



Information and Records Retention Policy

Cranleigh School
September 2024

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Introduction

One of the key principles of Data Protection is ensuring that personal data is not kept for longer than is necessary. This policy sets out a structured approach to reviewing and determining whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained by the school for research or litigation purposes. The Information & Records Retention Policy should be read in conjunction with the School's Data Protection Policy and Staff, Pupil and Parent Privacy Notices.

The School's Data Protection Lead will liaise with all departments and the School's senior management team annually to consider the records under review and will keep a record of what personal data has been deleted, when the deletion took place and by whom (on the School's Personal Data Destruction/Deletion Log).

The policy should help staff identify the key types of data/documents concerned and should focus attention on any particular issues associated with those types of documents. Importantly, it acts as a guide only – except where there is a specific statutory obligation to destroy records, it is not appropriate to interpret or apply any guidance as if it constitutes prescriptive time 'limits'. If you have any questions or need further guidance, please contact the School's Data Protection Lead (hjm@cranleigh.org) or Director of Operations (pad@cranleigh.org).

This document relates to both electronic and hardcopy data. When the retention period finishes and authorisation is given for the destruction of records, hard copies of personal data/confidential information should be shredded using secure shredding bags and the external contractor engaged by the School. When deleting electronic documents or files, you must ensure all copies are deleted, including those stored on the School's network shared drives, in Google, and/or Outlook email accounts, including in-boxes, sent items and recycle bins. The School will ensure that any electronic devices are wiped securely before they are disposed of or recycled.

Pupil Records

The School has carefully considered its approach to the retention of former pupil files, taking into account the IICSA report and guidance that all safeguarding records should be kept for a minimum of 75 years. To balance the School's risk from a data protection perspective with the arguably greater risks associated with permanent deletion of data that may subsequently be relevant to an historic safeguarding claim, the School will retain **ALL** electronic pupil files indefinitely.

The definition of a pupil e-file will include the pupil's education record, special education needs (SEN) and education healthcare (EHC) plans, mental or physical health referrals (including correspondence with external agencies and healthcare professionals) and related internal records, and ALL child protection, safeguarding and pastoral records. Any hard copy child protection notes will also be kept indefinitely.

The School's hardcopy pupil files for those joining the school post introduction of The Children Act 1989 will be transitioned over time to digital records and retained indefinitely. Pupil files for those joining prior to 1989 will be individually reviewed for any safeguarding concerns, together with any content of historic interest. Where no safeguarding/archive content is evident, files may be securely destroyed.

Notwithstanding the destruction of hard copy files for those joining pre-1989, senior school pupils' core data (Name, DOB and year of entry to the school) will be retained on the Old Cranleigh database for historic interest/archive purposes.

The School considers that the distinction between electronic and hardcopy files is justified, particularly as some older hardcopy file content is degenerating over time and the justification for keeping it is diminishing.

Run off period

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 may keep information for up to six months after the retention period set out in the table has come to an end. In practice therefore, a three-year retention period could mean three and a half years to allow the School to securely dispose of the information.

Emails

Emails should be filed/archived centrally as soon as is reasonable to help ensure that the appropriate retention period is applied. Emails relating to pupils/parent correspondence should be filed and retained in line with the examples in the table below:

Example types of email:	Current or Recommended Action
Important parent correspondence relating to complaints / sensitive welfare concerns	Cut & paste content or move email to Pastoral Module, ensuring one repository for all important welfare communication between parent and School. This will limit duplication of sensitive or special category personal data and restrict access to those who need to know.
Correspondence relating to pupil's education, achievements, concerns, in any academic year / term	Each House will retain in an inbox folder by - Academic Year - Pupil name [surname, forename] Shared 'House' inboxes to be created with permissions assigned to HsMs, Deputies, Assistants. Matrons for each House to use shared inbox and follow naming convention for storing emails as above.
Routine parent correspondence regarding, logistics/appointments/lost property	Response from appropriate person in the House - no need to keep for longer than needed to deal with the matter.
Emails from Medical Centre	Delete if information duplicated on Pastoral module. If related to a trip , see section 3.2 for further guidance.
Trigger/alert emails from systems such as: iSAMS; Pastoral Module; Evolve	Delete from inbox once actioned / noted

NB: Each staff member is required to exercise their own judgement about the reasonable timeframe for retaining routine emails which do not fall into any of the categories in the table. As a guide, inboxes, sent item and deleted item folders should be reviewed at the end of each term for filing, deleting or archiving the emails as appropriate.

