

SIMS .net Data Cleansing

Bulk Deletion of Pupil Leavers Legislative and Guidance Information Primary

Autumn 2024

(This guidance uses 2022/2023 as the Current Academic Year. Follow all dates outlined in the document)

Bulk Data Deletion of Pupil leavers should not be carried out in Fees Schools presently, guidance will be issued later.

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Introduction

As data controllers, schools are responsible for ensuring that all practices relating to the handling of personal data in the school meet the requirements of GDPR. The school Principal is responsible for day to day data protection compliance, and will work with the Board of Governors to ensure that the school's obligations under data protection legislation and GDPR are met.

Disposal is an important part of records management. Properly done, it ensures that an organisation retains records for as long as they are needed and then, when they are no longer needed, destroys them in an appropriate manner or disposes of them in some other way. All schools should have a Disposal of Records Schedule to support how they manage the retention and destruction of information.

It is recommended that schools follow DE's model Disposal of Records Schedule for schools (hereafter DE's Disposal of Records Schedule) which identifies the disposal arrangements for all manual and electronic records created by the school. This Schedule relates to a range of data areas, including pupil records.

The DE Disposal of Records Schedule can be accessed here: <https://www.education-ni.gov.uk/publications/disposal-records-schedule>.

SIMS Data Retention and Disposal Schedule Information

This booklet provides specific guidance on the **Bulk Deletion of Pupil Leaver records in SIMS** and is based on DE's Disposal of Records Schedule. Please note that some of the categories of data listed in the DE schedule are **not** contained in SIMS. Child Protection records must not be kept in SIMS. In order to assist schools with the bulk deletion of pupil leavers data in SIMS, a **SIMS Data Retention and Deletion Schedule** has been defined. The SIMS Data Retention and Deletion Schedule reflects the categories of pupil data in SIMS; these categories of data are grouped according to DE's Disposal of Records Schedule.

There are 2 categories for scheduling data retention and disposal: **time-bound** and **age-related**. For example, schools must retain pupil records for pupils with SEN until the data subject reaches 26 years of age; otherwise data can be deleted when the data subject reaches 23 years of age. A time-bound example is pupil attendance information and registers, which need to be retained from the date of the register plus 10 years.

NB Care must be taken when deleting data from SIMS that is subject to a time-bound schedule. In SIMS, Attendance and Fee Billing data areas are subject to time-bound data retention and disposal periods, as shown in the schedule below.

SIMS Data Retention and Disposal Schedule

See Appendix 1 for **Data Items** within each SIMS **Data Area**

DE Disposal of Records Schedule	SIMS Data Area	SIMS Pupil Ever SEN	SIMS Pupil Never SEN
<i>Pupil Education Records - School / Progress Reports, etc.</i> <i>Examination Results</i> <i>Medical Records – records of pupils with medical conditions and details for the administration of drugs when necessary</i>	Performance Data	26 years old	23 years old
	Conduct Data	26 years old	23 years old
	Alerts Data	26 years old	23 years old
	Interventions Data	26 years old	23 years old
	SEN Data	26 years old	N/A
	Communication Data	26 years old	23 years old
<i>Timetables and Class Groupings</i>	Curriculum Data	26 years old	23 years old
<i>Disciplinary Action (Suspension/Expulsion) / Offences – bullying</i>	Exclusions Data	26 years old	26 years old
<i>Pupil Attendance Information / Registers</i>	Attendance Data	Date of register + 10 years For pupil leavers with Academic Year of Leaving within or before 2011/12 only	Date of register + 10 years For pupil leavers with Academic Year of Leaving within or before 2011/12 only
<i>Financial Information</i>	Fees Billing data	Current financial year + 6 years	Current financial year + 6 years

For the purpose of initial pupil data deletion in schools, the academic year 2022/2023 is being used as the current year. Ensure the dates in this guide are followed.

