



George Stephenson
High School

Data Retention Policy and Guidance

Governance	Curriculum Committee	
Policy Officers	Assistant Headteacher / Data Manager	
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Retention Guidance for Staff

Retention Memorandum 25.07.2018

The ongoing Independent Inquiry into Child Sexual Abuse known as IICSA (www.iicsa.org.uk) has placed restrictions on the disposal of pupil or staff records, this is now subject to a moratorium:

<https://www.iicsa.org.uk/document/guidance-note-retention-instructions-and-data-protection-requirements>

Our guidance, below, reflects the restrictions by providing a retention period in the Retention Action column and where records should not be disposed of, this is noted in the Disposal Action column.

These guidelines give a description of each record type, followed by the action you need to take (e.g. retain for 3 years), based on a “trigger” event (e.g. date record created).

You can ignore retention periods for paper records which you may no longer create, except when reviewing any backlog of paper records. Many records separately listed on the following pages are maintained at George Stephenson High School as part of an integrated pupil record in an Electronic Management System (SIMS).

Where the stated retention period is under 7 years, this is generally not because of a legal obligation to dispose of the record at a particular point, but for administrative convenience or alignment with common practice. If there is no reasonably practical way to disaggregate the pupil record (e.g. Secure disposal of attendance data after 3 years but Secure disposal of exam results after 5 years), it is acceptable to securely dispose of all such data after 6 years plus the current academic year.

The Limitation Act 1980 provides a reasonable justification for this practice, as the school may need to rely on any component part of a record in defending itself from civil claims. Where the retention period is 7 years or more, this is applied in SIMS as it would be with paper records.

CHILD PROTECTION				
Ref	Record type	Retention action	Disposal action	Rationale / Further Info
1.1	Child protection files	Retain for 25 years Trigger: Pupil's date of birth	Do not Destroy Subject to moratorium Consider transfer to off - site storage on child reaching school leaving age to mitigate risk of loss or breach of confidentiality if kept onsite.	"Safeguarding Children in Education" 2004; Keeping Children Safe in Education (Department for Education) Where a child is removed from the roll to be educated at home/missing from education see below
1.2	Child protection files (Child missing from education, Traveller, Roma, or Gypsy and therefore removed from roll)	N/A Trigger: Date removed from roll	Do not Destroy Subject to moratorium Transfer to North Tyneside Children's Services	"Safeguarding Children in Education" 2004; Keeping Children Safe in Education (Department for Education) Where a child is removed from the roll to be educated at home/missing from education see below
1.3	Child protection files (child is removed from the roll and is Elective Home Educated)	N/A Trigger: Date removed from roll	Do not Destroy Subject to moratorium Transfer to North Tyneside Children's Services	"Safeguarding Children in Education" 2004; Keeping Children Safe in Education (Department for Education)
1.4	Allegations of a child protection nature made against a member of staff (including unfounded allegations)	Retain until the normal retirement age for the member of staff or for 10 years (whichever is the longer) Trigger: Employee's retirement age	Do not Destroy Subject to moratorium Transfer to North Tyneside	Employment Practices Code: Supplementary Guidance (Information Commissioner's Office)

GOVERNORS

Ref	Record type	Retention action	Disposal action	Rationale / Further Info
2.1	Principal set of signed minutes	Retain at school for 6 years Trigger: Date of meeting	Offer to North Tyneside Council	Common practice
2.2	Inspection copies of minutes	Retain for 3 years Trigger: Date of Meeting	Secure disposal	Common practice
2.3	Agendas	No retention required Trigger: Conclusion of meeting	Secure disposal	Common practice
2.4	Reports	Retain at school for 6 years Trigger: Date of report	Offer to North Tyneside Council	Common practice
2.5	Annual parents meeting papers	Retain at school for 6 years Trigger: Date of meeting	Offer to North Tyneside Council	Common practice
2.6	Instrument of Government	Retain at school for the duration of its operation Trigger: Closure of school	Offer to North Tyneside Council	Common practice
2.7	Trusts and Endowments	Retain at school whilst operationally required Trigger: End of operational use	Offer to North Tyneside Council	Common practice
2.8	Action Plans	Retain for 3 years Trigger: Expiration of action plan	Secure disposal	Common practice
2.9	Policy documents	Retain while policy is used operationally Trigger: Expiration of policy	Transfer to archives when policy is no longer operational	Common practice
2.10	Complaints files	Retain for 6 years Trigger: Resolution of complaint	Review and Secure disposal if complaints are non - contentious	Common practice
2.11	Annual reports required by central government	Retain at school for 10 years Trigger: End of the calendar year that the record was created in	Offer to North Tyneside Council	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002