Accountability

Staff members with accountability for monitoring the secure deletion of specific areas of the School's personal data are noted in the table below. These 'internal owners' will have responsibility for integrating the deletion timeframes into their departmental processes and will liaise with the School's Data Protection Lead regarding completion of the School's Personal Data Destruction/Deletion Log.

Charles	Boddington	Assistant Head, Co-Curricular	CHDB
Claudia	Brightman	Head's PA (CS)/Head of Administration	CLB
Michelle	Chilcott	Commercial Manager	MIC
Jody	Cooksley	Director of External Relations	JRC
Emma	Denby	Payroll Controller	ETD
Paul	Dunn	Director of Operations	PAD
Sue	Fairbrother	Head of Safeguarding	SFF
Krystle	Flack	Head of Learning Support (CS)	KJF
Alex	Forsdike	Director of Admissions	APF
David	Futcher	Assistant Head, Digital Strategy	DJF
Belinda	Graham-Rack	Head of Cranleigh Friends	BGR
Josephine	Henshall	Headmaster's PA (CPS)	JMH
Nicola	Hutton	HR Operations Manager	NJH
Vickie	Ingle	OCS & Cranleigh Network	VLI
Emma	Lewis	Deputy Head, Pastoral (CPS)	EFL
Alastair	McDonald	Finance Manager	AGMD
Karen	Mumford	Retail Manager	KEM
Jane	Proffitt	Director of Human Resources	JMP
Helen	Pullen	Head of Examinations	HLP
Mandy	Russell-Price	Cranleigh Giving	MRP
Patrick	Roberts	Clerk to the Governing Body	PTR
Jean	Salt	Head of Learning Support (CPS)	JAAS
Andrea	Saxel	Deputy Head, Pastoral	APS
Catherine	Staples	Head of Admissions (CPS)	CJS
Jane	Underdown	Director of Finance	JAU
Martin	Williamson	School Archivist	MSW
		Heads and SMT	SMT
		House Masters/Mistresses	HsMs
		House Matron Teams	Matrons
		Medical Centre Team	MedCentre

	Record	Retention period	Action at the end of the retention period	Retention period required by law?	Internal Owner
1	Individual Pupil and Parent Records				
1.1	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	CLB JMH
1.2	Letters authorising absence	Three years from the date of the last entry on the attendance register	SHRED / DELETE	No	
1.3	Parent* Personal Data	*includes parents, guardians and emergency contacts Contact details of parents of current pupils are retained & up-dated in iSAMS. Once a pupil has left school, delete all parent contact details from iSAMS by the end of the academic year in which the pupil left	 DELETE	No	CLB DJF (IT)
1.4	Child protection / Safeguarding records	Indefinite retention	Notes Child protection/safeguarding information must be 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	No	APS EFL SFF

	Record	Retention period	Action at the end of the retention period	Retention period required by law?	Internal Owner
			<p>obtained. The School will send the original copy of the file, keeping a copy of the information.</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 (IICSA) all schools 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.</p>		
1.5	<p>International Pupils Parents may ask the School to look after passports and/or biometric residence permits for safe keeping</p>	<p>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.</p> <p>Any passports/permits held by the school for safekeeping will be kept securely in the pupil's Boarding House.</p>	<p>Return to the pupil, parent, educational guardian or other appropriate adult in accordance with parents' instructions, or at the point the pupil leaves the School.</p>	No	HsMs

