



# Data Retention Policy

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|----------------------|--|
| Policy date:         | January 2026                           |
| Date of next review: | June 2027                              |
| Owner:               | Chief Financial and Operations Officer |
| Leadership Team:     | Operations Leadership Team             |
| Intended audience:   | All staff                              |
| Location:            | School Portal and website              |

## **1. Purpose and scope of the Policy**

- 1.1 This policy sets out the periods of retention the School applies to the different categories of records it holds.
- 1.2 The School will retain and store records in accordance with the relevant legal considerations which include:
- the General Data Protection Regulations (GDPR), the Data Protection Act 2018, and associated legislation;
  - other statutory duties and government guidance relating to schools, e.g. KCSIE;
  - disclosure requirements for potential future litigation;
  - contractual obligations; and
  - the law of confidentiality and privacy.
- 1.3 These will inform not only minimum and maximum retention periods, but also what the School must keep and who should be able to access it.

## **2. Roles and responsibility**

- 2.1 The Chief Financial and Operations Officer has oversight of data protection at the School. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Chief Financial and Operations Officer .

## **3. Child protection and document retention**

- 3.1 In the light of the Independent Inquiry into Child Sexual Abuse the School is aware of its duties relating to long-term, lifetime or even indefinite keeping of full records related to incident reporting. Regardless of suggested retention timescales set out below, the School may at its discretion extend retention periods, particularly in respect of any personnel or pupil documents, if they contain any information which may be relevant to allegations or future claims relating to safeguarding. Data protection issues should never put child safety at risk, nor take precedence over safeguarding considerations.

## **4. Meaning of “record”**

- 4.1 In these guidelines, "record" means any document or data which contains evidence or information relating to the School, its pupils or staff. Some of this material, but not all, will contain personal data as defined in the GDPR.
- 4.2 Many, if not most, new and recent records will be created, received and stored electronically. Others (such as certificates, registers, or older records) will be original paper documents.
- 4.3 Both paper and digital records will be stored securely, and all appropriate measures taken to ensure the security of the data at all times.

## **5. Secure disposal of documents**

- 5.1 When data is to be destroyed, this will be done securely. This may be carried out by an appropriately licenced third party, with whom an appropriate Data Processing Agreement is in place.

5.2 For data to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed. Paper records must be shredded using a cross-cutting shredder; CDs / DVDs / diskettes will be cut into pieces.

5.3 Hard-copy images, AV recordings and hard disks will be dismantled and destroyed.

## 6. Timescales for retention

6.1 Except where there is a specific statutory obligation to destroy records, the timescales suggested below should not be treated as prescriptive. They are guidelines only and should not be a substitute for exercising careful thought and judgement, or taking specific advice where necessary, depending on the circumstances. Sometimes, case-by-case decision making for the retention of documents will be required.

### Table of suggested retention periods

| Type of record/document  | Suggested retention period  | Owner/ Location                                 |
|--|---|---|
| <i>EMAILS</i>  |   |   |
| Pupil email accounts   | Delete within one year of leaving the School.   | Server/ cloud                                   |
| Staff emails   | Routine deletion of historic emails after 2-3 years and delete accounts within 1 year of leaving the School.              | Server / cloud                                  |
| <i>GOVERNANCE RECORDS</i>  |   |   |
| Registration documents of School   | Permanent or until closure of the School, and then likely subject to archiving for documents of historical significance.  | Bursary/ Archives                               |
| Minutes of Governors' meetings   | Legal requirement is 6 years from date of meeting but likely subject to archiving for records of historical significance. | Governors' Portal/ Archives                     |
| <i>ATTENDANCE RECORDS</i>  |   |   |
| Attendance Register  | Electronic records now kept indefinitely  | iSAMS / School Office                           |
| <i>ACADEMIC RECORDS</i>  |   |   |
| Annual curriculum  | 3 years from the end of the academic year.  | Director of Studies/ Deputy Head (Academic)     |
| Class records (e.g. marks, timetables, assignments)  | 1 year from the end of the academic year.   | Director of Studies/ HODs / Teaching staff      |
| <i>ADMISSIONS RECORDS</i>  |   |   |
| Admissions records including application forms, admissions assessments, bursary and scholarship information, and records of decisions: |   |   |
| For pupils who are admitted  | 25 years from date of birth (or 7 years from the pupil leaving).  | iSAMS / Admissions Department and School Office |
| For pupils who are unsuccessful  | 7 years from admission date applied for.  | iSAMS / Admissions Department                   |

