



Record Retention and Deletion Policy

Brookfield Primary School

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Version produced Spring 2024	Minor amends in green Policy & section numbering changed KCSIE references updated 8 added – details of MIS 11 added – retaining records following academisation 18.5 added – filtering & monitoring logs Updates arising from the School Attendance (Pupil Registration) (England) Regulations 2024 which requires that admissions and attendance registers are now retained for six years (previously three years).

This document will be reviewed annually and sooner when significant changes are made to the law
Guidance from the Department for Education about school policies can be found here:

<https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts>

1 Contents

1.	How to use this document	4
2.	Introduction	4
3.	Purpose	2
4.	Disposal of Data	2
5.	Transfer of Records to Archives	3
6.	Transfer of Records to other Media.....	3
7.	Transfer of Records to other Settings & ‘Last Known School’	4
8.	Management Information System (MIS)	5
9.	Records relating to Child Sexual Abuse.....	6
10.	Retention of Records relating to Staff	6
11.	Academisation.....	6
12.	Responsibility and Monitoring	7
13.	Retention tables.....	8
1.	Governing Body.....	Error! Bookmark not defined.
2.	Headteacher & Senior Management/Leadership Team	Error! Bookmark not defined.
3.	Admissions	Error! Bookmark not defined.
4.	Operational Administration	Error! Bookmark not defined.
5.	School Communications.....	Error! Bookmark not defined.
6.	HR – Recruitment.....	Error! Bookmark not defined.
7.	HR – Operational Staff Management.....	Error! Bookmark not defined.
8.	HR - Management of Disciplinary and Grievance Processes	Error! Bookmark not defined.
9.	HR – Payroll & Pensions	Error! Bookmark not defined.
10.	Health and Safety	Error! Bookmark not defined.
11.	Financial Management – Risk & Insurance, Asset Management.....	Error! Bookmark not defined.
12.	Financial Management – Accounts and Statements including Budget Management.....	Error! Bookmark not defined.
13.	Financial Management – Contract Management	Error! Bookmark not defined.
14.	Financial Management – School Fund [where one exists, or has done in the previous 7yrs]	Error! Bookmark not defined.
15.	Financial Management – School Meals	Error! Bookmark not defined.
16.	Property Management.....	Error! Bookmark not defined.
17.	Pupil Education Record (see s2 Education Record (Pupil Information) Regulations 2005)..	Error! Bookmark not defined.
18.	Child Protection (CP) / Safeguarding Records.....	Error! Bookmark not defined.

19.	Attendance.....	Error! Bookmark not defined.
20.	Special Educational Needs (SEN).....	Error! Bookmark not defined.
21.	Curriculum Management.....	Error! Bookmark not defined.
22.	Implementation of Curriculum	Error! Bookmark not defined.
23.	Extra Curriculum Management.....	Error! Bookmark not defined.
24.	Family Liaison / Early Help / Alternative Provision	Error! Bookmark not defined.
25.	Local Authority	Error! Bookmark not defined.
26.	Central Government	Error! Bookmark not defined.
27.	Parent / Alumni Associations	Error! Bookmark not defined.
28.	Recordings (meetings, calls, online lessons) – schools, please adapt this section to suit ensuring it is consistent with the Acceptable Use policy	Error! Bookmark not defined.
29.	Pupil Work Experience / Placement Records	Error! Bookmark not defined.
30.	Administration of Medication.....	Error! Bookmark not defined.
Appendix A – List of School Records and Data safely destroyed		35

1. How to use this document

This is a very big document. It can be read from front to back, but this will take time, alternatively you can select from an A-Z of relevant provisions.

A-Z

[Admissions](#)
[Attendance](#)
[Central Government](#)
[Child Protection \(CP\) / Safeguarding Records](#)
[Curriculum \(Implementation\)](#)
[Curriculum Management](#)
[Extra Curriculum Management](#)
[Family Liaison / Early Help / Alternative Provision](#)
[Financial Management – Accounts and Statements including Budget Management](#)
[Financial Management – Contract Management](#)
[Financial Management – Risk & Insurance, Asset Management](#)
[Financial Management – School Fund](#)
[Financial Management – School Meals](#)
[Governing Body](#)
[Headteacher & Senior Management/Leadership Team](#)
[Health and Safety](#)
[HR - Management of Disciplinary and Grievance Processes](#)
[HR – Operational Staff Management](#)
[HR – Payroll & Pensions](#)
[HR – Recruitment](#)
[Local Authority Returns](#)
[Medication \(Administration Records\)](#)
[Operational Administration](#)
[Parent / Alumni Associations](#)
[Property Management](#)
[Pupil Education Record inc SEN, Ed Psych reports](#)
[Recording Meetings, calls, online lessons, training](#)
[School Communications inc email & social media](#)
[Special Educational Needs \(SEN\)](#)
[Work Experience / Placement \(pupil\)](#)

2. Introduction

This record retention and deletion policy contains recommended retention periods for the different record series created and maintained by Brookfield Primary School. The schedule refers to all information whether it is held in hard copy or electronic format including cloud and web based or on third party platforms.

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 UK 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.

3. Purpose

This policy, for managing records at Brookfield Primary School 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.

As well as containing Record Retention tables, this document sets out more general information and guidelines for recording, managing, storing and the disposal of data, whether they are held on paper or electronically (including online), in order to assist staff, and the school, to comply with the General Data Protection Regulation (EU) 2016/679 (GDPR) including as adopted by the United Kingdom as a result of its exit from the European Union ("UK GDPR"), Data Protection Act 2018 and the Freedom of Information Act 2000. It should be read and used in conjunction with all of our related policies.