In SIMS, it is only possible to delete records for pupils who left the school more than **3 academic years in the past**. For example, if the current academic year is **2022/2023**, data will be available for bulk deletion of pupil leaver records from the **2018/19** academic year, back to any previous academic years that exist in SIMS. For some schools there will be an extensive number of academic years available for selection.

With the support of C2k Staff, the process of deleting pupil leaver records should commence in line with the SIMS Data Retention and Deletion Schedule which is aligned to the DE Disposal of Records Schedule. Do not begin pupil deletion until the Bulk Pupil Data Deletion Procedure Guide has been made available to the designated member of staff. A number of rules are applied to different areas of data and support will be required while carrying out this process.

Bulk Pupil Deletion in SIMS may take some time. It is advisable to run the Bulk Pupil Deletion process when there are fewer users logged into SIMS.

Documenting disposal

It is important to keep an audit trail of disposal actions (essentially what was deleted and when). A disposal log will provide evidence that the destruction took place in accordance with established and formally adopted policies and schedules and with appropriate authorisation. Without this it may be difficult to demonstrate that records were not eliminated to avoid disclosing them in response to a request for information.

It is recommended that as a minimum the disposal log should include:

- the disposal schedule reference;
- the disposal class and date range of the records concerned;
- evidence that destruction was properly authorised, the method of disposal;
- date the disposal was carried out and by whom.

Useful Links

- ❖ DE Disposal Schedule <https://www.education-ni.gov.uk/publications/disposal-records-schedule>
- ❖ The following DE Circular may also be useful <https://www.education-ni.gov.uk/publications/circular-202007-child-protection-record-keeping-schools>
- ❖ Additional information is available in the Think Data area on the EA website <https://www.eani.org.uk/about-us/privacy/ea-think-data-online-resource-hub> and the Retention and Disposal Schedule <https://www.eani.org.uk/about-us/privacy/ea-think-data-online-resource-hub/templates-and-guides>.

DE Disposal of Records Schedule

Record	Minimum Retention Period	Action After Retention
Child Protection Information-Social Services investigation outcome was inconclusive, unsubstantiated or substantiated	Until pupil is 30 years old	Retention period 30 years – if no Child Protection records held electronically then school can move to next retention period band (26 years) - Destroy
Disciplinary Action (Suspension/Expulsion) / Offences – bullying (Special Educational Needs)	Until pupil is 26 years old	Retention period 26 years – specifically relates to special educational needs pupils Destroy
Pupil Education Records - School / Progress Reports, etc. (Special Educational Needs)	Until Pupil is 26 years old	
Medical Records – records of pupils with medical conditions and details for the administration of drugs when necessary (Special Educational Needs)	Until pupil is 26 years old	
School Trips – Attendance / Staff Supervision, etc (Special Educational Needs)	In the case of an incident / accident involving a pupil, retain until pupil is 26 years old for a pupil with special educational needs	
Accident Reporting (Children) (Special Educational Needs)	Until pupil is until 26 years old	
Medical Records – records of pupils with medical conditions and details for the administration of drugs when necessary	Until pupil is 23 years old	Retention period 23 years Destroy
Disciplinary Action (Suspension / Expulsion) / Offences – bullying	Until pupil is 23 years old	
School Trips – Attendance / Staff Supervision, etc	In the case of an incident / accident involving a pupil, retain until pupil is 23 years old	
Pupil Education Records - School / Progress Reports, etc	Until pupil is 23 years old	
Accident Reporting (Children)	Until pupil is 23 years old	
Child Protection Information - Record of concerns where case was not referred to Social Services	10 years after last entry on file	
Child Protection Information - Social Services investigation where outcome was unfounded or malicious	10 years after last entry on file	
Pupil Attendance Information / Registers	Date of Register + 10 years	Offer to PRONI for Permanent Preservation
Examination Results	Current school year + 6 years	Current school year + 6 years Destroy
Careers Advice	Current school year + 6 years	
School Meals returns	Current financial year + 6 years	Current financial year + 6 years Destroy
Free Meals registers	Current financial year + 6 years	
School Trips – Financial & Administration details	Current financial year + 6 years	
School Trips-Attendance/Staff Supervision etc	Current financial year + 6 years	
Reports of Stolen/Damaged Items	Current financial year + 6 years	
Applications for enrolment	3 years after enrolment	3 years after enrolment Destroy
Transfer applications (Transfer Forms)	3 years after enrolment	
Timetables + Class Groupings	Retain while current	Destroy

