



Star

NURTURING TODAY'S **YOUNG PEOPLE**,
INSPIRING TOMORROW'S **LEADERS**

RECORDS MANAGEMENT POLICY





Document control

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Introduction

1. Star Academies recognises its responsibility to effectively managing its records to comply with its legal obligations and to contribute to the effective overall management of Star Academies and its establishments.
2. This policy has due regard to data protection laws, which incorporate the General Data Protection Regulation (GDPR), and other legal requirements.
3. This policy applies to all records created, received or maintained by staff of Star Academies and its establishments whilst carrying out its functions.
4. Records are defined as all those documents which facilitate the business carried out by Star Academies and its establishments. These records may be created or received, and then stored in hard copy or electronically.
5. The Star Academies Records Management Policy has due regard to the guidelines developed by the Information and Records Management Society (IRMS) within their publication Records Management Toolkit for Schools¹, the Department for Education Data Protection Toolkit and internal guidelines developed by Star Academies.
6. Whilst every effort has been made to ensure this policy is comprehensive, for any records not included in this policy, Star Academies will adhere to the retention guidelines of the IRMS Records Management Toolkit for Schools. Trust establishments should contact Star Central for guidance.
7. To support this policy, staff shall apply associated policies and procedures and participate in all training if requested to do so by Star Academies.
8. This policy does not form part of any employee's contract of employment and it may be amended at any time. Any breach of this policy will be taken seriously and may result in disciplinary action.
9. This policy will be implemented in conjunction with the following Star Academies policies:
 - Data Protection Policy
 - Freedom of Information Policy.

Aims

10. To ensure Star Academies fulfils its statutory responsibilities.
11. To ensure effective security and protection for data that has been provided by individuals to Star Academies which is required for the management and operation of its establishments.
12. To support the mission, vision and values of Star Academies and its establishments.

Who is responsible for this policy?

13. Star Academies has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory or Star framework. Star Academies has delegated day-to-day responsibility for operating the policy to Star Central Team and Head of each establishment.
14. The Local Governing Body and Senior Leadership Team at each establishment has a specific responsibility to ensure the fair application of this policy and all members of staff are responsible for supporting colleagues and ensuring its success.

¹ <http://www.irms.org.uk/groups/public-sector/resources/134-records-management-toolkit-for-schools>.



15. The Establishment Data Protection Lead will promote compliance with this policy so that information may be retrieved easily, appropriately and in a timely way.
16. The Establishment Data Protection Lead will monitor compliance annually by verifying records to ensure they are stored and can be accessed appropriately.
17. The Establishment Data Protection Lead will be responsible for ensuring all personal data and information outlined within the retention records has secure disposal when this is required.

Management of pupil records

18. Pupil records are specific documents that are used throughout a pupil's time in the education system – they are passed to each school that a pupil attends and includes all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.
19. The following information is stored on the front cover of a pupil record, and will be easily accessible:
 - Forename, surname, gender and date of birth;
 - Unique pupil number;
 - Note of the date when the file was opened; and
 - Note of the date when the file was closed, if appropriate.
20. The following information is stored inside the front cover of a pupil record, and will be easily accessible:
 - Ethnic origin, religion and first language (if not English);
 - Any preferred names;
 - Position in their family, e.g. eldest sibling;
 - Emergency contact details and the name of the pupil's doctor;
 - Any allergies or other medical conditions that are important to be aware of;
 - Names of parents, including their home address(es) and telephone number(s);
 - Name of the school, admission number, the date of admission and the date of leaving, where appropriate; and
 - Any other agency involvement, e.g. speech and language therapist.
21. The following information is stored within a pupil record, and will be easily accessible:
 - Admissions form;
 - Details of any SEND;
 - If the pupil has attended an early years setting, the record of transfer;
 - Signed Annual Multiple Consent Form– only the most recent notice will be included;
 - Additional Consent Forms, as appropriate;
 - Annual written reports to parents;
 - National curriculum and agreed syllabus record sheets;
 - Notes relating to major incidents and accidents involving the pupil;
 - Any information about an education and healthcare (EHC) plan and support offered in relation to the EHC plan;
 - Any notes indicating child protection disclosures and reports are held;
 - Any information relating to exclusions;
 - Any correspondence with parents or external agencies relating to major issues, e.g. mental health;
 - Notes indicating that records of complaints made by parents or the pupil are held.