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.
- Schools must have retention policies that reflect the importance of records relating to child sexual abuse to victims and survivors, and that they may take decades to seek access to such records.

4. Disposal of Data

Article 5(e) of the GDPR states that personal data should be 'kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes... in order to safeguard the rights and freedoms of the data subject ('storage limitation')'.

Not all data needs to be destroyed. The school should determine whether records are to be selected for permanent preservation, or for destruction or to be transferred into a different format.

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.

Skips, 'regular' waste disposal and ribbon shredders are not secure.

Paper records should be cross-shredded, incinerated, or pulped.

CDs/DVDs/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, a certificate of destruction must be obtained. Staff working for external provider should have been trained in the handling and destruction of confidential data.

If the school receives a request for records that have not yet been destroyed, even if they should have been destroyed, 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. This record should be retained for 15 years. 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

An example is contained in Annex A.

5. Transfer of Records to Archives

A school archive is different from official school records. A school archive preserves data 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.

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 offered to the Local Authority Record Office (see local guidance [Find an archive | The National Archives](#)).

Where the school decides to maintain an onsite archive, 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 the Local Authority Record Office, in order for the collected materials could be turned over if the school archives should be discontinued.

6. Transfer of Records to other Media

Where lengthy retention periods have been allocated to records, schools should 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 be documented in a Digital Continuity Policy. A scanning risk assessment is recommended to ensure the procedure is adequate. Further information about digital continuity can be found on the [National Archives](#) website who also provide guidance on assessing and managing [digital continuity risks](#) and a [digital continuity checklist](#). Schools that believe that they need to retain digital records over a long period on devices, software systems or in formats that may become inaccessible due to developments in technology should seek further advice from the Data Protection Officer and their IT support staff.

7. Transfer of Records to other Settings & ‘Last Known School’

When a child leaves the school, all pupil records, including safeguarding/child protection 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. [Keeping Children Safe in Education 2023](#) (KCSiE) states that “where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file.” All copies of data held by the school that the child has departed should then be deleted or retained in line with the retention schedule below, including all paper records and data stored electronically. Generally, a record should be kept for tracking and auditing purposes only. [Schools should be aware that where electronic systems are used, sending a pupil file to the next setting does not mean that their own copy of the file is deleted, so action should be taken to delete or archive copies retained where they are no longer required by the school that the pupil has left.](#)

There are four main categories of pupil records that need to be transferred to other settings:

- Management Information System (MIS) data

Data held on the MIS is extracted by the school using the Common Transfer File mechanism as specified in The Education (Pupil Information) (England) Regulations 2006 Statutory Instrument (SI) and in subsequent amendments (2005, 2008, 2016, 2018, 2019). The Department for Education specifies what data is to be included in the CTF file in technical specification documentation. This should mean that the majority of information held on the MIS is transferred using the CTF method. However, it is important to note that **not all personal data is transferred, only the data sets specified in the CTF schema**. If the MIS has been used to store additional information (documents such as copies of end of year reports or letters) schools must take proactive action to ensure these are sent separately and securely. Traditionally, this sort of documentation was held in a pupil ‘buff’ file, but as schools have turned to digital ways of working, these are frequently stored by attaching them to the digital MIS record.

- Safeguarding/Child Protection records

Schools frequently use vendor edtech products to hold and transfer these records. Many of these products include the functionality to electronically transfer a copy of (and obtain receipt for) pupil records directly to the next school, where the same product is also used by the receiving school. Where this is not possible, these products should have the functionality to download a pupil record for it to them be transferred electronically or printed out and delivered to the new school. Paper records should be dealt with carefully to ensure that these are safely received by the new school.

Some safeguarding edtech products enable schools to use the same system to record behavioural and other information in the same log. Schools should ensure that safeguarding/child protection records are clearly identified as such so that the receiving school can quickly identify this information. The school should consider if information such as behaviour notes needs to be transferred to the next setting, or whether it should be deleted if no longer required or relevant (e.g. a child’s toileting routine may be very relevant when younger, or merits/demerits re but does not need to be part of a permanent safeguarding record).

- Special Educational Needs records

It is becoming more common for schools to use vendor edtech products to manage these records. Whether stored in such edtech products, on school IT systems/cloud storage or on paper, the SEND co-ordinator must ensure that a complete record is compiled and passed securely to the next school.

- Pupil ‘buff’ files

For many schools, in recent years, the traditional pupil buff files have dwindled in relevance and importance as schools have increasingly moved to digital storage. Schools are left with either sending or receiving folders which are very light and seemingly irrelevant. However, there will be documentation, whether on paper or electronic (on the server, in emails, in the MIS) that should be sent to the next setting that the pupil will attend. The Education (Pupil Information) (England) Regulations 2005 state that this “Educational Record” should be transferred to the next setting within 15 school days of confirmation that a pupil is registered at another school. There may be a significant amount of material that is not contained in the CTF file, safeguarding or SEND records that should be transferred to the next setting. Schools may have inadvertently not adapted their records transfer practices as management of these records have moved from a paper ‘buff’ file to digital format and so this should be noted where relevant on the retention schedule below.

