THE AMERICAN SCHOOL IN ENGLAND

Records Retention Policy

This policy applies to the whole school including our Boarding and the Early Years Programs.
The current version of any policy, procedure, protocol or guideline is the version held on the TASIS England website. It is the responsibility of all staff to ensure that they are following the current version.

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Responsible area	Head of School

Agreed by:

Head of School	**Chair of the Board**
Bryan Nixon	David King
01 November 2025	01 November 2025

1. Related Policies

1.1. This policy refers to other TASIS England policies within the text and the following should be read/referred to in conjunction with this policy:

a. Data Protection Policy
b. Online Safety Policy
c. Code of Conduct Policy for Faculty and Staff
d. Confidentiality and Information Sharing Policy

1.2. These policies can be accessed via the TASIS England website.

2. Purpose

2.1. The purpose of this policy is to specify TASIS England's guidelines for retaining different types of personal data and a structured approach to reviewing and destroying records in relation to the school.

3. Scope

3.1. The scope of this policy covers all the school's data and information stored on company-owned, company-leased, and otherwise company-provided systems and media, regardless of location. These records may be created, received or maintained in hard copy or electronically.

4. Policy Statement

4.1. The need to retain records and data varies widely with the type of data. Some personal data can be immediately deleted once the purpose for it being held has been completed, and some must be retained until reasonable potential for future need no longer exists.

4.2. This policy provides guidelines to ensure that all applicable regulations and the school's rules on records and data retention are consistently applied throughout the school.

5. Reasons for records and data retention

5.1. Some records and data must be retained in order to protect the school's interests, comply with regulatory requirements, preserve evidence, and generally conform to good practices. Data and information may be retained for one or several of the following reasons:

a. Legal requirements
b. Regulatory requirements
c. Possible litigation
d. Accident investigation
e. Security incident investigation
f. Intellectual property preservation

6. Retention periods

6.1. Different types of data will be retained for different periods of time. For more details, please refer to **Appendix 1 – Records and Data Retention Schedule** below.

7. Retention of encrypted data

7.1. If any information retained under this policy is stored in an encrypted format, considerations must be taken for secure storage of the encryption keys. Encryption keys must be retained as long as the data that the keys decrypt is retained.

8. Data duplication

8.1. When identifying and classifying the school's personal data, it is important to also understand where that data may be stored, particularly for duplicate copies, so that this policy may be applied to all duplicates of the information and the data is discoverable to meet Subject Access Requests (refer to our Data Protection Policy). Personal data should

not be duplicated unless necessary to perform the process for which it is held.

9. Data destruction

9.1. When the retention timeframe expires, we will actively destroy the records and data covered by this policy in a confidential manner (e.g. shredding for paper records). For destruction of electronic storage devices or other non-paper records, please contact the IT Manager for guidance. If a processor/user (i.e. member of faculty or staff) feels that certain data should not be destroyed, they should identify the data to their supervisor so that an exception to the policy can be considered. Since this decision has long-term legal implications, exceptions will only be approved by a member or members of the school's Senior Leadership Team (SLT).

9.2. The school specifically directs users not to destroy data in violation of this policy. Destroying data that a user may feel is harmful to themselves or destroying data in an attempt to cover up a violation of law or school policy is forbidden.

10. Responsibilities

10.1. The Head of School has primary and day-to-day responsibility for implementing this policy.

10.2. The Data Protection Officer (DPO – David Harris – dharris@tasisengland.org), in conjunction with the school is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The DPO will consider the suitability and adequacy of this policy and report improvements directly to management. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate training where required.

11. Compliance, monitoring and review

11.1. All school faculty and staff are responsible for processing personal data in full compliance with this and all related and relevant policies and procedures.

12. Reporting in case of a personal data breach

12.1. In the case of possible data breach, the faculty or staff member(s) who first identifies the breach or incident must immediately report all details of the incident to the DPO. The DPO is required to deal with and report a personal data breach in accordance with the school's Data Breach Procedure.

13. Records management

13.1. Staff must maintain all records relevant to administering this policy and procedure in electronic form in a recognised school recordkeeping system.

Appendix 1 – Records and Data Retention Schedule

Governors

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Principal set Minutes (signed)	No	None	Permanent	Retain in school for 6 years from date of meeting	Transfer to Archives
Inspection copies	No	None	Date of meeting + 3 years	Destroy	
Agendas	No	None	Date of meeting	Destroy	
Reports	No	None	Date of report + 6 years	Retain in school for 6 years from date of meeting	Transfer to Archives
Instruments of Government	No	None	Permanent	Retain in school	Transfer to Archives when the school has closed
Trusts and Endowments	No	None	Permanent	Retain in school whilst operationally required	Transfer to Archives
Action Plans	No	None	Date of action plan + 3 years	Destroy	It may be appropriate to offer to the Archives
Policy documents	No	None	Expiry of policy	Retain in school whilst policy is operational	Transfer to Archives
Complaints (Parents, Students, Boarders); Whistleblowing; and	Yes	None	Date of resolution of complaint + 6 years	Retain in school for the first six years. Review for further retention in the case of contentious disputes/legal proceedings	Destroy routine complaints

