

Records Retention Schedule

Retention of Records

Schools and ETBs (Executive Trust Boards) as *data controllers* must be clear about the length of time for which personal data will be kept and the reasons why the information is being retained. In determining appropriate retention periods, regard must be had for any statutory obligations imposed on a data controller. If the purpose for which the information was obtained has ceased and the personal information is no longer required, the data must be deleted or disposed of in a secure manner. It may also be anonymised to remove any personal data. Anonymisation must be irrevocable; removing names and addresses may not necessarily be sufficient.

In order to comply with this legal requirement **The Dean Trust** has assigned specific responsibility and introduced procedures for ensuring that files are purged regularly and securely and that personal data is not retained any longer than is necessary. All records will be periodically reviewed in light of experience and any legal or other relevant indications.

IMPORTANT: In all cases, schools should be aware that where proceedings have been initiated, are in progress, or are reasonably foreseeable (although have not yet been taken against the school/board of management/an officer or employee of the school (which may include a volunteer)), all records relating to the individuals and incidents concerned should be preserved and should under no circumstances be deleted, destroyed or purged. The records may be of great assistance to the school in defending claims made in later years.

WARNING: In general, the limitation period does not begin to run until the person concerned acquires knowledge of the facts giving rise to the claim and the Statute of Limitations may be different in every case. In all cases where reference is made to “18 years” being the date upon which the relevant period set out in the Statute of Limitations commences for the purposes of litigation, the school must be aware that in some situations (such as the case of a student with special educational needs, or where the claim relates to child sexual abuse, or where the student has not become aware of the damage which they have suffered, and in some other circumstances), the Statute of Limitations **may not begin to run when the student reaches 18 years of age and specific legal advice should be sought by schools on a case-by-case basis.** In all cases where retention periods have been recommended with reference to the relevant statutory period in which an individual can make a claim, these time-frames may not apply where there has been misrepresentation, deception or fraud on the part of the respondent/defendant. In such a circumstance, the school/ETB should be aware that the claim could arise many years after the incident complained of and the courts/tribunals/employment fora may not consider the complainant to be “out of time” to make their claim.

Type of File	Retention period (operational)	Action taken after retention period
Admissions		
Register of admissions (start date & end date)	Until the pupil turns 25	The record should be reviewed. You may wish to keep the register permanently (100 years), as you may be contacted by past pupils to confirm the dates they attended the school.
Proof of address (where sought), supplied as part of the admissions process	Until the pupil turns 25	Securely disposed of
Supplementary information submitted including religious, medical information, etc. (where the admission was successful)	Until the pupil turns 25	Securely disposed of
Supplementary information submitted including religious, medical information, etc. (where the admission was unsuccessful)	Until the appeals process has been completed	Securely disposed of
Pupils' educational records		
Primary pupils' educational records	Whilst the pupil remains at the school	After the retention period, the file should follow the pupil to the relevant destination, such as another primary school, a secondary school or a pupil referral unit (PRU).
Secondary pupils' educational records	Until the pupil turns 25	Securely disposed of
Public examination results	Until the pupil turns 25	All uncollected certificates should be returned to the examination board.
Internal examination results	Until the pupil turns 25	Securely disposed of
Child protection information held on a pupil's file	Scanned to students SIMS Record (Local Documents), kept for 50 years	Securely disposed of

	Hard copies also stored in a sealed envelope for 50 years	
Child protection information held in a separate file	Hard copies also stored in a sealed envelope for 50 years	Securely disposed of
Attendance		
Attendance Registers	Until the pupil turns 25	Securely disposed of
Letters authorising absence	Until the pupil turns 25	Securely disposed of
SEND		
SEND files, reviews and individual education plans (IEPs)	Until the pupil turns 25	After the retention period, this information should be reviewed. Some data holders choose to keep these files longer than the recommended minimum to defend themselves in a 'failure to provide sufficient education' case. If a school chooses to keep these records longer than the minimum period, it should document the business risk analysis undertaken.
Education & health care plans or statement of SEN (and any amendments to the plan or statement)	Until the pupil turns 25	Securely disposed of, unless subject to legal hold.
Information and advice provided to parents regarding SEND	Until the pupil turns 25	Securely disposed of, unless subject to legal hold.
Accessibility strategy	Until the pupil turns 25	Securely disposed of, unless subject to legal hold.
Curriculum Management		
SATs results	Until the pupil turns 25	Securely disposed of
Examination papers	Until the pupil turns 25	Securely disposed of

Published Admission Number (PAN) Reports	Until the pupil turns 25	Securely disposed of
Value added and contextual data	Until the pupil turns 25	Securely disposed of
Self-evaluation forms	Until the pupil turns 25	Securely disposed of
Pupils' work	Until the pupil turns 25, unless anonymised	Securely disposed of, unless anonymised
Extra-curricular activities		
Parental consent forms for school trips where no major incident occurred	Stored in SIMS Linked Documents until the pupil turns 25	Securely disposed of
Parental consent forms for school trips where a major incident occurred	Stored in SIMS Linked Documents until the pupil turns 25	Securely disposed of
Walking bus registers	3 years from the date the register was taken	Securely disposed of
Family liaison officers and home-school liaison assistants		
Day books	2 years after current academic year	After the retention period, the information should be reviewed & securely disposed of if no longer needed
Reports for outside agencies	Until the pupil turns 25	Securely disposed of
Referral forms	Until the pupil turns 25	Securely disposed of
Contact data sheets	Until the pupil turns 25	After the retention period, the information should be reviewed & securely disposed of if no longer needed

Contact database entries	Until the pupil turns 25	After the retention period, the information should be reviewed & securely disposed of if no longer needed
Group registers	Until the pupil turns 25	After the retention period, the information should be reviewed & securely disposed of if no longer needed
Personal identifiers, contacts and personal characteristics		
Images used for identification purposes	Until the pupil turns 25	Securely disposed of
Biometric Data	Until the pupil leaves the school	Securely disposed of