Cabot Learning Federation

Records Retention Policy

June 2026 Cabot Learning Federation

Approved by: CLF Board Date
Approved: March 2026
Next Full Review: July 2027
Noted by Academy Council:

History of most recent Policy changes

Date	Page / Section	Change	Origin of Change e.g. TU request, Change in legislation
22 April 2015	Whole document	Policy written	Policy absent
6 July 2016		Minor updates as requested by Board	Adoption by Board
29 June May 2018	Whole document	Improved layout to support printing of sections of document. Updated definition of internal examinations. Updated to reflect GDPR.	Policy review.
29 January 2019	Whole document	Updated introduction and retention details to fully reflect changes since the introduction of GDPR. This updated is based on recommendations from VWV.	Updates from VWV.
12 December 2019	2. Retention Periods	Addition of retention periods for: • Pupil/Student personal folders; • Employees personal folders; • Finance records.	Enquiry from BOA and completion of Data Protection fact find visits.
16 June 2020	5.14 DBS checks and disclosures of criminal record forms	Annual Review Clarification of how and for how long DBS checks must be retained.	Update from HR following receipt of external guidance.
25 January 2021	5.14 DBS Checks – Minor Amendment	Addition of guidance relating to candidate information at the end of section 5.14 following judgement by Supreme Court around the Criminal Records System.	Safeguarding training received by CLF DSL.
1 March 2021	14.1 CCTV footage	Change retention period from 90 days to 60 days to fall in line with the CCTV Policy, set out in the HR Manual and minimise the period of time for which images are retained.	Better compliance with GDPR and consistency across Policies.
11 April 2022	1.8 Free School Meals	Addition of records following enquiry from an academy. Taken from Bristol City Council Retention Schedule	Records not previously included in Policy

17 May 2022	14.5 Body Worn Video (BWV)	Addition of records following decision by KOA to use BWV for safety and security of staff managing a road closure scheme.	Records not previously included in Policy
	18 Visitor Log	Addition of records not previously included in the Policy	Records not previously included in Policy
	19 Covid Documentation	Addition of documentation created specifically to support Covid pandemic.	Compliance with ICO guidance and DP best practice
25 Sep 2024	1.1 Admission registers	Increase in retention periods from 3 to 6 years.	Policy Review
	1.2 Attendance registers	Increase in retention periods from 3 to 6 years.	Policy Review
	15.1 Governance records	Increase in retention period of Governance meeting notes/minutes.	Legislation Change
12 May 2026	7.4 Positive Handling and Physical Intervention records	Addition of records not previously included in the Policy	Records not previously included in Policy

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1 Introduction

1.1 This policy sets out a structured approach to reviewing and destroying records in relation to Cabot Learning Federation (the Federation).

1.2 The retention period for each type of record is shown in the table below. In addition, data protection legislation makes it unlawful to keep the information when it is no longer needed for the purpose for which it is held. This requirement is uncertain and allows discretion and may vary according to the circumstances, but in practice it means that the Federation should promptly destroy the record once the retention period in the table below has been reached. Occasionally there may be special circumstances which mean that a record should be kept for longer (for example where there is a risk of litigation or a request from an outside body such as the Independent Inquiry into Child Sexual Abuse (IICSA) see below). The Federation should refer to its insurance policies and further legal advice should be sought in these circumstances.

1.3 The retention periods stated in the table below are the minimum storage requirements, in practice the Federation carries out a data cleanse of its files every 12 months. Accordingly, a 3 year retention period means 3 years plus up to 12 months to allow the Federation to securely dispose of the information.

1.4 Information must be securely deleted. This applies to paper records, electronic information and biometric information.

1.5 This policy does not apply to records connected with commercial activities.

1.6 The Federation will discuss document retention with its insurers (who may specify longer retention periods). If there is any conflict then any longer retention periods specified by the insurers should prevail.

1.7 If an email falls into one of the categories set out in the table then it should be filed centrally as soon as is reasonable.

1.8 "Routine" emails which do not fall into any of the categories in the table may be kept in inboxes for up to 1 year and should then be deleted. An examples of a routine email is an internal email advising staff that the weekly meeting is cancelled.

1.9 Independent Inquiry into Child Sexual Abuse (IICSA):

(i) The IICSA has issued retention instructions to a range of institutions regarding records relating to the care of children. In light of this, we are advising schools to temporarily cease the routine destruction of those records which might be relevant to the Inquiry in case they are requested by the Inquiry or made subject to a disclosure order. This means that before destroying any document the Federation should consider if it contains information that may fall within the Inquiry's remit.