	Record	Retention period	Action at the end of the retention period	Retention period required by law?	Internal Owner
2	Pupil files				
	Definition of pupil file	A pupil file includes the pupil's education record, special education needs (SEN) and education healthcare (EHC) Plans, mental or physical health referrals including correspondence with external agencies and healthcare professionals) and related internal records, and ALL child protection, safeguarding and pastoral records.			
2.1	Public examination scripts, marks and results	Retain digital records indefinitely.	Notes <ul style="list-style-type: none"> Any examination certificates left unclaimed should be returned to the appropriate Examination Board or retained under secure conditions for a minimum of 12 months from date of issue then destroyed. If the child moves school then the School must retain a copy of the file sent to the new school 	No	HLP
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.	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	HLP and HODs

	Record	Retention period	Action at the end of the retention period	Retention period required by law?	Internal Owner
	Confirmed Grades	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. Retained in iSAMS	Indefinite retention for School record of achievement		
	Non-Exam Assessment material (including video, photographic images)	NEA material can be deleted in the October following the end of the academic year (once grade confirmed and no outstanding appeal)	SHRED / DELETE		
	* See Examinations Archiving Policy for full details of retention of exam records (Head of Examinations)				HLP
2.3	General school work (e.g. essays, artwork)	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 and consider handing the work back to the pupil when appropriate.	SHRED / DELETE	No	

	Record	Retention period	Action at the end of the retention period	Retention period required by law?	Internal Owner
		<p>You could retain, for example:</p> <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	Digital records to be kept indefinitely	n/a	No	KJF
2.5	Education and Health Care (EHC) Plans	Digital records to be kept indefinitely	n/a	Yes	KJF
2.6	Special Educational Needs (SEN) records (to be risk assessed individually)	Digital records to be kept indefinitely	n/a	Yes	KJF JAAS
2.7	SEND - Exam Access Arrangement documentation	<p>(incl. Form 8, data protection forms, online applications and rest break letters)</p> <p>Digital records to be kept indefinitely</p>	n/a	No	KJF
2.8	Medical records* held by the School	<p>*including Controlled Drug Books held by Matrons</p> <p>Medical records to be kept indefinitely</p>	<p>*Controlled drug books no longer in use by House Matrons should be retained in the Medical Centre archive.</p> <p>n/a</p>	No	MedCentre & Matrons

	Record	Retention period	Action at the end of the retention period	Retention period required by law?	Internal Owner
2.9	Counselling records held by the School	Digital records to be kept indefinitely	n/a	No	
2.10	House minutes	Save by year group and retain in line with pupil files	n/a	No	HsMs
2.11	Matrons' Records* Handover Notes / House diaries	*not medical records No more than one academic year	*Medical records – see 2.8 SHRED / DELETE NB: All important welfare/pastoral concerns should be logged on Pastoral module and kept in line with pupil records	No	Matrons
3	Permissions – School Trips				
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	CHDB
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	Digital records to be kept indefinitely 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	n/a	No	CHDB

4	Admissions				
4.1	Admissions registers (however held)	<i>Statutory minimum: 6 years from the date of the last entry.</i> However, the School will retain indefinitely as an archive record of pupils attending CS and CPS.	N/A	Yes	APF CJS
4.2	Admissions and parent contract documents including registration form, letter of offer and acceptance form, incl. pupil assessment information. (successful admission)	Six years from date of leaving the School	Review for further retention in the case of contentious disputes SHRED / DELETE	No	APF CJS
4.3	Admissions documents relating to applicants who did not join the School (withdrawals)	Retain until the end of the academic year in which the pupil could have joined	Review data for completion of statistical analysis/reporting purposes SHRED / DELETE	No	APF CJS
4.4	Application forms, assessments, records of decisions - when pupil NOT admitted (rejection)	Retain until the end of the academic year in which the pupil could have joined	Review data for completion of statistical analysis/reporting purposes SHRED / DELETE	No	APF CJS
4.5	Documents that are required to be retained for each migrant enrolled under the Child Student visa routes.	Throughout the period of sponsorship and for whichever is the shorter period of either:	SHRED / DELETE	Yes	APF CJS

