



Loughborough
Schools Foundation

Nursery • Fairfield • Grammar • High

Information and Records Retention Policy

Document Management Information

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Policy Author:	James Leeson, Data Protection Officer
Approved By:	David Goodacre - Bursar
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Revision History

Version	Description of Revision	Date Approved
1.0	Adopted ISBA guidelines, with customisation to the Foundation.	June 2024
2.0	New version on Foundation template. Minor edits to structure and sentence structure. Updated content from solicitors and legal advisors.	Jan 2026

INTRODUCTION

This policy sets out a structured approach to reviewing and destroying records in relation to the Loughborough Schools Foundation (the Foundation).

- 1 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 Foundation should promptly destroy the record once the retention period in the table below has been reached – (subject to the paragraphs below).
- 2 Occasionally there may be special circumstances which means 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 Foundation will refer to its insurance policies and legal advice may be sought in these circumstances.

RUN OFF PERIOD

- 3 The Foundation 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 Foundation keeps information for six months after the retention period set out in the table has come to an end. In addition, the Foundation 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 Foundation to securely dispose of the information.

EMAILS AND OTHER FORMS OF ELECTRONIC COMMUNICATION

- 4 Emails and other electronic communications (such as Teams messages) should be filed in the right place as soon as is reasonable to help ensure that the appropriate retention period is applied. Communications should be filed as follows:

For example, a message relating to safeguarding should be filed on the safeguarding file as per the individual schools' policies. This only needs to occur when it's highly relevant to the individual concerned, whether that's staff, student or parent. Filing correctly ensures the data is secure and destroyed at the appropriate time.

- 5 The following platforms are authorised by the Foundation for use in addition to Foundation email: Microsoft Teams messages. Please see the Foundation's Acceptable use policy for further information about the Foundation's approach to staff use of these platforms.

SAFEGUARDING, THE IISCA AND INSURER REQUIREMENTS

- 6 In accordance with IISCA's recommendations made in its final report of October 2022, the Foundation has decided that it will retain records that are known to relate to allegations or cases of child sexual abuse for a period of 75 years from the date a pupil leaves the Foundation.

Please note that the Foundation is keeping this under review and intends to recommence controlled document destruction at the appropriate time.

SECURE DESTRUCTION

Personal data will be securely deleted or destroyed at the end of the relevant retention period.

- 7 The Foundation has allocated responsibility for the secure disposal of records containing personal data to the Data Protection Officer. The Data Protection Officer will liaise with all departments to ensure that the records are disposed of appropriately.

The Foundation will ensure that any electronic devices are wiped securely before they are disposed of or recycled.

- 8 Paper records are disposed of through secure shredding as follows: utilising the locked and confidential shredding bins throughout the Foundation, or asking for additional shredding secure bags, through the Data Protection Officer.
- 9 For papers that do not need to be retained in accordance with this policy, the Foundation has placed locked and confidential shredding bins around the Foundation site which are regularly emptied securely.
- 10 The Foundation 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 Foundation carries 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.
- 11 The Foundation 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.
- 12 Staff are allowed to use their personal devices for Foundation work so long as such use complies with the Foundation's requirements as set out in the Acceptable Use policy. The Foundation ensures that any Foundation related personal data is wiped from the device as follows: removing access to the account and deleting information from within apps associated to the Foundation login.
- 13 The Foundation uses contractors to process personal data on its behalf (called processors under data protection law). Examples of the processors used by the Foundation include Microsoft for productivity and collaboration, iSAMS for the Management Information System. The Foundation has adopted the following process to ensure that any Foundation personal data held by a processor is also securely destroyed: data processing agreements with providers to ensure data is deleted securely when the processing ends (usually at the end of a pre-agreed contract).

MONITORING AND REVIEW

- 21 The policy will be reviewed every two (2) years by the Data Protection Officer.