Schools may wish to retain some minimal ‘skeleton’ data about pupils’ admission, departure and next destination (where known) in order to respond to any requests for information about these pupils and for the school’s historical archive. They may also wish to retain records relating to safeguarding/child protection or SEND records, even though there is no legislative requirement to do so (i.e. to have their own copy of evidence in case of any later legal action). If schools intend to create and maintain skeleton records or retain copies of records, this should be noted on the retention policy. In some instances, schools may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If the school does retain pupil records, then they should be prepared to justify this retention and will need to consider if a Data Protection Impact Assessment should be completed for any extended retention of records once a pupil has left the school. See section 17.5 below.

Responsibility for maintaining the pupil record passes to the ‘last known school’.

The school is the final or last known school if:

- secondary phase and the pupil left at 16 years old or for post-16 or independent education, or;
- at any point the pupil left for elective home education, they are missing from education, or have left the UK, or have died.

Tertiary colleges are not included in this definition, therefore the school will retain the record. However, the college must receive a copy of the child protection file, as per the requirements of KCSiE above.

The Pupil Record should be retained as a whole for 25 years from the date of birth of the pupil, after which time, if no longer required, it can be deleted or destroyed.

SEN and other support service records can be retained for a longer period of 31 years to enable defence in a “failure to provide a sufficient education” case.

If a school wishes to retain data for analysis or statistical purposes, it should be done in an anonymised fashion.

8. Management Information System (MIS)

The majority of pupil records and some staff records are held on the school MIS. Managing data retention on the MIS can be complex because different data sets held on the MIS have different retention requirements. For example, information relating to emergency contacts is only required when a pupil or staff is a member of the school, and this information can be deleted quickly once they have left, whereas information relating to school meal and other financial transactions will need to be retained for six years (plus current) in line with financial retention requirements. Until 18 August 2024, legislation states that pupil admissions records and attendance records needed to be retained for three years from the date of entry, but from 19 August 2024, this information must be retained for six years. School staff have limited time and resources to manage these differing retention periods and should work with their MIS provider to request support on how to efficiently delete data sets from a record without deleting the

entire record (or deleting all data sets except those that are required as part of the 'skeleton' record for long term retention). Where this is not possible, schools may make a policy decision to retain the entirety of a record for the longest applicable retention period for a data set within the MIS (usually current plus six years). The school should set out how records will be retained in the MIS in the relevant section of the Retention Table below.

9. Records relating to Child Sexual Abuse

Records relating to child sexual abuse should be retained for 75 years, in line with the recommendations arising from the outcome of the Independent Inquiry into Child Sexual Abuse (IICSA). The Inquiry stated that these records should be retained for such a long period in recognition of the importance of these records to victims, but that they should be regularly reviewed during that extended retention period. **Where records are held digitally, schools will particularly need to consider digital continuity where:**

- they hold relevant records for staff or governors, or
- they are the 'last known school' responsible for this long retention period for any relevant pupil records.

Where there is evidence, or allegations of child sexual abuse, then it will almost certainly be appropriate to retain the entire pupil, staff or other record as a whole, not just the parts of the record that pertain to the abuse. Staff whose duties include reviewing or digitising records should be trained to understand the importance of any evidence or allegations of child sexual abuse that they may happen to uncover, whether that was what they were looking for and the importance of them bringing these to the attention of school leadership and/or preserving these records.

The Inquiry report also recommends that the UK government directs the Information Commissioner's Office (ICO) to introduce a Code of Practice on retention of and access to records known to relate to child sexual abuse. This Policy will be updated in line with any Code of Practice from the ICO. The report states that such a code should set out that institutions should have:

- retention policies that reflect the importance of such records to victims and survivors, and that they may take decades to seek to access such records;
- clear and accessible procedures for victims and survivors of child sexual abuse to access such records;
- policies, procedures and training for staff responding to requests to ensure that they recognise the long-term impact of child sexual abuse and engage with the applicant with empathy.

10. Retention of Records relating to Staff

As stated above regarding the long-term retention of minimal pupil records, schools may wish to retain very basic 'skeleton' records about staff that have worked in the school beyond the normal retention of the whole personnel/HR file. This information may include the staff name, role, contract start and end dates. This may be useful for schools who may need to respond to requests for information from/regarding staff, in the event of it being needed for litigation or other legal purpose and as part of their historical archive. If schools intend to create and maintain these records, this should be noted on the retention policy (at section 7.11 below)

11. Academisation

Where maintained schools academise during periods specified in this document, the Academy shall hold all School Records (including those relating to former pupil and employees), on trust for the Council from the Transfer Date.

12. Responsibility and Monitoring

The Head Teacher and/or Data Lead, hold primary and day to day responsibility, for implementing this policy. The Data Protection Officer, in conjunction with the school, is responsible for monitoring its use and effectiveness and resolving any queries with regards the interpretation of the policy.

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 are given training and guidance on accessing and managing school records, to ensure compliance with the time scales laid out under the retention schedule. 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 and documented 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.