*Child Protection Records

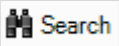
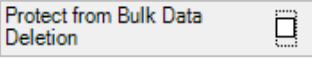

It is important to note that specific Child Protection Records, including notes of concern or UNOCINI referral forms, should not be recorded in SIMS. A Child Protection File is separate to the School Pupil/ Educational Record and must be stored securely. For more information on Child Protection Record Keeping in Schools, please refer to DE Circular 2020/07

<https://www.education-ni.gov.uk/publications/circular-202007-child-protection-record-keeping-schools>

Protecting a Pupil Record from Bulk Data Deletion in SIMS

There may be instances where a pupil should not be deleted. Individual pupils can be protected from bulk deletion by selecting the **Protect from Bulk Data Deletion** check box in the **Pupil** record. Multiple pupils can be protected from bulk deletion using the **Bulk Update** routine.

If a leaver is required to be protected from Bulk Data Deletion:

- Select **Focus | Pupil | Pupil Details**
- Change the **Status** from Current to **Leavers**
- In the **Surname** field enter the name of the required pupil and click 
- Open the pupil leaver record
- In panel **1 Basic Details** place a tick in  and click 
- Click **Yes** at the message the Date of Leaving is more than 14 days ago

Appendix 1 - Table of Data Areas including Data Item Detail

NB Not all Data Items listed below are used in all schools.
Homework Data, Concessions Data and AD Provisioning Data, are not used in any school in Northern Ireland.

Data Area	Data Item Detail	Data Area	Data Item Detail
Conduct Data	Achievement Records	Performance Data	Profiles Data
Conduct Data	Behaviour Records	Performance Data	Assessment Data
Conduct Data	Detentions	Performance Data	Exams Data
Conduct Data	Report Cards	Alerts Data	Alerts Messages
Conduct Data	Behaviour Reviews	EMA Data	Payment Authorisations
Conduct Data	Initiative records	EMA Data	Payment Appeals
SEN Data	SEN Needs	EMA Data	Entitlement
SEN Data	SEN Reviews	Partnership Data	Partnership Details
SEN Data	SEN Events	Concessions Data	Concessions Details
SEN Data	SEN Statements	Fees Billing Data	Fees Transactions
SEN Data	SEN Provisions	Fees Billing Data	Fees Charges
SEN Data	SEN IEPs	Fees Billing Data	Bill Payer Links
SEN Data	SEN Status History	Fees Billing Data	Instalment Arrangements
SEN Data	SEN Ability	Interventions Data	Interventions Details
Attendance Data	Attendance Marks	Interventions Data	Interventions Session Details
Attendance Data	Archived Attendance Marks	Communication Data	Fees Communication
Attendance Data	Lesson Marks	Communication Data	SEN Communication
Attendance Data	Attendance Comments	Communication Data	Behaviour Communication
Exclusions Data	Exclusions Details	Communication Data	Exclusion Communication
Exclusions Data	Exclusions Disciplinary Details	Communication Data	Student General Communication
Homework Data	Homework Details	AD Provisioning Data	Active Directory Account
Curriculum Data	Course Memberships		
Curriculum Data	Class Memberships		
Curriculum Data	Curriculum Memberships		
Curriculum Data	Timetable Exceptions		
Curriculum Data	Course Exceptions		
Curriculum Data	Learning Aims		