CANBURY SCHOOL

# DATA RETENTION POLICY

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| **Last Review Date:** | **October 2026** |
| **Policy Owner:** | **L Anindita-Beckman** |
| **Approved by:** | **Chair of Governors** |
| **Next Review Date:** | **October 2028** |

**DATA RETENTION POLICY**

Canbury School complies with the UK General Data Protection Regulation (UK GDPR) with regard to the retention of data. The School aims to collect only data that is necessary for it to run the School efficiently and effectively and to retain data only for as long as it is necessary. The School has safeguards in place to protect personal data (including staff training and data handling protocols); privacy notices; and a data breach policy outlining the action to take in the event of a data breach.

The School's Privacy Officer (the Bursar) is responsible for the management of the School's data and can be contacted at privacyofficer@canburyschool.co.uk in the event of any concerns about the handling of personal data.

Within the boundaries of the law and any safeguarding and statutory obligations placed on the School, data will be retained according to the table below:

| **Type of Record/Document** | **Retention Period** |
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| SCHOOL-SPECIFIC RECORDS | |
| Registration documents for School | Permanent (or until the closure of the school) |
| Attendance Register | 6 years from the last date of entry, then archive. |
| Minutes of Governors' meetings | Indefinitely as a historical record and reference |
| Annual curriculum | From the end of the year: 3 years (or 1 year for other class records, e.g. marks/timetables /assignments) |

| **INDIVIDUAL PUPIL RECORDS** | ***NB – this will generally be personal data*** |
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| Admissions: application forms, assessments, records of decisions | 25 years from date of birth (or, if the pupil is not admitted, up to 7 years from that decision or for as long as a pupil could be offered a place at the school). |
| Examination results (external or internal) | 7 years from the pupil leaving school |
| Pupil file including:<br>o Pupil reports<br>o Pupil performance records<br>o Pupil medical records | 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 pupil's lifetime). |
| Special educational needs records (*to be risk-assessed individually*) | Date of birth plus 35 years (allowing for special extensions to statutory limitation period) |
| SAFEGUARDING | |
| Policies and procedures | Keep a permanent record of historic policies. |
| DBS disclosure certificates (if held) | Not to be held: a record of the checks being made must be kept. |
| 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 are to be reviewed from time to time if resources allow and a suitably qualified person is available. |
| Child Protection files | Indefinitely (to ensure compliance with IICSA). |
| CORPORATE RECORDS | **e.g. if the School establishes a *trading arm*** |
| Certificates of Incorporation | Permanent (or until dissolution of the company) |
| Minutes, Notes and Resolutions of Boards or Management Meetings | Permanently (or until dissolution of the company) |
| Shareholder resolutions | Permanently (or until dissolution of the company) |

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| 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 (*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 |
| Tax returns | Minimum – 6 years |
| VAT returns | Minimum – 6 years |
| Budget and internal financial reports | Minimum – 3 years |
| CONTRACTS AND AGREEMENTS | |
| Signed or final/concluded agreements (*plus any signed or final/concluded variations or amendments*) | 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 a right plus a minimum of 7 years. |
| Assignments of intellectual property to or from the school | As above in relation to contracts (minimum 7 years) or, where applicable, deeds (minimum 13 years). |
| IP / IT agreements (including software licences and ancillary agreements e.g. maintenance, storage; development, coexistence agreements, and consents) | Minimum – 7 years from completion of contractual obligation concerned or term of agreement |
| EMPLOYEE / PERSONNEL RECORDS | ***NB this will contain personal data.*** |
| Single Central Record of employees | Keep a permanent record of all mandatory checks that have been undertaken (but <u>not</u> the DBS certificate itself) |

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| Contracts of employment | 7 years from the effective date of the end of the contract |
| Employee appraisals or reviews | Duration of employment plus a minimum of 7 years |
| Staff personnel file | As above, but do not delete any information which may be relevant to historical safeguarding claims. |
| Payroll, salary, maternity pay records | Minimum – 7 years |
| Pension or other benefit schedule records | Permanent (to prove actions taken and information given to staff to avoid future claims such as those in PPI) |
| Job application and interview/rejection records (unsuccessful applicants) | 1 year |
| Immigration records | Minimum – 7 years |
| Health records relating to employees | 7 years from the end of the contract of employment |
| Governors | 25 years from the end of their association with the School |
| Alumni | Lifelong unless they inform the School that they no longer wish to be associated with the School |
| INSURANCE RECORDS | |
| ● 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: for as long as any living person might make a claim. |
| ● Correspondence related to claims/ renewals/ notification re: insurance | Minimum – 7 years |
| ENVIRONMENTAL, HEALTH & DATA | |
| ● Maintenance logs | Permanent |
| ● Accidents to children | Minimum 25 years from birth (longer for safeguarding) |
| ● Accident at work records (staff) | Minimum – 7 years from the date of the accident, but review case-by-case where possible |

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| • Staff use of hazardous substances | Minimum – 7 years from end of date of use |
| • Risk assessments (carried out in respect of the above)<br>• Data protection records documenting processing activity, data breaches | 7 years from completion of relevant project, incident, event or activity.<br>No limit: as long as it is up-to-date and relevant (as long as no personal data is held) |