

Information and Records Retention Policy

Duke of Kent School

September 2024

Introduction

- 1 This policy sets out a structured approach to reviewing and destroying records at School (the School).
- 2 The retention period for each type of record is shown in the table below. In addition, data protection legislation makes it unlawful to keep the information when it is no longer needed for the purpose for which it is held. This requirement allows discretion and may vary according to the circumstances, but in practice it means that the School should promptly destroy the record once the retention period in the table below has been reached (subject to the paragraphs below).
- 3 Occasionally there may be special circumstances which mean that a record should be kept for longer, for example, where there is a risk of litigation or a request from an outside body. The School will refer to its insurance policies and legal advice may be sought in these circumstances.

Run off period

- 4 The School uses a six month "run off" period to help ensure that a record is not deleted if it needs to be kept for longer. This means that the School keeps information for six months after the retention period set out in the table has come to an end. In addition, the School carries out a data cleanse of its files every three to six months. In practice therefore, a three-year retention period means three and a half years plus up to six months to allow the School to securely dispose of the information.

Emails and other forms of electronic communication

- 5 Emails and other electronic communications should be filed in the right place as soon as is reasonable to help ensure that the appropriate retention period is applied. e.g. a message relating to safeguarding should be filed on the safeguarding file.
- 6 The following platforms are authorised by the School for use in addition to school email which is sent and received via Google mail. Google classroom, ISAMS, Oasis and Clarion. Please see the School's Acceptable Use Policy for further information about the School's approach to staff use of these platforms.

Safeguarding, the Independent Inquiry into Child Sexual Abuse (IICSA) and insurer requirements:

- 7 Although IICSA concluded in 2022, the School has decided to cease the routine destruction of records that are known to relate to allegations or cases of child sexual abuse in accordance with IICSA's recommendation or that otherwise relate to safeguarding concerns. The School has decided that this will mean retaining some categories of document indefinitely and these are referenced in the tables below.
- 8 Please note that the School is keeping this under review and intends to recommence controlled document destruction at the appropriate time.

Secure destruction

- 9 Personal data will be securely deleted or destroyed at the end of the relevant retention period.
- 10 The School has allocated responsibility for the secure disposal of records containing personal data to the Head of Operations. The Head of Operations will liaise with all departments to ensure that the records are disposed of appropriately.
- 11 The School will keep a record of what personal data has been deleted and when the deletion took place.
- 12 The School will ensure that any electronic devices are wiped securely before they are disposed of or recycled.
- 13 Paper records are disposed of through secure shredding. The School has two shredders located in the Staff room and Bursary. When required, the School will use the services of Shred on Site Limited for higher quantities of confidential waste.
- 14 The School may hire contractors to delete or dispose of personal data, for example, by wiping and disposing of electronic devices or by shredding paper. In these cases, the School carry out appropriate due diligence on its contractors to check that they are complying with their obligations and ensure that there is a suitable written agreement in place.
- 15 The School has measures in place to halt the deletion of information promptly should it need to be retained beyond the normal retention period. For example, if information may be required in relation to a legal claim.
- 16 Staff are generally not allowed to use their personal devices for school work other than to access work emails and there is specific guidance in this respect within the School's Information and Security Policy.
- 17 The School uses contractors to process personal data on its behalf (called processors under data protection law). Examples of the processors used by the School include the School's payroll provider, and the School's information management system which is hosted by ISAMS. Whenever the school uses a processor, a written contract will be in place so that both parties understand their responsibilities and liabilities including the deletion or return of all personal data at the end of the contract.