22. The following information is subject to shorter retention periods and, therefore, should be stored separately in a personal file for the pupil:
 - Absence Notes;
 - Parental and, where appropriate, pupil consent forms for educational visits; and
 - Correspondence with parents about minor issues, e.g. behaviour.
23. Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in a securely locked filing cabinet in the school office – a note indicating this is marked on the pupil's file.
24. Hard copies of complaints made by parents or pupils are stored in a file in the Principal's office – a note indicating this is marked on the pupil's file.
25. Actual copies of accident and incident information are stored separately on the school's management information system and held in line with the retention periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.
26. The school will ensure that pupil records are not altered or amended prior to transferring them to the next school that the pupil may attend. The only exception is if any records placed on the pupil's file have exceeded their retention period and need to be removed.
27. Electronic records relating to a pupil's record will also be transferred to the pupils' next school.
28. **Primary schools only.** The school will not keep any copies of information stored within a pupil's record, unless there is ongoing legal action at the time during which the pupil leaves the school. The responsibility for the pupil records will then transfer to the next school that the pupil attends.
29. **Secondary schools and sixth form colleges only.** For pupils attending the school until statutory school leaving age, the school will keep the pupil record until they reach the age of 25 years.
30. Star establishments will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The establishment it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the school.

Retention of pupil documentation

Type of file	Retention period
Admissions	
Admissions Register	Retain as historical record
Primary and secondary school admission application forms for in-year admissions, normal round admissions database, managed moves and fair access application forms	The current academic year, plus 1 year
Copies of birth certificates and other forms of identification (Passports etc.)	The current academic year, plus 1 year
Proof of address (supplied as part of the admissions process)	The current academic year, plus 1 year
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Added to the pupil's record
All appeal related documents	2 years following the hearing
Waiting Lists including In Year Waiting Lists	Until the point at which they would leave the school i.e. Year 6 or Year 11



Type of file	Retention period
Pupils' educational records	
Primary establishments - Educational Record	Whilst the pupil remains at the school and then transferred to the next destination. If this is an independent school, home-schooling or outside of the UK, the file will be transferred to the Local Authority.
Secondary establishments - Educational record	25 years after the pupil's date of birth
Pupil Data Collection Sheet	Updated Annually Data Collection Sheet completed in final year retained for 1 year after the pupil leaves the school
Child protection information held on a pupil's record	Stored in a sealed envelope for the same length of time as the pupil's record
Child protection records held in a separate file	25 years after the pupil's date of birth
Behaviour records	Whilst the pupil is at school plus 1 year
Exclusion records	Whilst the pupil is at school plus 1 year
Attendance	
Attendance registers	Last date of entry, plus 3 years
Letters authorising absence	Current academic year, plus 2 years
SEND	
SEND files, reviews and individual education plans	25 years after the pupil's date of birth. File to be retained if it is believed to be required for defence in a 'failure to provide sufficient education' case
Statement of SEN maintained under section 324 of the Education Act 1996 or an EHC plan maintained under section 37 of the Children and Families Act 2014 (and any amendments to the statement or plan)	25 years after the pupil's date of birth
Information and advice provided to parents regarding SEND	25 years after the pupil's date of birth
Accessibility strategy	25 years after the pupil's date of birth
Medical Information	
Permission Slips (to administer medicine etc.)	For the duration of the period the medication is given plus 1 month
Information regarding medical conditions and their ongoing management	Whilst the pupil is at school plus 1 year
Information regarding medical incidents including those with a behavioural or safeguarding component	Date of birth plus 25 years
Curriculum management	
SAT and public examination results	25 years after the pupil's date of birth
Pupil Assessment and Attainment data	Added to pupil's record and retained for 25 years after the pupil's date of birth
Internal examination results	Added to the pupil's record and retained for 25 years after the pupil's date of birth
Published Admission Number (PAN) reports	Current academic year, plus 6 years
Valued added and contextual data	Current academic year, plus 6 years
Self-evaluation forms	Current academic year, plus 6 years



