

**Date: February 2021**  
**Next review due: February 2022**  
**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 records.

1.2 A record is defined as any document or item of data which contains evidence of information relating to the Schools and any individual or company within their community - for example, pupils, parents, staff, governors, contractors, suppliers, volunteers. Some, but not all, of these records will contain personal data of individuals as defined by the General Data Protection Regulation 2018 (GDPR). Records can consist of original paper documents and those which are created, received and stored electronically.

1.3 This policy should be read in conjunction with the Schools' Privacy Notices and Data Protection Policy, which detail how the Schools handle, process and store personal data, including special category data. The Whole School Policy on the Acceptable Use of Electronic Devices and Information Technology Systems provides further details of how the Schools ensure electronic data is retained safely. These documents are available on the Schools' website.

## **2. Periods for the retention of records**

2.1 The following table sets out the usual period for retaining any record. If any 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. Appropriate documents may also be retained in the Schools' archives for historical and research purposes, as detailed in our Archives Policy.

2.2 All members of staff are responsible for complying with this policy and ensuring that all records 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.

RECORD/DOCUMENT	RETENTION PERIOD
<p><u>SCHOOL-SPECIFIC RECORDS</u></p> <p>Registration documents of the Schools</p> <p>Minutes of Governors' meetings</p> <p>Annual curriculum</p>	<p>Permanent (or until closure of the school)</p> <p>10 years from date of meeting (then archive)</p> <p>From end of academic year: 3 years (or 1 year for other class records: eg marks/timetables/assignments)</p>
<p><u>INDIVIDUAL PUPIL RECORDS</u></p> <p>Admissions: application forms, assessments, records of decisions</p> <p>Student immigration records</p> <p>Examination results, coursework and certificates (external or internal)</p> <p>Pupil file including:</p> <ul style="list-style-type: none"> <li>● Attendance records</li> <li>● Pupil reports</li> <li>● Pupil performance records</li> </ul>	<p><b><i>NB – these records will contain personal data</i></b></p> <p>25 years from date of birth (or, if pupil not admitted or their application is withdrawn, retained until they pass the last entry level into the Schools, unless parents notify us otherwise)</p> <p>Duration of student sponsorship plus minimum 1 year (depending on Home Office inspection)</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>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>

<ul style="list-style-type: none"> <li>● Pupil medical records (not accidents - see below)</li> </ul> <p>Special educational needs records (to be risk assessed individually)</p>	<p>Date of birth plus up to 35 years (allowing for special extensions to statutory limitation period)</p>
<p><u>SAFEGUARDING</u> (consists of paper and electronic records, including those kept on the CPOMS system)</p> <p>Policies and procedures</p> <p>DBS disclosure certificates</p> <p>Accident / Incident reporting</p> <p>Child Protection files</p> <p>Video recordings of meetings</p>	<p>Keep a permanent record of historic policies</p> <p><u>No longer than 6 months</u> from decision on recruitment, unless policy specifically consulted. A record of the checks being made must be kept on the SCR/HR file, 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). Ideally, files to be reviewed from time to time if resources allow and a suitably qualified person is available</p> <p>Indefinitely, if a referral has been made, where social care has been involved, the child has been subject of a multi-agency plan or if there is any risk of a future claim(s)</p> <p>If low level concerns, with no multi-agency action, 25 years from date of birth</p> <p>Where, for example, one-on-one meetings with pupils, counselling or application interviews are recorded for safeguarding purposes, a shorter retention period will be instigated based on the DSL's view of how quickly a concern is likely to be raised (this could be 3-6 months or immediately upon DSL review)</p>

	See digital data section for other recordings of online lessons and other meetings
<u>CORPORATE RECORDS (relating to our charitable status)</u>	
Certificates of Incorporation	Permanent (or until dissolution)
Minutes, notes and resolutions of boards or management meetings	10 years minimum
Register of members	Permanent (minimum 10 years for ex-members)
Annual reports	6 years minimum
<u>ACCOUNTING RECORDS</u>	
Accounting records (prime documents, including invoices, bank statements)	6 years minimum from the end of the academic year in which the transaction took place
Tax returns	6 years minimum
Budgets and internal financial reports	3 years minimum
<u>CONTRACTS AND AGREEMENTS</u>	
Signed or final/concluded agreements ( <i>plus any signed or final/concluded variations or amendments</i> )	Minimum – 7 years from completion of contractual obligations or term of agreement, whichever is the later
Deeds (or contracts under seal)	Minimum 13 years from completion of contractual obligation or term of agreement
<u>INTELLECTUAL PROPERTY RECORDS</u>	

