

**Date: May 2020**  
**Next review due: May 2021**  
**Responsibility: Bursar/Compliance Officer**



# **Dame Allan's Schools**

## **Retention of Records Policy**

## 1. This policy

1.1 The purpose of this policy is to inform the Dame Allan's Schools' community - which includes pupils, parents, staff, governors and suppliers - of the Schools' approach to the retention of documents.

1.2 This policy should be read in conjunction with the Schools' Privacy Notices and Data Protection Policy, which detail how the Schools process personal data. These are available on our website.

## 2. Periods for the retention of records

2.1 The following table sets out the usual period for retaining any document or record. If any document or record is required in connection with an ongoing legal case, an insurance claim or an investigation by a third party (for example, police, social services, HSE) it may be retained beyond the period indicated in the table.

2.2 All members of staff are responsible for complying with this policy and ensuring that all documents are stored securely and only retained for the appropriate period before being disposed of in an appropriate manner. Any breach of this policy may result in action being taken under the Schools' disciplinary policies.

<b>Record/Document</b>	<b>Retention Period</b>
<b><u>SCHOOL-SPECIFIC RECORDS</u></b>	
Registration documents of School	Permanent (or until closure of the school)
Minutes of Governors' meetings	6 years from date of meeting (then archive)
Annual curriculum	From end of year: 3 years (or 1 year for other class records: eg marks / timetables / assignments)
<b><u>INDIVIDUAL PUPIL RECORDS</u></b>	<b><i>NB – this will generally be personal data</i></b>
Admissions: application forms, assessments, records of decisions	25 years from date of birth (or, if pupil not admitted, up to 7 years from that decision)

<p>Examination results, coursework and certificates (external or internal)</p> <p>Attendance Records</p> <p>Pupil file including:</p> <ul style="list-style-type: none"> <li>● Pupil reports</li> <li>● Pupil performance records</li> <li>● Pupil medical records</li> </ul> <p>Special educational needs records (<i>to be risk assessed individually</i>)</p>	<p>Examination results - 7 years from pupil leaving school.</p> <p>Course work for external examinations - 7 years after the examination to which it relates, unless notified otherwise by examination board.</p> <p>Certificates for external examinations - 1 year after receipt if not collected</p> <p>3 years from date of last entry</p> <p>ALL: 25 years from date of birth (subject to where relevant to safeguarding considerations: any material which may be relevant to potential claims should be kept for the lifetime of the pupil).</p> <p>Date of birth plus up to 35 years (allowing for special extensions to statutory limitation period)</p>
<p><u>SAFEGUARDING</u></p> <p>Policies and procedures</p> <p>DBS disclosure certificates</p> <p>Accident / Incident reporting</p>	<p>Keep a permanent record of historic policies</p> <p><u>No longer than 6 months</u> from decision on recruitment, – but a record of the checks being made must be kept, if not the certificate itself.</p> <p>Keep on record for as long as any living victim may bring a claim (NB civil claim limitation periods can be set aside in cases of abuse).</p>

<p>Child Protection files</p>	<p>Ideally, files to be reviewed from time to time if resources allow and a suitably qualified person is available.</p> <p>If a referral has been made or where social care has been involved or the child has been subject of a multi-agency plan – indefinitely.</p> <p>If low level concerns, with no multi-agency action 25 years from date of birth.</p>
<p><u>ACCOUNTING RECORDS</u>  Accounting records – Prime documents – Invoices, Bank Statements</p> <p>Tax Returns</p> <p>Budgets and Internal Financial Reports</p>	<p>6 years from the end of the academic year in which the transaction took place</p> <p>6 Years</p> <p>3 Years</p>
<p><u>CONTRACTS AND AGREEMENTS</u>  Signed or final/concluded agreements (<i>plus any signed or final/concluded variations or amendments</i>)</p> <p>Deeds (or contracts under seal)</p>	<p>Minimum – 7 years from completion of contractual obligations or term of agreement, whichever is the later</p> <p>13 years from completion of contractual obligation or term of agreement</p>
<p><u>INTELLECTUAL PROPERTY RECORDS</u>  Formal documents of title (trade mark or registered design certificates; patent or utility model certificates)</p> <p>Assignments of intellectual property to or from the school</p>	<p>Permanent (in the case of any right which can be permanently extended, eg trade marks); otherwise expiry of right plus minimum of 7 years.</p> <p>As above in relation to contracts (7 years) or, where applicable, deeds (13 years).</p>

<p>IP / IT agreements (including software licences and ancillary agreements eg maintenance; storage; development; coexistence agreements; consents)</p>	<p>Minimum – 7 years from completion of contractual obligation concerned or term of agreement</p>
<p><u>EMPLOYEE / PERSONNEL RECORDS</u>  Single Central Record of employees</p> <p>Contracts of employment</p> <p>Employee appraisals or reviews</p> <p>Staff personnel file</p> <p>Payroll, salary, maternity pay records</p> <p>Pension or other benefit schedule records</p> <p>Job application and interview/rejection records (unsuccessful applicants)</p> <p>Immigration records/Right to Work in UK</p> <p>Health records relating to employees</p>	<p><b><i>NB this will contain personal data</i></b>  Keep a permanent record of all mandatory checks that have been undertaken (but not DBS certificate itself: 6 months as above)</p> <p>7 years from effective date of end of contract</p> <p>Duration of employment plus minimum of 7 years</p> <p>As above, but do not delete any information which may be relevant to historic safeguarding claims.</p> <p>6 years</p> <p>Possibly permanent, depending on nature of scheme</p> <p>Minimum 3 months but no more than 1 year</p> <p>2 years from end of contract of employment</p> <p>7 years from end of contract of employment</p>
<p><u>INSURANCE RECORDS</u>  Insurance policies (will vary – private, public, professional indemnity)</p>	<p>Duration of policy (or as required by policy) plus a period for any run-off arrangement and coverage of insured risks: ideally, until it is possible to calculate that no living person could make a claim</p>

Correspondence related to claims/renewals/ notification re: insurance	7 Years
<u>ENVIRONMENTAL, HEALTH &amp; DATA</u>	
Maintenance logs	10 years from date of last entry
Accidents to children	25 years from birth (longer for safeguarding)
Accident at work records (staff)	4 years from date of accident, but review case-by-case where possible
Staff use of hazardous substances	7 years from end of date of use
Risk assessments (carried out in respect of above)	7 years from completion of relevant project, incident, event or activity.
Data protection records documenting processing activity, data breaches	Permanently (as long as no personal data held)
Mandatory Training Records	7 Years
<u>PHOTOGRAPHIC IMAGES AND VIDEOS</u>	
Photographic images and video recordings of pupils, classes, teams and key events taking part at the Schools and/or during the course of extra-curricular activities, trips and tours	7 years from end of academic year in which the image was taken, unless the image is placed in the Schools' archives for historic and research purposes in which circumstances it may be retained indefinitely

DIGITAL DATA

Email accounts, including contents of all emails sent and received

Unless emails are required to be kept for other purposes (for example, safeguarding), emails are deleted or archived as follows:  
Pupils who leave the Schools before the end of Year 13 – email account deleted within 6 months of leaving;  
Pupils who leave the Schools at the end in Year 13 – email account deleted 3 months after leaving (unless they request that it remains open);  
Members of staff, except members of Senior Management Team – email account deleted within 1 year of leaving the Schools' employment;  
Members of Senior Management Team – email account deleted within 2 years of leaving the Schools; then contents archived.

All members of staff are instructed to review their email accounts and other digital documents at the end of each academic year and delete or archive emails and documents, as appropriate.