

# DATA RETENTION POLICY



**Blundell's**  

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PREPARATORY SCHOOL



**Blundell's**  

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FOUNDED 1604



# Data Retention Policy

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## **Data Retention Policy of Blundell's Preparatory School and Blundell's School ("the School")**

### **1. About this Policy**

In collecting and retaining data, Blundell's School is mindful of its obligations relating to:

- statutory duties and government guidance relating to schools, including for safeguarding;
- contractual obligations;
- the law of confidentiality and privacy; and
- the May 2018 General Data Protection Regulation (GDPR).

Queries relating to any aspects of this Policy can be referred to the School's Data Protection Lead (DPL), whose contact details are included on page 7 of this Policy.

### **2. Archiving and the Destruction or Erasure of Records**

All School staff receive basic training in data management, which covers issues such as security, recognising and handling sensitive personal data, safeguarding etc. Staff given specific responsibility for the management of records receive specific training to ensure, as a minimum, the following:

- That records – whether electronic or hard copy – are stored securely as above, including if possible with encryption, so that access is available only to authorised persons and the records themselves are available when required and (where necessary) searchable;
- That important records, and large or sensitive personal databases, are not taken home or – in respect of digital data – carried or kept on portable devices (whether CDs or data sticks, or mobiles and handheld electronic tablets) unless absolutely necessary, in which case this is subject to a risk assessment and in line with an up-to-date IT use policy;
- That questions of back-up or migration are likewise approached in line with general school policy (such as professional storage solutions or IT systems) and not individual *ad hoc* action;
- That arrangements with external storage providers – whether physical or electronic (in any form, but most particularly "cloud-based" storage) – are supported by robust contractual arrangements providing for security and access;
- That reviews are conducted on a regular basis, to ensure that all information being kept is still relevant and – in the case of personal data – necessary for the purposes for which it is held (and if so, that it is accurate and up-to-date); and
- That all destruction or permanent erasure of records, if undertaken by a third party, is carried out securely – with no risk of the re-use or disclosure, or re-construction, of any records or information contained in them.

### 3. Table of Record/Document Retention Periods

Type of Record/Document	Retention Period
<p><b><u>SCHOOL-SPECIFIC RECORDS</u></b></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.</p> <p>6 years from date of meeting.</p> <p>From end of year: 3 years (or 1 year for other class records: eg marks / timetables / assignments).</p>
<p><b><u>INDIVIDUAL PUPIL RECORDS</u></b></p> <ul style="list-style-type: none"> <li>• Admissions: application forms, entrance 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, 7 years from that decision).</p> <p>7 years from pupil leaving school.</p> <p>25 years from date of birth (subject to where relevant to safeguarding considerations).</p> <p>Date of birth plus up to 35 years.</p>
<p><b><u>SAFEGUARDING</u></b></p> <ul style="list-style-type: none"> <li>• Policies and procedures</li> <li>• DBS disclosure certificates</li> <li>• Accident / Incident reporting</li> <li>• Child Protection files</li> </ul>	<p>Permanent record of historic policies kept.</p> <p>No longer than 6 months from decision on recruitment, unless DBS specifically consulted.</p> <p>As a minimum, a record is kept for as long as any living victim may bring a claim.</p> <p>Minimum of 25 years from birth.</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><b><u>CORPORATE RECORDS</u></b></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 of 10 years.</p> <p>Minimum of 10 years.</p> <p>Permanent, or minimum of 10 years for former members/shareholders.</p> <p>Minimum of 6 years.</p>
<p><b><u>ACCOUNTING RECORDS</u></b></p> <ul style="list-style-type: none"> <li>• Accounting records</li> <li>• Tax returns</li> <li>• VAT returns</li> <li>• Budget and internal financial reports</li> </ul>	<p>Minimum of 6 years.</p> <p>Minimum of 6 years.</p> <p>Minimum of 6 years.</p> <p>Minimum of 3 years.</p>
<p><b><u>CONTRACTS AND AGREEMENTS</u></b></p> <ul style="list-style-type: none"> <li>• Signed or final/concluded agreements (plus any signed or final/concluded variations or amendments)</li> <li>• Deeds (or contracts under seal)</li> </ul>	<p>Minimum of 7 years from completion of contractual obligations or term of agreement, whichever is the later.</p> <p>Minimum of 13 years from completion of contractual obligation or term of agreement.</p>
<p><b><u>INTELLECTUAL PROPERTY RECORDS</u></b></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 eg maintenance, storage, development, coexistence agreements; consents)</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> <p>Minimum of 7 years from completion of contractual obligation concerned or term of agreement.</p>

<p><b><u>EMPLOYEE / PERSONNEL RECORDS</u></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>Permanent record kept 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, except for any information related to historic safeguarding issues.</p> <p>Minimum of 6 years.</p> <p>Permanent.</p> <p>Minimum of 3 months but no more than 1 year.</p> <p>Minimum of 4 years.</p> <p>7 years from end of contract of employment.</p>
<p><b><u>INSURANCE RECORDS</u></b></p> <ul style="list-style-type: none"> <li>• Insurance policies</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 of 7 years.</p>
<p><b><u>ENVIRONMENTAL, HEALTH &amp; DATA</u></b></p> <ul style="list-style-type: none"> <li>• Maintenance logs</li> <li>• Accidents to children</li> <li>• Accident at work records (staff)</li> <li>• Staff use of hazardous substances</li> </ul>	<p>10 years from date of last entry.</p> <p>25 years from birth (but as longer for accidents resulting from safeguarding issues).</p> <p>Minimum of 4 years from date of accident, but reviewed case-by-case where possible.</p> <p>Minimum of 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> <li>• Data protection records documenting processing activity, data breaches</li> </ul>	<p>7 years from completion of relevant project, incident, event or activity.</p> <p>No limit: as long as up-to-date and relevant (as long as no personal data held).</p>

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#### 4. Contact the School Data Protection Lead

The School's Data Protection Lead can be contacted using the methods below. In some cases, it may be appropriate or necessary to put your request in writing rather than by telephone.

**By Post:** Blundell's School, Blundell's Road, Tiverton, Devon, EX16 4DT

**By phone:** 01884 252232

**By email:** [bursar@blundells.org](mailto:bursar@blundells.org)

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