Type of file	Retention period
Pupils' work	Returned to pupils at the end of the academic year, or retained for the current academic year, plus 1 year
Exams Information	
Access Arrangements Information	Date of Birth plus 25 years
Awarding Body Administrative Information	To be retained until the current academic year update is provided
Attendance Registers (Copies)	Until after the exams reviews season
Candidates' Work	Until after the exams reviews season
Certificates	Awards evening plus 1 year
Certificate Destruction Information	To be retained for 4 years from the date of destruction
Certificates Issue Information	Until after the exams reviews season
Confidential Materials Delivery Logs	Until after the exams reviews season
Confidential Materials Tracking Logs	Until after the exams reviews season
Dispatch Logs	Until after the exams reviews season
Entry Information	Date of Birth plus 25 years
Exam Question Papers	Issued to teaching staff after the published finishing time of the exam and only when all candidates in the centre have completed the exam. Instructions issued by an individual awarding body relating to the use of question papers for vocational qualifications after the examination has taken place are followed
Exam Room Checklists	To be retained until after the deadline for Enquiries About Results(EARS) or until any appeal, malpractice or other results enquiry has been completed, whichever is later
Exam Room Incident Logs	Until after the exams reviews season
Exam Stationary	When awarding body or Joint Council for Qualifications (JCQ) common stationary is considered surplus or is out-of-date it will be disposed of
Examiner Reports	Date of Report, plus 2 years To be immediately provided to head of department as records owner
Exams Inspection Report	Date of Inspection, plus 5 years
Finance Information	To be returned to Finance department as records owner at the end of the academic year and retained for 6 years
JCQ Publications	To be retained until the current academic year update is provided
Moderator Reports	To be immediately provided to head of department as records owner
Overnight Supervision Information	To be retained for JCQ inspection purposes for the relevant exam series



Type of file	Retention period
Post Results Services: Confirmation of Candidate Consent Information	Until after the exams reviews season
Post Results Services: Requests/Outcome Information	Until after the exams reviews season
Post Results Services: Scripts Provided by ATS Service	Until after the exams reviews season
Post Results Services: Tracking Logs	Until after the exams reviews season
Proof of Postage – Candidate Work	Until after the exams reviews season
Resolving Clashes Information	Until after the exams reviews season
Results Information	Unclaimed certificates retained securely for minimum of 12 months from issue date. Signed collection sheets collated and retained for 4 years to identify and provide a record of collected and unclaimed certificates that have been destroyed.
Seating Plans	Until after the exams reviews season
Special Consideration Information	Until after the exams reviews season
Suspected Malpractice Reports/Outcomes	Until after the exams reviews season
Transfer of Credit Information	To be retained until the issue of the GCE A Level result for the candidate
Transferred Candidate Information	To be retained until the transfer arrangements are confirmed by the awarding body
Very Late Arrival Reports/Outcomes	Until after the exams reviews season
Examination papers	Until the appeals/validation process has been completed
Catering and free school meal management	
Meal administration	Whilst the pupil is at school, plus one year
Meal eligibility	Whilst the pupil is at school, plus five years
Extra-curricular activities	
Field File – information taken in school trip	Until the conclusion of the trip, plus one month. Where an incident occurs, field files should be added to the core file.
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip
Parental consent forms for school trips where a major incident occurred	Date of Birth plus 25 years permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils
Walking bus registers	Date of the register, plus 3 years
Family liaison officers and home-school liaison assistants	
Day books	Current academic year, plus 2 years
Reports for outside agencies	Duration of the pupil's time at school
Referral forms	Whilst the referral is current
Contact data sheets	Current academic year, reviewed and destroyed if no longer active
Contact data base entries	Current academic year, reviewed and destroyed if no longer active
Group registers	Current academic year, plus 2 years



