



## **DORSET HOUSE SCHOOL**

### **Retention of Records Policy**

<b>Contents</b>	<b>Page</b>
<b>1.</b> Policy Statement	<b>2</b>
<b>2.</b> Pupils' Records	<b>2</b>
<b>3.</b> Pupils with Special Educational, Welfare or Medical Needs	<b>2</b>
<b>4.</b> Medical Records	<b>2</b>
<b>5.</b> Safeguarding Files	<b>3</b>
<b>6.</b> Financial Records	<b>3</b>
<b>7.</b> Access by Staff	<b>3</b>
<b>8.</b> Data Protection/Privacy Policy	<b>3</b>
<b>9.</b> Access by Parents and Pupils	<b>3</b>
<b>10.</b> Staff Training	<b>4</b>
<b>11.</b> Records of Past Pupils	<b>4</b>
<b>12.</b> Staff Records	<b>4</b>
<b>Appendix 1</b> Table of Retention Periods	<b>5</b>

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## **1. POLICY STATEMENT**

Dorset House School needs to create and maintain accurate records in order for it to function. The policy for managing records at Dorset House School has been drawn up in conformity with legislation and regulations affecting schools.

In this policy, "record" means any document or item of data which contains evidence or information relating to the school, its staff or pupils. Some of this material, but not all, will contain personal and sensitive data concerning individuals.

All records will be kept within the recommended retention period (see Appendix 1) unless there is a legal obligation to retain beyond that time period.

## **2. PUPILS' RECORDS**

A file is kept on each pupil in a secure cabinet in the school office. The file holds the registration, admission and acceptance forms, the parent contract and the academic record of a pupil as he or she progresses through the school. It will also include reports of conversations between parents and members of staff about academic or pastoral issues, school reports, references from previous schools and references sent to senior schools. It will record disciplinary sanctions imposed on a pupil. The record identifies those with parental responsibility for the pupil and any court orders affecting parental responsibility.

The information held on the school's electronic management information system (MIS), Engage, covers: the pupil's name, address, House, emergency contact details, academic performance, subjects studied, extra-curricular activities and daily attendance. Access to the MIS is password protected.

## **3. 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.

## **4. MEDICAL RECORDS**

A confidential medical record on each pupil is kept securely in the surgery by the Matron. The medical record contains: the medical questionnaire that the parents completed when their child joined the school, and records of all treatment and immunisations that a pupil receives during his or her time at the School, including records of all accidents and injuries to the child. They include any significant known drug reactions, major allergies and notable medical conditions. This information is available to staff who are likely to administer medication or treatment. The Catering Manager holds details of pupils with food allergies.

The school's MIS identifies any pupils with a medical or chronic condition, via a flagging system, so that staff are aware and can obtain further information if/when required, for example if the pupil is attending a school trip.

## **5. SAFEGUARDING FILES**

The school's records on child protection are password protected and saved in a designated area on the Sschool system accessible to the Designated Safeguarding Lead (DSL) and deputy DSLs only. Paper files are kept locked in the DSL's office, and are separated from routine pupil records. Access is restricted to the DSL and deputy DSLs including the Head.

Where a pupil leaves the School, the DSL will ensure that their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. The DSL will retain a record of the child protection file in case of any historic safeguarding concern.

## **6. FINANCIAL RECORDS**

The Bursar and Bursar's Assistant holds secure financial records on all pupils throughout their time at the School. These cover: a record of the deposit, the acceptance form, bills for tuition fees and extras throughout a pupil's time at the school. The Bursar and Bursar's Assistant also hold secure records of any bursary applications, awards and annual assessments.

The Bursar and Bursar's Assistant hold supplier records including bank details. All financial records are kept securely in an office that is locked when no personnel are present.

## **7. ACCESS BY STAFF**

All teaching and school office staff are able to access the school's password protected MIS where it is necessary for their role. Teaching staff may consult the pupil records held in the school office. They also have access to relevant electronic records. Access to full medical records is restricted to the selected staff. Access to financial records is restricted to the Headmaster and the relevant Bursary staff.

## **8. DATA PROTECTION/PRIVACY POLICY**

Parents accept a place for their child at Dorset House 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 in line with the Data Protection Act 2018 (as amended or superseded).

## **9. ACCESS BY PARENTS AND PUPILS**

Dorset House School's Privacy Notice/Data Protection Policy describes its duties and obligations under the Data Protection Act 2018 (as amended or superseded), including parents' rights and the rights of pupils aged 13 or over to have access to their personal data. It also covers the circumstances under which data would be disclosed to a third party.

## **10. STAFF TRAINING**

New staff are given training regarding data protection and accessing and managing school records (including the MIS), as part of their induction to Dorset House School. Staff are provided with training updates regarding data protection and in particular the security of personal and sensitive data.

## **11. RECORDS OF PAST PUPILS**

We keep all records of past pupils until a pupil is 25 years old. At that point, the pupil file is securely destroyed unless there has been a safeguarding concern (see section 5). We only retain contact addresses, phone numbers and emails for our alumni organisation.

