



AMESBURY SCHOOL  
HINDHEAD

# **POLICY FOR STORING AND RETENTION OF RECORDS AND DOCUMENTS**

## Policy for storing and retention of records and documents

Amesbury has developed this policy with reference and guidance from the ISBA.

Any queries or questions on this policy should be referred to the Finance Office.

### TABLE OF RETENTION PERIODS

Type of Record/Document	<u>Suggested</u> Retention Period
<u>SCHOOL-SPECIFIC RECORDS</u>	
<ul style="list-style-type: none"> <li>• Registration documents of School</li> <li>• Attendance Register</li> <li>• Minutes of Governors' meetings</li> <li>• Annual curriculum</li> <li>• Lunch Register</li> <li>• Prep Register</li> </ul>	Permanent (or until closure of the school)  6 years from last date of entry, then archive.  6 years from date of meeting  From end of year: 3 years (or 1 year for other class records: e.g. marks / timetables / assignments)  Current Term  Current academic year
<u>INDIVIDUAL PUPIL RECORDS</u>	<b><i>NB – this will generally be personal data</i></b>
<ul style="list-style-type: none"> <li>• Admissions: application forms, assessments, records of decisions</li> <li>• Immigration Records</li> <li>• Examination results (external or internal)</li> <li>• Pupil file including:               <ul style="list-style-type: none"> <li>- Pupil reports and performance records</li> <li>- Pupil medical records</li> </ul> </li> <li>• Special educational needs records (<i>to be risk assessed individually</i>)</li> <li>• Pastoral meeting notes</li> <li>• Early Years funding records</li> <li>• Trip letters and consents</li> <li>• Boarding Consent</li> </ul>	25 years from date of birth (or up to 7 years from the pupil leaving). If unsuccessful: up to 1 year.  Duration of student sponsorship plus min. 1 year  7 years from pupil leaving school  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).  Date of birth plus up to 35 years (allowing for special extensions to statutory limitation period)  7 years from pupil leaving school, unless held as part of safeguarding evidence file  7 years  Current academic year  Current academic year

<p><u>SAFEGUARDING</u></p> <ul style="list-style-type: none"> <li>• Policies and procedures</li> <li>• DBS disclosure certificates (if held)</li> <li>• Accident / Incident reporting</li> <li>• Child Protection files and specific records of child sexual abuse</li> <li>• Visitor records</li> </ul>	<p>Keep a permanent record of historic policies</p> <p><u>No longer than 6 months</u> from decision on recruitment, unless police specifically consulted – but a record of the checks being made must be kept on the SCR, but 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>If a referral has been made / social care have been involved / child has been subject of a multi-agency plan; or if any risk of future claim(s): 75 years.</p> <p>1 Year</p>
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<p><u>CORPORATE RECORDS (where applicable)</u></p> <ul style="list-style-type: none"> <li>• Certificates of Incorporation</li> <li>• Minutes, Notes and Resolutions of Boards or Management Meetings</li> <li>• Shareholder resolutions</li> <li>• Register of Members/Shareholders</li> <li>• Annual reports</li> </ul>	<p><b><i>eg where schools have trading arms</i></b></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>
<p><u>ACCOUNTING RECORDS</u></p> <ul style="list-style-type: none"> <li>• Accounting records (<i>normally taken to mean records which enable a company's accurate financial position to be ascertained &amp; which give a true and fair view of the company's financial state</i>)</li> <li>• Tax returns</li> <li>• VAT returns</li> <li>• Budget and internal financial reports</li> <li>• Bursary applications</li> </ul>	<p>Minimum – 6 years for UK charities (and public companies) from the end of the financial year in which the transaction took place</p> <p>Minimum – 6 years</p> <p>Minimum – 6 years</p> <p>Minimum – 3 years</p> <p>Minimum 1 year from pupil leaving school</p>