		<p>one year from the date that the School ends sponsorship of the student, or</p> <p>if the student is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents</p>			
4.6	Documents confirming that the pupil has the required immigration or nationality status which permits them to study at the School	For as long as the pupil is enrolled at the School	SHRED / DELETE	Yes	APF CJS

5	Employment				
5.1	Employment or HR records including recruitment information, application forms, contracts of employment, changes to terms and condition, disciplinary matters, grievance procedures.	For at least six years after date of termination of employment	<p>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 of documentation securely, <u>unless any child protection/safeguarding concerns</u>. Records of anyone with child protection/safeguarding concerns (even if not proven) should be retained indefinitely.</p> <p>In line with the School's KCSIE responsibilities, 'spent' disciplinary sanctions will be retained on an individual's HR file in the event that any related concerns come to light or further disciplinary action is required.</p>	No	JMP / NJH
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	Indefinitely	N/A	No	JMP / NJH
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. However, should the School be notified of an historic abuse claim or should a former member of staff commit offences elsewhere, the School may	N/A - Retain the SCR entry for each former member of staff indefinitely <u>as part of an archive SCR</u>	Yes – for current staff members	JMP / NJH

		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 result, the SCR will be retained indefinitely for archive/referral purposes.			
5.4	Childcare disqualification declarations	Keep indefinitely if relevant to a historic safeguarding issue. *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.	N/A*	Yes	JMP / NJH
5.5	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*	*N/A - <u>The School has decided to keep these records indefinitely</u>	Yes	JMP / NJH
5.6	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 have been raised by social services or other agencies see 5.5 above. If none, SHRED / DELETE	No	JMP / NJH

5.7	Working time opt-out forms	As part of employment record, retain while employment continues and for six years after employment ends.	SHRED / DELETE	Yes	JMP / NJH
5.8	Records to show compliance with the Working Time Regulations	As part of employment record, retain while employment continues and for six years after employment ends.	SHRED / DELETE	Yes	JMP / NJH
5.9	Consents for the processing of personal data and sensitive personal data (known as special category personal data under the UK GDPR)	As part of employment record, retain while employment continues and for six years after employment ends.	SHRED / DELETE	Yes	JMP / NJH
5.10	Disclosure and Barring Service (DBS) checks Verification of candidate ID	In line with KCSIE statutory guidance, dispose of any documents or return original DBS Certificate/ID 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 eg if there is a disclosure or a dispute about the results of a DBS check, then the DBS Certificate may be kept for no more than 6 months.	Enter DBS certificate number, date, initials on Single Central Register. Make a note that the applicant has been deemed suitable for appointment.	Y – KCSIE	JMP / NJH
5.11	Immigration/Right to Work checks	Throughout employment and then retained for not less than two years after the termination of employment.	SHRED / DELETE	Yes	JMP / NJH

		Relevant information recorded on the SCR while in employment.			
5.12	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	<p>Throughout the period of sponsorship and for whichever is the shorter period of either:</p> <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	Yes	JMP / NJH
5.13	Recruitment records of unsuccessful candidates	<ul style="list-style-type: none"> • Six months after notifying unsuccessful candidates (those not interviewed) in order to demonstrate, if required, the fairness and transparency of the recruitment process; or • 12 months after notifying interviewed but unsuccessful candidates in order to demonstrate, if required, the fairness and transparency of the recruitment process • Retain for a longer period if the applicant has consented to be part of a 'talent bank' for future job vacancies. 	SHRED / DELETE	No	JMP / NJH (KELB)