13. Retention tables

Reference	File description	Retention			
		Period	Trigger	Basis	Action at end of use
1.1	Instruments of Government including Articles of Association	Permanent	Closure of school	Common practice	These should be retained in the schools whilst the school is open and then to the Local Authority Record Office, when the school closes
1.2	Trusts and Endowments managed by the Governing Body	Permanent	End of operational use	Common practice	These should be retained by the school, whilst the school is open and then to the Local Authority Record Office, should the school close
1.3	Scheme of delegation and terms of reference for committees	Until superseded or whilst relevant (schools may wish to retain these records for reference purposes in case decisions need to be justified)	Expiration of terms	Common practice	If the school is unable to store these, they should be offered to the Local Authority Office
1.4	Governor's Code of Conduct	One copy of each version should be kept for the life of the school.		Common practice	
1.5	Records relating to the election of chair and vice chair	Once the designation has been recorded in the minutes, the records relating to the election can be destroyed	Date of appointment	Common practice	Secure disposal
1.6	Appointment of a clerk to the governing body	Date of end of appointment + 6 years	Date of appointment	Common practice	Secure disposal

		(note HR records may require different retention)			
1.7	Records relating to the appointment of parent and staff governors, not appointed by the governors	Date of election + 6 months	Date of election	Common practice	Secure disposal
1.8	Records relating to the appointment of co-opted governors	Provided that the decision has been recorded in 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, or for allegations involving child sexual abuse for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Date of appointment	Common practice	Secure disposal
1.9	Application forms – successful candidates	End of term in office + 1 year	End of period of office	Common practice	Secure disposal
1.10	Appointment documentation: <ul style="list-style-type: none"> Terms of office of serving governors, including evidence of appointment Governor declaration against disqualification criteria 	End of term of office + 6 years (note HR records may require different retention)	Date of appointment	Common practice	Secure disposal

	<ul style="list-style-type: none"> • Register of business interests • Training required, and received, by governors • Induction programme for new governors • DBS checks carried out on the clerk and members of the governing body • Governor personnel files. 				
1.11	Annual Reports	Date of the report + 10 years	End of the calendar year that the record was created in	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002	Secure disposal
1.12	Annual reports required by the Department of Education	Date of report + 10 years	Date of report	Common practice	Secure disposal
1.13	Meetings schedule	Current year	Date of meeting	Common practice	Secure disposal
1.14	Agendas for Governing Body meetings	One copy to be retained with the master set of minutes - all other copies can be disposed of	Conclusion of meeting	Common practice	Secure disposal
1.15	Register of attendance at Full Governing Board meetings	Date of meeting + 6 years	Date of meeting	Common practice	Secure disposal
1.16	Minutes of Governing Body meetings (Principal Set signed)	Permanent to be held at school	Date of meeting	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office
1.17	Action plans created and administered by the Governing Body	Until superseded or whilst relevant	Expiration of action plan	Common practice	Secure disposal
1.18	Reports presented to the Governing Body	Reports should be kept for a minimum of 6	Date of report	Common practice	Secure disposal or retain with the signed set of minutes

		years. However, if the minutes refer directly to individual reports then the reports should be kept permanently			
1.19	Policy documents created and/or administered by the Governing Body	<p>A copy of each policy should create a time line of policy development OR a robust version control which allows a snapshot of a policy at any given date.</p> <p>Keep all policies relating to safeguarding and child protection for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.</p>	Expiration of the policy	Common practice	Secure disposal
1.20	Records relating to complaints made to, and investigated by the Governing Body and/or Head Teacher	<p>Date of the resolution of the complaint + a minimum of 6 years.</p> <p>If negligence or child protection/safeguarding is involved then current year + 15 years.</p> <p>If child sexual abuse issues are involved then for 75 years in line with the IICSA recommendations for extended retention of</p>	Resolution of complaint		

		records relating to child sexual abuse.			
1.21	Proposals concerning the change of status of a maintained school, including Specialist Status Schools and Academies	For the life of the organisation	Date proposal accepted or declined	Common practice	If the school is unable to store these, they should be offered to the Local Authority Record Office
1.22	Records relating to Governor Monitoring Visits	Date of visit + 3 years	Date of visit	Common practice	Secure disposal
2.1	Log books of activity in the school maintained by the Head Teacher (Legislation no longer requires the completion of a school log book)	Date of the last entry in the log book + a minimum of 6 years and then review	Date of last entry in the log book	Common practice	These could be of permanent historical value and should be offered to the Local Authority Office
2.2	Minutes and reports of Senior Management Team meeting and the meetings of other internal administrative bodies	Date of the meeting + 3 years	Date of the meeting	Common practice	Secure disposal
2.3	Correspondence created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities – not principally concerning pupils, staff or complaints . In those cases, correspondence should be immediately transferred to the relevant file.	Date of correspondence + 3 years and then review	Date of correspondence	Common practice	Secure disposal
2.4	Professional Development Plans	Life of plan + 6 years	Date plan commences	Common practice	Secure disposal
2.5	School Development Plans	Life of plan + 3 years	Date plan commences	Common practice	Secure disposal
2.6	Other records created by the Head Teacher, deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities outside of Business as Usual tasks	Current academic year + 6 years then review	Date of record	Common practice	Secure disposal

3.1	All records relating to the creation and implementation of the School's Admission's Policy	Life of the policy + 7 years then review		The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012	Secure disposal
3.2	Admissions – if the admission is successful Proofs of address, supplied by parents, as part of the admissions process Supplementary information forms to include; religion, medical conditions etc.	Added to the pupil file	Date of admission	School Admissions Code Statutory Guidance 2021	
3.3	Admissions – if the admission is unsuccessful (where no appeal is made)	Date of applied for admission + 1 year	Date of applied for admission		Secure disposal
3.4	Admissions – if the admission is unsuccessful (where an appeal is made)	Resolution of case + 1 year	Resolution of case		Secure disposal
3.5	Register of Admissions	Every entry in the School admission and attendance register is to be preserved for 6 years beginning with the day on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates.	Last entry in register	School Attendance (Pupil Registration) (England) Regulations 2024 Regulations 5, 7 (which comes into force on 19 August 2024) and	Offer to the Local Authority Record Office
3.6	Proofs of address, supplied by parents, as part of the admissions process	Current year + 1 year	Date of admission		Secure disposal