SCHOOL MANAGEMENT

Ref	Record type	Retention action	Disposal action	Rationale / Further Info
3.1	Minutes of management team	Retain at school for 5 years Trigger: Date of meeting	Offer to North Tyneside Council	Common practice
3.2	Reports made by management team	Retain at school for 3 years Trigger: Date of report	Offer to North Tyneside Council	Common practice
3.3	Development plans	Retain for 6 years Trigger: Expiry of plan	Review with a view to Secure disposal	Common practice May be appropriate offer to North Tyneside Council
3.4	Successful school admissions applications	Retain for 1 year Trigger: Date of admission	Secure disposal	Common practice
3.5	Unsuccessful school admission applications (where no appeal is made)	Retain for 1 year Trigger: Start of school term	Secure disposal	School Admissions Appeals Code 2012
3.6	Unsuccessful school admission applications (where an appeal is made)	Retain for 1 year Trigger: Resolution of case	Secure disposal	School Admissions Appeals Code 2012
3.7	Proofs of address supplied by parents as part of the admissions process	Retain for 1 year Trigger: Date of admission	Secure disposal	Common practice

PUPIL RECORDS				
Ref	Record type	Retention action	Disposal action	Rationale / Further Info
4.1	Admission registers	Retain for 6 years Trigger: Last entry in register	SIMS associated with other records retain as per student record rules.	School Admissions Code 2012; School Standards and Framework Act 1998 Part III.
4.2	Attendance registers	Retain for 3 years Trigger: Last entry in register	SIMS associated with other records retain as per student record rules	Common practice
4.3	Student Record and File Information needed by the school relating to a child and included in the Pupil File.	Retain for 25 years Trigger: Pupil's date of birth Paper documents relating to a child which a school has a need to retain must be scanned and linked to the student in Sims or other electronic student management system e.g. CPOMS. Paper records should be securely destroyed.	Do not Destroy Subject to moratorium Information may be stored in other electronic locations for example CPOMS. SIMS is associated with other records retain as per student record rules.	Limitation Act 1980, Section 2.
4.4	Special educational needs records relating to individual support provided by the school	Retain for 35 years Trigger: Pupil's date of birth (If held with the student in Sims see guidance note page 1)	Do not Destroy Subject to moratorium Consider transfer to off - site storage or electronic storage on child reaching school leaving age to mitigate risk of loss or breach of confidentiality if kept onsite.	Special Educational Needs and Disability Act 2001
4.5	Letters authorising absence	Retain for 2 years Trigger: Date of absence (If held with the student in Sims see guidance note page 1)	Secure disposal	Common practice
4.6	Public examination results	Retain for 6 years Trigger: Date of examination (If held with the student in Sims see guidance note page 1)	Secure disposal	Common practice

PUPIL RECORDS

Ref	Record type	Retention action	Disposal action	Rationale / Further Info
4.7	Internal school examination result	Retain for 5 years Trigger: Date of examination (If held with the student in Sims see guidance note page 1)	Secure disposal	Common practice
4.8	Advice and information issued by the school to parents regarding educational needs for individual pupils	Retain for 12 years Trigger: Date advice issued (If held with the student in Sims see guidance note page 1)	Secure disposal	Special Educational Needs and Disability Act 2001
4.9	Accessibility Strategy	Retain for 12 years Trigger: Expiry of strategy	Secure disposal	Special Educational Needs and Disability Act 2001 May be appropriate to offer to North Tyneside Council
4.10	Parental permission slips for school trips where there has not been a major incident	N/A Trigger: Confirmation that there has been no major incident	Secure disposal	Common practice
4.11	Parental permission slips for school trips where there has been a major incident (e.g. involvement of emergency services, hospital admission, disease outbreak)	Retain for 25 years from the date of birth of the pupil/s involved in the incident Trigger: Pupil's date of birth	Secure disposal	The Limitation Act 1980
4.12	Records created by schools to obtain approval to run an Educational Visit outside the classroom where there has not been a major incident	Retain for 14 years Trigger: Date of visit	Secure disposal	The Health and Safety at Work Act 1974 Records created might include risk assessments
4.13	Records created by schools to obtain approval to run an Educational Visit outside the classroom where there has been a major incident (e.g. involvement of emergency services, hospital admission, disease outbreak)	Retain for 21 years from the date of birth of the pupil/s involved in the incident Trigger: Pupil's date of birth	Secure disposal	The Limitation Act 1980 Records created might include risk assessments

