



## RECORDS MANAGEMENT POLICY

### International School of Torres Vedras

(hereafter referred to as “the School”)

#### Document Version Control

Version	Date	Changes
0.1	26/02/2026	Initial creation

### 1. Introduction and Scope

The School will implement a structured records management system in compliance with:

- Regulation (EU) 2016/679 (GDPR)
- Law 58/2019
- Civil Code
- Labour Code
- Commercial Code
- General Tax Law
- VAT Code
- Portuguese educational legislation

This policy applies to all documents created, received or maintained by the School, regardless of format.

### 2. Legal Framework for Retention

Retention periods will be determined based on:

- Article 5(1)(e) GDPR
- Article 30 GDPR
- Article 309 Civil Code – 20-year limitation period
- Articles 337 and 381 Labour Code
- Article 123 Commercial Code – 10-year accounting retention
- Article 52 VAT Code – 10-year tax retention
- Article 48 General Tax Law

Regulatory, safeguarding and operational requirements will also be considered.



### 3. Records Lifecycle

Records will be managed throughout their lifecycle:

- Creation and classification
- Active use
- Retention
- Secure disposal or archiving

Records must be authentic, reliable, complete and accessible only to authorised staff. Regular reviews will ensure compliance and integrity.

### 4. Pupil Records

Pupil records will be retained in accordance with:

- Article 309 Civil Code
- Applicable educational legislation
- Safeguarding obligations

Core pupil files will normally be retained until the pupil reaches **25 years of age**.

Safeguarding records may be retained longer where necessary.

Records will be securely transferred to onward educational institutions where applicable.

### 5. Staff Records

Personnel records will be retained in accordance with:

- Article 337 Labour Code
- Article 381 Labour Code
- Article 309 Civil Code

#### Retention periods:

- Personnel file: termination + 5 years
- Payroll and tax records: 10 years
- Social Security documentation: 10 years



## 6. Financial and Accounting Records

Financial and accounting documentation will be retained for **10 years** in accordance with:

- Article 123 Commercial Code
- Article 52 VAT Code

## 7. Contracts

Contracts will be retained for:

- Contract duration + up to **20 years** where civil liability risk exists
- Minimum **10 years** for accounting compliance

## 8. Health and Safety Records

Health and safety documentation will be retained in accordance with:

- Law 102/2009

Longer retention may apply where incidents or exposure records require it.

## 9. Security and Access Controls

All records will be protected under:

- Article 5(1)(f) GDPR
- Article 32 GDPR
- Law 58/2019

Security measures include:

- Role-based access controls
- Authentication mechanisms
- Encryption where appropriate
- Audit logging
- Secure physical storage

Access will be strictly on a need-to-know basis.



## 10. Disposal

Records will be destroyed after expiry of retention periods in accordance with:

- Article 5(1)(e) GDPR
- Article 17 GDPR
- Law 58/2019

All destruction will be securely carried out and recorded.

## 11. Archiving

Records of historical value may be preserved permanently under:

- Article 89 GDPR

Appropriate safeguards will be applied.

## Appendix I — Statutory Retention Summary Table

Record Category	Legal Basis	Retention Period
Personnel files	Art. 337 LC / Art. 309 CC	Termination + 5 years
Payroll & tax	Art. 123 Commercial Code	10 years
VAT	Art. 52 VAT Code	10 years
Accounting	Art. 123 Commercial Code	10 years
Contracts	Art. 309 Civil Code	Contract + up to 20 years
Pupil files	Art. 309 Civil Code	Until age 25
Safeguarding	Civil liability	Case-dependent
Health & Safety	Law 102/2009	As legally required
Archival records	Art. 89 GDPR	Permanent