Management

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Log Books	Yes	None	Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry.	Transfer to the Archives

Minutes of the Senior Management Team and other internal administrative bodies	Yes	None	Date of meeting + 5 years	Retain in the school for 5 years from meeting	Transfer to the Archives
Reports made by the head teacher or the management team	Yes	None	Date of report + 3 years	Retain in the school for 3 years from meeting	Transfer to the Archives
Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes	None	Closure of file + 6 years	Destroy	
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes	None	Date of correspondence + 3 years	Destroy	
Professional development plans	Yes	None	Closure + 6 years	Destroy	
School development plans	No	None	Closure + 6 years	Review	Offer to the Archives

Admissions

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Admissions – if the application results in enrolment of the child	Yes	None	DOB of the student + 25 years	Destroy
Admissions – if the application is unsuccessful or child does not enrol/take up offered place	Yes	None	Closure of application + 3 years	Destroy

Child Protection

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Child Protection files	Yes	Education Act 2002, related guidance "Safeguarding Children in Education", September 2004	Date of leaving + 25 years	Destroy	Child Protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (the information does not need to be sent to a university)

					Where a child is removed from roll to be educated at home, the file should be copied to the Local Authority.
Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance) Education Act 2002 guidance "Dealing with Allegations of Abuse against Teachers and Other Staff" November 2005	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer	Destroy	The following is an extract from "Safeguarding Children and Safer Recruitment in Education" p60: "Record Keeping 5.10 It is important that a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's confidential personnel file, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. It will provide clarification in cases where a future DBS Disclosure reveals information from the police about an allegation that did not result in a criminal conviction. And it will help to prevent unnecessary reinvestigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer."

Curriculum

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
School syllabus	No	None	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or Destroy
Schemes of work	No	None	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or Destroy

Timetable	No	None	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or Destroy
Class record books	No	None	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or Destroy
Mark Books	No	None	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or Destroy
Record of homework set	No	None	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or Destroy
Students' work	No	None	Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or Destroy

Students

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Admission Registers	Yes	None	Date of last entry in the book (or file) + 6 years	Retain in the school for 6 years from the date of the last entry.
Attendance registers	Yes	None	Date of register + 3 years	Destroy - If these records are retained electronically any back up copies should be Destroyed at the same time
Examination results				
● Public examination results	No	None	Year of examinations + 6 years	Destroy - Any certificates left unclaimed should be returned to the appropriate Examination Board
● Internal examination results	Yes	None	Current year + 5 years	Destroy - If these records are retained on the student file or in their National Record of Achievement they need only be kept for as long as operationally necessary.
Transcripts	Yes	None	Indefinitely	Meet school's obligation to maintain factual information on what Students have studied and achieved – perhaps for the life of the Student
Any other records created in the course of contact with students	Yes	None	Current year + 3 years	Review at the end of 3 years and either allocate a further retention period or Destroy
Statement maintained under The Education Act 1996 - Section 324	Yes	SEN and Disability Act 2001 Section 1	DOB + 30 years	Destroy unless legal action is pending
Proposed statement or amended statement	Yes	SEN and Disability Act 2001 Section 1	DOB + 30 years	Destroy unless legal action is pending
Advice and information to parents regarding educational	Yes	SEN and Disability Act 2001 Section 1	Closure + 12 years	Destroy unless legal action is pending

needs				
Accessibility Strategy	Yes	SEN and Disability Act 2001 Section 1	Closure + 12 years	Destroy unless legal action is pending
Children's SEN Files	Yes	None	DOB of student + 25 years then review – it may be appropriate to add an additional retention period in certain cases	Destroy unless legal action is pending
Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980	DOB of the student involved in the incident + 25 years The permission slips for all students on the trip need to be retained to show that the rules had been followed for all students	Destroy
Parental permission slips for school trips – where there has been no major incident	Yes	None	Conclusion of the trip	Destroy
Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Pre K to Grade 4	N	3 part supplement to the Health & Safety of Students on Educational Visits (HASPEV) (1998).	Date of visit + 14 years	Destroy
Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Grades 5 to 8 and Upper Schools	No	3 part supplement to the H&S of Students on Educational Visits (HASPEV) (1998).	Date of visit + 10 years	Destroy

Personnel/Human Resources Records

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Timesheets, sick pay	Yes	Financial Regulations	Current year + 7 years	Destroy