CURRICULUM				
Ref	Record type	Retention action	Disposal action	Rationale / Further Info
5.1	Curriculum development	Retain for 6 years Trigger: End of the calendar year that the record was created in	Secure disposal	Common practice
5.2	Curriculum returns	Retain for 3 years Trigger: End of the calendar year that the record was created in	Secure disposal	Common practice
5.3	School syllabus	Retain for 1 year Trigger: Expiration of syllabus	Secure disposal	Common practice
5.4	Schemes of work	Retain for 1 year Trigger: End of the calendar year that the record was created in	Review with a view to Secure disposal	Common practice
5.5	Timetable development	Retain for 1 year Trigger: End of the calendar year that the record was created in	Review with a view to Secure disposal	Common practice
5.6	Records of marks awarded	Retain for 1 year Trigger: End of the calendar year that the record was created in (If held with the student in Sims see guidance note page 1)	Secure disposal	Common practice
5.7	Records of homework set	Retain for 1 year Trigger: End of the calendar year that the record was created in (If held with the student in Sims see guidance note page 1)	Secure disposal	Common practice

PERSONNEL				
Ref	Record type	Retention action	Disposal action	Rationale / Further Info
6.1	Staff personnel files	Retain for 7 years Trigger: End of employment	Do not Destroy Subject to moratorium	Common practice
6.2	Recruitment record for successful candidates, including interview notes and copy evidence of entitlement to work in the UK	Retain and add to personnel file. Trigger: Date of recruitment		Common practice, Immigration, Asylum and Nationality Act 2006
6.3	Interview notes for unsuccessful candidates	Retain for 12 months Trigger: Date successful candidate is in post	Secure disposal	Business requirement
6.4	Disclosure and Barring Service Checks	Record only satisfactory / unsatisfactory result and delete other information. If copy is kept, not to be retained beyond 6 months Trigger: Date information checked	Secure disposal	See further DfE statutory Guidance ' Working Together to safeguard children' https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
6.5	Pre-employment vetting of successful candidates, for the purposes of ensuring school staff are adequately qualified	Add copies of evidence to personnel file [6,1]		Common practice
6.6	Pre-employment vetting of successful candidates, for the purposes of ensuring school staff are legally entitled to work in the United Kingdom	Add copies of evidence to personnel file [6,1]		Immigration, Asylum and Nationality Act 2006
6.7	Written warnings (level 1)	Retain for 6 months Trigger: Date of warning	Do not Destroy Subject to moratorium	Common practice
6.8	Written warning (level 2)	Retain for 12 months Trigger: Date of warning	Do not Destroy Subject to moratorium	Common practice

PERSONNEL				
Ref	Record type	Retention action	Disposal action	Rationale / Further Info
6.9	Final warning	Retain for 18 months Trigger: Date of warning	Do not Destroy Subject to moratorium	Common practice
6.10	Warnings subsequently found to be based on an unfounded case (excluding child protection related warning)	No retention required Trigger: Date case found to be unfounded	Do not Destroy Subject to moratorium	Common practice For child protection related warnings see Child Protection section above.
6.11	Staff appraisal records	Retain for 5 years Trigger: End of the calendar year that the record was created in	Do not Destroy Subject to moratorium	Common practice

