

DATA RETENTION GUIDELINES

One of the key principles of Data Protection is ensuring that personal information is not kept for any longer than is necessary. This guidance document has three main functions and should be read in conjunction with the School's Data Protection Policy and Staff, Pupil and Parent Privacy Notices.

- it should help staff identify the key types of data/documents concerned
- it should focus attention on any particular issues associated with those types of documents
- Finally, and importantly, it acts as a guide only – if you have any questions or need further guidance, please contact the School's Data Protection Lead.

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'. Dates/timelines given are not intended as a substitute to exercising thought and judgment, or taking specific advice depending on the circumstances.

These guidelines relate to both electronic and hardcopy data. When the retention period finishes, hard copies of personal data/confidential information should be shredded. If not shredded immediately, the data/records must be held in a 'confidential shredding' bag and locked in a secure place.

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 docs., and/or Outlook email accounts, including in-boxes, sent items and recycle bins.

IICSA and Retention of Documents Relating to the Care of Children

The Independent Inquiry into Child Sexual Abuse has issued guidance that any institutions holding records relating to the care of children must preserve those records for as long as necessary to assist an official Inquiry. With this in mind, the School will not destroy any pupil or staff records that may relate to the safeguarding or child protection of pupils relating to an ongoing or historic inquiry.

SUGGESTED RETENTION PERIODS

Type of Record / Document	Suggested Retention Period
SCHOOL SPECIFIC RECORDS	
Registration documents of School	Permanent (or until closure of the school)
Attendance & Admissions Registers	In line with other pupil records: retain until pupil reaches 25 years of age
Minutes of Governors' meetings	Permanent
Annual curriculum	From end of year: 7 years
INDIVIDUAL PUPIL AND PARENT RECORDS	
Applications for Bursaries:	
- Unsuccessful applications	<u>No more than 3 months</u>
- Successful applications	In line with other pupil records: retain until pupil reaches 25 years of age
Admissions: application forms, assessments, records of decisions - when pupil NOT admitted	Keep until the end of academic year in which application made and/or assessment under taken
Admissions: application forms, assessments, records of decisions when pupil IS admitted to School	25 years from date of birth
Pupil files including: Pupil reports Pupil performance records Examination Results Pupil medical records House Outlook folders for parent/pupil/staff correspondence	ALL: 25 years* from date of birth (subject to any relevant safeguarding considerations). Any material which may be relevant to potential safeguarding or child protection concerns or claims should be kept for the lifetime of the pupil. Archive e-folders when pupil leaves school and retain for 7 years. Delete all data when former pupil reaches 25 years of age.
Special Educational Needs (SEN) records (to be risk assessed individually)	Date of birth plus up to 35 years (allowing for special extensions to statutory limitation period)
<p>* A child may make a claim for negligence for 7 years from their 18th birthday. This retention period ensures that all records are kept until the pupil reaches the age of 25 years.</p>	

Type of Record / Document	Suggested Retention Period
SAFEGUARDING	
Policies and procedures	Keep a permanent record of historic policies
Incident reporting	Keep on record for as long as any living victim may bring a claim (NB civil claim limitation periods can be set aside in cases of abuse).
Safeguarding / Child Protection Files	Safeguarding and/or Child protection files should be passed by the Safeguarding Team on to any new school the child attends. If pupil remains at Cranleigh, keep files until their 25th birthday (7 years after they reach the school leaving age)* *or longer (up to the lifetime of the former pupil) pending further guidance from IICSA
CORPORATE RECORDS(eg where schools have trading arms)	
Certificates of Incorporation	Permanent (or until dissolution of the company)
Minutes, Notes and Resolutions of Boards and Management Meetings	Minimum - 10 years
Shareholder resolutions	Minimum - 10 years
Register of Members/Shareholders	Permanent (minimum 10 years for ex-members/shareholders)
Annual Reports	Minimum - 6 years
ACCOUNTING RECORDS	
Accounting records (<i>normally taken to mean records which enable a company's accurate financial position to be ascertained & which give a true and fair view of the company's financial state</i>)	Minimum - 3 years for private UK companies (except where still necessary for tax returns) Minimum - 6 years for UK charities (and public companies) from the end of the financial year in which the transaction took place Internationally: can be up to 20 years depending on local legal/accountancy requirements
Tax returns	Minimum - 6 years
VAT returns	Minimum - 6 years
Budget and internal financial reports	Minimum - 3 years
Parent (Fee) Direct Debit Mandates	Destroy once pupil has left the school
Details of contracts entered into (by both the School and Cranleigh Enterprises Limited for the purpose of commercial and educational activities)	Details of contracts will be retained for 6 years after the expiration of the contract. If the contract is with a pupil or parent of the school, details may be kept in line with retention guidelines for Pupil / Parent data.