(ii) The range of documentation which might need to be kept is wide. It will include any information linked to alleged or established child sexual abuse, whether by staff, volunteers or pupils with no limitation date. For example, a list of pupils who attended an overnight school trip or admission registers which show which pupils were at the Federation at a given time. As such, documents should be kept for longer than the retention periods listed in the policy if they concern information which might be relevant to the Inquiry. The Federation should therefore review the retention periods under each of the rows below in case they are relevant to IICSA.

(iii) Please note that the Federation should keep this under review so that it recommences document destruction at the appropriate time.

1.10 Archiving in the public interest:

(i) Section 12.2 of the policy provides for the retention of personal data for reasons of archiving in the public interest for an indefinite period. The Federation should only keep documents indefinitely for archiving if it is complying with the relevant aspects of data protection legislation as detailed below.

(ii) There is an archiving in the public interest exemption under the GDPR which allows personal data to be:

- kept for longer than usual; and
- used for purposes which are incompatible with the purposes for which it was originally obtained.

(iii) The Federation should satisfy itself that this exemption applies if it keeps personal data for archiving reasons. Broadly speaking, the exemption will apply if:

- the personal data is being kept for reasons of archiving in the public interest e.g. enabling academic historical research or genealogical research or enabling educational use;
- the personal data will not be used for the purposes of measures or decisions with respect to a particular data subject. For example, the personal data could not be used to check whether an individual was entitled to join the alumni association; and
- the use of the personal data is not likely to cause substantial damage or substantial distress to a data subject.

(iv) When relying on this exemption the Federation must put certain safeguards in place. What amounts to appropriate safeguards will depend on what information is being retained and you may wish to take legal advice on this point.

(v) The Federation should also be aware that a recital to the GDPR (albeit which is not legally binding) states that organisations which rely on this exemption should be under a legal obligation to archive and to provide access to the records. However, the National Archives' (a non-ministerial government department) position is that in the UK no such legal obligation is required and the archives do not need to be made publicly available.

(vi) The Federation should ensure that its privacy notices for staff, pupils and parents cover the retention of their personal data indefinitely for reasons of archiving in the public interest.

(vii) If the Federation has any questions or concerns about particular documents we would be pleased to advise further. Please note that this specific advice would fall outside of the fixed fee for this policy.

(viii) The Federation should also have particular regard to paragraph 1.9 above before destroying any records. If in doubt, legal advice should be sought.

2 Retention Periods

	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 of the last entry	Review for further retention in the case of contentious dispute SHRED/DELETE or delete copies and including back-ups and copies	Yes
1.2	Attendance registers (however held)	Six years from the date of the last entry	Review for further retention in the case of contentious dispute SHRED/DELETE including back-ups and copies	Yes
1.3	Child protection records	DOB of the pupil + 50 years	Review for further retention in the case of contentious dispute SHRED/DELETE **Notes** 1 Child protection information must be copied and sent under separate cover to the new school whilst the child is still under 18. Federations should ensure secure transit and confirmation of receipt should be obtained 2 Where a child is removed from roll to be educated at home, the file should be copied to the Local Authority (**LA**) 3 In accordance with the terms of reference of the Independent Inquiry into Child Sexual Abuse all schools are required to retain information which relates to allegations (substantiated or not) of organisations and individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; institutional failures to protect children from sexual abuse or other exploitation. 50 years from the date of birth of the	No

			pupil involved should be a sufficient period of retention but this should be kept under review	
1.4	Biometric information (e.g. fingerprints to be used as part of an automated biometric recognition system)	For as long as the Federation 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 Federation, where the parent or pupil withdraws consent or the pupil objects to its use	No
1.5	Medical records held by the Federation	DOB of the pupil + 25 years; or Six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident Whichever is the longer The 25 year period is based on the fact that once the child turns 18 years old they have a certain amount of time (known as a limitation period) in which to bring claims against the Federation. The longest of these limitation periods is six years, albeit that some periods can be extended by the courts	Review for further retention in the case of contentious disputes SHRED/DELETE	No
1.6	Counselling records held by the Federation	DOB of the pupil + 25 years; or Six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident	Review for further retention in the case of contentious disputes SHRED/DELETE	No