5.14	HR and training records	Whilst employment continues and up to six years after employment ends.	SHRED / DELETE	No	JMP / NJH
5.15	Annual leave records	While employment continues and for six years after employment ends.	SHRED / DELETE	No	JMP / NJH
5.16	Collective / workforce agreements	Whilst employment continues and for six years after employment ends.	SHRED / DELETE	No	JMP / NJH
5.17	Defined Contribution Pension Death Benefit Nomination and Revocation Forms	Not retained by School – nomination of beneficiary forms held by pension provider (Aviva)	SHRED / DELETE any duplicate records held by School	No	JMP / NJH
5.18	Life Assurance Scheme Nomination of Beneficiary forms	Whilst employment continues and for six years after employment ends.	SHRED / DELETE	No	JMP / NJH
Employment: PAYROLL					
5.19	Payroll and wage records These include records of: <ul style="list-style-type: none"> • Details on overtime • Bonuses • Expenses • Benefits in kind 	Six years after employment ends.	SHRED / DELETE	Yes	ETD
5.20	PAYE Records	Six years after employment ends.	SHRED / DELETE	Yes	ETD

5.21	<p>Maternity / paternity records</p> <p>These include:</p> <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 certificates showing the expected week of confinement. 	<p>Four years after the end of the tax year in which the maternity pay period ends, or</p> <p>Six years after employment ends (in line with other employee records).</p>	SHRED / DELETE	Yes	ETD
5.22	<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. 	Six years after employment ends.	SHRED / DELETE	No	ETD

5.23	Records in relation to hours worked and payments made to workers	Six years after the working relationship ends.	SHRED / DELETE	Yes	ETD
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	ETD
5.25	Records of salary advances / loans to employees	Whilst employment continues and up to six years after employment ends	SHRED / DELETE	No	ETD
5.26	Records and documents relating to membership of and contributions to the Teachers' Pension Scheme	Indefinitely	N/A Decisions in relation to the Teachers' Pension Scheme may have ramifications beyond six years, and may be queried at any time by members and administrators of the Teachers' Pension Scheme.	No	ETD
5.27	Records of ISEO defined benefit pension scheme and associated monthly pensioner payroll. [Pension scheme closed to new members in 2012]	Indefinitely NB: nomination of pension benefit beneficiary forms held by ISEO.	Records and decisions in relation to the closed DB pension scheme may have ramifications beyond six years, and may be queried at any time by members, pensioners or the administrators of the Scheme.	No	ETD

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	PAD
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	PAD
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	PAD
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	PAD
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	PAD
6.6	Records of air monitoring for asbestos	Where a health record is required at least 40 years from the date if the last entry		Yes	PAD

		In other cases, at least five years from the date of the last entry			
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	PAD
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	PAD
6.9	Records of water monitoring, inspection, testing, checks and control measures for legionellosis	Retain 5 years of inspection / testing data.	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes	PAD
7	Health and Safety Information - Pupils				
7.1	Accident reports including first aid / accident book	Date of Accident + 3 years	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	No	PAD

7.2	Reportable injuries, diseases and dangerous occurrences (RIDDOR) reports or own record	Minimum statutory retention period is at least 3 years but recommend that the record is kept for DOB of the pupil involved in the incident + 25 years	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes	PAD
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 + 25 years	Review for further retention in the case of enforcement action or civil claims for personal injury SHRED / DELETE	No	PAD
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	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). The school will retain all audit reports indefinitely.	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	No	PAD

	<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 fire drills, fire safety risk assessments and fire safety policy / fire arrangements</p>				
8.2	<p>Copies of documents, including health and safety files, prepared pursuant to the Construction (Design and Management) Regulations 2015</p>	<p>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</p>	<p>SHRED / DELETE</p>	<p>N / A</p>	<p>PAD</p>

9	Insurance				
9.1	Insurance certificates and schedules of cover	Indefinitely	N / A	No	PAD
9.2	Correspondence with insurers related to specific accidents or incidents	<p>Three years generally</p> <p>If the incident involved a pupil - DOB of the pupil involved in the incident + 25 years</p> <p>Disease claims or where there have been allegations of abuse – retain indefinitely</p>	<p>Review for further retention in the case of civil claims for disease or personal injury</p> <p>SHRED / DELETE</p> <p>N/A</p>	No	PAD

