



## Document Retention Policy

### Introduction

St Hilary's actively promotes democracy, the rule of the law, individual liberty and mutual respect of those with different faiths and beliefs. These are fundamental British Values which underpin all that we offer, as does our School Motto 'Not for oneself but for all.

This Policy Statement is made in accordance with the duties of the Governing Body in relation to the storage and retention of school records and documents. Records are the life blood of any school. The school needs to create and maintain accurate records in order for it to function. The policy for managing records at St Hilary's School has been drawn up in conformity with legislation and regulations affecting schools.

### CURRENT PUPILS

#### Pupil Records

A file is kept on each pupil in the Administration Office. The file holds the registration and acceptance form (the parent contract), and the academic record of a pupil as he or she progresses through the school. It will also include reports of all conversations between parents and members of staff about any academic or pastoral issues, school reports, references from previous schools and references prepared for universities and other institutions. It will record any disciplinary sanctions imposed on a pupil.

The information held on the school's electronic database covers: the pupil's name, address, form, house, emergency contact details, academic performance, subjects studied and daily attendance. Confidentiality of personal information is protected.

### PUPILS WITH SPECIAL EDUCATIONAL, WELFARE OR MEDICAL NEEDS

The names of pupils with special educational, welfare or medical needs are recorded and any special provision to be made for individual pupils are made available to those staff who need to know that information.

### MEDICAL RECORDS

A confidential medical record (St Hilary's School – Medical Registration Form) on each pupil is kept securely in the Business Manager's Office, by the Office Manager (who is also the School's Lead First Aider) in a separate file. The medical record contains: the Medical Registration Form that the parents completed when their child joined the school, any Individual Healthcare Plan for specific medical needs, and records of all treatment and immunisations that a pupil receives during his/her time at the school, including records of all accidents and injuries to their child.

They include any significant known drug reactions, major allergies and notable medical conditions. This information is available to staff likely to administer medication or treatment and recorded on a Medication Administration Record. The Catering Manager holds details of pupils with food allergies and there is also a food allergy book kept in the following locations: The Pepperpot, After School Club and the Hiorn's Centre (Sports Pavilion).

The Office Manager will provide the office with a list of the names of current pupils with medical conditions, or social information of a sensitive nature that may be of relevance to staff in their dealings with pupils, for example, when arranging trips and visits. The office staff will input data onto the school database, which will create a "red flag" if the pupil has medical issues. The teaching staff will then know

that they should consult the Office Manager or the Office Administrator about a particular individual when arranging an activity.

### **FINANCIAL RECORDS**

The Business Manager holds financial records on all pupils throughout their career at the school. These cover: a record of the deposit, bills for tuition fees and extras throughout a pupil's time at the school. If a pupil receives a bursary or scholarship, this will form part of the record, along with records of annual assessments and awards.

### **ACCESS BY STAFF**

All teaching and office staff are able to access the school's password protected database. Teaching staff may consult the pupil records held in the Administration Office. Access to medical records is restricted to the Office Manager and Deputy Office Manager. Access to financial records is restricted to the Headteacher and Accounts staff.

### **DATA PROTECTION POLICY**

Parents accept a place for their child at St Hilary's School in the knowledge that data about pupils and their parents will be collected periodically and stored and processed in order to allow for the efficient operation of the school.

Parents who accept a place for their child at St Hilary's School are invited to agree to the school using anonymous photographs of their child and information relating to his or her achievements for promotional purposes, which may be published in the prospectus or on the website. Those parents not wishing to have their child's photographs used by the School sign a Photographic Consent Form with their preferences.

### **ACCESS BY PARENTS AND PUPILS**

St Hilary's School's Privacy Notice (including Data Protection Policy for Pupils and Parents) describes its duties and obligations (under the Data Protection Act 2018), including parents' rights and the rights of pupils aged 12 or over to have access to their personal data. It also covers the circumstances under which data would be disclosed to a third party.

### **FAIR PROCESSING NOTICE**

St Hilary's School will comply with a Fair Processing Notice legally issued by a public body or other authority that is a data controller and is subject to the same legal constraints regarding the manner in which it handles data.