Type of file	Retention period
Operational Administration	
Consent Record	Updated each year – retain until pupil leaves school plus 3 years
Home School Agreements	Updated each year – retain until pupil leaves school plus 1 Month
Photography and Video Consent Forms	Latest version – retain until pupil leaves school plus 1 Month
Bus Service Subscribers List	Updated each year – retain until pupil leaves school plus 1 Month
School Library system information	Updated each year – retain until pupil leaves school plus 1 Month
Biometric data	For the duration of the activity for which is required and consent has been sought, or whilst the pupil remains at the school, whichever is the less, plus one month

Retention of staff documentation

Type of file	Retention period
Operational	
Staff members' personal files and training records	Termination of employment, plus 6 years
Senior executives' records (SLT or equivalent) including appointment documentation	Permanently for historical purposes
Single Central Record	Termination of employment, plus 6 months
Staff Data Collection Sheet	Updated annually Termination of employment, plus 1 year
Absence Records	Termination of employment, plus 6 years
Return to Work Information	Termination of employment, plus 6 years
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	6 years from the date of redundancy
Timesheets	Current academic year, plus 6 years
Annual appraisal and assessment records	Termination of employment, plus 6 years
Wage/salary records (also overtime, bonuses, expenses)	6 years
Inland Revenue/HMRC approvals	Permanently
Income tax and NI returns, income tax records and correspondence with HMRC	Not less than 3 years after the end of the financial year to which they relate
Maternity/paternity/Parental leave	5 years from birth/adoption of the child or 18 years if the child receives a disability allowance
Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical evidence	3 years after the end of the tax year in which the maternity period ends
Statutory Sick Pay records, calculations, certificates, self-certificates	Termination of employment, plus 6 years
Records relating to children and young adults	Until the child/young adult reaches the age of 21
Retirement benefits records	6 years from the date of retirement
Actuarial valuation reports	Permanently
Pensioners' records	12 years after benefit ceases



Type of file	Retention period
Trade union agreements	10 years after ceasing to be effective
Annual appraisal records	Current academic year, plus five years
Consent Record	Updated each year – retain until staff member leaves employment plus 3 years
Photography and Video Consent Forms	Latest version – retain until staff member leaves employment plus 1 Month
Register of Business Interest	Retain until staff member leaves employment, plus 6 years
Recruitment	
Records relating to the appointment of a new Principal or Executive Principal	Permanently for historical purposes
Records relating to the appointment of new members of staff (unsuccessful candidates)	Date of appointment of successful candidate, plus 6 months
Records relating to the appointment of new members of staff (successful candidates)	Relevant information added to the member of staff's personal file. Other information - termination of employment, plus 6 years
DBS certificates	Keep in a separate file for six months. This information must not be retained on the personnel file
Proof of identify as part of the enhanced DBS check	Until DBS certificate is obtained and verified
Disqualification Declaration - for those staff who work in or manage educational settings for Pupils under 8	Retained as part of Personnel File Date of termination, plus 6 years
Evidence of right to work in the UK	Termination of employment, plus 2 years
Pre-Employment Medical Screening	Successful Candidate - Termination of employment, plus 6 years Candidate who has offer of employment withdrawn - Retained for 6 Months following date of appointment of successful candidate Retained if it is believed to be required for defence in the event of legal action
Disciplinary and grievance procedures	
Child protection allegations, including where the allegation is unfounded	Retain indefinitely in a file separate from the staff file in a separate locked cupboard
Child protection allegations where the allegation is founded	Retain indefinitely in a file separate from the staff file, and files related to unfounded allegations, in a separate locked cupboard
Oral warnings that don't relate to child protection/safeguarding cases	Record - Termination of employment, plus 6 years Letter regarding sanction – removed once sanction period has expired
Written warnings that don't relate to child protection/safeguarding cases – level 1	Record - Termination of employment, plus 6 years Letter regarding sanction – removed once sanction period has expired
Written warnings that don't relate to child protection/safeguarding cases – level 2	Record - Termination of employment, plus 6 years