				School Admissions Code Statutory Guidance 2021	
3.8	Supplementary information forms to include; religion, medical conditions etc. For successful admissions	This information should be added to the pupil file	Date of admission/annual data check	The Limitation Act 1980	Secure disposal
3.9	Supplementary information forms to include; religion, medical conditions etc. For unsuccessful admissions	Until the appeal process is completed	Date of admission		Secure disposal
4.1	Records relating to the creation and publication of the school brochures or prospectus	Current year + 3 years	Expiration of current publication	Common practice	Offer to the Local Authority Record Office
4.2	Records relating to the creation and distribution of circulars to staff, parents or pupils	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office
4.3	Newsletters and other items with short operational use	Current year + 1 year	Date of record	Common practice	Offer to the Local Authority Record Office
4.4	Visitor management systems (including electronic systems, visitors' books and signing in sheets)	Current year + 6 years then review	End of calendar year	Common practice	Secure disposal
4.5	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupil Associations	Current year + 6 years then review	Date of record	Common practice	Secure disposal
4.6	Pupil & Family Privacy Notice which is made available via the school website as part of UK GDPR compliance	Date of issue + 6 years	When policy is superseded	Common practice	Secure disposal
4.7	Consents relating to school activities as part of UK GDPR compliance (e.g. consent for photographs to be published, social media / website etc as well as for mailings)	This information should be added to the pupil file	Date of admission	Common practice	

4.8	Security breach logs	Date of issue + 25 years (pupils) and 6 years (staff)	Date of implementation	Common practice	Secure disposal
4.9	Digital Continuity Plans	Date of issue + 6 years	Expiration of current plan	Common practice	Secure disposal
4.10	Call Recordings (including VOIP messages and recordings)	Once played and dealt with	Date of call recording	Common practice	Secure disposal
4.11	CCTV Recordings (retention for all 'ordinary' footage- any footage retained for specific purposes e.g. accident will need to be considered individually regarding how long it should be retained- please see CCTV policy)	21 days	Date of footage recording	Common practice	Secure disposal
5.1	School emails and other platforms such as Microsoft Teams containing personal data – inbox, sent items, deleted items	Once dealt with and addressed accordingly. Where forming part of a record, information in these must be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. The Code of Practice states that there is no need to retain ephemeral material and this may be destroyed on a routine basis.	In line with guidance in Acceptable use policy	Common practice	Full deletion

5.2	Social media platforms	Whilst the pupil remains on roll	End of academic yr	Common practice	Posts deleted
5.3	Website – pictures / news stories	Whilst the pupil remains on roll	End of academic yr	Common practice	Posts deleted
6.1	All records leading up to the appointment of a new Head Teacher	Unsuccessful attempts - date of appointment + 6 months. Successful attempts - add to the staff personnel file and retain until the end of the appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years or information containing allegations of sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Date of appointment	Common practice. Right to work - Immigration, Asylum and Nationality Act 2006	Secure disposal
6.2	All records leading up to the appointment of a new member of staff (successful candidate)	This information should be added to the staff personnel file	Date of appointment	Common practice. Right to work - Immigration, Asylum and Nationality Act 2006	
6.3	All records leading up to the appointment of a new member of staff (unsuccessful candidate)	Date of appointment + 6 months	Date of appointment	Common practice	Secure disposal

6.4	Pre-employment vetting information of successful candidates	Application forms, references and other documents – for the duration of their employment + 6 years. Note there is no requirement to keep a copy of DBS once the details have been entered into the Single Central Record. At the end of employment, information contained in the Single Central Record should be transferred to the personnel file.	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2023	Secure disposal
6.5	Proofs of identity	To be kept only as proof of right to work. Not kept for any other purpose. These documents should be added to the personal folder. Home Office requires that the documents are kept until termination of employment plus not less than 2 years.	Date of receipt	Right to work - Immigration, Asylum and Nationality Act 2006. KCSIE 2023	Secure disposal
6.6	Pre-employment vetting information of successful candidates – for the purposes of ensuring school staff are adequately qualified	To be added to the member of staff's personal folder	Date of receipt	KCSIE 2023	Secure disposal

7.1	Staff Personnel File	Termination of employment + 6 years	Date of appointment	Limitation Act 1980	Secure disposal
7.2	Timesheets	Current year + 6 years	Date of appointment	Common practice	Secure disposal
7.3	Annual appraisal/assessment records	Current year + 6 years	End of calendar year that the record was created in	Common practice	Secure disposal
7.4	Sickness absence monitoring	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 separate from accident records. Current practice recommends that sickness records should be held for the current year + 3 years.	Date of absence	Common practice & Statutory Sick Pay Act 1994	Secure disposal
7.5	Staff training records	Keep on personnel file (see above).	Date of appointment	Common practice (unless dictated by a professional body)	Secure disposal
7.6	Annual leave records	6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year	End of relevant tax year	Common practice	Secure disposal