	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 the 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	75 years.	Notes Child protection information must be transferred separately from the pupil's main educational file to the Designated Safeguarding Lead (DSL) at the new Foundation whilst the child is still under 18, in accordance with the requirements set out in KCSIE. Foundations should ensure secure transit and confirmation of receipt should be obtained. As to whether the Foundation should send the original or a copy, practice varies from local authority to local authority on this so the Foundation 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 Foundation).	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
			Where a child is removed from the roll to be educated at home, the file should be sent to the Local Authority (LA), with a copy being retained by the Foundation. In accordance with recommendations of the IICSA, all Foundations should 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 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 (for example, fingerprints to be used as part of an automated biometric recognition system)	For as long as the Foundation 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 Foundation, where the parent or pupil withdraws consent, or the pupil objects to its use.	No
1.5	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.	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	e.g. Biometric data			
1.6	Medical records held by the Foundation	DOB of the pupil + 25 years.	Review for further retention in the case of contentious disputes. SHRED / DELETE	No
1.7	Counselling records held by the Foundation	DOB of the pupil + 25 years.	Review for further retention in the case of contentious disputes. SHRED / DELETE	No
1.8	Parents of international pupils may ask the Foundation to look after passports and/or biometric residence permits for safe keeping	These documents are only ever to be looked after by the Foundation 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 + 25 years.	Review for further retention in the case of contentious disputes, for example, parental complaints, disciplinary matters, pupil exclusions, bullying incidents and subject access requests. SHRED / DELETE Notes When reviewing pupil files, the Foundation should have regard to other	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
			applicable sections of this policy. - Any examination certificates left unclaimed should be returned to the appropriate Examination Board. - If the child moves Foundation, then the Foundation must retain a copy of the file sent to the new Foundation.	
2.2	Internal examination scripts, marks and results	Scripts: Scripts from weekly or monthly tests: Keep until the end of the next term. Scripts from termly or yearly tests: Keep until the end of the next academic year. Marks and results: 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. 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.	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.	No
2.3	General Foundation work, for	DOB of the pupil + 25 years.	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	example, essays and artwork <i>Please note that this row only applies to pupils in Year 10 and above.</i>	It is at the Foundation'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 Foundation work submitted by pupils, staff should be selective. You could retain, for example: • Coursework submissions • A particularly good piece of classwork • Extra-curricular pieces such as poetry		
2.4	Individual Education Plans	DOB of the pupil + 25 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 + 25 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
2.7	Documents that are required to be	Throughout the period of sponsorship	SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	retained for each migrant enrolled under the Student or Child Student visa routes	and for whichever is the shorter period of either: i. one year from the date that the Foundation ends sponsorship of the student, or ii. if the student is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents		
2.8	Documents confirming that the pupil has the required immigration or nationality status which permits them to study at the Foundation	For as long as the pupil is enrolled at the Foundation.	SHRED / DELETE	Yes
3	Permissions			
3.1	Parental permission slips for Foundation 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. SHRED / DELETE	No
3.2	Parental permission slips for Foundation 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 + 25 years. The permission slips for all pupils on the trip may need to be retained to show that	Review for further retention in the case of relevance to contentious disputes or relevance to safeguarding. SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		the rules had been followed for all pupils.		
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 Foundation.	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 Foundation	One year. If there is risk of litigation, extend to DOB + 22	SHRED / DELETE	No
4.3	Financial information in respect of fees	Six years from the end of the financial period to which they relate	Review for further retention in the case of contentious disputes. SHRED / DELETE	No
4.4	Financial information in respect of Foundation trips	Six years from the end of the financial period to which they relate.	Review for further retention in the case of contentious disputes. SHRED / DELETE	No
4.5	School Assisted Place/ Bursary applications and assessments	Six years from the end of the financial period to which they relate.	Review for further retention in the case of contentious disputes. SHRED / DELETE	No
5	Employment			
5.1	Employment or personnel records	For at least six years after date of	If on a date no earlier than six years after the	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	including recruitment information, application forms, (including data gathered from online searches of shortlisted candidates), contracts of employment, changes to terms and condition, disciplinary matters and grievance procedures	termination of employment. For at least 12 years after date of termination if any of the documents were signed as a deed.	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 of the documentation securely unless there are any child protection concerns. Records of anyone with child protection concerns (even if not proved) should be retained for 75 years. Also review guidance available at the time of planned destruction, in case that guidance suggests a need to retain for longer.	
5.2	Risk assessments carried out for the purposes of 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)	75 years.	N/A	No
