

The recommended retention periods contained within this policy have been set by the Information Records Management Society's (IRMS) and until specific GDPR guidance is available, school will follow these recommendations.

Retention of individual pupil records

Schools should be committed to maintaining the confidentiality of their information and ensuring that all records stored are only accessible to the appropriate individuals. This article provides schools with recommended retention periods for data and actions to take after the data is no longer required. Please note, the table below has been created using recommended retention periods provided by the Information Records Management Society's (IRMS) 'Information management toolkit for schools' (2016) guidance and the DfE – it is not an exhaustive list of records that may be kept by schools.

TheSchoolBus has contacted the IRMS to enquire when it will be updating its guidance in accordance with the GDPR. In the meantime, schools can still use these recommendations as guidance, as the GDPR stipulates that data should not be kept for longer than is necessary.

Any retention periods should be in line with schools' local arrangements and justification for processing data.

Type of file	Retention period (operational)	Action taken after retention period
Personal identifiers, contacts and personal characteristics		
Images used for identification purposes	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month	Securely disposed of.
Images used in displays in schools	Whilst the pupil is at school	Securely disposed of.
Images used for marketing purposes, or other	In line with the consent period	Securely disposed of.
Biometric data	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month	Securely disposed of.
Postcodes, names and characteristics	Whilst the pupil is at school, plus five years	Securely disposed of.
House number and road	For the duration of the event/activity, plus one month	Securely disposed of.
Admissions		
Register of admissions	Whilst the pupil remains at the school, plus one year	After the retention period, the record should be reviewed. Schools are advised that they may wish to keep the register permanently, as they are often contacted by past pupils to confirm the dates they attended the school.
Admissions appeals	Whilst the pupil remains at school, plus five years	After the retention period, this information should be securely disposed of.
Secondary school admissions (casual)	Whilst the pupil remains at the school, plus one year	After the retention period, this information should be securely disposed of.
Proof of address supplied as part of the admissions process	Whilst the pupil remains at the school, plus one year	After the retention period, this information should be securely disposed of.
Supplementary information submitted including religious, medical information, etc. (where the admission was successful)	Whilst the pupil remains at the school, plus one year	After the retention period, this information should be securely disposed of.
Supplementary information submitted including religious, medical information, etc. (where the admission was unsuccessful)	Whilst the pupil remains at the school, plus five years	After the retention period, this information should be 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).
If the pupil transfers to an independent school, transfers to home-schooling, leaves the country, or dies whilst at the school, the file should be returned to the LA and retained for the statutory period.		
Secondary pupils' educational records	25 years after the pupil's date of birth, with their personal data removed	After the retention period, this information should be securely disposed of.
Public examination results	Added to the pupil's record and transferred to next school Copies with pupils' names are held whilst the pupil is at school, plus five years Copies with pupils' names removed are held for 25 years after the pupil's date of birth	All uncollected certificates should be returned to the examination board.
Internal examination results	Added to the pupil's record and transferred to next school Copies with the pupil's personal data are held whilst the pupil is at school, plus five years Copies with personal data removed are held for 25 years after the pupil's date of birth	The Information and Records Management Society (IRMS) has not provided specific advice on the actions to be taken once the recommended time period has expired.
Behaviour records	Added to the pupil's record and transferred to the next school Copies are held whilst the pupil is at school, plus one year	Securely disposed of.
Exclusion records	Added to the pupil's record and transferred to the next school Copies are held whilst the pupil is at school, plus one year	Securely disposed of.
Child protection information held on a pupil's file	Stored in a sealed envelope for the same length of time as the pupil's record	After the retention period, this information should be securely disposed of (these records must be shredded).

Education, training and employment destinations data	At least three years after the pupil has left school	Securely disposed of.
Attendance Attendance registers	Whilst the pupil remains at school, plus one year Non-identifiable summary statistics are held after the initial retention period for 25 years after the pupil's date of birth	After the retention period, this information should be securely disposed of.
Letters authorising absence	Whilst the pupil remains at school, plus one year Non-identifiable summary statistics are held after the initial retention period for 25 years after the pupil's date of birth	After the retention period, this information should be securely disposed of.
Medical information and administration		
Permission slips	For the duration of the period that medication is given, plus one month	Securely disposed of.
Medical conditions – ongoing management	Added to the pupil's record and transferred to the next school Copies held whilst the pupil is at school, plus one year	Securely disposed of.
Medical incidents that have a behavioural or safeguarding component	Added to the pupil's record and transferred to the next school Copies held whilst the pupil is at school, plus 25 years	Securely disposed of.
SEND		
SEND files, reviews and individual education plans (IEPs)	25 years after the pupil's date of birth (as stated on the pupil's record)	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.

Statement of SEN maintained under section 324 of the Education Act 1996 (and any amendments to the statement)	25 years after the pupil's date of birth (as stated on the pupil's record)	After the retention period, this information should be securely disposed of, unless it is subject to a legal hold.
Information and advice provided to parents regarding SEND	25 years after the pupil's date of birth (as stated on the pupil's record)	After the retention period, this information should be securely disposed of, unless it is subject to a legal hold.
Accessibility strategy	25 years after the pupil's date of birth (as stated on the pupil's record)	After the retention period, this information should be securely disposed of, unless it is subject to a legal hold.
Curriculum management		
SATs results	25 years after the pupil's date of birth (as stated on the pupil's record)	After the retention period, this information should be securely disposed of.
Examination papers	Until the appeals/validation process has been completed	After the retention period, this information should be securely disposed of.
Published Admission Number (PAN) Reports	Current academic year, plus six years	After the retention period, this information should be securely disposed of.
Value added and contextual data	Current academic year, plus six years	After the retention period, this information should be securely disposed of.
Self-evaluation forms	Current academic year, plus six years	After the retention period, this information should be securely disposed of.
Pupils' work	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	After the retention period, this information should be securely disposed of.
Extra-curricular activities		
Field file – information taken on school trips	Until the conclusion of the trip, plus one month	Securely disposed of.
Until the conclusion of the visit, plus one month		Securely disposed of.
Family liaison officers and home-school liaison assistants		
Day books	Current academic year, plus two years	After the retention period, this information should be reviewed.
Reports for outside agencies	Duration of the pupil's time at school	After the retention period, this information should be securely disposed of.
Referral forms	Whilst the referral is current	After the retention period, this information should be securely disposed of.

Contact data sheets	Current academic year	After the retention period, this information should be reviewed, and destroyed if contact is no longer active.
Contact database entries	Current academic year	After the retention period, this information should be reviewed, and destroyed if contact is no longer active.
Group registers	Current academic year, plus two years	The IRMS has not provided specific advice on the actions to be taken once the recommended time period has expired.
Catering and free school meal management		
Meal administration	Whilst the pupil is at school, plus one year	Securely disposed of.
Meal eligibility	Whilst the pupil is at school, plus five years	Securely disposed of.