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	APS SFF EFL
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, 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>The school will keep all reports submitted to an external agency / regulator indefinitely.</p>	SHRED / DELETE / RETAIN	No	PAD

11	Old Cranleighan Society (OCS)				
	For the purposes of data protection relating to our alumni (Old Cranleighans), together with OC parents, former members of staff, Governors and Trustees, there are two data controllers: Cranleigh School and the Old Cranleighan Society.				
11.1	As we have an ongoing relationship with our alumni and others, most information held by the Old Cranleighan Society is kept indefinitely. Please see the OCS privacy notice for further information.	Until no longer needed. Contact details of Old Cranleighans, together with current and historic information that maybe relevant for archive and/or historical research purposes, will be retained indefinitely.	N / A	No	MSW / VLI
11.2	Records of communication preferences (e.g. a record that an individual has asked to unsubscribe from emails).	Will be kept indefinitely.	N / A	No	MSW / VLI
12	Cranleigh Giving (Fundraising and Development)				
12.1	As we have an ongoing relationship with our alumni, those who have signed up to Cranleigh Friends, and others, most information held by Cranleigh Giving is kept indefinitely. Please see our Cranleigh Giving privacy notice for further information.	Until no longer needed. Current and historic information on fundraising activities, and any other information relating to Fundraising and Development that maybe relevant for archive and/or historical research purposes, will be retained indefinitely.	N / A	No	BGR MRP

12.2	Records of communication preferences (e.g. a record that an individual has asked to unsubscribe from emails).	Will be kept indefinitely.	N / A	No	BGR MRP
12.3	Contact details of individuals and businesses who express interest or take a stall at the Cranleigh Christmas Fair	Will be kept without a time limit to continue communication in relation to the Fair.	N/A	No	BGR
12.4	Contracts and financial information relating to stall holders at the Cranleigh Christmas Fair	Retained for 3 years following date of last contract	SHRED / DELETE	No	BGR JAU
12.5	Gift aid information	<i>*passed to Finance Team</i>	<i>See section 17.</i>		AGMD

13	Commercial Activities (Cranleigh Enterprises Limited)				
13.1	<p>Personal data of those using / hiring the School's facilities for:</p> <p>Residential and non-residential hires, and events</p> <p>TASC: Membership of Sports Club and hiring of sports facilities</p> <p>Use of Equestrian Centre</p> <p>Running of Cranleigh Academies (eg swimming and cricket)</p> <p>Running of commercial training courses and conferences</p>	<p>There is a Data Sharing Agreement in place between Cranleigh School and Cranleigh Enterprises Limited.</p> <p>Retain commercial contract details for 6 years after contract ends.</p> <p>Retain personal data of members / those using CEL facilities for 6 years from date of last attendance.</p>	<p>SHRED / DELETE</p> <p>SHRED / DELETE</p>		<p>Commercial Manager (CIM) + leads for TASC Equestrian Academies Training Conferences</p>
13.2	<p>School Shop:</p> <p>Personal data of parents/guardians and pupils* relating to purchase of uniforms and school accessories. *parent/guardian and pupil data taken from iSAMS</p>	<p>Individual pupil shop account details captured in WCBS (finance system)**</p> <p>Details of pupil Summer uniform fittings, together with payment receipts.</p>	<p>** DELETE personal payment information once pupil leaves Cranleigh School (subject to payment of any outstanding invoices).</p> <p>Retain for up to two years, then SHRED / DELETE</p>	No	KEM
13.3	<p>Contracts entered into with or by Cranleigh Enterprises Ltd</p>	<p>Retain contract details for 6 years after contract ends</p>	SHRED / DELETE	No	CIM

14	Keeping information for longer – School Archive				
14.1	Records which do not contain personal data, for example, old photos of School buildings, title deeds etc.	Can be kept indefinitely	N / A	No	MSW
14.2	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.	Can be kept indefinitely.	N / A	No	MSW