7.7	Working Time Regulations: · Opt out forms · Records of compliance with WTR	2 years from the date on which they were entered into 2 years after the relevant period	End of relevant tax year	Common practice	Secure disposal
7.8	Maternity/Adoption/Paternity Leave records	Current year + 3 years	End of relevant tax year	Common practice	Secure disposal
7.9	Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards	End of employment	Common practice	Secure disposal
7.10	Staff policy acknowledgement	Life of the policy + 3 years	Implementation of the policy	Common practice (unless otherwise dictated eg KCSIE, H&SWA)	Secure disposal
7.11	[see para 1.9 above regarding this] Staff 'skeleton' record (which would include a brief record of name, job role, contract start and end dates (and any information that would be needed to be included in a reference))	Permanent. These form part of the historical archives of the school.	Archive on closure of the school.	Common Practice.	Offer to the Local Authority Record Office
7.12	Register of business interests	Date of appointment + 6 years	Date of appointment	Common practice	Secure disposal
8.1	Allegation of a child protection nature, against a member of staff, including where the allegation is unfounded	Until the person's normal retirement age or 10 years from the date of allegation, whichever is longer, then review. Information containing allegations of sexual	Date of referral	KCSIE 2023	Secure disposal

		abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse NB – allegations that are found to be malicious should be removed from personnel files, from the date they are proven to be unfounded.			
8.2	Disciplinary proceedings: Verbal warning	Date of warning + 6 months	Date of warning	KCSIE 2023	Secure disposal
8.3	Disciplinary proceedings: Written warning (level 1)	Date of warning + 6 months	Date of warning	KCSIE 2023	Secure disposal
8.3	Disciplinary proceedings: Written warning (level 2)	Date of warning + 12 months	Date of warning	KCSIE 2023	Secure disposal
8.4	Disciplinary proceedings: Final Warning	Date of warning + 18 months	Date of warning	KCSIE 2023	Secure disposal
8.5	Warnings subsequently found to be based on an unfounded case (excluding child protection related warnings)	If the incident is child protection related then see above; otherwise dispose following the conclusion of the case	Date of resolution	KCSIE 2023	Secure disposal
9.1	Maternity Pay Records	Current year + 3 years	End of the financial year in which the maternity pay period ends	Statutory Maternity Pay (General) Regulations 1986	Secure disposal

9.2	Records held under Retirement Benefits Schemes - records of notifiable events, for example, relating to incapacity	Current year + 6 years	End of the financial year	Retirement Benefits Schemes (Information Powers) Regulations 1995	Secure disposal
9.3	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	Current year + 6 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal
9.4	Bonus sheets, Car Allowance claims, Overtime	Current year + 3 years	End of the financial year	Taxes and Management Act 1970, Income and Corporation Taxes Act 1988	Secure disposal
9.5	Income Tax P60, Personal bank details. Tax Forms P6/P11/P11D/P35/P45/P46/P48	Current year + 6 years	End of the financial year	Common practice	Secure disposal
9.6	Absence records, Sickness records, Staff returns, Time Sheets/Clock Cards/Flexitime	Current year + 3 years	End of the financial year	Common practice	Secure disposal
9.7	Statutory Sick Pay	Current year + 3 years	End of the financial year	Common practice	Secure disposal
10.1	Accessibility Plans	Current year + 6 years	End of the calendar year that the records was created in	Equality Act 2010	Secure disposal

10.2	Health and Safety Policy Statements	Life of the policy + 3 years	Implementation of the policy	Common practice	Secure disposal
10.3	Health and Safety Risk Assessments	Life of the assessment + 3 years	Implementation of the assessment	Common practice	Secure disposal
10.4	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm) and https://www.hse.gov.uk/pubns/edis1.htm Adults	Retain for 7 years	Date of incident	Common practice	Secure disposal
10.5	Accident reporting (reportable accidents - https://www.hse.gov.uk/riddor/reportable-incidents.htm) and https://www.hse.gov.uk/pubns/edis1.htm Children	Retain for 25 years	Date of birth	Common practice	Secure disposal
10.6	Minor incidents (non reportable) accident book	Retain for 3 years	End of academic year	Common practice	Secure disposal
10.7	Control of Substances Hazardous to Health (COSHH)	Current year + 40 years	Last action on file	The Control of Substances Hazardous to Health Regulations 2002	Secure disposal
10.8	Process of monitoring areas where employees/pupils are likely to come into contact with asbestos	Last action + 40 years	Last action on file	The Control of Asbestos at Work Health Regulations 2012	Secure disposal
10.9	Process of monitoring areas where employees/pupils are likely to come into contact with radiation	Last action + 50 years	Last action on file	The Ionising Radiations Regulation 2017	Secure disposal
10.10	Fire Precautions log books	Current year + 3 years	End of calendar year	Common practice	Secure disposal

11.1	Employer's Liability Insurance Certificate	Date of closure + 40 years	Closure of school	Common practice	Offer to Local Record Office
11.2	Inventories of furniture and equipment	Current year + 6 years	End of calendar year	Common practice	Secure disposal
11.3	Burglary, theft and vandalism report forms	Current year + 6 years	End of calendar year	Common practice	Secure disposal
12.1	Annual accounts	Current year + 6 years	End of financial year	Common practice	Offer to Local Record Office
12.2	Loans and grants managed by the school	Date of last payment on the loan + 12 years then review	End of financial year	Standard financial regulations	Secure disposal
12.3	Student Grant applications	Current year + 3 years	End of financial year	Standard financial regulations	Secure disposal
12.4	All records relating to the creation and managements of budgets, including the Annual Budget statement, and background papers	Current financial year + 3 years	End of financial year	Common practice	Secure disposal
12.5	Invoices, receipts, order books and requisitions, delivery notices	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.6	Records relating to the collection and banking of monies	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.7	Records relating to the identification and collection of debt	Current financial year + 6 years	End of financial year	Standard financial regulations	Secure disposal
12.8	Pupil Premium Fund records, including evidence of successful FSM eligibility checks	Date pupil leaves the provision + 6 years	End of financial year	Common practice	Secure disposal