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
1	Pupils			
1.1	Admission registers (however held)	Six years from the date that data was entered	Review for further retention in the case of contentious dispute SHRED / DELETE	Yes
1.2	Attendance registers (however held)	Six years from the date that the data was entered	Review for further retention in the case of contentious dispute SHRED / DELETE	Yes
1.3	Child protection records	Indefinite retention	<p>Notes</p> <p>Child protection information must be transferred separately from the pupil's main educational file to the Designated Safeguarding Lead (DSL) at the new school whilst the child is still under 18 in accordance with the requirements set out in KCSIE. Schools should ensure secure transit and confirmation of receipt should be obtained. As to whether the School should send the original or a copy, practice varies from local authority to local authority on this so the School should check local requirements. KCSIE is silent on whether the original or a copy must be sent. (A copy of the information, whether the original or a copy of the original, should be retained by the School).</p> <p>Where a child is removed from roll to be educated at home, the file should be sent to the Local Authority (LA), with a copy being retained by the School.</p> <p>In accordance with recommendations of the Independent Inquiry into Child Sexual Abuse all schools should retain information which relates to allegations (substantiated or not) of organisations and</p>	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
			individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; and institutional failures to protect children from sexual abuse or other exploitation.	
1.4	Biometric information (e.g. fingerprints to be used as part of an automated biometric recognition system)	For as long as the School requires the information for the automated biometric recognition system	This information must not be kept for longer than it is needed. The information must be destroyed if the pupil no longer uses the system including when they leave the School, where the parent or pupil withdraws consent or the pupil objects to its use	No
1.5	Consents for using pupils' biometric data	For as long as the data is being processed and up to six years afterwards	SHRED / DELETE	No
1.6	Medical records held by the School	DOB of the pupil + 24 years	Review for further retention in the case of contentious disputes SHRED / DELETE	No
1.7	Counselling records held by the School	DOB of the pupil + 24 years	Review for further retention in the case of contentious disputes SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
1.8	Parents of international pupils may ask the School to look after passports and/or biometric residence permits for safe keeping	These documents are only ever to be looked after by the School where parents have given their written consent and are to be returned immediately on request.	Return to the pupil, parent, educational guardian or other appropriate adult in accordance with parents' instructions	No
2	Pupil files			
2.1	Pupil files (including public examination scripts, marks and results)	DOB of the pupil + 24 years	<p>Review for further retention in the case of contentious disputes, for example, parental complaints, disciplinary matters, pupil exclusions, bullying incidents and subject access requests</p> <p>SHRED / DELETE</p> <p>Notes</p> <ul style="list-style-type: none"> • When reviewing pupil files, the School should have regard to other applicable sections of this policy • Any examination certificates left unclaimed should be returned to the appropriate Examination Board <p>If the child moves school, then the School must retain a copy of the file sent to the new school.</p>	No
2.2	Internal examination scripts, marks and	<p>Scripts:</p> <p>Scripts from weekly or monthly tests: Keep until the end of the next term.</p>	Keep for longer in accordance with the retention periods and guidance set out in row 2.1 above if risk of contentious disputes, for example, parental complaints, disciplinary matters, pupil exclusions,	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	results	<p>Scripts from termly or yearly tests: Keep until the end of the next academic year.</p> <p>Marks and results:</p> <p>If the purpose of the test is to progress the child (either internally or externally) then keep marks and results in accordance with the retention periods and guidance set out in row 2.1 above.</p> <p>If the purpose of the test is for general internal assessment of academic performance, then keep marks and results for the same period as the scripts themselves.</p>	bullying incidents and subject access requests.	
2.3	General school work (e.g. essays, artwork)	<p>DOB of the pupil + 24 years</p> <p>It is at the School's discretion which pieces of work to retain. The purpose of retention here is to support any further education / job applications that may require evidence of past work. There is no need to keep all school work submitted by pupils, staff should be selective.</p> <p>You could retain, for example:</p>	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		<ul style="list-style-type: none"> • Coursework submissions • A particularly good piece of classwork Extra curricular pieces such as poetry		
2.4	Individual Education Plans	DOB of the pupil + 24 years	Review for further retention in the case of contentious disputes SHRED / DELETE	No
2.5	Education and Health Care (EHC) Plans	DOB of the pupil + 24 years	SHRED / DELETE unless legal action pending The Plan belongs to the LA which makes and maintains the Plan	Yes
2.6	Letters authorising absence	Three years from the date of the last entry on the attendance register	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	Conclusion of the trip + six years	Review for further retention in the case of contentious disputes otherwise SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
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 The permission slips for all pupils on the trip may need to be retained to show that the rules had been followed for all pupils	Review for further retention in the case of relevance to contentious disputes or relevance to safeguarding. SHRED / DELETE	No
4	Admission department and bursarial records			
4.1	Admission and parent contract documents including registration form, letter of offer and acceptance form	Six years from date of leaving the School	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	One year	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