		Whichever is the longer		
1.7	Records held on the equivalent of a Students Personal Drive or My Documents Folder	One year from the date of leaving the Academy	SHRED / DELETE	No
1.8	Free School Meal Applications	End of the school year in which the application was made + 6 years	SHRED / DELETE	No
1.9	Pupil Data Collection Forms	End of school year + 6 years	SHRED / DELETE	No
2	**Pupil files**			
2.1	Pupil files (including public examination scripts, marks & results)	DOB of the pupil + 25 years; or Six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident Whichever is the longer	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** 1 When reviewing pupil files, the Federation should have regard to other applicable sections of this policy 2 Any examination certificates left unclaimed should be returned to the appropriate Examination Board	No
2.2	Internal examination scripts, marks and results	Scripts: Scripts from weekly or monthly tests: Keep until the end of the next term. Whichever is the longer	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

		Scripts from termly or yearly tests: Keep until the end of the next academic year. Marks & results: If the purpose of the test is to progress the child (either internally or externally) then keep marks & 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 & results for the same period as the scripts themselves.		
2.3	Special Educational Needs files, reviews and Individual Education Plans	DOB of the pupil + 25 years; or Six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident Whichever is the longer	Review for further retention in the case of contentious disputes SHRED/DELETE	No
2.4	Statement of Special Education Needs & Disabilities (**SEND**) and Education Healthcare Plans (**EHCP**)	Statements of SEND (including appendices) and EHCP should never be retained once the pupil has left the Federation	SHRED/DELETE unless legal action pending The Statement / Plan belongs to the LA which makes and maintains the Statement / Plan	Yes

2.5	Letters authorising absence	Three years from the date of the last entry on the attendance register	SHRED/DELETE	No
3	**Permissions**			
3.1	Parental permission slips for school trips – where there has been no major incident, accident, injury or near miss involving anyone on the trip	Conclusion of the trip + three years	Review for further retention in the case of contentious disputes otherwise SHRED/DELETE	No
3.2	Parental permission slips for school trips – where there has been a major incident, accident, injury or near miss involving anyone on the trip	DOB of the pupil involved in the incident + 25 years; or Six years from the date of the incident if the pupil was 18 years old at the date of the incident Whichever is the longer The permission slips for all pupils on the trip may need to be retained to show that the rules had been followed for all pupils	Review for further retention in the case of relevance to contentious disputes. SHRED/DELETE	No
4	**Admission department**			
4.1	Admission documents, including enrolment forms	Six years from date of leaving the Federation	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 Federation	We suggest that one year would be reasonable (subject to requirements for admission appeal documents - see below), however, this is at the Federation's discretion. If there is a risk that parents or a pupil might bring a claim against the Federation then the documents should be retained. The documents can be kept for as long as the Federation considers that they are required, subject to the Federation's obligation not to keep the documents for longer than is necessary	SHRED/DELETE	No
4.3	Documents relating to admission appeal proceedings	At least two years	Review for further retention in the case of relevance to contentious disputes. SHRED / DELETE	Yes
5	**Employment**			
5.1	Employment or personnel records, including contracts of employment, changes to terms and condition, disciplinary matters, grievance procedures	For at least six years after date of termination of employment For at least 12 years after date of termination if any of the documents were signed as a deed	If on a date no earlier than six years after the termination date there has been no recent contact from the relevant individual and no apparent breach of contract claim, dispose securely of documentation unless any child protection concerns. Records of anyone with child protection concerns (even if not proved) should be retained	No

5.2	Single central register (SCR)	There is no legal requirement to keep the SCR entry for staff who have left as it ceases to be relevant for inspection purposes. Many schools move the entry on to an archive register whilst others keep a list of the checks carried out on the personnel file instead and retain that in accordance with their retention policy. As there is no statutory requirement to keep this information in this form it should only be kept for as long as is necessary. As it ceases to be relevant for inspection purposes the Federation should consider and document why it is necessary to keep it for a particular length of time. Should the Federation be notified of a historic abuse claim or should a former member of staff commit offences elsewhere the Federation may need to demonstrate that it carried out all required checks prior to work starting, when they were carried and out and by whom. This information could also be requested in relation to the IICSA. As a consequence best advice is to retain the SCR entry for each former member of staff indefinitely either on an archive SCR or within the personnel file.	Review whether further retention is necessary. If so, these reasons must be documented. If not SHRED/DELETE	No