13.1	All records relating to the management of contracts under seal	Current year + 12 years	End of contract	The Limitation Act 1980	Secure disposal
13.2	All records relating to the management of contracts under signature	Current year + 6 years	End of contract	The Limitation Act 1980	Secure disposal
13.3	Records relating to the monitoring of contracts	Current year + 6 or 12 years	End of calendar year	The Limitation Act 1980	Secure disposal
14.1	School Fund: <ul style="list-style-type: none"> • cheque books and paying in books • ledger • invoices • receipts • bank statements • journey books 	Current year + 6 years	End of use	Financial Services Act 2012, HMRC regulations Companies Act 2006	Secure disposal
15.1	Free School Meals Register, including evidence of successful SFM eligibility checks	Current year + 6 years	End of calendar year	Common practice	Secure disposal
15.2	School Meals Register	Current year + 3 years	End of calendar year	Common practice	Secure disposal
15.3	School Meals Summary Sheets	Current year + 3 years	End of calendar year	Common practice	Secure disposal
16.1	Title deeds of properties belonging to the school	Permanent. These should follow the property unless the property has been registered with the Land Registry	Archive upon closure	Common practice	Offer to Local Authority Record Office
16.2	All records relating to the maintenance of the school, carried out by contractors	Current financial year + 6 years Records relating to rewiring, major alterations etc must be	End of financial year that the record was created in	Common practice	Secure disposal

		retained in the health and safety file whilst the building belongs to the school and must be passed onto any new owners if the building is leased or sold.			
16.3	All records relating to the maintenance of the school, carried out by school employees, including maintenance log book	Current calendar year + 6 years Records relating to rewiring, major alterations etc must be retained in the health and safety file whilst the building belongs to the school and must be passed onto any new owners if the building is leased or sold.	End of calendar year that the record was created in	Common practice	Secure disposal
16.4	Plans of property belonging to the school	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 of asset	Common practice	Offer to Local Authority Record Office
16.5	Leases of property leased by, or to, the school	Expiry of lease + 6 years	Commencement of lease	Common practice	Secure disposal
16.6	Records relating to the letting of school premises	Current financial year + 6 years	End of financial year that the record was created in	Common practice	Secure disposal

17.1	Primary	Retain whilst the child remains at the primary school. Records may be kept on the MIS in an archive or 'former roll' area) after a pupil has left the school – see 1.7 Last School and 1.8 Management Information System	Date pupil changes school	Education (Pupil Information) (England) Regulations 2005	The file should follow the pupil when they leave the primary school (see 1.7 Last School . If pupil does not attend a secondary school, or the child dies, then records should be retained as per 17.2 below.)
17.5	[see para 4.7 above regarding this] Pupil 'skeleton' record (which would include a brief record of pupil names, UPNs, date of birth, address, parent details, date of admission, date of departure and destination (if known))	Permanent. These form part of the historical archives of the school.	Archive on closure of the school.	Common Practice.	Offer to the Local Authority Record Office
18.1	Child Protection Information - Primary	CP files must be transferred to the new school as soon as possible (5 days), to maintain continuity. Ensure secure transit, and a confirmation of receipt should be obtained. The CP file should be transferred separately from the main pupil file.	Date pupil changes school (Where a child is removed from the roll to be educated at home/missing from education, see below)	KCSIE 2023 & Annex C	Transferred to new or Secondary school. Duplicates must be securely disposed of.
18.2	Child Protection (CP) Information	Where a pupil moves between secondary schools – treat as primary above.	Pupil's date of birth (Where a child is removed from the roll to be educated at	KCSIE 2023 & Annex C Common Practice	Secure disposal

		Otherwise, retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	home/missing from education, see below)		
18.3	Child Protection (CP) Information – Children Missing from Education, Traveller, Roma, or Gypsy and, therefore, removed from roll and child deaths.	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Coordinator for Missing Children and Secure disposal
18.4	Child Protection (CP) Information – Child is removed from the roll and is Elective Home Educated	Retain for 25 years from the child's date of birth, then review. Information relating to child sexual abuse must be preserved for 75 years in line with the IICSA recommendations for extended retention of records relating to child sexual abuse.	Date removed from roll	Common Practice (there is guidance in KCSIE, but not as to retention period)	Transfer to LA Elective Home Education Coordinator and Secure disposal

18.5	Filtering & Monitoring Logs. Where these indicate a child protection/safeguarding concern, the log will be added to the pupil CP Information and retained in line with the periods in 18.1-18.4.	Retained on Myconcern for up to 18 months. We will request deletion of erroneous logs as soon as is practically possible	Date of log	Common Practice	Deletion
19.1	Attendance Registers	Every entry in the School admission and attendance register is to be preserved for 6 years beginning with the day on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates.	Last entry in register	School Attendance (Pupil Registration) (England) Regulations 2024 Regulations 5, 7 (which comes into force on 19 August 2024).	Secure disposal
19.2	Correspondence relating to authorized absence	Date of absence + 2 years	Date of absence	DfE School attendance Guidance for maintained schools, academies, independent schools and local authorities May 2022	Secure disposal
20.1	SEN files, reviews and Individual Education Plans – Primary	Retain for duration of attendance at school	Date pupil changes school	The Limitation Act 1980	Transfer to new or Secondary School

