

## Haileybury Data Retention Policy

Type of Record/Document	Retention Period
-------------------------	------------------

### **School Specific Records**

Registration documents of School	Permanent (or until closure of the school)
Attendance Register	6 years from last date of entry, then archive.
Minutes of Governors' meetings	Permanent (or until closure of the school)
Annual curriculum	7 years from end of the academic year

### **Individual Pupil Records**

Admissions: application forms, assessments, records of decisions	25 years from date of birth (or, if pupil not admitted, up to 7 years from that decision).
Examination results (External)	Date of birth plus up to 35 years ( Except where Special Educational Needs requires an extension )
Examination results (internal)	7 years from pupil leaving school
Pupil file including (Pupil reports, Pupil performance records, Pupil medical records)	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).
Special educational needs records <i>(to be risk assessed individually)</i>	Date of birth plus up to 35 years (allowing for special extensions to statutory limitation period) . Permanent in case we need to use it to provide some learning profile as evidence

### **Safeguarding**

Policies and procedures	Keep a permanent record of historic policies
DBS disclosure certificates (if held)	No longer than 6 months from decision on recruitment, unless DBS specifically consulted – but a record of the checks being made must be kept, if not the certificate itself.
Accident / Incident reporting	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.
Child Protection files	If a referral has been made / social care have been involved or child has been subject of a multi-agency plan – indefinitely. 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).

# Haileybury

## **Corporate Records**

Certificates of Incorporation	Permanent (or until dissolution of the company)
Minutes, Notes and Resolutions of Boards or Management Meetings	Permanent (or until dissolution of the company)
Shareholder resolutions	Permanent (or until dissolution of the company)
Register of Members/Shareholders	Permanent (minimum 10 years for ex-members/shareholders)
Annual reports	Permanent (or until dissolution of the company)

## **Accounting Records**

Accounting records	Minimum – 6 years from the end of the financial year in which the transaction took place
Tax returns	Minimum – 6 years
VAT returns	Minimum – 6 years
Budget and internal financial reports	Minimum – 6 years

## **Contracts and Agreements**

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

## **Intellectual Property Records**

Formal documents of title (trade mark or registered design certificates; patent or utility model certificates)	Permanent (in the case of any right which can be permanently extended, e.g. trade marks); otherwise expiry of right plus minimum of 7 years.
Assignments of intellectual property to or from the school	As above in relation to contracts (7 years) or, where applicable, deeds (13 years).
IP / IT agreements (including software licences and ancillary agreements e.g. maintenance; storage; development; coexistence agreements; consents)	Minimum – 7 years from completion of contractual obligation concerned or term of agreement

# Haileybury

## **Employee / Personnel Records**

Single Central Record of employees	Keep a permanent record of all mandatory checks that have been undertaken (but <u>not</u> DBS certificate itself: 6 months as above)
Contracts of employment	Duration of employment plus a minimum of 7 years
Employee appraisals or reviews	Duration of employment plus minimum of 7 years
Staff personnel file	As above, but we do not delete any information which may be relevant to historic safeguarding claims.
Payroll, salary, maternity pay records	Minimum – 6 years
Pension or other benefit schedule records	Possibly permanent, depending on nature of scheme
Job application and interview/rejection records (unsuccessful applicants)	Minimum 3 months but no more than 1 year
Immigration records	Minimum – 4 years
Health records relating to employees	7 years from end of contract of employment

## **Insurance Records**

Insurance policies	Kept until it is possible to calculate that no living person could make a claim.
Correspondence related to claims/ renewals/ notification re: insurance	Minimum – 7 years

## **Environmental, Health and Data**

Maintenance logs	10 years from date of last entry
Accidents to children	25 years from birth (longer for safeguarding)
Accident at work records (staff)	Minimum – 4 years from date of accident, but review case-by-case where possible
Staff use of hazardous substances	Minimum – 7 years from end of date of use
Risk assessments (carried out in respect of above)	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)

## **Development / Alumni**

Minutes of Development Board meetings:	6 years from date of meeting
Minutes of Foundation Board meetings:	6 years from date of meeting
Gift/Donor forms:	6 years from date of gift
Gift Aid declarations:	6 years from date of declaration
Alumni, benefactors and wider community:	We will keep the information you have provided as long as you consent for us to do so or we are legally required

# Haileybury

Last reviewed: 4 June 2018