15	CCTV, videos and photos				
15.1	CCTV footage	Up to 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 for the safety and security of the School's premises.</p> <p>If a subject access request has been made for CCTV footage it must be retained.</p>	No	PAD
15.2	Photos of pupils, employees and visitors for internal administration purposes e.g. to identify the individual or for photos used on security passes	<p>These photos should be retained for as long as they are required for the purpose for which they were taken.</p> <p>NB: visitor security passes will be issued and returned to Reception for secure shredding.</p>	<p>SHRED / DELETE</p> <p>Review for further retention in the case of relevance to contentious disputes.</p>	No	
15.3	Photos or videos of pupils taken for marketing reasons e.g. photos for use in the School prospectus or a video of pupils on the School's website	These photos and videos 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	JRC
15.4	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	Can be deleted following the end of the academic year, once exam/NEA grade confirmed (if relevant) and no outstanding appeal	SHRED / DELETE	No	HoDs

16	Governance Records				
16.1	Minutes of governors' and members' meetings and copies of written resolutions	Retain as a permanent record of the School	N / A	Yes	PTR
16.2	The Company's Statutory Books (if the School is constituted as a limited company)	Indefinitely	N / A	Yes	PTR
16.3	Constitutional documents such as Registration documents of the School. [Memorandum and Articles of Association]	Indefinitely	N / A	No	PTR
16.4	Copies of any material correspondence with the Charity Commission, including serious incident reports	Indefinitely	N / A	No	PTR / CLB

17	Financial Records (personal data)				
17.1	Parent (Fee) Direct Debit Mandates	Until pupil leaves the School	SHRED / DELETE	No	JAU / AGMD
17.2	Financial information in respect of fees	Seven years from date of leaving the School	Review for further retention in the case of contentious disputes SHRED / DELETE	No	JAU / AGMD
17.3	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	JAU / AGMD
17.4	Travel and subsistence expense claims	Whilst employment continues or, for leavers, up to six years after the claim was made.	SHRED / DELETE	No	JAU / AGMD
17.5	Applications for Bursaries: - Unsuccessful applications - Successful applications	No more than <u>3 months</u> from date of decision. Seven years from date of leaving School.	Review for further retention in the case of contentious disputes SHRED / DELETE	No	JAU
17.6	Linked pupil fee arrangements – where a fee arrangement covers more than one child in the same family.	Retain all records relating to the agreed family fee structure for seven years after the last child to join leaves the school.	Review for further retention in the case of contentious disputes SHRED / DELETE	No	JAU
17.7	Gift aid information (OCS and Cranleigh Giving)	Six years from the end of the tax year in which the claim to HMRC is made.	SHRED / DELETE	No	AGMD

18	Financial Records (non-personal data)			
18.1	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
18.2	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 event that the School ceases to exist.
18.3	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
18.4	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 child protection or safeguarding.	No (provided it has been filed with the Charity Commission)
18.5	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	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.

		<p>has been opted to tax, or an asset is subject to the Capital Goods Scheme.</p> <p>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 Cash Accounting Scheme, and Margin Schemes.</p> <p>VAT registered businesses must keep some VAT records digitally in compliance with the rules for Making Tax Digital.</p>		
18.6	<p>Details of contracts entered into (by both the School and Cranleigh Enterprises Limited for the purpose of commercial and educational activities</p>	<p>Six years from the end of the expiry of the contract.</p>	SHRED / DELETE	

19	Intellectual Property (non-personal data)				
19.1	Formal documents of title (trade mark or registered design certificates; patent or utility model certificates)	Retain indefinitely (in the case of any right which can be permanently extended, eg trade marks); otherwise expiry of right plus minimum of 7 years.	N / A SHRED / DELETE	No	JRC
19.2	Assignments of intellectual property to or from the school	As above in relation to contracts (7 years) or, where applicable, deeds (13 years).	SHRED / DELETE	No	JRC
19.3	IP / IT agreements (including software licenses and ancillary agreements eg maintenance; storage; development; co-existence agreements; consents)	Minimum - 7 years from completion of contractual obligation or term of agreement	SHRED / DELETE	No	DJF