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
4.4	Financial information in respect of school trips	Seven years for audit purposes.	Review for further retention in the case of contentious disputes SHRED / DELETE	No
5	Employment			
5.1	Employment or personnel records including recruitment information, application forms, (data gathered from online searches on shortlisted candidates), contracts of employment, changes to terms and condition, disciplinary matters, grievance procedures.	For at least six years after date of termination of employment For at least 12 years after date of termination if any of the documents were signed as a deed	If on a date no earlier than six years after the termination date (or 12 years if any of the documents are a deed) there has been no recent contact from the relevant individual and no apparent breach of contract claim, dispose securely of documentation unless any child protection concerns. Records of anyone with child protection concerns (even if not proved) should be retained indefinitely. Also review guidance available at the time of planned destruction, in case that guidance suggests a need to retain for longer.	No
5.2	Risk assessments carried out for the purposes of	Indefinitely	N/A	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	determining a person's suitability to work with children and records relating to any formal or informal process concerning a matter of a safeguarding nature (including low level concerns)			
5.3	Single central register (SCR)	There is no legal requirement to keep the SCR entry for staff who have left as it ceases to be relevant for inspection purposes. Many schools move the entry on to an archive register whilst others keep a list of the checks carried out on the personnel file instead and retain that in accordance with their retention policy. As there is no statutory requirement to keep this information in this form it should only be kept for as long as is necessary. As it ceases to be relevant for inspection purposes, the School should consider and document why it is necessary to keep	Review whether further retention is necessary. If so, these reasons must be documented. If not SHRED / DELETE If the entry is destroyed once the staff member has left, the School should keep a record of the fact that vetting was carried out, the result and the recruitment decision taken.	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		it for a particular length of time. Should the School be notified of a historic abuse claim or should a former member of staff commit offences elsewhere the School may need to demonstrate that it carried out all required checks prior to work starting, when they were carried and out and by whom. As a consequence, best advice is to retain the SCR entry for each former member of staff indefinitely either on an archive SCR or within the personnel file.		
5.4	Childcare disqualification declarations	Keep indefinitely if relevant to a safeguarding issue. Unless there are safeguarding matters, declarations which contain information in relation to the household of a member of staff should be destroyed with immediate effect as the 'by association' element ceased to apply with effect from August 2018.	SHRED / DELETE in so far as it contains information in relation to the household of a member of staff. In cases relating to safeguarding, keep indefinitely. If the records concern a safeguarding matter, and relates to the member of staff and/or the household of a member of staff, retain indefinitely.	Yes
5.5	Records and documents relating to membership of	Indefinitely	Review whether further retention is necessary. Decisions in relation to the Teachers' Pension Scheme may have ramifications beyond six years, and may be queried at any time by members and the	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	and contributions to the Teachers' Pension Scheme		Teachers' Pension Scheme.	
5.6	Employment references received and provided where concerns were raised about an individual in relation to safeguarding, an individual's employment ended for a safeguarding reason or where a safeguarding concern was outstanding at the time of termination	Part 4 of KCSIE states that these records should be retained for at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. However, the School has decided to keep these records indefinitely.	Indefinitely. If not retaining indefinitely, always review whether further retention is necessary prior to deletion. If none, SHRED / DELETE	Yes
5.7	Employment references received and references provided (where	While employment continues and at least up to six years after employment terminates.	Consider whether any recent reference requests for the relevant individual have been received. If any concerns are / have been raised by social services or other agencies, see 5.6 above.	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	no safeguarding concerns have arisen or are known)		If none, SHRED / DELETE	
5.8	Working time opt-out forms	Two years from the date on which they were entered into. However, given their potential relevance to disputes they should be retained for three years from the date on which they were entered into.	SHRED / DELETE	Yes
5.9	Records to show compliance with the Working Time Regulations	Two years from the creation of the record. However, given their potential relevance to disputes they should be retained for three years from the creation of the record.	SHRED / DELETE	Yes
5.10	Payroll and wage records These include records of: <ul style="list-style-type: none"> • Details on overtime. • Bonuses. • Expenses. 	To comply with the relevant statutory requirements, retain for at least three years after employment ends. However, given their potential relevance to pay disputes they should be retained for the longer period of six years after employment ends	SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	<ul style="list-style-type: none"> Benefits in kind. 			
5.11	PAYE Records	Although the requirement is three years after the end of the tax year to which they relate, given the potential relevance of PAYE Records to pay disputes they should be retained for six years after employment ends.	SHRED / DELETE	Yes
5.12	Maternity / paternity records These include: <ul style="list-style-type: none"> Records regarding Maternity payments made save for where those include payroll records. Dates of maternity leave. Period without maternity payment. Maternity 	Three years after the end of the tax year in which the maternity pay period ends. However, given their potential relevance to disputes they should be retained for four years after the end of the tax year in which the maternity pay period ends.	SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	certificates showing the expected week of confinement.			
5.13	<p>Sickness records required for the purposes of Statutory Sick Pay (SSP)</p> <p>These include:</p> <ul style="list-style-type: none"> • The dates the employee was off sick. • Which of those days were qualifying days? • The reason they said they were off work. • The employee's National Insurance number. 	<p>Three years after the end of the tax year to which they relate.</p> <p>Employers may be required by HMRC to maintain records for PAYE purposes and to show they are meeting their SSP obligations.</p>	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
