



HARROGATE LADIES' COLLEGE & HIGHFIELD

Independent School for Girls Aged 2 to 18
and Boys Aged 2 to 11

INFORMATION AND RECORDS RETENTION POLICY FOR PUPILS AND PARENTS

Harrogate Ladies' College family of Schools:

Highfield Pre School, Highfield and College

SLT Responsibility: Sarah Bowman

Governor Committee Review: F&GP

Review Cycle: Triannual

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Since 1893



Introduction

1. This policy sets out a structured approach to reviewing and destroying records in relation to Harrogate Ladies' School (the **School**).
2. The retention period for each type of record is shown in the table below.
3. The retention periods stated in the table below are the minimum storage requirements. In practice the School carries out a data cleanse of its files every 12 months. Accordingly, a 3-year retention period means 3 years plus up to 12 months to allow the School to securely dispose of the information.



Information and Records Retention Policy for Pupils and Parents

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
1	Pupils			
1.1	Attendance registers (however held)	Seven years from the date of the last entry	Review for further retention in the case of contentious dispute Shred/delete including back-ups and copies	Yes
1.2	Child protection records	DOB of the pupil + 50 years	Review for further retention in the case of contentious dispute Shred/delete	No
1.3	Medical records held by the School	DOB of the pupil + 24 years; or Six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident	Review for further retention in the case of contentious disputes Shred/delete	No
1.4	Counselling records held by the School	DOB of the pupil + 24 years; or Six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident	Review for further retention in the case of contentious disputes Shred/delete	No
2	Pupil files			
2.1	Pupil files (including public examination scripts, marks & results, ISAMS interventions and notes, rewards and sanctions)	DOB of the pupil + 24 years; or Six years from the date of an incident which may become contentious if the pupil was 18		No

This policy applies to all members of our school community, including boarders and those in our EYFS setting.



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		years old at the date of the incident		
2.2	Internal examination scripts, marks and results	<p><u>Scripts:</u> Scripts from weekly or monthly tests: Keep until the end of the next term or return to pupils. Scripts from termly or yearly tests or mock examinations: Keep until the end of the next academic year.</p> <p><u>Marks & results:</u> Marks & results kept for DOB of pupil +24 years</p>	<p>Review for further retention in the case of contentious disputes</p> <p>Shred/delete</p>	No
2.3	Special Educational Needs files, reviews and Individual Education Plans	<p>DOB of the pupil + 24 years; or</p> <p>Six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident</p>	<p>Review for further retention in the case of contentious disputes</p> <p>Shred/delete</p>	No
2.4	Statement of Special Education Needs (SEN) and Education Healthcare (EHC) Plans	Statements of SEN (including appendices) and EHC Plans should never be retained once the pupil has left the School	Shred/delete unless legal action pending	Yes
2.5	Letters authorising absence	Seven years from the date of the last entry on the attendance register	<p>Review for further retention in the case of safeguarding concerns</p> <p>Shred/delete</p>	No

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
2.6	Documents that are required to be retained for each migrant enrolled under Tier 4 (General) Student or Tier 4 (Child) Student visas	Through the period of sponsorship and for whichever is the shorter period of either: <ul style="list-style-type: none"> • one year from the date that the School ends sponsorship of the Tier 4 student, or • if the Tier 4 student is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents 	Shred/delete	No
3	Permissions			
3.1	Parental permission slips for school trips – where there has been no major incident, accident, injury or near miss involving anyone on the trip	Three years from the end of the academic year in which the trip took place	Review for further retention in the case of contentious dispute, otherwise shred/delete	No
3.2	Parental permission slips for school trips – where there has been a major incident, accident, injury or near miss involving anyone on the trip	DOB of the pupil involved in the incident + 24 years; or Six years from the date of the incident if the pupil was 18 years old at the date of the incident	Review for further retention in the case of relevance to contentious disputes. Shred/delete	No
4	Admission department and bursarial records			

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
4.1	Admission and parent contract documents including registration form, letter of offer and acceptance form	DOB of the pupil + 24 years	Review for further retention in the case of contentious disputes Shred/delete	No
4.2	Admissions documents relating to applicants who did not join the School	Six years from the academic year the pupil applied to join the School	Shred/delete	No
4.3	Financial information in respect of fees	Six years from date of leaving the School	Review for further retention in the case of contentious disputes Shred/delete	No
5	Health and safety information - pupils			
5.1	Accident reports including first aid/accident book	DOB of the pupil involved in the incident + 24 years; or Three years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident	Review for further retention in the case of enforcement action or contentious disputes Shred/delete	No
5.2	Reportable injuries, diseases and dangerous occurrences (RIDDOR) reports or own record	Minimum statutory retention period is at least 3 years but, we recommend that the record is kept for DOB of the pupil involved in the incident + 24years; or Three years from the date of an incident which may become	Review for further retention in the case of enforcement action or contentious disputes Shred/delete	Yes

