



AMESBURY SCHOOL
HINDHEAD

CHARTERHOUSE FAMILY OF SCHOOLS

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 Retention Period</u>
Type of Record/Document EMAILS ON SERVER - Pupil email account - Staff emails [schools may wish to set their own policies, either centrally or with staff]	<u>Suggested Retention Period</u> <u>[see note on email retention and storage]</u> <u>Delete upon leaving school, or within one year.</u> <u>Routine deletion of historic emails after 2-3 years, and delete account within 1 year of leaving school.</u>
SCHOOL-SPECIFIC RECORDS - Registration documents of School - Admission Register ('the school roll') - Attendance Register - Minutes of Governors' meetings - Annual curriculum - Complaints Register / Log	<u>Permanent (or until closure of the school)</u> <u>At least 6 years from date of entry (monthly backup required). (Schools may then wish to archive in order to retain a definitive record of who attended the school when)1</u> <u>At least 6 years from date of entry (monthly backup required) 1</u> <u>6 years from date of meeting</u> <u>From end of year: 3 years (or 1 year for other class records: e.g. marks / timetables / assignments)</u> <u>7 years from pupil leaving school</u>
INDIVIDUAL PUPIL RECORDS - Admissions: application forms, assessments, records of decisions - Student immigration records - Examination results (external or internal) - Pupil file including: - Pupil reports and performance records - Pupil medical records (not accidents) - Pupil disciplinary records (not issues of safeguarding)	<u>NB these records will contain personal data</u> <u>25 years from date of birth (or up to 7 years from the pupil leaving). If unsuccessful: up to 1 year2.</u> <u>Duration of student sponsorship plus min. 1 year</u> <u>7 years from pupil leaving school.</u> <u>ALL: 25 years from date of birth (subject where relevant to any material that may be relevant to potential historic claims: see below).</u> <u>Date of birth plus up to 35 years (risk assessed)</u>

- Attendance data • Special educational needs records	
SAFEGUARDING • Policies, procedures and insurance • DBS disclosure certificates (if held) • Accident / Incident reporting • Child Protection files and specific records of child sexual abuse • Video recordings of meetings	<u>[see note on IICSA guidelines]</u> <u>Keep a permanent record of historic policies</u> <u>No longer than 6 months from decision on recruitment, unless police specifically consulted.</u> <u>A record of the checks being made must be kept on SCR / personnel file, but not the certificate itself.</u> <u>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. 3</u> <u>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. 3</u> <u>Where any one-on-one meetings of classes, counselling, or application interviews are recorded (e.g. for safeguarding purposes), a shorter-term retention policy is acceptable based on the DSL's view of how quickly a concern will likely be raised: e.g. 3-6 months or immediately upon DSL review.</u>
CORPORATE RECORDS (where applicable) • Certificates of Incorporation	<u>eg where schools have trading arms</u> <u>Permanent (or until dissolution of the company)</u>
• Minutes, Notes and Resolutions of Boards or Management Meetings	<u>Minimum – 10 years</u>
• Shareholder resolutions	<u>Minimum – 10 years</u>
• Register of Members/Shareholders	<u>Permanent (minimum 10 years for ex members/shareholders)</u>
• Annual reports	<u>Minimum – 6 years</u>
ACCOUNTING RECORDS 4 • Accounting records (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) [NB specific ambit to be advised by an accountancy expert]	<u>Minimum – 3 years for private UK companies (except where still necessary for tax returns)</u> <u>Minimum – 6 years for UK charities (and public companies) from the end of the financial year in which the transaction took place</u> <u>Internationally: can be up to 20 years depending on local legal/accountancy requirements</u>
• Tax returns	<u>Minimum – 6 years</u>
• VAT returns	<u>Minimum – 6 years</u>
• Budget and internal financial reports	<u>Minimum – 3 years</u>

