: allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned	SECURE DISPOSAL These records must be shredded
2.3.2a	Disciplinary Proceedings oral warning	Yes		Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal files, they must be weeded from the file]
2.3.2b	Disciplinary Proceedings written warning – level 1	Yes		Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal files, they must be weeded from the file]

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
2.3.2c	Disciplinary Proceedings written warning – level 2	Yes		Date of warning + 12 months	SECURE DISPOSAL [If warnings are placed on personal files, they must be weeded from the file]
2.3.2d	Disciplinary Proceedings final warning	Yes		Date of warning + 18 months	SECURE DISPOSAL [If warnings are placed on personal files, they must be weeded from the file]
2.3.2e	Disciplinary Proceedings case not found	Yes		If the incident is child protection related then see above, otherwise dispose at the conclusion of the case	SECURE DISPOSAL [If warnings are placed on personal files, they must be weeded from the file]
Health & Safety					
2.4.1	Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/ injury at work	Yes		Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	SECURE DISPOSAL
2.4.4a	Accident Reporting Adults	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of the incident + 6 years	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
2.4.4b	Accident Reporting Children	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1981	DOB of the child + 25 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	Current year + 40 years	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
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
2.4.8	Fire Precautions log books	No		Current year + 6 years	SECURE DISPOSAL
Payroll & Pensions					
2.5.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Retirement Benefits Schemes (Information Powers) Regulations 1995	Current year + 6 years	SECURE DISPOSAL
Risk Management & Insurance					
3.1.1	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
Asset Management					

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL
Accounts & Statements					
3.3.1	Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
3.3.2	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
3.3.3	Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
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
3.3.5	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.6	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.7	Records relating to the identification	No		Current financial year + 6 years	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
	and collection of debt				
Contracts					
3.4.1	All records relating to the management of contracts under seal	No	Limitation Act 1980 (Section 2)	Last payment on the contract + 12 years	SECURE DISPOSAL
3.4.2	All records relating to the management of contracts under signature	No	Limitation Act 1980 (Section 2)	Last payment on the contract + 6 years	SECURE DISPOSAL
3.4.3	Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL
School Funds					
3.5.1	School Fund - Cheque books	No	*	Current year + 6 years	SECURE DISPOSAL
3.5.2	School Fund - Paying in books	No	*	Current year + 6 years	SECURE DISPOSAL
3.5.3	School Fund – Ledger	No	*	Current year + 6 years	SECURE DISPOSAL
3.5.4	School Fund – Invoices	No	*	Current year + 6 years	SECURE DISPOSAL
3.5.5	School Fund – Receipts	No	*	Current year + 6 years	SECURE DISPOSAL
3.5.6	School Fund - Bank statements	No	*	Current year + 6 years	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
3.5.7	School Fund – Journey Books	No		Current year + 6 years	SECURE DISPOSAL
School Meals					
3.6.1	Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.6.2	School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
3.6.3	School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL
Property Management					
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
4.1.2	Plans of property belonging 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.	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
4.1.5	CCTV Register. List of CCTV cameras, locations and review outcomes.	No		The year which for which the register is current + 1 year	

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
4.1.6	CCTV Recordings: Routine automatic recording	Yes		Recordings are overwritten after 30 days	
4.1.7	CCTV Recordings for Investigations. Extracts from recordings to support investigations	Yes		Retention depends on the type of investigation and who is the investigating body. If it for an external body, the recording can be deleted once a copy is transferred. If it is the organisation's investigation, it should be retained for the same retention period as the investigation records	SECURE DISPOSAL
4.1.8	CCTV access requests. Records of requests received for copies of CCTV recordings	Yes		Retain for the year to which they relate + 1 year	SECURE DISPOSAL
Maintenance					
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school employees including	No		Current year + 6 years	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
	maintenance log books				
Educational Record					
5.1.1	Student's Educational Record: Secondary		Limitation Act 1980 (Section 2)	Date of Birth of the student + 25 years	SECURE DISPOSAL
5.1.2a	Examination Results – Student Copies: Public	Yes		This information should be added to the student file	All uncollected certificates should be returned to the examination board.
5.1.2b	Examination Results – Student Copies: Internal			This information should be added to the student file	
5.1.3	Child Protection information held on student file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	If any records relating to child protection issues are placed on the student file, it should be in a sealed envelope and then retained for the same period of time as the student file.	SECURE DISPOSAL – these records MUST be shredded

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
5.1.4	Child protection information held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	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	SECURE DISPOSAL – these records MUST be shredded
5.2.1	Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities 01/10/2014	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL
5.2.2	Correspondence relating to authorized absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL
Special Educational Needs					
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of Birth of the student + 25 years	REVIEW NOTE: This retention period is the minimum retention period that any student file should be kept. Some authorities

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
					choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.
5.3.2	Statement (now called EHC) maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the student + 25 years [This would normally be retained in the student file]	SECURE DISPOSAL unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the student + 25 years [This would normally be retained in the student file]	SECURE DISPOSAL unless the document is subject to a legal hold
5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the student	SECURE DISPOSAL unless the document is subject to a legal hold
Statistics & Management Information					
6.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
6.1.2a	Examination Results (Schools Copy)	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.2b	SATS records – Results	Yes		The SATS results should be recorded on the student’s educational file and will therefore be retained until the student reaches the age of 25 years. 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	SECURE DISPOSAL
6.1.2c	SATS records – Examination Papers	Yes		The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self-Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL
Implementation of Curriculum					
6.2.1	Schemes of Work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
					period or SECURE DISPOSAL
6.2.2	Timetable	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL
6.2.3	Class Record Books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL
6.2.4	Mark Books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL
6.2.5	Record of homework set	No		Current year + 1 year	
6.2.6	Students' Work	No		Where possible students' work should be returned to the student at the end of the academic year; if this is not the school's policy then current year + 1 year would apply	SECURE DISPOSAL
Educational Visits outside the Classroom					

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 10 years	SECURE DISPOSAL
7.1.2	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	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. SHRED
7.1.3	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the student involved in the incident + 25 years. The permission slips for all the students on the trip need to be retained to show that the rules had been followed for all students	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
Family Liaison					
7.2.1	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	
7.2.2	Referral forms	Yes		While the referral is current	
7.2.3	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	
7.2.4	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	
7.2.5	Group Registers	Yes		Current year + 2 years	
Local Authority					
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
8.1.2	Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
8.1.3	School Census Returns	No		Current year + 5 years	SECURE DISPOSAL
8.1.4	Circulars and other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
Central Government					
8.2.1	OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
8.2.2	Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL
8.2.3	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL
Information Governance					
9.1.1	Records of Processing Activity	No		Ongoing record	
9.1.2	Information Governance Report. Annual statement to Governing Body on compliance with Information law, including DPO statement, performance data and audit outcomes	No		Current year + 1 year	
9.1.3	Freedom of Information Requests	Yes		Closure + 1 year	SECURE DISPOSAL

Ref.	Title	Data Protection Issues	Statutory Provisions	Retention Period	Action
9.1.4	Environmental Information Requests	Yes		Closure + 1 year	SECURE DISPOSAL
9.1.5	Subject Access Requests	Yes		Closure + 5 years	SECURE DISPOSAL
9.1.6	ICO Complaints: No further action	Yes		Closure + 1 year	SECURE DISPOSAL
9.1.7	ICO Complaints: Action required	Yes		Closure + 2 years	SECURE DISPOSAL