5.14	Records in relation to hours worked and payments made to workers	For a period of six years beginning with the last day of the following month to which the records relate.	SHRED / DELETE	Yes
5.15	Consents for the processing of personal data and sensitive personal data (known as special category personal data under the UK GDPR)	For as long as the data is being processed and up to six years afterwards For consent to be valid it must be "freely given". This is often difficult to evidence in an employment context owing to the imbalance in the relationship between the School and the employee. Therefore, the School should be very careful before asking employees to consent to their data being used in a particular way. In the vast majority of cases it is not necessary to obtain the employee's consent before using their personal data.	SHRED / DELETE	Yes
5.16	Disclosure and Barring Service (DBS) checks	Dispose of / return to subject of check once the individual has been deemed suitable for appointment unless the School can justify a longer retention period in an individual case.	Enter DBS certificate number, date, initials on Single Central Register. Make a note that the applicant has been deemed suitable for appointment. SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
5.17	Immigration/Right to Work checks	Throughout employment and then retained for two years after the termination of employment	SHRED / DELETE	Yes
5.18	Documents that are required to be retained for each worker sponsored by the school under the Tier 2 (General), Skilled Worker or Temporary Worker immigration categories	Throughout the period of sponsorship and for whichever is the shorter period of either: <ul style="list-style-type: none"> i. one year from the date that the sponsorship of the migrant worker ends; or ii. if the migrant worker is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents. 	SHRED / DELETE <i>As at June 2023 the UK Visas and Immigration Sponsor Guidance advises sponsors to retain at least one of the following in relation to recruitment exercises that result in the sponsorship of a migrant worker:</i> <ul style="list-style-type: none"> • <i>"a copy or summary of the interview notes for the successful candidate</i> • <i>a list of common interview questions used for all candidates as part of your selection process</i> • <i>brief notes on why the successful candidate was selected and why other candidates were rejected</i> • <i>information about any scoring or grading process you used to identify the successful candidate</i> • <i>any other relevant information or evidence.</i> <p><i>Application forms, CVs, interview notes or any other personal data relating to unsuccessful candidates do not have to be retained.</i></p>	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
5.19	Recruitment records of unsuccessful candidates (including data gathered from online searches on shortlisted candidates)	Six months after notifying unsuccessful candidates in order to demonstrate, if required, the fairness and transparency of the recruitment process; or If the successful candidate was sponsored by the School before 1 December 2020 under the Tier 2 (General) immigration category, for the period specified in 5.18 above.	SHRED / DELETE	Yes
5.20	Personnel and training records	Whilst employment continues and up to six years after employment ceases	SHRED / DELETE	No
5.21	Annual leave records	While employment continues and for six years after employment ends.	SHRED / DELETE	No
5.22	Collective / workforce agreements	Whilst employment continues and for six years after employment ceases	SHRED / DELETE	No
5.23	Works Council minutes	Permanently	N / A	No
5.24	An Employee's bank details	As soon after the end of employment as possible once last payments have been made	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
5.25	Travel and subsistence claims	Whilst employment continues and up to six years after employment ends	SHRED / DELETE	No
5.26	Records of advances for season tickets and loans to employees	Whilst employment continues and up to six years after employment ends	SHRED / DELETE	No
5.27	Death Benefit Nomination and Revocation Forms	Whilst employment continues and up to six years after employment ends	SHRED / DELETE	No
6	Health and safety information - employees			
6.1	Reportable injuries, diseases and dangerous occurrences (RIDDOR) reports or own record	Three years from the date of record If disease - indefinitely (recommended)	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
6.2	First aid / accident book entry	Three years from the date of injury or last record in the book If disease - indefinitely	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes
6.3	Records of maintenance, examination and test control measures relating to substances hazardous to health under the Control of Substances Hazardous to Health (COSHH) regime	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED / DELETE	Yes
6.4	Health records for licensable asbestos work	At least 40 years from the date if the last entry	Review for further retention in the case of enforcement action contentious disputes SHRED / DELETE	Yes
6.5	Medical surveillance certificate for licensable asbestos work	At least four years from the date it was issued	Review for further retention in the case of enforcement action contentious disputes SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
6.6	Records of air monitoring for asbestos	Where a health record is required at least 40 years from the date of the last entry In other cases at least five years from the date of the last entry		Yes
6.7	Records of examinations, tests and repairs carried out in respect of exhaust or respiratory protective equipment under the Control of Asbestos Regulations 2012 (CAR)	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED / DELETE	Yes
6.8	Examination / report of defect for power presses	Two years	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes
6.9	Records of water monitoring, inspection, testing, checks and control measures for	Five years from the date of the last entry	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	legionellosis			
7	Health and safety information - pupils			
7.1	Accident reports including first aid / accident book	DOB of the pupil involved in the incident + 21 years	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	No
7.2	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 + 21 years	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes
7.3	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 + 21 years	Review for further retention in the case of enforcement action or civil claims for personal injury SHRED / DELETE	No
8	Generic health and safety records			
8.1	Risk assessments, records of health	These should be kept for as long as they remain relevant - we recommend	Review for further retention in the case of enforcement action or	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	<p>and safety arrangements, copies of policies and procedures</p> <p>General records of health and safety auditing and monitoring including fire risk assessments, electrical testing, PAT testing and gas appliance testing</p> <p>Training records and copies of instructions or information</p> <p>Maintenance logs and / or records of plant and / or equipment plus safety manuals / notices / instructions</p> <p>Records of emergency evacuations and</p>	<p>at least three years (in the absence of a specific accident, incident, dangerous occurrence or notifiable disease)</p>	<p>contentious disputes</p> <p>SHRED / DELETE</p>	

