

Annual Review of School Records and Safe Data Destruction Checklist

1. Introduction

1.1. This checklist has been produced in accordance with the guidance published in February 2023 by the Department For Education (DfE) "[Data protection in schools](#)" and Freedom of Information Act 2000 (FoIA) legislation. The Information and Records Management Society (IRMS) has published a [toolkit for academies](#) and a [toolkit for schools](#). It includes more guidance about information and records management.

2. Aims

2.1. This is a checklist developed to enable school business managers, clerks, and other school staff to carry out an efficient annual review and safe destruction of school records and information.

3. Relationship with existing policies

3.1. This document should be read in conjunction with school data protection policy, FoIA policy, schools record management policy the records retention schedule, safeguarding and child protection record keeping guidance and other legislation regulations or statutory guidance (including, audit, equal opportunities, and ethics) affecting the school.

3.2. On 20 October 2022, the Independent Inquiry into Child Sexual Abuse (IICSA) published its final statutory Report. The Inquiry recommended that the UK government directs the Information Commissioner's Office (ICO) to introduce a code of practice on retention of and access to records that are known to relate to child sexual abuse and that the retention period for such records known to relate to allegations or cases of child sexual abuse should be 75 years with appropriate review periods. This will be debated with the ICO, and further guidance is expected. In the meantime, any records that fall within the above categories in whatever format must be retained for a minimum of 75 years.

4. Scope

4.1. This policy applies to all records, in all electronic or physical formats or media, created, received, or maintained by staff of the school in the course of carrying out its functions.

5. Data Protection

5.1 The fifth data protection principle under the UK General Data Protection Regulation (UK GDPR) states that, "Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes"

5.2 In each school, the leadership must ensure that records that are no longer required for business use are reviewed as soon as possible under the criteria set out so that only the appropriate records are destroyed.

5.3 The school review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format, or retained by the school for research or litigation purposes. Whatever decisions are made they need to be documented as part of the records management policy within the school.

6. Freedom of Information Act 2000 (FOIA)

6.1 The FOIA requires the school to maintain a list of records which have been destroyed and who authorised their destruction. Members of staff should record at least:

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

7. Safe destruction of data and records

7.1. All records containing personal information, or sensitive policy information must be securely disposed of, made either unreadable or unreconstructable to reduce the likelihood of retrieval and reconstruction to an acceptable level so that it cannot be accessed by anybody else either by mistake or for malicious purposes. Do not dispose these types of records with regular waste or in a skip

7.2. Paper records should be shredded using a cross-cutting shredder or shredded by an external company, ¹ for data held electronically or held on other storage media such as CDs / DVDs / floppy disks / SD etc. should be destroyed in line with National Cyber Security Centre guidance ² to ensure data cannot be read by unauthorised parties after it has left school organisational control.

7.3. Documentation on destroyed records should be kept indefinitely to manage the risk of not having evidence that records were destroyed during a managed disposal process, in the event that destruction of particular records is questioned. It should provide evidence that the destruction took place in accordance with established and formally adopted policies and schedules and with appropriate authorisation.

7.4. It is important to understand that if the records are recorded as to be destroyed but have not yet been destroyed and a request for the records under the UK GDPR or FOIA has been received, they MUST still be provided.

8. Support

8.1. Following this guidance will ensure that the school is compliant with the Data Protection rules and the Freedom of Information Act 2000.

8.2. If you have any queries in completing this checklist, the Council Information Governance Team are able to offer further support and guidance on records and information management within the school.

Email: igschoolsupport@stockport.gov.uk.

¹ Where an external contractor is used for shredding records, it is recommended that all records must be shredded on-site in the presence of an employee. The organisation must also be able to prove that the records have been destroyed by the company who should provide a certificate of destruction. Staff working for the external provider should have been trained in the handling of confidential documents.

² <https://www.ncsc.gov.uk/guidance/secure-sanitisation-storage-media>

Appendix A - Checklist for Annual Review of School Records and Safe Data Destruction

| | | | |
|---------------------------------|--|--------------|--|
| School Name: | | | |
| Review completed by: | | Date: | |
| Approved by Headteacher: | | Date: | |

Summary of areas reviewed

| Ref. | School Retention Schedule - Area Reviewed | Annual Review Completed Tick (✓) | Reviewer Initials |
|------|---|----------------------------------|-------------------|
| 1.1 | Management of Governing Body | | |
| 1.2 | Governor Management | | |
| 2.1 | Senior Management Team | | |
| 2.2 | Operational Administration | | |
| 2.3 | Staff Management | | |
| | • Staff Records | | |
| | • Disciplinary and Grievance Process | | |
| | • Payroll and Pensions | | |
| | • Contract and Supply Staff | | |
| 2.4 | Health and Safety | | |
| 2.5 | Financial Management | | |
| | • Risk Management and Insurance | | |
| | • Asset Management | | |
| | • Accounts and Budget Management | | |
| | • Contract Management | | |
| | • School Funds | | |
| | • School Meals | | |
| 2.6 | Property Management | | |
| 3.1 | Admissions and Attendance | | |
| 3.2 | Pupil's Education Record | | |
| 3.3 | Child Protection | | |
| 4.1 | Statistics and Management | | |
| 4.2 | Implementation of the Curriculum | | |
| 4.3 | School Trips | | |
| 4.4 | Family and Home School Liaison | | |
| | Central Government and Local Authority | | |

Note – The completion of this review can be shared at the Governors meeting and minuted.

Appendix B - List of School Records and Data safely destroyed

| Ref No. | File/Record Title | Description | Reference or Cataloguing Information | Date Approved for Disposal | Authorising Officer | No. of Files or Records Destroyed | Method of destruction or disposal | Date Destroyed | Destroying Officer/ Contractor | <u>Confirm</u> (i) Safely destroyed - and (ii) in accordance with data retention guidelines (Tick ✓) |
|---------|-------------------|---|---|----------------------------|---------------------|-----------------------------------|-----------------------------------|----------------|--------------------------------|---|
| e.g., | School Invoices | Copies of purchase invoices dated 2015/16 | Folders marked "Purchase Invoices 2015/16" 1 to 3 | 01/05/2023 | AN Other | 3 Folders | Shredding | 16/06/2023 | AN Other | ✓ |
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