### **STAFF INDUCTION**

All new teaching and office staff will be given training accessing and managing school records (including the database), as part of their induction into the St Hilary's School's "house style" for marking work, report-writing and written and electronic communications with pupils and parents.

### **RECORDS OF PAST PUPILS**

We keep all records of past pupils until a pupil is 25 years old. At that point, we securely destroy: all disciplinary, medical and financial records. We retain records of results in public examination, lists of school prizes and other significant achievements, together with information relating to former pupils' subsequent academic achievements. Records relating to alumni are stored in the Administration office.

Attached to this policy: Table of retention periods

Links to other documents: Parent Contract, [Medical Registration Form](#), [Medication Administration Form](#), [Photographic Consent Form](#)

---

**Reviewed:** June 2019, June 2020, June 2021, June 2022, June 2023, June 2024

**Next review date:** June 2025

**Person responsible:** Mrs Hannah Wynn (Business Manager)

## TABLE OF RETENTION PERIODS

Type of Record/Document	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> </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 (including other class records: e.g. marks / timetables / assignments)
<u>INDIVIDUAL PUPIL RECORDS</u> <ul style="list-style-type: none"> <li>Admissions: application forms, assessments, records of decisions</li> <li>Examination results (external or internal)</li> <li>Pupil file including:               <ul style="list-style-type: none"> <li>Pupil reports</li> <li>Pupil performance records</li> <li>Pupil medical records</li> </ul> </li> <li>Special educational needs records (<i>to be risk assessed individually</i>)</li> </ul>	<p><b><i>NB – this will generally be personal data</i></b></p> 25 years from date of birth (or, if pupil not admitted, up to 7 years from that decision).  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)
<u>SAFEGUARDING</u> <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</li> </ul>	Keep a permanent record of historic policies Keep copy of certificate in staff file in Business Manager's Office.  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. If a referral has been made / social care have been involved or child has been subject of a multi-agency plan or if there is ongoing legal action – 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).
<u>CORPORATE RECORDS (where applicable)</u> <ul style="list-style-type: none"> <li>Certificates of Incorporation</li> </ul>	Permanent (or until dissolution of the company)

<ul style="list-style-type: none"> <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>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>these are records which enable the School's accurate financial position to be ascertained &amp; which give a true and fair view of the School's financial state</i>)</li> <li>• Tax returns</li> <li>• Expense Claims</li> <li>• Budget and internal financial reports</li> </ul>	<p>Minimum – 6 years 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><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> </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>

<ul style="list-style-type: none"> <li>IP / IT agreements (including software licences and ancillary agreements e.g. maintenance; storage; development; coexistence agreements; consents)</li> </ul>	<p>Minimum – 7 years from completion of contractual obligation concerned or term of agreement</p>
<p><b>EMPLOYEE / PERSONNEL RECORDS</b></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> </ul>	<p><b><i>NB this will contain personal data</i></b></p> <p>Keep a permanent record of all mandatory checks that have been undertaken (but <u>not</u> DBS certificate itself: kept 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><b>INSURANCE RECORDS</b></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>   <li>Employers Liability Insurance Certificate</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>Permanent</p>
<p><b>ENVIRONMENTAL, HEALTH &amp; DATA</b></p> <ul style="list-style-type: none"> <li>Maintenance logs</li> <li>Accidents to children</li>   <li>Accident at work records (staff)</li> </ul>	<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 (eg in the event of personal injury claims)</p>

<ul style="list-style-type: none"> <li>• Staff use of hazardous substances</li> </ul>	<p>Minimum – 7 years from end of date of use</p>
<ul style="list-style-type: none"> <li>• Risk assessments (carried out in respect of above)</li> </ul>	<p>7 years from completion of relevant project, incident, event or activity</p>
<ul style="list-style-type: none"> <li>• Data protection records documenting processing activity, data breaches</li> </ul>	<p>No limit: as long as up-to-date and relevant (as long as no personal data held)</p>