Records relating to Working Time	Yes	The Working Time Regulations 1998 (SI 1998/1833).	2 years from date on which they were made.	Destroy
Staff Personal files	Yes	None	Termination + 7 years	Destroy
Interview notes and recruitment records	Yes	None	Date of interview + 6 months	Destroy
Pre-employment vetting information (including DBS checks)	No	DBS guidelines	Date of check + 6 months	Destroy [by the designated member of staff]
Disciplinary proceedings		Where the warning relates to child protection issues see "Child Protection - Allegation of a child protection nature against a member of staff, including where the allegation is unfounded". If the disciplinary proceedings relate to a child protection matter, please contact DSL for further advice.		
Oral warning – issues of concern	Yes	ACAS Code of Practice	Date of warning + 12 months	Destroy - if placed on Personal File it must be "weeded" from there.
Written warning – level one/first	Yes	ACAS Code of Practice	Date of warning + 12 to 18 months	Destroy - if placed on Personal File it must be "weeded" from there.
Written warning – level two/second	Yes	ACAS Code of Practice	Date of warning + 12 to 18 months	Destroy - if placed on Personal File it must be "weeded" from there.
Final warning	Yes	ACAS Code of Practice	Date of warning + 18 months	Destroy - if placed on Personal File it must be "weeded" from there.
Case not substantiated	Yes	None	If child protection related please see above, otherwise destroy at the conclusion of the case	Destroy
Records relating to accident/ injury at work	Yes	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended, and Limitation Act 1980. Special rules apply concerning incidents involving hazardous substances	Date of incident + 12 years In the case of serious accidents, a further retention period will need to be applied	Destroy
Annual appraisal/assessment records	Yes	None	Current year + 5 years	Destroy
Wage/salary records (also overtime, bonuses, expenses)	Yes	Taxes Management Act 1970.	6 years	Destroy

Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year +3yrs	Destroy
Income tax and NI returns, income tax records and correspondence with HMRC	Yes	The Income Tax (Employments) Regulations 1993 (SI 1993/744) as amended, for example by The Income Tax (Employments) (Amendment No. 6) Regulations 1996 (SI 1996/2631)	Not less than 3 years after the end of the financial year to which they relate.	Destroy
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	The Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	Current year + 6 years	Destroy
Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	Yes	None	Where possible these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be placed on the member of staff's personal file.	Destroy

Administrative

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record	
Employer's Liability certificate	No	None	Closure of the school + 40 years	Destroy	
Inventories of equipment and furniture	No	None	Current year + 7 years	Destroy	
General file series	No	None	Current year + 5 years	Review to see whether a further retention period is required	Transfer to Archives
School brochure or prospectus	No	None	Current year + 3 years	Transfer to Archives	
Circulars (staff/parents/students)	No	None	Current year + 1 year	Destroy	
Newsletters, ephemera	No	None	Current year + 1 year	Review to see whether a further retention period is required	Transfer to Archives

Visitors' book	Yes	None	Current year + 2 years	Review to see whether a further retention period is required	Destroy – unless required for retention for legal purposes
Alumni	Yes	None	Current year + 6 years	Review to see whether a further retention period is required – consent required	Destroy or, where appropriate, transfer to archives

Health and Safety

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Accessibility Plans	Yes	Disability Discrimination Act	Current year + 6 years	Destroy
Accident Reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
Adults	Yes	None	Date of incident + 7 years	Destroy
Children	Yes	None	DOB of child + 25 years	Destroy
COSHH		None	Current year + 10 years [where appropriate an additional retention period may be allocated]	Destroy
Incident reports	Yes	None	Current year + 20 years	Destroy
Policy Statements	No	None	Date of expiry + 1 year	Destroy
Risk Assessments	Yes	None	Current year + 3 years	Destroy
Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	Yes	None	Last action + 40 years	Destroy

Process of monitoring of areas where employees and persons are likely to have come in contact with radiation	Yes	None	Last action + 50 years	Destroy
Fire Precautions log books	Yes	None	Current year + 6 years	Destroy

Property

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Title Deeds	No	Permanent	Permanent these should follow the property unless the property has been registered at the Land Registry	Offer to Archives if the deeds are no longer needed
Plans	No	Permanent	Retain in school whilst operational	Offer to Archives
Maintenance and contractors	No	Financial Regulations	Current year + 7 years	Destroy
Leases	No	None	Expiry of lease + 6 years	Destroy
Lettings	No	None	Current year + 3 years	Destroy
Burglary, theft and vandalism report forms	Yes	None	Current year + 6 years	Destroy
Maintenance logbooks	No	None	Last entry + 10 years	Destroy
Contractors' Reports	No	None	Current year + 6 years	Destroy

Financial/Tax Records

Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of the administrative life of the record
Accounting records	no (public document)	The Companies Act 2006	The Companies Act 2006 determines that financial records are kept for 6 years from the end of the financial year to which they relate. All records that support the annual accounts are,	Destroy

			therefore, retained for the same period	
Bank statements	yes	Within the above	6 years from the end of relating financial year	Destroy
Purchase Invoices	yes	Within the above	6 years from the end of relating financial year	Destroy
Sales invoices	yes	Within the above	6 years from the end of relating financial year	Destroy
Business milage and expenses records	yes	Within the above	6 years from the end of relating financial year	Destroy
Business assets and liabilities	yes	Within the above	6 years from the end of relating financial year	Destroy, unless records required for capital allowance consideration
Bank loans, debentures, mortgages	yes	Within the above	6 years from the end of relating financial year	Destroy, unless secured on property, in which case retain indefinitely
Tax returns	yes	Within the above	6 years from the end of relating financial year	Destroy
VAT returns	yes	Record keeping (VAT Notice 700/21)	6 years from the end of relating financial year	Destroy