HEALTH AND SAFETY

Ref	Record type	Retention action	Disposal action	Rationale / Further Info
7.1	Accessibility Plans, including Personal Emergency Evacuation Plan (PEEPs)	Retain for 6 years Trigger: End of the calendar year that the record was created in	Secure disposal	Disability and Equality Act 2010
7.2	Accident/incident reporting (adults)	Retain for 7 years Trigger: Date of incident	Secure disposal	Common practice
7.3	Accident/incident reporting (children)	Retain for 25 years Trigger: Child's date of birth	Secure disposal	The Limitation Act 1980
7.4	Records of monitoring areas where employees/pupils are likely to come into contact with asbestos	Retain for 40 years Trigger: Last action on file	Secure disposal	The Control of Substances Hazardous to Health Regulations 2002
7.5	Records of monitoring areas where employees/pupils are likely to come into contact with radiation	Retain for 50 years Trigger: Last action on file	Secure disposal	The Ionising Radiations Regulations 1985
7.6	Fire log books	Retain for 7 years Trigger: End of calendar year	Secure disposal	Common practice
7.7	Records of the administration of non-prescription medicines and remedies including painkillers, or very commonly prescribed drugs such as antibiotics or asthma inhalers	Retain for 1 year Trigger: End of calendar year	Secure disposal	Business decision Events significantly outside individual treatment plan should be treated as non-routine (see below)
7.8	Records of the administration of any other medication, including: peg feeding; injections; treatments for serious conditions such as diabetes, ADHD or depression; records of reported incidents, or problems arising from administering medication.	Retain for 21 years and 6 months from pupil's date of birth Trigger: Pupil's date of birth	Secure disposal	Business decision

HEALTH AND SAFETY				
Ref	Record type	Retention action	Disposal action	Rationale / Further Info
7.9	Employer's Liability Certificate	Retain for 40 years Trigger: Closure of school		Common practice Transfer on closure of school
7.10	Inventories of equipment/furniture	Retain for 6 years Trigger: End of calendar year	Secure disposal	Common practice
7.11	Circulars to parents/staff/pupils	Retain for 1 year Trigger: End of calendar year	Secure disposal	Common practice
7.12	Newsletters produced by the school	Retain for 1 year Trigger: End of calendar year	Offer to North Tyneside Council	Common practice
7.13	Visitor books	Retain for 2 years Trigger: End of calendar year	Secure disposal	Common practice

FINANCE

Ref	Record type	Retention action	Disposal action	Rationale / Further Info
8.1	Annual accounts	Retain at school for 6 years Trigger: End of calendar year	Offer to North Tyneside Council	Common practice
8.2	Invoices, receipts, and other financial records covered by financial regulations	Retain for 6 years Trigger: End of calendar year	Secure disposal	Standard financial regulations
8.3	Annual budget and supporting papers	Retain for 6 years Trigger: End of calendar year	Secure disposal	Common practice
8.4	Ordinary contracts	Retain for 6 years Trigger: End of contract	Secure disposal	The Limitation Act 1980
8.5	Contracts under seal	Retain for 12 years Trigger: End of contract	Secure disposal	The Limitation Act 1980

PROPERTY				
Ref	Record type	Retention action	Disposal action	Rationale / Further Info
9.1	Building plans	Retain whilst operational Trigger: End of operational use	Offer to North Tyneside Council	Common practice
9.2	Burglary, theft and vandalism report forms	Retain for 6 years Trigger: End of the calendar year that the record was created in	Secure disposal	Common practice
9.3	Contractors' reports	Retain for 6 years Trigger: End of the calendar year that the record was created in	Secure disposal	Common practice

LOCAL AUTHORITY				
Ref	Record type	Retention action	Disposal action	Rationale / Further Info
10.1	Secondary transfer sheets	Retain for 2 years Trigger: Year of transfer (If held with the student in Sims see guidance note page 1)	Secure disposal	School Admissions Code 2012; School Standards and Framework Act 1998 Part III.
10.2	Attendance returns	Retain for 1 year Trigger: End of the calendar year that the record was created in (If held with the student in Sims see guidance note page 1)	Secure disposal	Common practice

CENTRAL GOVERNMENT

Ref	Record type	Retention action	Disposal action	Rationale / Further Info
11.1	Ofsted reports and papers	Retain whilst current Trigger: Date new report issued	Transfer to North Tyneside Council	Common practice Replace old report with new report
11.2	Returns to central government (e.g. school census)	Retain for 6 years Trigger: End of the calendar year that the record was created in (Held electronically hosted by North Tyneside as part of Sims)	Secure disposal	Common practice