5.3	Records and documents relating to membership of and contributions to the Teachers' Pension Scheme	Indefinitely	Review whether further retention is necessary. Decisions in relation to the Teachers' Pension Scheme may have ramifications beyond six years, and may be queried at any time by members and the Teachers' Pension Scheme	No
5.4	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 5.5 below. If none, SHRED/DELETE	No
5.5	Employment reference where an individual's employment ended for a safeguarding reason or where safeguarding was outstanding at the time of termination	At least for 10 years after the person has retired or until the individual reaches the age of 75, whichever is the later	Consider whether any recent reference requests for the relevant individual or new concerns raised by social services or other agencies If none, SHRED/DELETE	Yes
5.6	Working time opt-out forms	Two years from the date on which they were entered into	SHRED/DELETE	Yes
5.7	Records to show compliance with	Two years after the relevant period	SHRED/DELETE	Yes

	the Working Time Regulations			
5.8	Payroll and wage records These include records of: •Details on overtime. •Bonuses. •Expenses. •Benefits in kind.	Six years from the financial year end in which payments are made	SHRED/DELETE	Yes
5.9	PAYE Records	Three years in addition to the current year (however it may be sensible to keep them for six years as they may fall within the definition of payroll and wage records).	SHRED/DELETE	Yes
5.10	Maternity/paternity records These include: •Records regarding Maternity payments made save for where those include payroll records. •Maternity certificates	Three years after the end of the tax year in which the maternity pay period ends	SHRED/DELETE	Yes

	showing the expected week of confinement			
5.11	Sickness records required for the purposes of Statutory Sick Pay (**SSP**)	During employment and for a period of three years after employment has ended and to be kept separate from absence records which merely demonstrate the dates absent and not the health issue.	SHRED/DELETE	Yes
5.12	Records in relation to hours worked and payments made to workers	For a period of three years beginning with the last day of the following month to which the records relate	SHRED/DELETE	Yes
5.13	Consents for the processing of personal data and sensitive personal data (known as special category personal data under the GDPR)	For as long as the data is being processed and up to six years afterwards For consent to be valid it must be "freely given". This is often difficult to evidence in an employment context owing to the imbalance in the relationship between the Federation and the employee. Therefore, the Federation should be very careful before asking employees to consent to their data being used in a particular way. In the vast majority of cases it is not necessary to obtain the employee's consent before using their personal data.	SHRED/DELETE	Yes

5.14	Disclosure and Barring Service (**DBS**) checks and disclosures of criminal record forms	The physical DBS certificate will never be retained or copied in any circumstance. The DBS information – certificate, date, initials, will be recorded on the Single Central Register. If the DBS is completed by the CLF and is clear the snapshot from protocol will be kept on employee personnel file or volunteer/visitor file. If the DBS is not completed by CLF and is clear the details will be recorded on a form which will be stored in volunteer/visitor file. If there are convictions on the DBS, this information will be recorded in a file note along with the rationale to proceed with recruitment. This will be recorded on employee personnel file or volunteer/visitor file. Candidates applying for roles will be asked to declare any relevant convictions. Details of these will be recorded in the application form and any interview notes.	As per above for Single Central Register (5.2) This will be destroyed when file is destroyed as per this retention policy. This will be destroyed when file is destroyed as per this retention policy. This will be destroyed when file is destroyed as per this retention policy. This will be destroyed when file is destroyed as per this retention policy.	Yes
5.15	Immigration checks	Throughout employment and then retained for two years after the termination of employment	SHRED/DELETE	Yes

5.16	Recruitment records of unsuccessful candidates	Six months after notifying unsuccessful candidates in order to demonstrate, if required, the fairness and transparency of the recruitment process	SHRED/DELETE	No
5.17	Personnel and training records	Whilst employment continues and up to six years after employment ceases	SHRED/DELETE	No
5.18	Annual leave records	Six years or possibly longer if leave can be carried over from year to year	SHRED/DELETE	No
5.19	Collective / workforce agreements	Permanently or six years after the agreement comes to an end	SHRED/DELETE	No
5.20	Works Council minutes	Permanently	N/A	No
5.21	An Employee's bank details	Until last payment made	SHRED/DELETE	No
5.22	Travel and subsistence claims.	Whilst employment continues and up to six years after employment ends	SHRED/DELETE	
5.23	Records of advances for season tickets and loans to employees	Whilst employment continues and up to six years after repayment or end of employment	SHRED/DELETE	No
5.24	Death Benefit Nomination and Revocation Forms	Whilst employment continues and up to six years after payment of benefit	SHRED/DELETE	No