| Type of record/document   | Suggested retention period   | Owner/ Location   |
|---|--|---|
| Pupil immigration records for sponsored students  | Duration of student sponsorship plus minimum 1 year (i.e. this means for one year after pupil has left the School).  | Admissions Department files (electronic files in Google and hard copy kept for UKVI inspection purposes)  |
| <b>PUPIL RECORDS</b>  |  |   |
| Examination results (external or internal)  | 7 years from pupil leaving the School.   | iSAMS / School Office   |
| Pupil file including: <ul style="list-style-type: none"> <li>- Pupil reports</li> <li>- Performance records</li> <li>- Pupil medical information</li> </ul> | 25 years from date of birth (or 7 years from the pupil leaving).<br><i>(Note - this is subject to the School keeping any documents that may be relevant to potential future safeguarding or child protection claims.)</i>  | iSAMS / School Office   |
| Special educational needs records   | Date of birth plus up to 35 years ( <i>risk assessed</i> ).  | Learning Support Department   |
| <b>SAFEGUARDING</b>   |  |   |
| Policies, procedures and insurance  | The School now retains a permanent record of historic policies and procedures and insurance documents.   | Historic policies and procedures are retained in the Policies Shared Drive accessible by SLT. Insurance documents are retained by the Chief Financial and Operations Officer. |
| DBS disclosure certificates   | <u>The School does not hold copies of DBS certificates</u> . Original certificates are inspected on recruitment and DBS details (number and date) are recorded.  | A record of the checks made is kept on SCR and in a hard copy personnel file kept by the HR Department. These are retained indefinitely in case of future claims.             |
| Accident / Incident reporting   | Records must be kept for as long as any living victim may bring a claim (note that civil claim limitation periods can be set aside in cases of abuse). Files should be reviewed from time to time (every 6 years) if resources allow and a suitably qualified person is available. | CPOMS; files kept by Deputy Head (Pastoral); legal files kept by Chief Financial and Operations Officer   |
| Child Protection files  | If a referral has been made; social care have been involved; the child has been the subject of a multi-agency plan; or if there is any risk of future claim(s), such files must be kept indefinitely.  | CPOMS; Deputy Head (Pastoral); legal files kept by Chief Financial and Operations Officer   |
| Counselling notes   | Counselling notes will be kept for 12 years from the date of the last academic year of counselling, except for cases of allegations of abuse.  | Lead Counsellor   |
| Video recordings of meetings  | Where e.g. one-on-one meetings of classes, counselling, or application interviews are recorded for safeguarding purposes, a shorter-term retention   | DSL/ Deputy Head (Pastoral)   |

| Type of record/document   | Suggested retention period   | Owner/ Location                                |
|---|--|--|
|   | 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.   |  |
| <b>CORPORATE RECORDS (e.g. for Haileybury Enterprises Ltd)</b>  |  |  |
| Certificates of Incorporation   | Permanent (or until dissolution of the company).   | Chief Financial and Operations Officer         |
| Minutes and Resolutions of Boards   | Minimum – 10 years.  | Chief Financial and Operations Officer         |
| Shareholder resolutions   | Minimum – 10 years.  | Chief Financial and Operations Officer         |
| Register of Members/ Shareholders   | Permanent (minimum 10 years for ex members/shareholders).  | Chief Financial and Operations Officer         |
| Annual reports  | Minimum – 6 years.   | Chief Finance Officer/<br>Financial Controller |
| <b>ACCOUNTING RECORDS (always subject to professional advice from accountants/auditors)</b>   |  |  |
| Accounting records<br>( <i>Note - this is normally taken to mean records which enable an accurate financial position to be ascertained and which give a true and fair view of the School's financial status</i> ) - as advised by the School's auditors | Minimum 6 years for private UK companies i.e. Haileybury Enterprises Ltd.<br>Minimum 6 years for UK charities from the end of the financial year in which the transaction took place.<br>Internationally: can be up to 20 years depending on local legal/accountancy requirements. | Chief Finance Officer/<br>Financial Controller |
| Tax returns   | Minimum 6 years.   | Chief Finance Officer/<br>Financial Controller |
| VAT returns   | Minimum 6 years.   | Chief Finance Officer/<br>Financial Controller |
| Budget and internal financial reports   | Minimum 3 years.   | Chief Finance Officer/<br>Financial Controller |
| <b>CONTRACTS AND AGREEMENTS</b>   |  |  |
| 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.   | Chief Financial and Operations Officer         |
| Deeds (or contracts under seal)   | Minimum 13 years from completion of contractual obligation or term of agreement.   | Chief Financial and Operations Officer         |
| <b>INTELLECTUAL PROPERTY RECORDS</b>  |  |  |
| Formal documents of title (trademark or registered design certificates; patent or utility model certificates)   | Permanent (in the case of any right which can be permanently extended, e.g. trademarks); otherwise expiry of right plus minimum of 7 years.  | Chief Financial and Operations Officer         |