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 Foundations 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	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 Foundation should keep a record of the fact that vetting was carried out, the result and the recruitment decision	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		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 Foundation should consider and document why it is necessary to keep it for a particular length of time. Should the Foundation be notified of a historic abuse claim or should a former member of staff commit offences elsewhere the Foundation may need to demonstrate that it carried out all required checks prior to work starting, when they were carried out and by whom. As a consequence best advice is to retain the SCR entry for each former member of staff for 75 years either on an archive SCR or within the personnel file	taken.	
5.4	Childcare disqualification declarations	75 years (see section Error! Reference source not found. in the introductory notes above). 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	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 for 75 years. If the records concern a safeguarding matter and relates to the member of staff and/or the household of a member of staff, retain for 75	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		2018.	years.	
5.5	Records and documents relating to membership of and contributions to the Teachers' Pension Scheme, APTIS and Royal London	Indefinitely.	Review whether further retention is necessary. Decisions in relation to the pension schemes may have ramifications beyond six years and may be queried at any time by members and the pension schemes.	No
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 Foundation has decided to keep these records for 75 years.	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 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 above. If none, SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
5.8	Working time opt-out forms	Although the requirement is two years from the date on which they were entered into, 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	Although the requirement is two years from the creation of the record, given their potential relevance to disputes they should be retained for three years from the creation of the record.	SHRED / DELETE	Yes
5.10	PAYE, payroll and wage records These include records of: • Details on overtime • Bonuses • Expenses • Benefits in kind	Six years. Records and documents that will be used to complete tax returns or any claim forms (e.g. benefits or allowances), as well as any records that may be relevant for a related dispute will be retained for six years from the end of the accounting period they relate to.	SHRED / DELETE	Yes
5.11	Neonatal care leave records These include: • Records relating to neonatal care leave payments, save for where those include payroll records	Three years from the end of the tax year in which the neonatal pay period ends. However, given their potential relevance to disputes they should be retained for six years from the end of the accounting period in which the neonatal pay period	SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	Records relating to the period of neonatal care and the employee's written declaration stating their caring responsibilities and relationship with the child	ends.		
5.12	Maternity / paternity / shared parental (ShP) / adoption leave records These include: - Records regarding maternity / paternity / ShP / adoption payments made, save for where those include payroll records - Dates of maternity / paternity / ShP / adoption leave - Period without maternity / paternity / ShP / adoption payment - Medical certificate (Mat B1) showing the expected week of confinement	Three years from the end of the tax year in which the relevant pay period ends. However, given their potential relevance to disputes they should be retained for six years from the end of the accounting period in which the relevant pay period ends.	SHRED / DELETE	Yes
5.13	Sickness records required for the purposes of Statutory Sick Pay (SSP) These include: The dates the employee was off	Three years from the end of the tax year to which they relate. Employers may be required by HMRC to maintain records for PAYE purposes and	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	sick • Which of those days were qualifying days • The reason they said they were off work • The employee's National Insurance number	to show they are meeting their SSP obligations. Sickness records can sometimes be useful evidence of who attended the Foundation at a given time. This may be useful in future, for example, to defend claims. There is therefore an argument that these records should be kept indefinitely but doing so does run into data protection compliance risks. If sickness records are kept for longer than three years then we recommend the information should be limited to the dates when the staff member was off and not the reason, (i.e., the record should not even state they were off for sickness related reasons). The same point applies to row 5.22.		
5.14	Records in relation to hours worked and payments made to workers	For a period of six years from the end of the accounting period these records relate to.	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 Foundation and the employee.	SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		Therefore, the Foundation 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.		
5.16	Disclosure and Barring Service (DBS) checks	Dispose of or return to the subject of the check once the individual has been deemed suitable for appointment, unless the Foundation 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
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	Right to Work in the UK checks	Throughout employment and then retained for three years after the termination of employment.	SHRED / DELETE	No
5.19	Documents that are required to be retained for each worker sponsored by the Foundation 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: i. one year from the date that the sponsorship of the migrant	SHRED / DELETE	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		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. At the time of writing (March 2025) 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: • a copy or summary of the interview notes for the successful candidate • a list of common interview questions used for all candidates as part of your selection process • brief notes on why the successful candidate was selected and why other candidates were rejected • information about any scoring or grading process you used to identify the successful candidate • any other relevant information or		