Type of file	Retention period
	Letter regarding sanction – removed once sanction period has expired
Final warnings that don't relate to child protection/safeguarding cases	Record - Termination of employment, plus 6 years Letter regarding sanction – removed once sanction period has expired
Records relating to unproven incidents	Termination of employment, plus 6 years

Retention of senior leadership and management documentation

Type of file	Retention period
Governing board	
Agendas for Board of Trustees meetings, including Committees and Local Governing Bodies	One copy alongside the original set of minutes – all others disposed of without retention
Original, signed copies of the minutes of Board of Trustees meetings, including Committees and Local Governing Bodies	Permanent
Inspection copies of the minutes of Board of Trustees meetings, including Committees and Local Governing Bodies	Date of meeting, plus 6 years
Reports presented to the Board of Trustees, including Committees and Local Governing Bodies	Date of meeting, plus 6 years
Meeting papers relating to parents' meeting	Date of meeting, plus 6 years
Instruments of government, including Articles of Association	Permanent
Trusts and endowments managed by the Board of Trustees	Permanent
Policy documents created and administered by the Board of Trustees	Duration of the policy, plus 3 years
Records relating to complaints dealt with by the Trust	Date of the resolution of the complaint, plus 6 years Reviewed for further retention in case of contentious disputes If child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years
Proposals concerning significant changes	Date proposal accepted or declined, plus 3 years
Register of Business Interests	End of term of Trustee, Member, and Governor, plus 6 years
Chief Executive, Principal and Senior Leadership Team (SLT)	
Log books of activity in the school maintained by the Principal	Date of last entry, plus 6 years Reviewed and offered to the Star Central Team for archive purposes if appropriate
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus 3 years



Type of file	Retention period
Reports created by the Chief Executive, Principal or SLT	Date of the report, plus 3 years
Records created by the Chief Executive, Principal, SLT, Heads of Year and staff with administrative responsibilities	Current academic year, plus 6 years
Correspondence created by the Chief Executive, Principal, SLT, Heads of Year and staff with administrative responsibilities	Date of correspondence, plus 3 years
School development plan	Duration of the plan, plus 3 years

Retention of financial documentation

Type of file	Retention period
Payroll pensions	
Payroll Information	Termination of employment, plus 6 years
Maternity pay records	Current academic year, plus 3 years
Retirement Benefits Records	Current academic year, plus 6 years
Risk management and insurance	
Employer's liability insurance certificate	Closure of the establishment, plus 40 years
Asset management	
Inventories of furniture and equipment	Current academic year, plus 6 years
Burglary, theft and vandalism report forms	Current academic year, plus 6 years
Accounts and statements including budget management	
Annual Accounts	Current academic year, plus 6 years
Loans and grants managed by the school	Date of last payment, plus 12 years
All records relating to the creation and management of budgets	Duration of the budget, plus 3 years
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus 6 years
Records relating to the collection and banking of monies	Current financial year, plus 6 years
Records relating to the identification and collection of debt	Current financial year, plus 6 years
Contract management	
All records relating to the management of contracts under seal	Last payment on the contract, plus 12 years
All records relating to the management of contracts under signature	Last payment on the contract, plus 6 years
All records relating to the monitoring of contracts	Current academic year, plus 2 years
School fund	
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus 6 years
School meals	
Free school meals registers	Current academic year, plus 6 years
School meals registers	Current academic year, plus 3 years
School meals summary sheets	Current academic year, plus 3 years



Retention of health and safety documentation

Type of file	Retention period
Health and safety policy statements	Duration of policy, plus 3 years
Health and safety risk assessments (including DSE assessments)	Duration of risk assessment, plus 3 years
Records relating to accidents and injuries at work	Date of incident, plus 12 years In the case of serious accidents, date of incident, plus 15 years
Accident reporting – adults	Date of the incident, plus 6 years
Accident reporting – pupils	25 years after the pupil's date of birth
Control of substances hazardous to health	Current academic year, plus 40 years
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action, plus 40 years
Information relating to areas where employees and persons are likely to come into contact with radiation	Date of last action, plus 50 years
Fire precautions log books	Current academic year, plus 6 years
Business Continuity and Emergency Response Plan	Updated annually