5.25	Records held on the equivalent of a Staff members Personal Drive or My Documents Folder	One year from the date of leaving the Academy These directories should not include personal information about the staff member or pupils so should not form part of their employment record or details relating to safe guarding or pupil management.	SHRED / DELETE	No
6	**Health and safety information - employees**			
6.1	Reportable injuries, diseases and dangerous occurrences (**RIDDOR**) reports or own record	Three years from the date of record If disease - indefinitely (recommended)	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	Yes
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	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes

	Substances Hazardous to Health (**COSHH**) regime			
6.4	Health records for licensable asbestos work	At least 40 years from the date if the last entry	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes
6.5	Medical surveillance certificate for licensable asbestos work	At least four years from the date it was issued	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes
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 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**			
7.1	Accident reports including first aid / accident book	DOB of the pupil involved in the incident + 21 years; or Three years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	No
7.2	Reportable injuries, diseases and dangerous occurrences (**RIDDOR**) reports or own record	Minimum statutory retention period is at least 3 years but, we recommend that the record is kept for DOB of the pupil involved in the incident + 21 years; or Three years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	Yes
7.3	Incident investigations and	DOB of the pupil involved in the incident + 21 years; or	Review for further retention in the case of enforcement action or civil claims for personal injury	No

	reports, risk assessments and other relevant documents where there has been an accident or incident	Three years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident	SHRED/DELETE	
7.4	Positive Handling and Physical Intervention records	Until the subject reaches 25 years	Review for further retention in the case of enforcement action or contentious disputes 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	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

	instructions or information Maintenance logs and / or records of plant and / or equipment plus safety manuals / notices / instructions Records of emergency evacuations and fire drills, fire safety risk assessments and fire safety policy / fire arrangements			
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 Federation - records should be retained as long as is reasonably necessary to inform on future construction projects at the Federation site	SHRED/DELETE	N/A
9	**Insurance**			

9.1	Insurance certificates and schedules of cover	Indefinitely	N/A	No
9.2	Correspondence with insurers related to specific accidents or incidents	Three years generally If the incident involved a pupil - DOB of the pupil involved in the incident + 21 years; or Three years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident Disease claims or where there have been allegations of abuse - indefinitely	Review for further retention in the case of civil claims for disease or personal injury SHRED/DELETE	No
10	**Investigations, reviews and inquiries**			
10.1	Documents relevant to IICSA	Indefinitely	Review once the Inquiry has been completed.	No - unless the school has received a formal notice from IICSA
10.2	Internal reports and investigations into accidents / incidents Copies of reports submitted to external agencies / regulators such as	To be decided by the Federation 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.	SHRED/DELETE	No

	Ofsted, Health and Safety Executive, Local Authority, Education and Skills Funding Agency etc External reports, reviews, investigations and inquiries for example inquests and public inquiries	Where this relates to pupil DOB +21 years); or Three years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident.		
11	**Alumni records**			
11.1	We recommend that alumni should be treated as employees for the purposes of health and safety records. Although this is not strictly necessary, (some of the health and safety requirements relating to employees do not apply to alumni), treating them the same can be	As set out in section 6 above	As set out in section 6 above	No

	considered good practice and may be more straightforward to implement in practice			
11.2	General alumni correspondence, membership forms etc	Six years after the last time the individual contacted the Federation This is subject to any longer retention period set out above or below. For example, records relating to a reportable disease should be kept indefinitely.	SHRED/DELETE	No
11.3	Records of communication preferences (e.g. a record that an individual has asked not to unsubscribe from emails).	Will be kept indefinitely.	N/A	No
12				
12.1				
12.2				
13	**Keeping information for longer**			

13.1	Records which do not contain personal data, for example, old photographs of Federation buildings, title deeds etc	Can be kept indefinitely	N/A	No
13.2	Records kept for reasons of archiving in the public interest. For example, such as old class photographs, lists of pupils attending the Federation in any given year, old Federation prospectuses, newspaper cuttings etc	Will be kept indefinitely.	N/A	No
14	**CCTV, videos and photographs**			
14.1	CCTV footage	These should be retained for as long as the operating system of the CCTV permits, but no longer than 60 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.	No