CONTRACTS AND AGREEMENTS Signed or final/concluded agreements (plus any signed or final/concluded variations or amendments)	<u>Minimum – 7 years from completion of contractual obligations or term of agreement, whichever is the later</u>
Deeds (or contracts under seal)	<u>Minimum – 13 years from completion of contractual obligation or term of agreement</u>
INTELLECTUAL PROPERTY RECORDS Formal documents of title (trade mark or registered design certificates; patent or utility model certificates)	<u>Permanent (in the case of any right which can be permanently extended, eg trade marks); otherwise expiry of right plus minimum of 7 years.</u>
Assignments of intellectual property to or from the school	<u>As above in relation to contracts (7 years) or, where applicable, deeds (13 years).</u>
IP / IT agreements (including software licences and ancillary agreements e.g. maintenance; storage; development; coexistence agreements; consents)	<u>Minimum – 7 years from completion of contractual obligation concerned or term of agreement</u>
EMPLOYEE / PERSONNEL RECORDS - Single Central Record of employees - Contracts of employment - Employee appraisals or reviews - Staff personnel file	<u>NB these records will contain personal data</u> <u>Keep a permanent record that mandatory checks have been undertaken (but do not keep DBS certificate information itself: 6 months as above)</u> <u>7 years from effective date of end of contract</u> <u>Duration of employment plus minimum of 7 years</u> <u>As above, but do not delete any information which may be relevant to historic safeguarding claims</u>
Payroll, salary, maternity pay records	<u>Minimum – 6 years</u>
Pension or other benefit schedule records	<u>Potentially permanent (ie lifetimes of those involved), depending on nature of scheme</u>
Job application and interview/rejection records (unsuccessful applicants)	<u>12 months (NB – ACAS has extended the early conciliation period to 12 weeks from 1 December 2025 and there are also proposals to extend the time limit for bringing a tribunal claim from 3 to 6 months). [In respect of DBS certificates and records of criminal information disclosed by the candidate (if applicable), see DBS section in 'Safeguarding' above.]</u>
- Staff immigration records (Right to work, etc.) - Tier 2 migrant worker sponsor records	<u>Minimum – 2 years from end of employment</u> <u>Minimum – 1 year from end of employment</u>
- Health records relating to employees - Records of low-level concerns about adults	<u>7 years from end of employment</u> <u>At least until end of employment (as recommended by KCSIE), then subject to review for relevance: e.g. 7 years from end of employment if they have ongoing relevance for</u>

	<u>employment claims, longer if necessary for safeguarding purposes / claims.</u>
INSURANCE RECORDS	
Insurance policies (will vary – private, public, professional indemnity)	<u>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.</u>
Correspondence related to claims/ renewals/ notification re: insurance	<u>Minimum – 7 years (but this will depend on what the policy covers and whether e.g. historic claims may still be made)</u>
ENVIRONMENTAL, HEALTH & DATA	
- Maintenance logs - Accidents to children 5	<u>10 years from date of last entry</u> <u>25 years from birth (longer for safeguarding)</u>
Accident at work records (staff) 5	<u>Minimum – 4 years from date of accident, but review case-by-case where possible</u>
- Staff use of hazardous substances 5 - Covid-19 risk assessments, policies and other key documents	<u>Minimum – 7 years from end of date of use</u> <u>7 years from date of creation</u>
Risk assessments (carried out in respect of above) 5	<u>7 years from completion of relevant project, incident, event or activity.</u>
- Art.30 UK GDPR records of processing activity (ROPAs) and "Appropriate Policy Document" (if different) where relying on certain special category data processing grounds - Data protection impact assessments (DPIAs) - Data breach log / register	<u>No limit (as long as no personal data held), but must be kept up-to-date, accurate and relevant.</u> As _____ above <u>Keep up to date and retain details of breaches for the last 6 years (where risk of claims) and at least 3 years in the ordinary course. (Consider if necessary to hold any personal data as part of the breach log).</u>

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.
- 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