



**FINTON HOUSE**  
SCHOOL

**RECORD RETENTION POLICY**  
**ISSUE 2 | AUGUST 2022**

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## 2 Policy Ownership

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A hardcopy of this policy is available to all governors and parents on request from the School Office. It is accessible to all staff electronically (in the Policy folder on the Staff Admin Drive) and a hardcopy held on file in the Head's Office. This policy applies to all at the school including those in Reception (the EYFS).

**Ownership:** Gareth Atkinson, Bursar & Kate Hebblethwaite, Head of Admissions

**Governor Oversight:** Finance & General Purposes Committee

## 3 Policy Statement

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This policy is intended to ensure that personal information is dealt with properly and securely and in accordance with the General Data Protection Regulations, the Data Protection Act 2018, and other related legislation. This policy applies in addition to the School's other relevant terms and conditions and policies, including

- The School's Safeguarding Policy
- The Acceptable Use Policy
- The School's Terms and Conditions (Parent Contract)
- The School's Data Protection Policy
- The School's Retention of Records Policy

Finton House is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned. At Finton House we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.

The School has appointed Gareth Atkinson as the Data Compliance Co-ordinator. 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 Data Compliance Co-ordinator. Overall responsibility lies with the Governing Board, delegated to the Headmaster.

## 4 Storage of Records

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The School has specific legal obligations under the Data Protection Act with regard to the storage and archiving of records. Staff with specific responsibility for the management of records have training to ensure they understand their responsibility to uphold these. These include ensuring that:

- Records are stored securely so that access is available only to authorised persons and the records are available when required and searchable;
- Records are not removed from school premises either as hard copy or on portable devices, in line with the AUP for staff;
- The School has robust systems in place for backing up data;

- The School has formal contractual arrangements in place with any external providers of storage (whether physical or electronic – e.g. “cloud-based” storage) providing for security and access;
- Regular reviews / audits are conducted to ensure that records in storage are still relevant and necessary for the purpose for which it is held;
- That all destruction or permanent erasure of records is carried out securely with no risk of re-use, disclosure or re-construction.

## 5 Disposal of Records

All confidential, sensitive or personal information for disposal will be destroyed or erased securely in line with the principles of this policy.

- Paper records are shredded and placed in one of the three secure waste disposal bins around school.
- CDs and DVDs are cut into pieces.
- Hard copy images, video recordings and hard drives are dismantled and destroyed.

The School has a contract with BPR Group Europe Ltd, trading as **Paper Round** to collect all sensitive paper waste for secure disposal on a monthly basis. This company is registered with the Environment Agency, registration number **CBDU114789**.

## 6 Table of Retention Periods

The following table has been created by Farrer & Co LLP for the Independent School Bursars' Association (ISBA). It provides a list of the types of information the school is likely to hold, and gives suggested retention periods in line with current legislation. Some of these periods are mandatory legal requirements (eg under the Companies Act 2006 or the Charities Act 2011), but in the majority of cases it will be up to the School to decide whether practical considerations for retention, such as limitation periods for legal claims, and guidance from courts, outweigh those in respect of data protection.

When faced with a decision about an individual document, members of staff should ask themselves the following:

- Has the information come to the end of its useful life?
- Is there a legal requirement to keep this information or document for a set period?
- Would the information be likely to be needed in the case of any legal proceedings? In particular, is it potentially relevant to an historic child abuse enquiry? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)
- Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
- Is the document of historic or statistical significance?

If the decision is made to keep the document, this should be referred to the Data Compliance Co-ordinator who will log the reasons why it is being kept, and the revised retention period.

Type of Record/Document	Retention Period
<b>SCHOOL SPECIFIC RECORDS</b>	
Registration documents of School	Permanent (or until closure of the school)
Attendance Register	6 years from last date of entry, then archive
Visitor/Staff/Pupil sign in records	Destroyed at the end of the following term
Minutes of Governors' meetings	6 years from date of meeting

Type of Record/Document	Retention Period
Annual curriculum	From end of year: 3 years (or 1 year for other class records: e.g. marks / timetables / assignments)
<b>INDIVIDUAL PUPIL RECORDS</b>	
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 or internal)	7 years from pupil leaving school
Pupil file including: <ul style="list-style-type: none"> <li>• Pupil reports</li> <li>• Pupil performance records</li> <li>• Pupil medical records</li> <li>• First aid logs, accident reports</li> <li>• logs of children taken ill</li> <li>• Administration of medication logs</li> <li>• Requests for Leave of Absence</li> <li>• Special educational needs records (to be risk assessed individually)</li> </ul>	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)
<b>SAFEGUARDING</b>	
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)
<b>ACCOUNTING RECORDS</b>	
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)	Minimum – 6 years for UK charities (and public companies) from the end of the financial year in which the transaction took place  Internationally: can be up to 20 years depending on local legal/accountancy requirements

Type of Record/Document	Retention Period
Tax returns	Minimum – 6 years
VAT returns	n/a as FH is a registered charity
Budget and internal financial reports	Minimum – 3 years
<b>CONTRACTS &amp; 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
Deeds (or contracts under seal)	Minimum – 13 years from completion of contractual obligation or term of agreement
<b>INTELLECTUAL PROPERTY RECORDS</b>	
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, eg 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 eg maintenance; storage; development; coexistence agreements; consents)	Minimum – 7 years from completion of contractual obligation concerned or term of agreement
<b>EMPLOYEE RECORDS</b>	
Single Central Record of employees	Keep a permanent record of all mandatory checks that have been undertaken for all current employees (but not DBS certificate itself: 6 months as above)
Contract of employment	Minimum 7 years from effective date of end of contract
Employee appraisals or reviews	Duration of employment plus minimum of 7 years
Staff personnel file	As above, but do not delete any information which may be relevant to historic safeguarding claims.
Payroll, salary, maternity pay records	6 years
Pension or other benefit schedule records	6 years
Job application and interview/rejection records (unsuccessful applicants)	Minimum 3 months but no more than 1 year
Immigration records	Minimum – 4 years

Type of Record/Document	Retention Period
Health/sickness records relating to employees	Keep for minimum of 7 years, or permanently if there is a likelihood that a claim may be raised.
<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.
Correspondence related to claims/ renewals/ notification re: insurance	Minimum – 7 years from last relevant correspondence.
<b>ENVIRONMENTAL, HEALTH &amp; DATA</b>	
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)