			CCTV footage may also be needed in relation to parental complaints, disciplinary matters, pupil exclusions, bullying incidents or health and safety matters. If a subject access request has been made for the footage it must be retained. The Federation should consider the relevant limitation periods for claims being brought against the Federation and seek advice as necessary.	
14.2	Photographs of pupils for internal administration purposes e.g. to identify the pupil or photographs used on security passes	These photographs should be retained for as long as they are required for the purpose for which they were taken.	SHRED/DELETE Review for further retention in the case of relevance to contentious disputes.	No
14.3	Photographs or videos of pupils taken for marketing reasons e.g. photographs for use in the Federation prospectus or a video of pupils on the Federation's website	These photographs and videos should be retained for as long as they are required for the purpose for which they were taken. If the Federation would like to retain the images for archiving reasons please see the comments at paragraph **Error! Reference source not found.** of the introduction above.	SHRED/DELETE Review for further retention in the case of relevance to contentious disputes.	No
14.4	Photographs or videos of pupils used as part of the curriculum e.g. a	These photographs and videos should be retained for as long as they are	SHRED/DELETE Review for further retention in the case of relevance to contentious disputes.	No

	video of a drama lesson/ performance or as part of an art project	required for the purpose for which they were taken. If the Federation would like to retain the images for archiving reasons please see the comments at paragraph **Error! Reference source not found.** of the introduction above.		
14.5	Body Worn Video (BWV) devices used for staff safety and security purposes.	Content captured on a BWV device should be retained until it is downloaded to a suitable secure location *(normally the same day as the content is captured)*. Downloaded content, held in a secure storage location, should be retained for 30 days unless the content needs to be retained for evidential purposes *(See below)*. Content which is retained for evidential purposes should be deleted after 6 months unless there are clear legal reasons to continue to hold it.	SHRED/DELETE Review for further retention in the case of relevance to contentious disputes.	No
15	**Governance Records**			
15.1	Minutes and paperwork of meetings: Members, Board, Academy Council, Sub-committees	10 years from the date of meeting There is a requirement for meeting minutes to be signed (approved) before being stored. Typically, approval may be documented by virtue of the chair signing a copy of the minutes. Alternatively, minutes	SHRED/DELETE Review for further retention if the recording may be required for any reason such as in relation to the sponsor or conversion of an academy.	No

	and Executive groups	can be approved via email or by obtaining a digital signature. If either of the latter apply (minutes being approved via email or use of a digital signature) then the requirement has been met.		
15.2	General correspondence	Current school year +6 years	SHRED/DELETE	No
15.3	Statutory Books	Current school year + 10 years	SHRED/DELETE	No
15.4	Register of Pecuniary interests for members, board and Councils	Current school year + 6 years	SHRED/DELETE Review for further retention in the case of relevance to reported conflicts of interest and related party transactions.	No
16	**Finance Records**			
16.1	Bank deposit records Bank reconciliations Bank statements Petty cash records Creditor's invoices/credit notes - paper files Creditor's statements Refunds Requisition records	End of Financial year + 2 years	SHRED / DELETE	Yes
16.2	Cheques and associated records	End of Financial year + 6 years	SHRED / DELETE	Yes

	Creditor's records and invoices/credit notes - electronic copies Barclaycard statements Journals Trial balances Reconciliations Receipt books Cash register records and reconciliations Revenue records Debtor's records and invoices/credit notes - electronic copies Debts written off Purchase order records Asset registers Depreciation registers Financial statements ParentPay, Tucasi etc. statements Bursary payment records Remittance advice			

	Subsidiaries Nominal ledger payments			
17	**Payroll Reports**			
17.1	Salary records (copies from HR)	End of Financial year + 2 years	SHRED / DELETE	No
17.2	Payroll journals	End of Financial year + 6 years	SHRED / DELETE	No
18	**Visitor Logs**			
18.1	All records, both manual and electronic relating to sign in/out of visitors on CLF premises	End of calendar year + 6 years	SHRED / DELETE	No
19	**Covid Documentation**			
19.1	Covid Track & Trace Forms used to record onsite attendance in support of NHS Track and Trace	The date the onsite visit took place + 21 days.	SHRED / DELETE *See ICO Guidance - https://www.gov.uk/guidance/maintaining-records-of-staff-customers-and-visitors-to-support-nhs-test-and-trace*	No