

# Information and Records Retention Policy

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## The Children's House

This policy should be renewed every year and as required by legislation.		
Action	Reviewer	Date
Review	KO	Feb 2021
Approved by Chair of COM	DB	Feb 2021
Date for next internal review		Feb 2022

<b>Reviewed policy published on:</b>	
On website	✓
On portal	✓
Dropbox	✓

## Introduction

- 1 This policy sets out a structured approach to reviewing and destroying records in relation to The Children's House (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 such as the Independent Inquiry into Child Sexual Abuse (IICSA), see below. 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

- 5 Emails should be filed centrally as soon as is reasonable to help ensure that the appropriate retention period is applied. Emails should be filed as follows:
  - 5.1 Pupil related emails to be filed in the School's pupil information management system
  - 5.2 Routine emails to be kept inboxes for up to six months before being deleted
  - 5.3 Emails relating to any areas covered in the table below, to be filed in line with the retention table

The Independent Inquiry into Child Sexual Abuse (IICSA) and insurer requirements:

- 6 IICSA has issued retention instructions to a range of institutions regarding records relating to the care of children. In light of this and the wider safeguarding context, the School has decided to temporarily cease the routine destruction of those records which might be relevant in case they are requested by IICSA or made subject to a disclosure order. The School has decided to apply this to the following categories of document:
  - 6.1 Child Protection Records
  - 6.2 Statement of Special Educational Needs files
  - 6.3 Single Central Register
  - 6.4 Childcare Disqualification

- 6.5 Employment Reference where employment ended for a safeguarding reason or where safeguarding was outstanding at the time of termination.
- 7 Please note that the School is keeping this under review and intends to recommence controlled document destruction at the appropriate time.
- 8 The School's insurers have requested that the School keeps the following categories of information:
- **Children's records:** reasonable period (e.g. 3 years after leaving or until age 21 or 24 for child protection records)
  - **Reportable death, injury, disease etc:** 3 years
  - **Staff accident records:** 3 years after last entry
  - **COSHH accidents/records:** 40 years
  - **Health and Safety assessments:** Permanent
  - **Personnel files and training records:** 6 years
  - **Application forms/interview notes:** 1 year
  - **DBS Checks:** 6 years after end of employment
  - **Child protection allegations:** Until person subject to allegation reaches retirement age or 10 years (whichever longer)
  - **Complaint record book:** 3 years or until next inspection (whichever longer)
  - **Insurance documents:** 40 years
  - **Minutes:** 10 years (companies), 6 years (CIOs)
  - **Accounting records:** 6 years
  - **Wage/Salary records:** 7 years
  - **Maternity pay records:** 3 years
  - **Income tax/Ni records:** 3 years
  - **Redundancy details:** 6 years

#### 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 our Bursar, Sue Garcin. Sue Garcin 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 as follows: On-site by the school administrators.
- 14 For papers that do not need to be kept in accordance with this policy, the School has placed confidential waste bins in the offices at each site, which are regularly emptied securely.
- 15 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.
- 16 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.
- 17 Staff are allowed to use their personal devices for School work so long as such use complies with the School's requirements as set out in the Information Security and Online Safety Policies. The School ensures that any School related personal data is wiped from the device as follows: The deletion of school related personal data is supervised by the IT Director.
- 18 The School uses contractors to process personal data on its behalf (called data processors under data protection law). Examples of the data processors used by the School include the School's payroll provider, and the school's information management system which is hosted by iSams.

This Policy was reviewed, amended and agreed by the Council of Management in February 2021. It will be reviewed again in one year's time.

Signed: Dawn Brindle                      Chair of the Council of Management

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
1	<b>Pupils</b>			
1.1	Admission registers (however held)	Three years from the date of the last entry	Review for further retention in the case of contentious dispute SHRED / DELETE	Yes
1.2	Attendance registers (however held)	Three years from the date of the last entry	Review for further retention in the case of contentious dispute SHRED / DELETE	Yes
1.3	Child protection records	DOB of the pupil + 70 years (but consider indefinite retention in light of IICSA).	Review for further retention in the case of contentious dispute SHRED / DELETE  <b>Notes</b> Child protection information must be copied (so that the School retains the original) and sent under separate cover to the pupil's educational file to the Designated Safeguarding Lead (DSL) at the new school whilst the child is still under 18. Schools should ensure secure transit and confirmation of receipt should be obtained.  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.  In accordance with the terms of reference of the Independent Inquiry into Child Sexual Abuse all schools are required to retain information which relates to allegations (substantiated or not) of organisations and 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	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
			sexual activity with, or having a sexual interest in, children; 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	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
1.6	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
1.7	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