<p>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 Schools</p> <p>IP/IT agreements (including software licences and ancillary agreements; for example, maintenance, storage, development, coexistence agreements, consents)</p>	<p>Permanent (in the case of any right which can be permanently extended, for example: 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>Minimum – 7 years from completion of contractual obligation concerned or term of agreement</p>
<p><u>EMPLOYEE/PERSONNEL/HR RECORDS</u></p> <p>Single Central Record of employees</p> <p>Contracts of employment</p> <p>Employee appraisals or reviews</p> <p>Staff HR/personnel file, including any documents relating to capability, grievance or disciplinary</p> <p>Payroll, salary, maternity pay records</p> <p>Pension or other benefit schedule records</p>	<p><b><i>NB these records will contain personal data</i></b></p> <p>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>Duration of employment plus minimum of 7 years, but do not delete any information which may be relevant to safeguarding</p> <p>Minimum 6 years from the end of the financial year to which they relate</p> <p>Possibly permanent (i.e. lifetimes of those involved), depending on nature of scheme</p>

<p>Job application and interview/rejection records (unsuccessful applicants)</p> <p>Immigration records/Right to Work in UK</p> <p>Tier 2 migrant worker sponsor records</p> <p>Health records relating to employees</p>	<p>Minimum 3 months but no more than 1 year</p> <p>Minimum 2 years from end of contract of employment</p> <p>Minimum 1 year from end of employment</p> <p>7 years from end of contract of employment</p>
<p><u>INSURANCE RECORDS</u></p> <p>Insurance policies (will vary – private, public, professional indemnity)</p> <p>Correspondence related to claims/renewals/ notification re: insurance</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> <p>Minimum 7 years (but this will depend on what the policy covers and whether, for example, historic claims may still be made)</p>
<p><u>ENVIRONMENTAL, HEALTH &amp; DATA</u></p> <p>Maintenance logs</p> <p>Accidents to children</p> <p>Accident at work records (staff)</p> <p>Staff use of hazardous substances</p>	<p>10 years from date of last entry</p> <p>25 years from birth (longer for safeguarding or if possibility of latent injury claims)</p> <p>Minimum 4 years from date of accident, but review case-by-case where possible</p> <p>Minimum 7 years from end of date of use (retain for longer if there is a possibility of latent injury claims)</p>

<p>Mandatory Training Records</p> <p>Risk assessments (carried out in respect of above)</p> <p>Covid-19 risk assessments, consent, notices</p> <p>Article 30 GDPR and other data protection records documenting processing activities, data breach records, impact assessments</p>	<p>Minimum 7 years from completion of training</p> <p>7 years from completion of relevant project, incident, event or activity (retain for longer if there is a possibility of latent injury claims)</p> <p>Retain until further guidance has been issued; different retention periods apply in respect of testing data, which are set out in the privacy notices which apply to the differing types of testing of pupils and/or staff</p> <p>Permanently (as long as no personal data held), but must be kept up-to-date, accurate and relevant</p>
<p><u>PHOTOGRAPHIC IMAGES AND VIDEOS</u></p> <p>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</p>	<p>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, in accordance with the Archives Policy</p>
<p><u>DIGITAL DATA</u></p> <p>Email accounts, including contents of all emails sent and received, digital documents stored on the Schools' network/cloud</p>	<p>Unless emails are required to be kept for other purposes (for example, safeguarding), emails are deleted or archived as follows:</p> <p>Pupils who leave the Schools before the end of Year 13 – email account deleted within 6 months of leaving;</p> <p>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);</p> <p>Members of staff, except members of Senior Management Team – email account deleted within 1 year of leaving the Schools' employment;</p>

<p>Recordings of online lessons and meetings (staff, departmental, governors etc) (using google classroom, google meet and other platforms)</p>	<p>Members of Senior Management Team – email account deleted within 2 years of leaving the Schools; then contents archived.</p> <p>All members of staff are instructed to review their email accounts and other digital documents on a regular basis and certainly at the end of each academic year and delete or archive emails and documents, as appropriate.</p> <p>Unless required to be retained for safeguarding purposes (and not retained within the CPOMS system), delete by the end of the term following the term in which the recording was made (i.e. recordings made in Autumn term should be deleted by the end of Spring term)</p>
<p><u>COMPLAINTS</u></p> <p>Records of complaints made by parents in accordance with the Complaints Policy</p>	<p>Complaints, which do not involve safeguarding - minimum 7 years</p> <p>Complaints, which do involve safeguarding - for the term of the independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if this is longer</p>
<p><u>APPLICATIONS FOR BURSARIES</u></p> <p>Financial information and documentation relating to applications for bursaries</p>	<p>Successful applications - retain until that student leaves the Schools</p> <p>Unsuccessful applications - retain for 1 year from the date of the application; then destroy</p>