Type of Record / Document	Suggested Retention Period
INTELLECTUAL PROPERTY RECORDS	
Formal documents of title (trade mark or registered design certificates; patent or utility model certificates)	Permanent (in the case of any right which can be permanently extended, eg trade marks); otherwise expiry of right plus minimum of 7 years.
Assignments of intellectual property to or from the school	As above in relation to contracts (7 years) or, where applicable, deeds (13 years).
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 concerned or term of agreement
EMPLOYEE/PERSONNEL RECORDS	
Single Central Record of employees	Keep as a permanent record of current and former School employees
Single Central Register of Appointments (as defined by Independent Schools Inspectorate)	Keep a record of all mandatory checks that have been undertaken as part of an employee's personnel file. NB: Copies of individual DBS Certificates will not be retained, unless there is a disclosure, or a dispute about the results of a check, then the Certificate may be kept for no more than 6 months.
Job application and interview / rejection records - unsuccessful applicants	No more than 6 months
Immigration records	Minimum - 4 years
Health records relating to employees	7 years from end of contract of employment
Contracts of employment	7 years from effective date of end of contract
Employee appraisals or reviews	Duration of employment plus minimum of 7 years
Staff personnel file	As above, but <u>do not delete any information which may be relevant to any safeguarding or child protection concerns or claims.</u> Records regarding concerns about an adult's behaviour around children should be kept on their personnel file either until normal retirement age or for 10 years, whichever is longer. This timeframe applies to current and former staff/volunteers.

Type of Record / Document	Suggested Retention Period
Payroll	
Payroll, salary, maternity pay records	Minimum - 6 years
Pension or other benefit schedule records	Possibly permanent, depending on nature of Scheme (eg membership details of final salary/Teachers' Pension scheme)
Employee Bank Details	Retain for no more than 3 months after cessation of employment/once final payments made.
INSURANCE RECORDS	
Insurance policies (will vary - private, public, professional indemnity)	Duration of policy (or as required by policy) plus a period for any run-off arrangement and coverage of insured risks: ideally, until it is possible to calculate that no living person could make a claim. Public Liability and Employers Liability should be kept permanently.
Correspondence related to claims/renewals/ notification re: insurance	Minimum - 7 years
ENVIRONMENTAL AND HEALTH & SAFETY RECORDS	
Maintenance logs	10 years from date of last entry
Accidents to children	25 years from birth (unless safeguarding incident)
Accident at work records (staff)	Minimum - 4 years from date of accident, but review case-by-case where possible
Staff use of hazardous substances (COSHH)	Minimum - 7 years from end of date of use
Risk assessments (carried out in respect of above)	7 years from completion of relevant project, incident, event or activity.
Reportable Injuries, diseases and dangerous occurrences (RIDDOR) reports	Keep for minimum of 3 years from date of record. Review for further retention in case of enforcement or on-going/historic disputes. For RIDDOR reporting in respect of pupils – retain records for 25 years from pupil's date of birth.
CRANLEIGH GIVING	
Database of Old Cranleighans	Contact details of former pupils, parents, staff and other third parties who become 'Old Cranleighans' will be retained indefinitely, together with historic and current information on fundraising activities and any other information that may be relevant for archive / historical research purposes.
Personal data of individuals / businesses who contract with Cranleigh Giving in relation to the Cranleigh Christmas Fair	Contracts will be retained for no more than 3 years from date of last contact with the School.