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
2	<b>Pupil files</b>			
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><b>Notes</b></p> <ul style="list-style-type: none"> <li>• When reviewing pupil files, the School should have regard to other applicable sections of this policy</li> <li>• Any examination certificates left unclaimed should be returned to the appropriate Examination Board</li> </ul> <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 results	<p><b>Scripts:</b></p> <p>Scripts from weekly or monthly tests: Keep until the end of the next term.</p> <p>Scripts from termly or yearly tests: Keep until the end of the next academic year.</p> <p><b>Marks and results:</b></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</p>	<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, bullying incidents and subject access requests.</p>	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		<p>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>		
2.3	Special Educational Needs files, reviews and Individual Education Plans	DOB of the pupil + 24 years	Review for further retention in the case of contentious disputes SHRED / DELETE	No
2.4	Statement of Special Education Needs ( <b>SEN</b> ) and Education Healthcare ( <b>EHC</b> ) Plans	<p>DOB of the pupil + 24 years</p> <p>Consider also whether further retention is appropriate in light of IICSA.</p>	<p>SHRED / DELETE unless legal action pending</p> <p>The Statement / Plan belongs to the LA which makes and maintains the Statement / Plan</p>	Yes
2.5	Letters authorising absence	Three years from the date of the last entry on the attendance register	SHRED / DELETE	No
2.6	Documents that are required to be retained for each migrant enrolled under Tier 4	<p>Throughout the period of sponsorship and for whichever is the shorter period of either:</p> <p>i. one year from the date that</p>	SHRED / DELETE	Yes



	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	(General) Student or Tier 4 (Child) Student visas	<p>the School ends sponsorship of the Tier 4 student, or</p> <p>ii. if the Tier 4 student is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents</p>		
2.7	Documents confirming that the pupil has the required immigration of nationality status which permits them to study at the school	For as long as the pupil is enrolled at the school	SHRED / DELETE	Yes
3	<b>Permissions</b>			
3.1	Parental permission slips for school trips – where there has been no major incident, accident, injury or near miss involving anyone	Conclusion of the trip + six years	Review for further retention in the case of contentious disputes otherwise SHRED / DELETE	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	on the trip			
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.  SHRED / DELETE	No
4	<b>Admission department and bursarial records</b>			
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	Six years from date of leaving the	Review for further retention in the case of contentious disputes	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	information in respect of fees	School	SHRED / DELETE	
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	<b>Employment</b>			
5.1	Employment or personnel records including recruitment information, 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 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	No
5.2	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	Review whether further retention is necessary. If so, these reasons must be documented. If not SHRED / DELETE	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
		<p>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 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. This information could also be requested in relation to the IICSA. 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.</p>		
5.3	Childcare disqualification	Keep in accordance with guidance from the IICSA.	SHRED / DELETE	Yes

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	declarations	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.		
5.4	Records and documents relating to membership of and contributions to the Teachers' Pension Scheme	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 Teachers' Pension Scheme.	No
5.5	Employment references received and references provided (where no safeguarding concerns have arisen or are known)	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 below.  If none, SHRED / DELETE	No
5.6	Employment reference where an individual's employment	Part 4 of KCSIE states that these records should be retained for at least 10 years after the person has retired or until the individual reaches the age	Review whether further retention is necessary when IICSA ends.  If none, SHRED / DELETE	Yes

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	ended for a safeguarding reason or where safeguarding was outstanding at the time of termination	of 75, whichever is the later. However, whilst IICSA is ongoing no such records should be destroyed.		
5.7	Working time opt-out forms	Two years from the date on which they were entered into	SHRED / DELETE	Yes
5.8	Records to show compliance with the Working Time Regulations	Two years from the creation of the record	SHRED / DELETE	Yes
5.9	Payroll and wage records  These include records of: <ul style="list-style-type: none"> <li>• Details on overtime.</li> <li>• Bonuses.</li> <li>• Expenses.</li> <li>• Benefits in kind.</li> </ul>	Seven years from the financial year end in which payments are made	SHRED / DELETE	Yes

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
5.10	PAYE Records	Three years after the end of the tax year to which they relate (however it may be sensible to keep them for six years as they may fall within the definition of payroll and wage records).	SHRED / DELETE	Yes
5.11	Maternity / paternity records These include: <ul style="list-style-type: none"> <li>• Records regarding Maternity payments made save for where those include payroll records.</li> <li>• Maternity certificates showing the expected week of confinement</li> </ul>	Three years after the end of the tax year in which the maternity pay period ends	SHRED / DELETE	Yes
5.12	Sickness records required for the purposes of Statutory Sick Pay	Employers are required to maintain records for PAYE purposes and to show they are meeting their SSP obligations should HMRC require this.	SHRED / DELETE	Yes

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	<b>(SSP)</b>	Keep in accordance with 5.10 above.		
5.13	Records in relation to hours worked and payments made to workers	For a period of three years beginning with the last day of the following month to which the records relate. Given their potential relevance to pay disputes they should be retained for six years after the working relationship ends.	SHRED / DELETE	Yes
5.14	Consents for the processing of personal data and sensitive personal data (known as special category personal data under the 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
5.15	Disclosure and Barring Service	Dispose of once an applicant has been	Enter DBS certificate number, date, initials on Single Central Register	Yes