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		evidence Note: You do not have to retain application forms, CVs, interview notes or any other personal data relating to unsuccessful candidates. Therefore if the Foundation does retain any information about unsuccessful applicants this should be anonymised.		
5.20	Recruitment records of unsuccessful candidates (including data gathered from online searches of 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 Foundation before 1 December 2020 under the Tier 2 (General) immigration category, for the period specified in 5.19 above.	SHRED / DELETE	Yes
5.21	Personnel and training records	Whilst employment continues and up to six years after employment ceases.	SHRED / DELETE	No
5.22	Annual leave records	While employment continues and for six years after employment ends.	SHRED / DELETE	No
5.23	Collective	Ten years after ceasing to be effective.	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	/ workforce agreements			
5.24	Works Council minutes	Permanently.	N / A	No
5.25	An Employee's bank details	As soon after the end of employment as possible once last payments have been made.	SHRED / DELETE	No
5.26	Travel and subsistence claims	Six years from the end of the financial period to which they relate.	SHRED / DELETE	No
5.27	Records of advances for season tickets and loans to employees	Whilst employment continues and up to six years after employment ends.	SHRED / DELETE	No
5.28	Death Benefit Nomination and Revocation Forms	Whilst employment continues and up to six years after employment ends.	SHRED / DELETE	No
5.29	Redundancy details, calculations of payments, refunds, notification to the Secretary of State	Six years from the date of redundancy	SHRED / DELETE	No
5.30	Flexible working requests (appeals)	18 months following an appeal.	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
5.31	Whistleblowing documents	Six months following the outcome (if a substantiated investigation). If unsubstantiated, personal data should be removed immediately.	SHRED / DELETE	Yes
6	Health and safety information - employees			
6.1	Reportable injuries, diseases and dangerous occurrences reports (RIDDOR) 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 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 of the last entry.	Review for further retention in the case of enforcement action contentious disputes. SHRED / DELETE	Yes
6.5	Medical surveillance certificate for	At least four years from the date it was	Review for further retention in the case of	Yes