20.3	Statement / Education Health Care Plan (EHCP) under <u>Section 324 of the Education Act 1996</u> and any amendments made to the plan	Date of birth of pupil + 25 years	Pupil's date of birth	Special Educational Needs and Disability Act 2001, Children and Families Act 2014 & The Limitation Act 1980	Secure disposal
21.1	Curriculum returns	Current year + 3 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.2	Curriculum development	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.4	SATs Results	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 year SATS results. These could be kept for the current year + 6 years to allow suitable comparison	Date that results are released	Common practice	Secure disposal

21.5	SATs Examination papers	The examination papers should be kept until any appeals/validation process is complete	Date of examination	Common practice	Secure disposal
21.6	Published Admission Number (PAN) Reports	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.7	Value Added and Contextual Data	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
21.8	Self-Evaluation Forms	Current year + 6 years	Date of completion	Common practice	Secure disposal
21.9	Internal Moderation	Academic year + 1 academic year	Date of commencement	Common practice	Secure disposal
21.10	External Moderation	Until superseded	Date of commencement	Common practice	Secure disposal
22.1	Schemes of Work	Current year + 1 year	End of the academic year that the record was created in	Common practice	Review these records at the end of each year and allocate a further retention period or secure disposal
22.2	Timetable	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.3	Class Record books, mark books, homework records (eg teacher spreadsheets etc)	Current year + 1 year	End of the academic year that the record was created in	Common practice	Secure disposal
22.4	Pupil work	Where possible, pupils' work should be returned to the pupil at	End of the academic year	Common practice	Secure disposal

		the end of the academic year. If this is not, currently, the school's policy then it should be retained for the current year +1	that the record was created in		
22.5	Online learning platforms	As above. Work should be cleared from platforms at the end of the following academic year	End of the academic year that the record was created in	Common practice	Secure disposal
22.6	Teacher diaries & Notebooks	Contents should be transferred to appropriate record keeping (eg staff file, pupil record, MIS safeguarding / behaviour log) as soon as possible. Destroyed within 3 months.	Expiration of diary. Completion of notebook	Common practice	Secure disposal
23.1	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 (Records created might include risk assessments)	Date of visit + 14 years	Date of visit	The Health and Safety at Work Act 1974	Secure disposal
23.3	Parental consent forms for school trips where there has been no Major Incident	No retention is required		Common practice	Secure disposal
23.4	Records created by schools to obtain approval for to run an Educational Visit outside the Classroom, where there has been a Major Incident (Records created might include risk assessments)	Retain for 25 years from the date of birth of the pupil/s involved in the incident	Pupil's DOB	The Limitation Act 1980	Secure disposal
23.5	Parental consent forms for school trips, where there has been a Major Incident	Retain for 25 years from the date of birth of the	Pupil's DOB	The Limitation Act 1980	Secure disposal

		pupil/s involved in the incident. 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			
24.1	Day books	Current year + 2 years then review	End of the calendar year that the record was created in	Common practice	Secure disposal
24.2	Reports for outside agencies – where the report has been included on the agency case file	Whilst the child is attending school and then destroy	Date of completion of report	Common practice	Secure disposal
24.3	Referral forms	While the referral is current	Date of completion of form	Common practice	Secure disposal
24.5	Contact data sheets and database entries	Current year then review – if contact is no longer active then destroy	End of the calendar year that the record was created in	Common practice	Secure disposal
24.6	Group registers	Current year + 2 years	Last entry in register	Common practice	Secure disposal
25.1	Secondary Transfer sheets	Current year + 2 years	Year of transfer	Common practice	Secure disposal
25.2	Attendance Returns	Current year + 1 year	End of the calendar year that the record was created in	Common practice	Secure disposal
25.3	School Census Returns	Current year + 5 years	Completion of return	Common practice	Secure disposal

25.4	Circulars and other information sent from the Local Authority	Operational use	Date of issue	Common practice	Secure disposal
26.1	OFSTED reports and papers	Retain whilst current	Date new report is issued	Common practice	Offer to Local Authority Record Office
26.2	Returns made to central government, including Schools financial value standard (SFVS) and assurance statement	Current year + 6 years	End of the calendar year that the record was created in	Common practice	Secure disposal
26.3	Circulars and other information sent from central government	Operational use	Date of issue	Common practice	Secure disposal
27.1	Records relating to the creation and management of PTA and Old Pupil Associations	Current year + 6 years	Date of foundation	Common practice	Secure disposal
28.1	Incoming & Outgoing calls	Current + 1 year		Common practice	Secure disposal
28.2	Meetings	Current + 1 year		Common practice	Secure disposal
28.3	Online lessons	Current + 1 year		Common practice	Secure disposal
28.4	Staff training	Current + 1 year		Common practice	Secure disposal
30.1	Non-prescription medicines and remedies inc painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers	Current year + 1 year	Date of administration	Limitation Act 1980	Secure disposal
30.2	All other administration of medication not covered by 30.1 including, but not limited to: peg feeding, injections, treatments for serious conditions such as diabetes, ADHD or depression	Date of birth of the pupil + 25 years	Date of administration	Limitation Act 1980	Secure disposal

Appendix A – List of School Records and Data safely destroyed

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

The following is an example of how to create a destruction record – this could be a spreadsheet.

Reference Number	File/Record Title	Description	Reference or Cataloguing Information	Number of Files Destroyed	Method of Destruction	Confirm; (i) Safely Destroyed (ii) In accordance with Data Retention Guidelines Yes/No	Name of Authorising Officer
1.	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)