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		contentious if the pupil was 18 years old at the date of the incident		
5.3	Incident investigations and reports, risk assessments and other relevant documents where there has been an accident or incident	DOB of the pupil involved in the incident + 24 years; or Three years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident	Review for further retention in the case of enforcement action or civil claims for personal injury Shred/delete	No
6	Generic health and safety records			
6.1	Risk assessments, records of health and safety arrangements, copies of policies and procedures General records of health and safety auditing and monitoring including fire risk assessments, electrical testing, PAT testing and gas appliance testing Training records and copies of instructions or information Maintenance logs and/or records of plant and/or equipment plus safety	Kept for as long as they remain relevant (at least three years in the absence of a specific accident, incident, dangerous occurrence or notifiable disease)	Review for further retention in the case of enforcement action or contentious disputes Shred/delete	No

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	<p>manuals/notices/ instructions</p> <p>Records of emergency evacuations and fire drills, fire safety risk assessments and fire safety policy / fire arrangements</p>			
6.2	Copies of documents, including health and safety files, prepared pursuant to the Construction (Design and Management) Regulations 2015	Records are retained as long as is reasonably necessary to inform on future construction projects at the School site	Shred/delete	N/A
7	Insurance			
7.1	Insurance certificates and schedules of cover	Indefinitely	N/A	No
7.2	Correspondence with insurers related to specific accidents or incidents	<p>Three years generally</p> <p>If the incident involved a pupil - DOB of the pupil involved in the incident + 24 years; or</p> <p>Three years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident</p>	<p>Review for further retention in the case of civil claims for disease or personal injury</p> <p>Shred/delete</p>	No

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		Disease claims or where there have been allegations of abuse - indefinitely		
8	Investigations, reviews and inquiries			
8.1	Documents relevant to IICSA	Indefinitely	Review once the Inquiry has been completed.	No - unless the school has received a formal notice from IICSA ¹
8.2	<p>Internal reports and investigations into accidents / incidents</p> <p>Copies of reports submitted to external agencies / regulators such as Independent Schools Inspectorate, Health and Safety Executive, Local Authority, Charity Commission etc.</p> <p>External reports, reviews, investigations and inquiries for example inquests and public inquiries</p>	<p>Where the investigation/inquiry/report has been necessitated as a result of a specific incident, these documents are stored centrally for at least three years where there is a risk of enforcement action and/or criminal prosecution and/or a civil claim. Where this relates to a pupil DOB +24 years; or</p> <p>Three years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident.</p>	Shred/delete	No
9	Former Pupil and Alumni records			

¹ Section 21 Inquiries Act 2005



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9.1	Health and Safety Records relating to former pupils	As set out in section 5 above. This is subject to any longer retention period set out above. For example, records relating to a reportable disease should be kept indefinitely .	As set out in section 5 above	No
9.2	General alumni correspondence, membership forms etc.	For at least six years after the last time the individual contacted the School	Shred/delete	No
10	Keeping Information for Longer			
10.1	Records which do not contain personal data, for example, old photographs of School buildings, title deeds etc.	Can be kept indefinitely	N/A	No
10.2	Records relating to a number of pupils/staff, or the School generally, such as old class photographs, lists of pupils attending the School in any given year, School prospectuses, newspaper cuttings etc.	Can be kept indefinitely provided the School is satisfied (1) there is a legitimate interest in doing so, (2) keeping the record is necessary for that legitimate interest, and (3) the legitimate interest is not overridden by the interests, rights or freedoms of the individuals concerned.	N/A	No
10.3	Records concerning specific pupils kept for a valid reason. For example, a	Can be kept indefinitely if the School is satisfied (1) there is a legitimate interest in doing so, (2)	N/A	No

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	poem written by an exceptionally gifted pupil.	<p>keeping the record is necessary for that legitimate interest, and (3) the legitimate interest is not overridden by the interests, rights or freedoms of the individuals concerned.</p> <p>Please note that this does not apply to more routine pupils' records. Routine work produced by pupils are kept in line with the retention periods set out in section 2.1 above unless the School has a specific reason for keeping it and that decision can be justified on the basis of the legitimate interests assessment detailed above</p>		
11	CCTV, videos and photographs			
11.1	CCTV footage	30 days	<p>Delete</p> <p>Review for further retention if the recording may be required for any reason such as in relation to an incident or accident involving any person.</p>	No
11.2	Photographs of pupils/staff for internal administration purposes e.g. to identify the pupil or photographs used on security passes	These photographs will be retained for as long as they are required for the purpose for which they were taken.	<p>Shred/delete</p> <p>Review for further retention in the case of relevance to contentious disputes.</p>	No

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11.3	Photographs or videos of pupils/staff taken for marketing reasons e.g. photographs for use in the School prospectus or a video of pupils on the School's website	These photographs and videos will be retained for as long as they are required for the purpose for which they were taken.	Shred/delete Review for further retention in the case of relevance to contentious disputes.	No
11.4	Photographs or videos of pupils used as part of the curriculum e.g. a video of a drama lesson/ performance or as part of an art project	These photographs and videos will be retained for as long as they are required for the purpose for which they were taken.	Shred/delete Review for further retention in the case of relevance to contentious disputes.	No

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