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	fire drills, fire safety risk assessments and fire safety policy / fire arrangements			
8.2	Copies of documents, including health and safety files, prepared pursuant to the Construction (Design and Management) Regulations 2015	To be decided by the School - records should be retained as long as is reasonably necessary to inform on future construction projects at the School site	SHRED / DELETE	N / A
9	Insurance			
9.1	Insurance certificates and schedules of cover	Indefinitely	N / A	No
9.2	Correspondence with insurers related to specific accidents or incidents	Three years generally If the incident involved a pupil - DOB of the pupil involved in the incident + 21 years Disease claims or where there have been allegations of abuse - indefinitely	Review for further retention in the case of civil claims for disease or personal injury SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
10	Investigations, reviews and inquiries			
10.1	Documents relevant to IICSA	Indefinitely	Review periodically.	No - unless the school has received a formal notice from IICSA
10.2	<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</p>	<p>To be decided by the School</p> <p>Where the investigation / inquiry / report has been necessitated as a result of a specific incident, we recommend that 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.</p> <p>Where this relates to pupil DOB + 21 years</p>	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	inquiries			
11	Records held by the development office including alumni records			
11.1	As we have an ongoing relationship with our alumni and others, most information held by the development office is kept indefinitely. Please see our Fundraising and Development Privacy Notice for further information.	Until no longer needed.	N / A	No
11.2	Alumni should be treated as employees for the purposes of health and safety records. Although this is not strictly necessary, (some of the health and safety	As set out in section 6 above	As set out in section 6 above	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	requirements relating to employees do not apply to alumni), treating them the same can be considered good practice and may be more straightforward to implement in practice			
11.3	Records of communication preferences (e.g. a record that an individual has asked to unsubscribe from emails).	Will be kept indefinitely.	N / A	No
11.4	Gift aid information	Six years from the end of the tax year in which the claim to HMRC is made.	N / A	No
12	Keeping information for longer			
12.1	Records which do not contain	Can be kept indefinitely	N / A	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	personal data, for example, old photos of School buildings, title deeds etc.			
12.2	Records kept for reasons of archiving in the public interest. For example, such as old class photos, lists of pupils attending the School in any given year, old School prospectuses, newspaper cuttings etc.	Will be kept indefinitely.	N / A	No
12.3	Former staff and pupil lists showing name, DoB and years attending kept as evidence of their attendance at the school.	Indefinitely		