| Type of record/document   | Suggested retention period   | Owner/ Location   |
|---|--|---|
| Assignments of intellectual property to or from the School  | As above in relation to contracts (7 years) or, where applicable, deeds (13 years).  | Chief Financial and Operations Officer  |
| 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.  | Chief Financial and Operations Officer / Director of IT   |
| <b>EMPLOYEE / PERSONNEL RECORDS</b>   |  |   |
| Records relating to candidates who have been unsuccessful in their job application  | Six months from the end of the application process   | HR Department   |
| Single Central Record of employees  | The School keeps a permanent record of that mandatory checks that have been undertaken on recruitment on the SCR.  | SCR / HR Department   |
| HR staff files (including employment contracts, appraisals or reviews, payroll and salary records, application and interview records, immigration and right to work documents, records of any concerns (including low-level safeguarding concerns, and employee health records) | 7 years from the end of your employment i.e. for the duration of your employment plus a minimum of 7 years. However documents will be retained indefinitely if they could be relevant to historic safeguarding or child protection issues. | HR Department - held on iSAMS and employee electronic file  |
| Pension or other benefit schedule records   | Potentially permanent (i.e. lifetimes of those involved), depending on the nature of the scheme.   | HR Department   |
| <b>INSURANCE RECORDS</b>  |  |   |
| Insurance policies (will vary – private, public, professional indemnity)  | 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.                                | Chief Financial and Operations Officer  |
| Correspondence related to claims/ renewals/ notification re: insurance  | Minimum – 7 years ( <i>but this will depend on what the policy covers and whether e.g. historic claims may still be made</i> ).  | Chief Financial and Operations Officer  |
| <b>ENVIRONMENTAL, HEALTH AND DATA PROTECTION</b>  |  |   |
| Maintenance logs  | 10 years from date of last entry   | Estate Director   |
| Accidents to children   | 25 years from birth (or indefinitely for issues relating to safeguarding or child protection)<br>Note - latent injuries can take years to manifest, and the limitation period for claims reflects this. Therefore keep a                   | Head of Health and Safety / DSL if safeguarding / Chief Financial and Operations Officer for documents relating to potential legal claims |

| Type of record/document  | Suggested retention period   | Owner/ Location  |
|--|--|--|
|  | note of all procedures as they were at the time, plus a record that they were followed, and relevant insurance documents.                                  |  |
| Accident at work records (staff)   | Minimum 4 years from date of accident, but reviewed case-by-case by Head of Health and Safety in consultation with Chief Financial and Operations Officer. | Head of Health and Safety / Chief Financial and Operations Officer |
| Staff use of hazardous substances  | Minimum – 7 years from end of date of use.   | Head of Health and Safety / Estate Director                        |
| Covid-19 risk assessments, consents etc.   | Retain for now legal paperwork (consents, notices, risk assessments) but not individual test results.  | Head of Health and Safety  |
| Risk assessments (carried out in respect of above)                                 | 7 years from completion of relevant project, incident, event or activity.  | Head of Health and Safety (risk assessments held on iProtectU)     |
| Art.30 GDPR records of processing activity, data breach records, impact assessment | No limit (as long as no personal data held), but must be kept up-to-date, accurate and relevant.   | Chief Financial and Operations Officer                             |

#### **DEVELOPMENT AND ENGAGEMENT**

|                            |  |                                     |
|----------------------------|--|-------------------------------------|
| Donor and prospect records | Active donor records kept for a minimum of six years following the last donation. Prospective donor records retained for no longer than three years. Anonymised data may be kept indefinitely. | Development and Engagement Director |
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| <b>Version history</b> |                                   |                                  |
|------------------------|-----------------------------------|----------------------------------|
| <b>Date</b>            | <b>Reviewed by</b>                | <b>Notes</b>                     |
| April 2022             | Data Committee                    | New policy                       |
| April 2022             | SLT                               | Approved                         |
| July 2023              | Chief Operating Officer           | Updated                          |
| September 2025         | Executive Leadership Team (ELT)   | Updated to reflect the CFOO role |
| November 2025          | Operational Leadership Team (OLT) | Reviewed and updated             |
| December 2025          | CFOO                              | Reviewed and updated             |
| January 2026           | ELT                               | Reviewed and approved            |