	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	(DBS) checks	deemed suitable for appointment	SHRED / DELETE	
5.16	Immigration/Right to Work checks	Throughout employment and then retained for two years after the termination of employment	SHRED / DELETE	Yes
5.17	Documents that are required to be retained for each worker sponsored by the school under Tier 2 or Tier 5	Throughout the period of sponsorship and for whichever is the shorter period of either: <ul style="list-style-type: none"> <li>i. one year from the date that the sponsorship of the Tier 2 or 5 migrant ends, or</li> <li>ii. if the Tier 2 or 5 migrant is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents</li> </ul>	SHRED / DELETE	Yes
5.18	Recruitment records of unsuccessful candidates	<ul style="list-style-type: none"> <li>• Six months after notifying unsuccessful candidates in order to demonstrate, if required, the fairness and transparency of the recruitment process; or</li> <li>• If the successful candidate was sponsored by the School using its Tier 2 sponsor licence, for the</li> </ul>	SHRED / DELETE	Yes

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
		period specified in 5.17 above		
5.19	Personnel and training records	Whilst employment continues and up to six years after employment ceases	SHRED / DELETE	No
5.20	Annual leave records	While employment continues and for six years after employment ends	SHRED / DELETE	No
5.21	Collective / workforce agreements	Whilst employment continues and for six years after employment ceases	SHRED / DELETE	No
5.22	Works Council minutes	Permanently	N / A	No
5.23	An Employee's bank details	As soon after the end of employment as possible once last payments have been made	SHRED / DELETE	No
5.24	Travel and subsistence claims.	Whilst employment continues and up to six years after employment ends	SHRED / DELETE	
5.25	Records of advances for season tickets and loans to employees	Whilst employment continues and up to six years after repayment or end of employment	SHRED / DELETE	No
5.26	Death Benefit Nomination and	Whilst employment continues and up to six years after payment of benefit	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	Revocation Forms			
6	<b>Health and safety information - employees</b>			
6.1	Reportable injuries, diseases and dangerous occurrences <b>(RIDDOR)</b> 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
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	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED / DELETE	Yes

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	Health ( <b>COSHH</b> ) regime			
6.4	COSHH accidents/records	At least 40 Years from the date of the last entry	Review for further retention in the case of enforcement action contentious disputes SHRED / DELETE	
6.5	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
6.6	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
6.7	Records of air monitoring for asbestos	Where a health record is required at least 40 years from the date if the last entry  In other cases at least five years from the date of the last entry		Yes
6.8	Records of examinations, tests and repairs carried out in respect of exhaust or	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED / DELETE	Yes

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	respiratory protective equipment under the Control of Asbestos Regulations 2012 (CAR)			
6.9	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
6.10	Records of water monitoring, inspection, testing, checks and control measures for legionellosis	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
<b>7</b>	<b>Health and safety information - pupils</b>			
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	Minimum statutory retention period is at least 3 years but, we recommend	Review for further retention in the case of enforcement action or contentious disputes	Yes

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	and dangerous occurrences (RIDDOR) reports or own record	that the record is kept for DOB of the pupil involved in the incident + 21 years	SHRED / DELETE	
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
<b>8</b>	<b>Generic health and safety records</b>			
8.1	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,	These should be kept for as long as they remain relevant - we recommend 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

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	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 manuals / notices / instructions  Records of emergency evacuations and fire drills, fire safety risk assessments and fire safety policy / fire arrangements			

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
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
<b>9</b>	<b>Insurance</b>			
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
<b>10</b>	<b>Investigations, reviews and inquiries</b>			
10.1	Documents relevant to IICSA	Indefinitely	Review once the Inquiry has been completed.	No - unless the school has received a formal



	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
				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 inquiries</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. Where this relates to pupil DOB + 21 years</p>	SHRED / DELETE	No
11	<b>Records held by the development office including alumni records</b>			

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
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.	NA	NA
11.2	We recommend that 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 requirements relating to employees do not	As set out in section 6 above	As set out in section 6 above	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	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	<b>Keeping information for longer</b>			
12.1	Records which do not contain personal data, for example, old photographs of	Can be kept indefinitely	N / A	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	School buildings, title deeds etc			
12.2	Records kept for reasons of archiving in the public interest. For example, such as old class photographs, lists of pupils attending the School in any given year, old School prospectuses, newspaper cuttings etc	Will be kept indefinitely.	N / A	No
<b>13</b>	<b>CCTV, videos and photographs</b>			
13.1	CCTV footage	90 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</p>	No

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
			retained. The School should consider the relevant limitation periods for claims being brought against the School and seek advice as necessary.	
13.2	Photographs of pupils for internal administration purposes e.g. to identify the pupil or photographs used on security passes	These photographs should 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
13.3	Photographs or videos of pupils 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 should be retained for as long as they are required for the purpose for which they were taken.  If the School would like to retain the images for archiving reasons please see the comments in the introduction.	SHRED / DELETE Review for further retention in the case of relevance to contentious disputes.	No
13.4	Photographs or videos of pupils used as part of the curriculum e.g. a video of a drama	These photographs and videos should 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

	<b>Record</b>	<b>Retention period</b>	<b>Action at the end of the retention period</b>	<b>Retention period required by law?</b>
	lesson / performance or as part of an art project	If the School would like to retain the images for archiving reasons please see the comments in the introduction.		