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	licensable asbestos work	issued.	enforcement action contentious disputes. SHRED / DELETE	
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 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
7	Health and safety information - pupils			

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
7.1	Accident reports including first aid / accident book	DOB of the pupil involved in the incident + 22 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 + 22 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 + 22 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 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	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

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	manuals / notices / instructions Records of emergency evacuations and 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 Foundation - records should be retained as long as is reasonably necessary to inform on future construction projects at the Foundation 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 + 22 years. Disease claims - indefinitely / allegations of abuse - 75 years.	Review for further retention in the case of civil claims for disease or personal injury. SHRED / DELETE	No
10	Investigations, reviews and inquiries			
10.1	Documents relevant to IICSA	75 years.	Review periodically.	No - unless the Foundation has received a formal

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
				notice from IICSA
10.2	Internal reports and investigations into accidents / incidents Copies of reports submitted to external agencies / regulators such as Independent Foundations Inspectorate, Health and Safety Executive, Local Authority, Charity Commission etc. External reports, reviews, investigations and inquiries, for example, inquests and public inquiries	To be decided by the Foundation. 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 + 22.	SHRED / DELETE	No
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 requirements	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?
	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, for example, a record that an individual has asked to unsubscribe from emails).	Will be kept indefinitely. <i>This information should be kept indefinitely to ensure that individuals are not contacted in way which contradicts their preferences.</i>	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 personal data, for example, old photos of Foundation buildings, title deeds etc.	Can be kept indefinitely.	N / A	No
12.2	Records kept for reasons of archiving in the public interest. For example, such as old class photos, lists of pupils attending the Foundation in any given year, old Foundation prospectuses, newspaper cuttings etc.	Will be kept indefinitely.	N / A	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
12.3	Former staff and pupil lists showing name, DoB and years attending kept as evidence of their attendance at the Foundation	Indefinitely.		
13	CCTV, videos and photos			
13.1	CCTV footage	28 days	DELETE 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. CCTV footage may also be needed in relation to parental complaints, disciplinary matters, pupil exclusions, bullying incidents or health and safety matters. If CCTV footage is utilised for the purpose of a disciplinary matter or an unfair dismissal claim, footage must be kept for six months. If a subject access request has been made for the footage it must be retained. The Foundation should consider the relevant limitation periods for claims being brought against the Foundation and seek advice as necessary.	No
	Photos of pupils for internal administration purposes, for example,	These photos should be retained for as long as they are required for the purpose	SHRED / DELETE	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	to identify the pupil or photos used on security passes	for which they were taken.	Review for further retention in the case of relevance to contentious disputes.	
13.2	Photos or videos of pupils taken for marketing reasons, for example, photos for use in the Foundation prospectus or a video of pupils on the Foundation's website	These photos and videos should be retained for as long as they are required for the purpose for which they were taken. If the Foundation 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
13.3	Photos or videos of pupils used as part of the curriculum, for example, a video of a drama lesson / performance or as part of an art project	DOB of the pupils captured in the recording + 25 years.	SHRED / DELETE Review for further retention in the case of relevance to contentious disputes.	No
14	Governance Records			
14.1	Minutes and papers of governors' and members' meetings and copies of written resolutions	Indefinitely.	N / A	Yes
14.2	The Company's Statutory Books (if the Foundation is constituted as a limited company)	Indefinitely.	N / A	Yes
14.3	Constitutional documents such as Memorandum and Articles of	Indefinitely.	N / A	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	Association			
14.4	Copies of any material correspondence with the Charity Commission including serious incident reports	Indefinitely.	N / A	No
14.5	Declarations of Interest	6 years after the individual ceases to be a trustee/governor.	DELETE	No
14.6	Governor induction and training records	6 years after the individual ceases to be a trustee/governor.	DELETE	No
14.7	Policies and Procedures (e.g. safeguarding, whistleblowing)	Retain current version and 6 years after superseded	DELETE	No
14.8	Governor recruitment records Candidates not appointed	6 years after the individual ceases to be a trustee/governor. Retain for 1 year	DELETE Review for further retention if a vacancy arises and they wish to be considered in future	No
14.9	Governor resignation letters and exit interviews	6 years after the individual ceases to be a trustee/governor.	Exit data can be retained but anonymised	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
15	Property, Financial and Contractual 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 Foundation ceases to exist.
15.2	Tax records, Stamp Duty Land Tax returns 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 event that the Foundation 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 safeguarding.	Yes The requirement passes to the last trustees in the event the Foundation 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	No (provided it has been filed with the Charity

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
			where content might be relevant to safeguarding.	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, for example, the Annual Accounting Scheme, the Flat Rate Scheme, the Cash Accounting Scheme, and Margin Schemes. VAT registered businesses must keep some VAT records digitally in compliance with the rules for Making Tax Digital.	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 Foundation ceases to exist.
15.6	Contracts	Six years from the later of the date of the agreement, and the conclusion of the delivery of any services provided for in that agreement or obligations in the agreement otherwise expired.	Review the contracts to consider whether any elements of those contracts remain live.	No
15.7	Deeds (non-Property)	Twelve years from the later of the date of execution of the Deed, and the conclusion of the delivery of any services provided for in that Deed or obligations in the Deed	Review the Deeds to consider whether any elements of those Deeds remain live.	No

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		otherwise expired.		
15.8	Property Deeds (original documents including signed deeds)	Permanently.	N/A	No
15.9	Correspondence or non-deeds (documents) relating to Property Transactions	Twelve years from completion of the transaction.	Review the correspondence to consider whether any elements of those matters remain live. SHRED/DELETE	No

