



Dair House School

Retention of Records Policy



Monitoring: Bursar Updated: November 2018 Review: August 2019

The purpose of the retention of records policy

The retention of records policy lays down in Appendix A the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use.

Members of staff are expected to manage their current record keeping systems using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems.

The retention schedule refers to all information, regardless of the media in which they are stored.

What to do with records once they have reached the end of their administrative life

Destruction of records

Where records have been identified for destruction they should be disposed of in an appropriate way. All records containing personal information, or sensitive policy information should be shredded before disposal.

Transfer of records to the Archives

Where records have been identified as being worthy of permanent preservation, arrangements should be made to transfer the records to the Archives.

Transfer of information to other Media

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

Appendix A

<p><u>SCHOOL-SPECIFIC RECORDS</u> Registration documents of School Attendance Register Minutes of Governors' meetings Annual curriculum</p>	<p>Permanent (or until closure of the school) 6 years from last date of entry, then archive.</p> <p>6 years from date of meeting</p> <p>From end of year: 3 years (or 1 year for other class records: eg marks / timetables / assignments)</p>
<p><u>INDIVIDUAL PUPIL RECORDS</u> Admissions: application forms, assessments, records of decisions Examination results (external or internal) Pupil file including:</p> <ul style="list-style-type: none"> o Pupil reports o Pupil performance records o Pupil medical records <p>Special educational needs records (<i>to be risk assessed individually</i>)</p>	<p><i>NB – this will generally be personal data</i> 25 years from date of birth (or, if pupil not admitted, up to 7 years from that decision).</p> <p>7 years from pupil leaving school</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 DBS disclosure certificates (if held)</p> <p>Accident / Incident reporting</p> <p>Child Protection files</p>	<p>Keep a permanent record of historic policies <u>No longer than 6 months</u> from decision on recruitment, unless DBS specifically consulted – 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). Ideally, files to be reviewed from time to time if resources allow and a suitably qualified person is available. ²</p> <p>If a referral has been made / social care have been involved or child has been subject of a multi-agency plan – indefinitely.</p> <p>If low level concerns, with no multi-agency act – apply applicable school low-level concerns policy rationale (this may be 25 years from date of birth OR indefinitely).</p>
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<p><u>CORPORATE RECORDS (where applicable)</u></p> <p>Certificates of Incorporation</p> <p>Minutes, Notes and Resolutions of Boards or Management Meetings</p> <p>Shareholder resolutions</p> <p>Register of Members/Shareholders</p> <p>Annual reports</p>	<p><i>eg where schools have trading arms</i></p> <p>Permanent (or until dissolution of the company)</p> <p>Minimum – 10 years</p> <p>Minimum – 10 years</p> <p>Permanent (minimum 10 years for ex-members/shareholders)</p> <p>Minimum – 6 years</p>
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<p><u>ACCOUNTING RECORDS</u>³ Accounting records (<i>normally taken to mean records which enable a company's accurate financial position to be ascertained & which give a true and fair view of the company's financial state</i>) <u>[NB specific ambit to be advised by an accountancy expert]</u></p> <p>Tax returns</p> <p>VAT returns</p> <p>Budget and internal financial reports</p>	<p>Minimum – 3 years for private UK companies (except where still necessary for tax returns) Minimum – 6 years for UK charities (and public companies) from the end of the financial year in which the transaction took place Internationally: can be up to 20 years depending on local legal/accountancy requirements</p> <p>Minimum – 6 years</p> <p>Minimum – 6 years</p> <p>Minimum – 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>Minimum – 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>IP / IT agreements (including software licences and ancillary agreements eg maintenance; storage; development; coexistence agreements; consents)</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>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 Contracts of employment</p> <p>Employee appraisals or reviews Staff personnel file</p> <p>Payroll, salary, maternity pay records Pension or other benefit schedule records</p> <p>Job application and interview/rejection records (unsuccessful applicants)</p> <p>Immigration records Health records relating to employees</p>	<p><i>NB this will contain personal data</i> Keep a permanent record of all mandatory checks that have been undertaken (but <u>not</u> 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 As above, but <u>do not delete any information which may be relevant to historic safeguarding claims.</u></p> <p>Minimum – 6 years</p> <p>Possibly permanent, depending on nature of scheme</p> <p>Minimum 3 months but no more than 1 year</p> <p>Minimum – 4 years</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>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</p>
<p><u>ENVIRONMENTAL, HEALTH & DATA</u> Maintenance logs Accidents to children ⁴</p> <p>Accident at work records (staff) ⁴</p>	<p>10 years from date of last entry 25 years from birth (longer for safeguarding)</p> <p>Minimum – 4 years from date of accident, but review case-by-case where possible</p>

Staff use of hazardous substances ⁴	Minimum – 7 years from end of date of use
Risk assessments (carried out in respect of above) ⁴	7 years from completion of relevant project, incident, event or activity.
Data protection records documenting processing activity, data breaches	No limit: as long as up-to-date and relevant (as long as no personal data held)