Retention of other documentation

Type of file	Retention period
Property management	
Title deeds of properties	Permanent Transferred to new owners if the property is leased or sold
Plans of properties	For as long as the property is within ownership Transferred to new owners if the building is leased or sold
Leases of properties	Expiry of lease, plus 6 years
Records relating to the letting of premises	Current financial year, plus 6 years
Maintenance	
All records relating to the maintenance carried out by contractors	Current academic year, plus 6 years
All records relating to the maintenance carried out by school employees	Current academic year, plus 6 years
Operational administration	
Records relating to the creation and publication of the school brochure and/or prospectus	Current academic year, plus 3 years
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus 1 year
Newsletters and other items with short operational use	Current academic year, plus 1 year
External Speakers and Charitable Giving Information	Current academic year, plus 3 years
Visitors' books and signing-in sheets	Current academic year, plus 6 years
Information on signing-in systems	Current academic year, plus 6 years
ID/Swipe Cards	Until pupil or staff member leaves
Records relating to the creation and management of parent or pupil associations	Current academic year, plus 6 years



Type of file	Retention period
Photographs (Staff and Pupils)	<p>Images used in Identity System - date of leaving school plus 1 month</p> <p>Images used in displays in school - date of leaving plus 1 year</p> <p>Images used on website or for promotional purposes - date photograph taken plus 4 years.</p>
User Profiles	<p>Star Central CEO, Executive Directors and Principals – Termination of employment, plus 6 months</p> <p>All other members of staff – Termination of employment, plus 3 months</p> <p>The Line Manager must ensure the member of staff has transferred any required files into an agreed location before leaving and undertook a review themselves within this time period.</p> <p>Accounts cannot be deleted if an employment dispute is ongoing or if a Subject Access Request has been submitted.</p>
Staff Email Accounts	<p>Star Central CEO, Executive Directors and Principals – Termination of employment, plus 6 months</p> <p>All other members of staff – Termination of employment, plus 3 months</p> <p>The Line Manager must ensure the member of staff has transferred any required emails into an agreed location before leaving and undertook a review themselves within this time period.</p> <p>Accounts cannot be deleted if an employment dispute is ongoing or if a Subject Access Request has been submitted.</p> <p>For schools that have transferred to the Trust we will only migrate emails from the previous 12 months.</p>
CCTV Footage that has been Downloaded	<p>CCTV footage that has been downloaded in relation to an incident – 12 months or until the conclusion, or expiry, of any related action (police investigation, court/tribunal proceedings etc.)</p>
Library Usage Data	<p>Until pupil/staff member leaves school, plus 1 month</p>
School Census Information	<p>Retained in SIMS or on a CSV file if transferred from a legacy MIS.</p> <p>Follows pupil record retention date of birth plus 25 years</p>
Complaints dealt with by the school or the Principal	<p>Date of complaint, plus 3 years</p>



Type of file	Retention period
	Reviewed for further retention in the case of ongoing disputes with the family. If child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years
Internal and External Audit Reports	Date of Audit, plus 6 years
Statutory Requests for Information, Subject Access Requests and Freedom of Information Requests	Date of request, plus 2 years
Statutory Requests for Information, Subject Access Request and Freedom of Information Logs	End of Academic Year, plus 12 months
Data Breach Information	Date of breach, plus 6 years
Data Privacy Impact Assessment (DPIA)	Date of assessment, plus 6 years
Requests for Letters from Parents/Guardians	Date of request, plus 1 year

Retention of Star Institute documentation

Type of file	Retention period
Student Records	
Trainee Data	End of course, plus 7 years
NPQ Participant Data	End of course, plus 7 years

Disposal of documentation

- Where disposal of information is outlined as secure disposal, this will be shredded using a cross cut shredder, pulped or via a confidential waste management company and electronic information will be permanently electronically erased.
- The Data Protection Lead of each Establishment will maintain a record of information that has been disposed of on the **Establishment Record of Destruction**, please follow the guidance contained within the **Record of Destruction SOP**.