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
13	CCTV, videos and photos			
13.1	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> <p>CCTV footage may also be needed in relation to parental complaints, disciplinary matters, pupil exclusions, bullying incidents or health and safety matters.</p> <p>If a subject access request has been made for the footage it must be retained.</p> <p>The School should consider the relevant limitation periods for claims being brought against the School and seek advice as necessary.</p>	No
	Photos of pupils for internal administration purposes e.g. to identify the pupil or photos used on security passes	These photos should 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
13.2	Photos or videos of pupils taken for marketing reasons e.g. photos for use in the School	<p>These photos and videos should be retained for as long as they are required for the purpose for which they were taken.</p> <p>If the School would like to retain the</p>	<p>SHRED / DELETE</p> <p>Review for further retention in the case of relevance to contentious disputes.</p>	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	prospectus or a video of pupils on the School's website	images for archiving reasons please see the comments in the introduction.		
13.3	Photos 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	DOB of the pupils captured in the recording + 24 years	SHRED / DELETE Review for further retention in the case of relevance to contentious disputes.	No
14	Governance Records			
14.1	Minutes of governors' and members' meetings and copies of written resolutions	10 years from the date of the meeting or date resolution was passed (a legal requirement if the School is constituted as a limited company).	Review for further retention where the minutes relate to matters where there is a risk of enforcement action, contentious disputes or where content might be relevant to safeguarding.	Yes
14.2	The Company's Statutory Books (if the School is constituted as a limited company)	Indefinitely	N / A	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
14.3	Constitutional documents such as Memorandum and Articles of Association	Indefinitely	N / A	No
14.4	Copies of any material correspondence with the Charity Commission including serious incident reports]	Indefinitely	N / A	No
15	Financial Records (non-personal data)			
15.1	Annual Accounts	Six years from the end of the financial period to which they relate.	Review for further retention if the accounts relate to a period to which enforcement action or contentious disputes may relate or where content might be relevant to IICSA or safeguarding.	Yes The requirement passes to the last trustees in the event the school ceases to exist
15.2	Tax records and corporation tax returns	Six years from the end of the period for which a tax return is required, or if an enquiry is opened, until the conclusion of the enquiry.	Review for further retention if the accounts relate to a period to which enforcement action or contentious disputes may relate.	Yes The requirement passes to the last trustees in the

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
				event that the School ceases to exist.
15.3	Financial reports and accounting information	Six years from the end of the financial period to which they relate.	Review for further retention if the accounts relate to a period to which enforcement action or contentious disputes may relate or where content might be relevant to IICSA or safeguarding.	Yes The requirement passes to the last trustees in the event the School ceases to exist
15.4	Trustees' annual report	Six years from the end of the financial period to which it relates.	Review for further retention if the accounts relate to a period to which enforcement action or contentious disputes may relate or where content might be relevant to IICSA or safeguarding.	No (provided it has been filed with the Charity Commission)
15.5	VAT records and VAT returns	Six years from the end of the accounting period to which the VAT return relates. Some records will need to be kept for longer. This includes where a property has been opted to tax, or an asset is subject to the Capital Goods Scheme. There are different retention periods applicable to certain special VAT schemes that a taxable person may use e.g. the Annual Accounting Scheme, the Flat Rate Scheme, the	Review for further retention if the records relate to a period to which enforcement action or contentious disputes may relate.	Yes The requirement passes to the last trustees in the event that the School ceases to exist.

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		Cash Accounting Scheme, and Margin Schemes. VAT registered businesses must keep some VAT records digitally in compliance with the rules for Making Tax Digital.		