## **12. STAFF RECORDS**

The school maintains records of personnel relating to employees qualifications, experience, length of service, salary levels, medical questionnaire, disciplinary notes, grievance notes, right to work in the UK and all other required statutory documentation. All documentation is kept in secured filing cabinets and restricted areas of the network. All material is kept securely after employment has finished so that references can be written.

Access to staff records is available only to those where it is necessary for their role, including the Headmaster, Bursar and Bursar's Assistant as well as Line Managers where applicable (e.g. appraisal and training records etc.). Only relevant information necessary for processing salaries is passed to the external payroll company.

## APPENDIX 1 – TABLE OF RETENTION PERIODS

Except where there is a specific statutory obligation to destroy records, these retention periods should not be prescriptive. Figures are not intended as a substitute to exercise of thought and judgement. Specific advice, depending on the circumstances, may be appropriate.

Type of Record/Document	Retention Period
<p><u>EMAILS ON SERVER</u></p> <ul style="list-style-type: none"> <li>• Pupil email account</li> <li>• Staff email</li> </ul>	<p>Delete upon leaving school, or within 1 year</p> <p>Routine deletion of historic emails after 2-3 years and delete account within 1 year of leaving school</p>
<p><u>SCHOOL-SPECIFIC RECORDS</u></p> <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>	<p>Permanent (or until closure of the school)</p> <p>6 years from last date of entry, then archive</p> <p>Minimum – 10 years</p> <p>3 years from the end of the year</p>
<p><u>INDIVIDUAL PUPIL RECORDS</u></p> <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>o Pupil reports</li> <li>o Pupil performance records</li> <li>o Pupil medical records</li> </ul> </li> <li>• Special educational needs records</li> </ul>	<p>25 years from date of birth (or, if pupil not admitted, up to 7 years from that decision)</p> <p>7 years from pupil leaving school</p> <p>ALL: 25 years from date of birth (subject to where relevant to safeguarding considerations: any material which may be relevant to potential claims kept for the lifetime of the pupil)</p> <p>Date of birth plus up to 35 years (risk assessed)</p>

<p><u>SAFEGUARDING</u></p> <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>	<p>Permanent record of historic policies</p> <p><u>No longer than 6 months</u> from decision on recruitment, unless DBS specifically consulted – but a record of the checks being made must be kept, if not the certificate itself</p> <p>Kept 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)</p> <p>If a referral has been made / social care have been involved or child has been subject of a multi-agency plan – indefinitely.</p> <p>If low level concerns, with no multi-agency act – applicable school low-level concerns policy rationale (this may be 25 years from date of birth OR indefinitely).</p>
<p><u>CORPORATE RECORDS</u></p> <ul style="list-style-type: none"> <li>• Certificates of Incorporation</li> <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>Permanent (or until dissolution of the company)</p> <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>normally taken to mean records which enable a company's accurate financial position to be ascertained &amp; which give a true and fair view of the company's financial state</i>)</li> <li>Tax returns</li> <li>VAT returns</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> <li>IP / IT agreements (including software licences and ancillary agreements e.g. maintenance; storage; development; coexistence agreements; consents)</li> </ul>	<p>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</p> <p>As above in relation to contracts (7 years) or, where applicable, deeds (13 years)</p> <p>Minimum – 7 years from completion of contractual obligation concerned or term of agreement</p>

<p><u>EMPLOYEE / PERSONNEL RECORDS</u></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: 6 months as above)</p> <p>7 years from effective date of end of contract</p> <p>Duration of employment plus minimum of 7 years</p> <p>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 (i.e. lifetimes of those involved), depending on nature of scheme</p> <p>Minimum 3 months but no more than 1 year</p> <p>Minimum – 2 years from end of employment</p> <p>7 years from end of employment</p>
<p><u>INSURANCE RECORDS</u></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> </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><u>ENVIRONMENTAL, HEALTH &amp; DATA</u></p> <ul style="list-style-type: none"> <li>• Maintenance logs</li> </ul>	<p>10 years from date of last entry</p>



<ul style="list-style-type: none"> <li>• Accidents to children</li> <li>• Accident at work records (staff)</li> <li>• Staff use of hazardous substances</li> <li>• Covid-19 risk assessments, consents etc</li> </ul>	<p>25 years from birth (longer for safeguarding)</p> <p>Minimum – 4 years from date of accident, but review case-by-case where possible</p> <p>Minimum – 7 years from end of date of use</p> <p>Retain for now but not individual test results</p>
<ul style="list-style-type: none"> <li>• Risk assessments (carried out in respect of above)</li> <li>• Data protection records of processing activity, data breaches, impact assessments</li> </ul>	<p>7 years from completion of relevant project, incident, event or activity.</p> <p>No limit: as long as up-to-date, accurate and relevant (and as long as no personal data held)</p>