<p><u>CONTRACTS AND AGREEMENTS</u></p> <ul style="list-style-type: none"> <li>Signed or final/concluded agreements (<i>plus any signed or final/concluded variations or amendments</i>)</li> <li>Deeds (or contracts under seal)</li> </ul>	<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></p> <ul style="list-style-type: none"> <li>Formal documents of title (trade mark or registered design certificates; patent or utility model certificates)</li> <li>Assignments of intellectual property to or from the school</li> <li>IP / IT agreements (including software licences and ancillary agreements e.g. maintenance; storage; development; coexistence agreements; consents)</li> </ul>	<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></p> <ul style="list-style-type: none"> <li>Single Central Record of employees</li> <li>Contracts of employment</li> <li>Employee appraisals or reviews</li> <li>Staff personnel file</li> <li>Payroll, salary, maternity pay records</li> <li>Pension or other benefit schedule records</li> <li>Job application and interview/rejection records (unsuccessful applicants)</li> <li>Immigration records</li> <li>Health records relating to employees</li> <li>Low-level concerns about employees</li> </ul>	<p><b><i>NB this will contain personal data</i></b></p> <p>Keep a permanent record that mandatory checks have been undertaken (but do <u>not</u> keep DBS certificate information 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 <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>7 years from end of contract of employment unless forming part of a safeguarding file</p>

<p><u>INSURANCE RECORDS</u></p> <ul style="list-style-type: none"> <li>Insurance policies (will vary – private, public, professional indemnity)</li> <li>Correspondence related to claims/ renewals/ notification re: insurance</li> </ul>	<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 &amp; DATA</u></p> <ul style="list-style-type: none"> <li>Maintenance logs</li> <li>Accidents to children</li> <li>Accident at work records (staff)</li> <li>Staff use of hazardous substances</li> <li>Covid-19 risk assessments, consents etc. <i>(for now: this to be subject to further review)</i></li> <li>Risk assessments (carried out in respect of above)</li> <li>Art.30 GDPR records of processing activity, data breach records, impact assessments</li> </ul>	<p>10 years from date of last entry</p> <p>25 years from birth. Indefinite for safeguarding</p> <p>Minimum – 4 years from date of accident, but reviewed case-by-case where possible</p> <p>Minimum – 7 years from end of date of use</p> <p>Retain for now legal paperwork (consents, notices, risk assessments) but not individual test results</p> <p>7 years from completion of relevant project, incident, event or activity.</p> <p>No limit (as long as no personal data held), but must be kept up-to-date, accurate and relevant.</p>
<p><u>EMAILS ON SERVER</u></p> <ul style="list-style-type: none"> <li>Pupil</li> <li>Staff</li> </ul>	<p>Within 1 term of leaving school</p> <p>Routine purge of e-mails over 3 years old</p> <p>Mailbox deleted within 1 year of leaving school</p>
<p><u>CCTV</u></p>	<p>30 days unless forming part of a safeguarding file</p>

## FOOTNOTES

General basis of suggestion:

- Some of these periods will be mandatory legal requirements (e.g. under the Companies Act 2006 or the Charities Act 2011, depending on status), but in the majority of cases these decisions are up to the institution concerned. The suggestions will therefore be based on practical considerations for retention such as limitation periods for legal claims, and guidance from Courts, weighed against whether there is a reasonable argument in respect of data protection.

2. The High Court has found that a retention period of 35 years was within the bracket of legitimate approaches for retaining safeguarding records. IICSA has recommended that, for child sexual abuse records, the period should be 75 years, and subject to regular review. The ICO (Information Commissioner's Office) also expects to see a regular review policy in place (e.g. every 6 years), although the High Court also held that could be a disproportionate use of resource for many organisations' safeguarding teams. The position is likely to be different for records of low-level concerns about adults, which should only be kept in line with employment records unless likely to be relevant for historic abuse claims or a specific safeguarding need.
3. Retention period for tax purposes should always be made by reference to specific legal or accountancy advice.
4. Be aware that latent injuries can take years to manifest, and the limitation period for claims reflects this: so keep a note of all procedures as they were at the time, and keep a record that they were followed